

#	Recommendation	ICAC Response	CSNSW Response	Action to be taken describing activities, allocating responsibility, measures to be used	STATUS	Notes
1	That the personal assistant to a general manager (GM) of a correctional centre be required to enter all submitted incident reports into CSNSW's electronic systems.	Implement the intent of the recommendation in an alternative way	Accepted in principle	Regular informal reminders to be communicated to all staff at the local level on the need to submit relevant incident reports in OIMS or IRM in a timely manner Formal reminder via Assistant Commissioners Memorandum to be circulated to all staff reinforcing the need to submit relevant incident reports in OIMS or IRM in a timely manner. Review current training and ensure appropriate emphasis on the need to ensure all officer reports are submitted in line with COPP requirements.	Regional Directors and Governors have been communicating this to the frontline. The AC Memo is scheduled for publication in October. In addition, communications to support the transition to the new Tiered Review Model will reinforce this. Developed training for UoF Reviewing Officers to support transition to tiered review model. - ensure training underlines existing policy and procedure regarding all reporting requirements for any staff member involved in an incident. - ensure training articulates the consequences and potential legal ramifications of non compliance. Training is in the final development phase and roll out is scheduled to commence in September 2019 and be completed in November 2019.	This is not a practical function of the Governors PA. According to current policy, The Custodial Operations Policy and Procedures (COPP) provides clear direction on submitting reports stating, all reports and documents relating to a Use of Force (UoF) must be registered, stored and managed using the EDRMS in accordance with the Records Management Procedure, NSW Department of Justice (13.7 - 10 10 EDRMS records management and video evidence).
2	That CSNSW ensures its policies and procedures discourage the sharing or misuse of passwords. These requirements should also be reflected in the relevant officer's training.	Implement the recommendation as described in the report	Accepted	Add Information Security as an agenda item under the Work Health and Safety section of the Custodial Executive meeting to maintain focus on this issue. Develop training for UoF Reviewing Officers to support transition to tiered review model. - ensure training reinforces the security requirements for all staff including the appropriate use of passwords, to enable local monitoring and management. Review Brush Farm Corrective Services Academy material, including primary training and any relevant courses to ensure information security policy and procedures are addressed adequately in line with Recommendation 2. Develop and implement localised communication strategies to remind staff about their obligations with regards to information security.	This is now a regular item on the Custodial Executive Agenda. Training is in the final development phase and roll out is scheduled to commence in September 2019 and be completed in November 2019. Primary Training has been reviewed and adequately reflects information security requirements.	The Department of Justice's Information Security Policy as well as Corrective Services NSW Guide to Conduct and Ethics, and the Custodial Operations Policy and Procedures (16.3 Computer equipment and software) all discourage the sharing or misuse of passwords. These policies are part of CSNSW Primary Training. In the correctional centre context it is the responsibility of Governors and Officers in Charge to ensure data integrity and issue reminders as required to staff regarding appropriate conduct.
3	That CSNSW introduces controls to ensure that, if required information is not entered into the Offender Integrated Management System (OIMS) within a specified period of time, a report will be generated and a review conducted by an appropriate officer who will be required to report to the GM.	Implement the intent of the recommendation in an alternative way	Accepted - Ongoing	Investigate reporting options with Corrections Research Evaluation and Statistics to consider how the timeliness of reporting can be monitored more closely through existing practices. Reinforce the importance of timely reporting formally through training, informally at meetings and in performance discussions with staff.	Investigations are underway with Corrections Research Evaluation and Statistics to determine if it is practical to produce a report based on OIMS and IRM data to enhance current monitoring of timeliness. Failing this further options will be examined. The UoF Reviewing Officer training specifically addresses the need for timely reporting and the need for all officers involved and or witness to an incident must provide written reports.	Currently there is a centralised function within the organisation which monitors the timely completion of reports. (S&I Duty Office follows up incomplete/outstanding reports). Monitoring timely reporting also forms part of the role of the Functional Manager, Security and Manager of Security in correctional centres.
4	That CSNSW: • supplies body cameras to correctional officers who are likely to be involved in UoF incidents and prioritises the supply of these cameras to correctional officers assigned to the IATs. • provides correctional centres with the means to readily obtain footage from these body cameras and store it for a sufficient period of time.	Implement the recommendation as described in the report	Accepted - Underway	CSNSW to roll out body worn cameras to all Immediate Action Teams across the state. CSNSW to provide local capacity to expand use of body worn cameras to identified posts. Ensure body worn camera footage is stored appropriately and minimises human error or intervention in data retention. Update all relevant policy and procedures roll out of body worn cameras. Throughout the trial, regular reports were provided to the Assistant Commissioner, Security & Intelligence, this will continue right through implementation and into business as usual operations.	In December 2018 CSNSW commenced a trial of body worn cameras at selected facilities. Earlier this year a tender process was commenced to enable roll out across the state. This means all Immediate Action Teams will be equipped with body worn cameras. The tender evaluation for the Body Worn Cameras has been completed and the contract will be signed by late September 2019. This will allow individual centres to expand the use of cameras beyond IAT at their discretion. Relevant policy and procedures have been updated and outline operating requirements including storage of footage. The state-wide roll out which includes training will commence in September 2019.	CSNSW commenced a Body Worn Camera trial in late 2018. The success of the trial has resulted in a decision to roll out the practice statewide. A tender process is underway and we anticipate Immediate Action Teams across the state to be equipped by the end of August 2019. The tender is inclusive of cloud based storage to support compliant practice. <u>As at August 2019:</u> The tender process is now complete. Statewide roll out is expected to take three months, with staff from Security & Intelligence providing training and support on site. Centres/units that participated in the trial will continue to use body worn cameras throughout the implementation phase. These centres/units are: MRRCC, Silverwater Women's, MSPC, Goulburn, Lithgow, South Coast, Cessnock, Shortland, Wellington, Macquarie, Extreme High Risk Security Unit and SOG Southern Region.

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5	That CSNSW: • mandates the videorecording of the destruction of contraband drugs found on inmates or in their cells. • provides correctional centres with the means to readily obtain such footage and store it for a sufficient period of time. Please indicate the response the public authority will take in its plan of action:	Implement the intent of the recommendation in an alternative way	Accepted	Review the section of the COPP relating to the discovery and disposal of drugs.	The procedure is currently under review by the Custodial Corrections Project Management Office. The team is cognisant of Recommendation 5.	Currently, the Custodial Operations and Policy and Procedures requires all substantial contraband discoveries to be filmed on hand-held video camera and CCTV wherever possible. This does not extend to the destruction of contraband but COPP 13.11 Discovery and disposal of drugs does detail the required procedures for the destruction of contraband. Note in some instances contraband may become police evidence, in which case responsibility for disposal is transferred to NSWPF. <u>As at August 2019:</u> The COPP is still being reviewed and it is anticipated that this will result in changes to the policy.
6	That CSNSW ensures all correctional centres have sufficient technical resources to retain all CCTV footage that is necessary or desirable to retain under CSNSW procedures concerning the UoF and targeted searches.	Partially implement the recommendation	Accepted	Develop a storage solution that will support CSNSW to retain CCTV and relevant footage in relation to UoF incidents. Review policy and procedures regarding the recording of targeted searches.	As part of the ICAC supported internal UoF Review Project, an interim digital storage solution has been developed for the UoF and is currently being tested. This will support the retention of all CCTV and other video footage for Tier 1 UoF incidents. A more permanent digital solution is being scoped by Digital Technology Services but is still under development.	CSNSW have developed a new tiered review model for the governance and oversight of UoF. As part of the tiered model, the relevant video footage for all "tier 1" UoF incidents will be stored centrally and is subject to review independent from the centre where the UoF occurred. Currently IATs are required to record planned search operations and store footage in the event that contraband is detected. The Security Operations Group currently record all targeted search operations and store footage for reporting purposes. <u>As at August 2019:</u> The Interim Storage Solution will be able to store CCTV, HHV & BWV, not exceeding 1GB, for UoF incidents only – this is not the all of CCTV solution. The solution is ready to go live and will launch with the tiered UoF model. Digital Technology Services have been provided with a master list of approved users and a user guide has been developed to support uptake transition. In relation to targeted searches within a correctional centre, Custodial Operations Policy and Procedures (COPP) sections include guidance on when targeted searches may be recorded where possible. The introduction of Body-Cameras will increase the number of targeted searches being video recorded. Presently there are a number of factors relating to searches that already require video footage to be recorded.
7	That CSNSW requires that all contraband at correctional centres is photographed at the time of discovery. This requirement should be reinforced via relevant CSNSW training, compliance and audit programs.	Implement the intent of the recommendation in an alternative way	Accepted in principle	Review the section of the COPP relating to the discovery and disposal of drugs. Should the COPP be amended subsequent action will be taken to ensure relevant training, compliance and audit programs are updated.	The procedure is currently under review by the Custodial Corrections Project Management Office. The team is cognisant of Recommendation 7.	The COPP provides detailed direction regarding the necessary actions required after a contraband discovery (13.11 Discovery and disposal of drugs). Currently policy instructs officers to call for a video or still camera to be brought to the location and record the suspected prohibited substance in-situ. If a camera is not available, the instruction is to take written notes of the position and location, and a description of the substance. <u>As at August 2019:</u> Relevant policies are still under review and it is anticipated that this will result in changes to the policy.
8	That CSNSW communicates to the GMs and managers of security (MoSs) at all correctional centres that they cannot be involved in a review of any UoF package if they were involved in or a witness to the UoF in question. Instead, the UoF package must be externally reviewed.	Implement the recommendation as described in the report	Accepted - Underway	Develop an external review mechanism to ensure UoF incidents involving Governors and Managers of Security at correctional centres are not reviewed by those same Governors and Managers of Security.	The UoF Review Steering Committee has developed a tiered review model for UoF governance and oversight which includes an independent review (independent of the centre where the UoF occurred) where the last reviewing officer is involved in the UoF [Governor/MOS/SAS].	The UoF Review Steering Committee has developed a tiered review model for UoF governance and oversight which includes an independent review (independent of the centre where the UoF occurred) where the last reviewing officer is involved in the UoF [Governor/MOS/SAS].
9	That the activities of the IATs be included in any relevant Operational Performance Review Branch reviews, such as reviews of correctional centres against service specifications.	Implement the recommendation as described in the report	Accepted - Ongoing	OPRB reviews existing matrix with a view to include specific reference to Immediate Action Teams. OPRB continue to review correctional centre performance and compliance according to the review matrix. Enhance oversight of IAT ongoing training requirements and deployment within correctional centres.	OPRB have expanded the existing terms to say all officers including IAT that use force will be reviewed as per the matrix. Security Operations Group have established a new role, Senior Assistant Superintendent IAT. This role is responsible for improving the consistency of IAT training and deployment across the State.	As part of their remit the Operational Performance Review Branch can be requested to review a correctional centre practices against public correctional centre standards for critical incident response, this now specifically includes Immediate Action Teams. In addition, as a result of the UoF Review Steering Committee a new role was created with the Security and Intelligence Branch to provide tactical operations support to ensure consistent deployment and training across the State. Recommendation 9 will now be considered in line with these current practices and any further enhancement opportunities identified.

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10	That following review by the MoS and GM of a correctional centre, UoF packages be sent to a centralised CSNSW business unit, which should: <ul style="list-style-type: none"> • receive this package before CCTV footage is overwritten • have direct access to relevant CCTV footage • receive any other related technical product, such as recordings or photographs • review either (i) all UoF packages it receives or (ii) a proportion of the UoF packages it receives that is sufficient to readily identify systemic issues that relate to a particular correctional centre. 	Implement the intent of the recommendation in an alternative way	Accepted - Underway	Develop a framework to support the implementation of Recommendation 10: <ul style="list-style-type: none"> - develop a digital solution to enable the centralised storage of UoF packages including CCTV footage and any other relevant files/documentation. - develop a model to review a proportion of UoF packages to enhance oversight and assurance with a view to identify systemic issues. 	As part of the ICAC supported internal UoF Review Project, the tiered UoF Review Model has been developed. The tiered model includes: <ul style="list-style-type: none"> - A mechanism to consistently classify incidents as Tier 1 or Tier 2 and articulates subsequent review procedures. - Digital storage solution developed to centrally store footage. - Training for reviewing officers in final stages of development to support implementation and transition will commence in September 2019. - Terms of Reference for the UoF Review Committee. - Committee members appointed. - Training under development for reviewing officers to support transition to new model. - Communications and active to CSNSW staff. - Updates to policies and procedures. 	As part of the tiered review model for UoF, all packages for incidents classified as "tier 1" will be stored centrally. This will provide direct access to relevant CCTV footage, recordings and photographs. The packages will be subject to an independent/external review allowing better identification of potential systemic issues at a centre. <p>As at August 2019.</p> <p>The new model will roll out in September and launch formally in October 2019.</p>
11	That CSNSW develops specific, independent assurance mechanisms surrounding the searching of cells. These mechanisms should examine whether CSNSW procedures are being complied with, and good practice is being applied, in relation to the: <ul style="list-style-type: none"> • discovery of contraband, including videorecording requirements • reporting of the discovery of contraband • confiscation and disposal of prohibited substances 	Implement the intent of the recommendation in an alternative way	Accepted - Ongoing	The Operational Performance Review Branch (OPRB) continue to perform its assurance role within CSNSW, including at the Commissioner's request conducting any thematic review of correctional centre operating practices for compliance with policy and procedures. <p>Communicate regularly with Functional Managers at correctional centres regarding the monthly validation process for searches and the importance of their assurance role.</p>	CSNSW has detailed standard operating procedures that govern cell searches and contraband finds. <p>In line with Correctional Centre Local Operating Procedures the Functional Manager, Security and Functional Manager Accommodation roles are required to conduct a monthly validation of all searches.</p> <p>The relevant validating officer will ensure that the searches are conducted and recorded in the OIMS search module and are consistent with this procedure. The results of the checks are to be recorded in the Security Compliance Journal, subsequently the Manager of Security will ensure that the validating officer has complied with this procedure.</p> <p>The Operational Performance Review Branch (OPRB) performs an assurance role within CSNSW. At the Commissioner's request, they can be engaged to conduct any thematic review of correctional centre operating practices against policy and procedures.</p> <p>The performance monitoring and reporting framework currently being introduced across CSNSW correctional centres includes a KPI for illicit drug use as well as a performance indicator for inmate searches. Measuring and tracking this information will provide valuable data insight into operational practice.</p> <p>As at August 2019</p> <p>Note: The policies and procedures relating to the discovery of contraband are currently under review by the Custodial Corrections Project Management Office. The team is cognisant of Recommendation 11 and it is anticipated that this will result in changes to the policy.</p>	
12	That CSNSW implements a coordinated strategy to improve the cultural environment for correctional officers within its centres, with a view to alleviating the burden imposed on those officers who report the misconduct of others. Logically, those measures might include: <ul style="list-style-type: none"> • focused training and education on the importance of reporting misconduct with a corrections environment • support for complainants and protection of their identity • avenues for making anonymous reports and identification • exposure and action in response to those who engage in bullying, harassment or other forms of reprisal. 	Implement the recommendation as described in the report	Accepted - Underway	Identify opportunities to support and encourage appropriate behaviour in the workplace. <p>Incorporate opportunities for regular conversations and discussions in the workplace about behaviour and conduct.</p> <p>Review the Professional Standards Branch's staff facing content and ensure it clearly articulates their role, purpose and function.</p> <p>Explore avenues to provide an anonymous reporting option for staff.</p> <p>Clearly communicate in a variety of methods the expected standards of conduct between colleagues, provide a clear vision of what professional behaviour is.</p>	myPositive Workplace Program pilot is launching in September at four Correctional Centres. This pilot will be evaluated and inform the statewide roll out of the program. <p>The program includes a Dignity and Respect Policy as well as an updated procedure for managing workplace issues. These will replace the old bullying and harassment policy and grievance management procedure. The Pilot provides targeted training for managers aimed at providing support to build positive and respectful workplace relationships. In addition, information sessions will be run for all staff to unpack the JustTalk tool which provides a framework for staff to have value conversations and understand an issue from all perspectives, to achieve mutual understanding.</p> <p>CSNSW is also implementing a range of initiatives to ensure all staff feel safe and supported at work. This includes the development of a Mental Health, Wellbeing and Resilience strategy for the agency. It is designed to provide a coordinated and sustained approach to support staff to manage work related stress in a constructive way. Further updates on progress will be provided.</p> <p>Review of PSB staff facing content is underway and a soft launch is anticipated in late September.</p> <p>A series of conduct related articles have been published in the staff magazine, <i>The CSNSW Bulletin</i>. Including, Correct UoF, Protected Interest Disclosures and Body-worn-cameras. This practice reinforces appropriate conduct in an informal way that staff can easily relate to.</p>	As part of the joint review we are examining ways we can better support staff to report wrongdoing, better protect staff who come forward, and build on our culture of accountability and professionalism.

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13	That CSNSW monitors the treatment of those officers who have assisted the Commission in this investigation.	Implement the recommendation as described in the report	Accepted - Underway	Appoint a senior independent delegate who staff can contact as required. Assistant Commissioner, Custodial Corrections to discretely monitor the treatment of those officers who assisted the Commission via open dialogue with relevant Governors	Custodial Corrections have appointed a Regional Director who is independent of the Lithgow incident to provide a point of contact for staff.	CSNSW will undertake to ensure that officers who assisted the investigation are not adversely affected. CSNSW has appointed a senior independent delegate who staff can contact for support as required. CSNSW may not be aware of the identities of all the Corrective Services NSW officers who assisted the Commission however will work with Human Resources, Peer Support Officers and local centre management to support staff.
14	That CSNSW takes sustained measures to prevent the practice of "therapy", "cell therapy" or like practices being applied to inmates	Implement the recommendation as described in the report	Accepted - Ongoing	Review options to directly address the practice of 'cell therapy' in officer training. Take a layered approach to addressing the practice of 'cell therapy' or like practices being applied to inmates. Actively communicate to staff the appropriate conduct with regards to the searching of inmate cells.	Ethical conduct and ethical leadership training courses have been updated to include reference to and learnings from Operation Estry, in particular 'cell therapy'. Included in UoF Reviewing Officer Training is reference to the ICAC's Operation Estry Report, and the practice of 'cell therapy' is explicitly addressed	CSNSW will continue to reinforce the importance of professional conduct and the severe consequences of engaging in misconduct. Changes to IAT oversight, the introduction of the tiered UoF review model, the roll out of Body Worn Cameras, policy enhancements and the implementation of the performance monitoring and reporting framework will have a cumulative effect on the practice of cell therapy and our ability to identify instances of it occurring.
15	That CSNSW investigators have ready access to (i) relevant CSNSW documents, such as UoF packages, and (ii) other evidence, such as CCTV footage, in a manner that does not in any way depend on, or alert, other CSNSW staff	Implement the recommendation as described in the report	Accepted in principle	Investigate options to provide discrete access to key incident information for CSNSW Investigators.	The tiered UoF review model provides CSNSW Investigators access to all Tier 1 UoF packages that does not in any way depend on or alert other CSNSW staff. Current technological infrastructure presents challenges to the full implementation of this recommendation. However, CSNSW supports the recommendation and will continue to work with Digital Technology Services to improve systems.	As a result of the tiered UoF review model, CSNSW Investigations Branch will have access to all Tier 1 UoF packages that does not in any way depend on or alert other CSNSW staff. While this does not cover off other types of footage they may require, it is a significant development. It may take a considerable amount of time to achieve this recommendation in full due to the limitations of CSNSW information technology infrastructure and the significant cost of upgrading. Recommendation 15 will be further considered in line with the work already underway.
16	That CSNSW reviews its procedures for the initiation and escalation of investigations. Among other things, this review should address the need for independence and objectivity.	Implement the intent of the recommendation in an alternative way	Accepted	A clear escalation point now exists for CSNSW Investigations Branch.	The new Professional Standards Committee commenced operation in July 2018. This forum provides a clear escalation point for investigations as outlined in Recommendation 16.	The reinvigoration of the Professional Standards Committee as a result of the UoF Review clearly aligns with Recommendation 16. This forum provides a clear escalation point for investigations as outlined in the recommendation.
17	That CSNSW reviews its investigation function to ensure that it: • is staffed in a manner that enables it to meet timeframe key performance indicators without compromising investigation quality • has access to appropriate technical resources, including a case management system that sufficiently caters for its needs.	Implement the recommendation as described in the report	Accepted in principle	CSNSW to investigate options for a Case Management System that sufficiently caters for the investigative requirements of the agency.	An application has been made through the Minor Capital Works Program to fund a Case Management System. CSNSW is awaiting the outcome of this application.	Current systems and processes support the ongoing functions of the CSNSW Investigations Branch. A tailored dedicated case management system that meets all the needs of the agency would be of significant benefit to the management of investigations, data analysis and tracking of trends. This would require significant capital expense which is currently not reflected in the CSNSW budget. Recommendation 17 will be considered in line with the work already underway.
18	That CSNSW prioritises the completion of its investigation manual.	Implement the recommendation as described in the report	Accepted - Underway	Complete the CSNSW Investigation Manual.	The Director, CSNSW Investigations Branch is developing an Investigations Manual which is due for completion in November 2019.	CSNSW will undertake to prioritise the completion of its investigations manual.
19	That staff responsible for CSNSW's project regarding systemic issues identified in this investigation consider and action the following issues: • whether any of the conduct identified in the Commission's investigation occurs at other correctional centres • the evidence and findings made by anti-corruption agencies in Queensland and Western Australia • how data analysis of its information holdings can facilitate the identification of misconduct by correctional officers and issues that may be systemic within the corrections sector in NSW.	Implement the recommendation as described in the report	Accepted - Underway	The findings of the Western Australian and Queensland reports have been considered by the Committee and where relevant learnings incorporated.	CSNSW continue to engage actively with Australian and International jurisdictions to continuously improve practice.	The tiered UoF review model is designed to support the identification of systemic issues, enhance CSNSW governance and oversight across the board, and lift overall standards. Corrective Services NSW pays close attention to inter-jurisdictional reports as a means of continuously improving our own practices.