

Hi Kathleen,

I hope you are well. As per the COB 20<sup>th</sup> December 2022 deadline.

Ventia CSCS's to **OICS Report Part Commentary in recommendation 10**; *Ventia confirmed it has not sought approval from their aircraft operator to either use, or not use, leg restraints. Rather, the decision to not use leg restraints is based on historic practices.*

- Ventia and the key service provider for aviation movements continue to liaise and have ongoing meetings. The use of leg restraints on Persons in Custody whilst a passenger on an aircraft has been a topic of discussion previously. In general terms, most Aviator's take the position that the use of leg restraints is a safety risk in respect to aircraft emergencies and the disembarkation of passengers on board during an emergency. In addition, the Captain (Pilot) of each individual aircraft (at the time of the movement/escort) can also make an assessment and give direction as they have full responsibility of all passengers on board the aircraft from a safety, security and emergency response perspective and Ventia abide by their directions at all times. The Civil Aviation Safety Regulations 1998, Aviation Transport Security Act 2004, and the Aviation Transport Security Regulations 2005, are fully complied with in respect to the Aviators requirements.
- Risk Assessments are conducted on all prisoners who are due to be moved/escorted and if it is assessed by Ventia that a specific prisoner is required to be in 'leg restraints', then an application for leg restraints is made either prior to the movement occurring (or at the time of the movement) with the Aviation Service Provider or the Captain of the Aircraft. Ventia then act accordingly on the direction of the aircraft provider. If it is deemed that a Prisoner is of such a high risk to require leg restraints in combination with hand restraints, the prisoner would more than likely be transferred by road and not be placed on an aircraft.
- Given the varying views, assessments and requirements between aircraft operators and individual Captains (Pilot); it can be difficult to get a consistent approach on all aircraft movements and the use of leg restraints.
- The relevant Ventia SOPs' will be reviewed in respect to the 3 Points of restraints, the use of leg restraints, risk assessments and consultation with the aircraft operator.

Regards and Thanks.

**Jonathan Snow**  
Contract Director - Court Security and Custodial Services

