



Government of **Western Australia**  
Department of **Justice**  
**Corrective Services**

# **Response to OICS Draft Report:**

## **Inspection of Court Custody Centres**

**March 2025**

Version 1.0

## Response Overview

### Introduction

On 31 August 2023, the Office of the Inspector of Custodial Services (OICS) announced the commencement of the inspection of court custody centres (the inspection).

To assist with the inspection, the Department of Justice (the Department) provided a range of documentation as well as access to systems, custody centres, staff and people in custody.

On 29 January 2025, the Department received the draft report on the inspection which contained five recommendations.

For the Inspector's consideration when finalising the report, a list of inaccuracies and clarifying comments against the report findings as raised by the Department can be found in **Appendix A**.

A similar list of inaccuracies and clarifying comments as raised by Western Liberty Group can be found in **Appendix B**.

### Department Comments

The operation of court custody centres Statewide is a highly complex system involving various internal and external stakeholders working in collaboration to maintain a high standard of service delivery, security, and safety for people in custody who attend these centres, staff and the community.

The management of court custody centres is facilitated through two contracts:

- 1) The CBD Courts Contract, through contractor Western Liberty Group (WLG) and sub-contractor G4S, for the management of the District Court Building (DCB) and Central Law Courts (CLC).
- 2) The Court Security and Custodial Services (CS&CS) Contract, through contractor Ventia, for the management of all other court custody centres Statewide, in addition to the provision of custodial transport services.

A number of internal stakeholders are also involved covering various aspects of court custody centre operations, including:

- The CS&CS Contract Management Team (Operational Support Directorate), and Youth Custodial Services (Young People Directorate), *Corrective Services Division*.
- The Courts Contract Team, and the Court Risk Assessment Directorate (CRAD), *Court and Tribunal Services Division*.
- The Infrastructure and Environment Directorate, *Corporate Services Division*.

To demonstrate the complexities and inter-dependencies of managing and maintaining the various court custody centres, the table below highlights the roles and responsibilities of all stakeholders by court location.

Court Custody Centre	Infrastructure Ownership	Maintenance Responsibility	Managing Personnel	Governance and Oversight
District Court Building (including connecting infrastructure to Central Law Courts)	Western Liberty Group	Western Liberty Group	G4S	CBD Courts Contract Team
Central Law Courts	The State	Infrastructure and Environment Directorate	G4S	CBD Courts Contract Team
Perth Children's Court	The State	Infrastructure and Environment Directorate	Ventia (non-custodial areas and general security) Youth Custodial Services (custodial areas and supervision of young people)	CS&CS Contract Management Team Young People Directorate
All other court custody centres Statewide	The State	Infrastructure and Environment Directorate	Ventia	CS&CS Contract Management Team

The Department conducts frequent reviews of contractor policies and procedures to ensure the safety and wellbeing of people held in custody. This is critically important with respect to Ventia policies and procedures given its role in the provision of custodial transportation services Statewide. All Ventia Standing Operating Procedures (SOPs) are currently under review to ensure alignment with relevant Commissioner's Operating Policies and Procedures (COPPs).

The findings from the inspection in relation to searching improvements are noted with Ventia having completed its review of *Standing Operating Procedure (SOP) Chapter 5 – Screening and Searches Courthouse Users*. Ventia have submitted the SOP to the Department for endorsement who will consider the findings in order to propose any additional amendments to SOP Chapter 5 as necessary.

While the Department is concerned that strip searching procedures of young people by contractors may not be conducted in accordance with policy, it was pleasing to note that the Department's Youth Custodial Services staff within the Perth Children's Court were found to be compliant with the best-practice policy provisions for the searching of young people as set out in COPP 11.2 – Searching (Youth).

While recommendation 4 pertaining to the strip searching of young people has been directed to both G4S and Ventia, it should be noted that young people are not held in custody in either the DCB or CLC, and therefore this recommendation is not applicable to G4S. Action being undertaken in relation to Ventia SOPs is detailed in the response to recommendation 4.

The provision of blankets in court custody centres is a complicated matter. Although reported within the inspection findings that blankets are provided within the CLC, but not the DCB, WLG have clarified that blankets are not provided in either location by its sub-contractor, G4S, due to self-harm and security risks.

This is in contrast to Ventia who do allow the provision of blankets within court custody centres and are making efforts to improve processes in this respect. Actions undertaken include auditing of blanket stock at all Ventia court locations, ordering of additional stock where required, and establishing improved drycleaning processes through the engagement of contractors to collect used blankets daily and being washed over weekends, with clean blankets returned to court locations at the commencement of each week.

While the Department acknowledges Ventia's practice to provide blankets to people in custody is different to that of G4S, Ventia have safeguards in place to ensure blankets are provided and used in a safe manner.

Maintaining the infrastructure of court custody centres Statewide is an ongoing priority and routine maintenance and infrastructure replacement plans are established at all court custody centres owned by the State to ensure court infrastructure is maintained to a safe and secure standard. The Department's Court Risk Assessment Directorate also conducts regular security assessments of court locations to identify where improvements in relation to security and safety can be made.

Many court locations are located in registered heritage buildings, requiring engagement with the Heritage Council of WA, including comprehensive assessments and approvals to determine what structural works, if any, can be facilitated to improve the safety and security of court locations while also remaining compliant with heritage building legislation and regulations.

Noting the above, identified infrastructure improvements at each court location are investigated and remedied where possible. All court custody centres managed by the State can report infrastructure issues directly with the Infrastructure and Environment Directorate who, subject to prioritisation, will undertake investigative works on the reported issues.

In respect to the DCB, this infrastructure is owned by WLG who are responsible for the ongoing maintenance and any improvements to the infrastructure of the building.

The Department is satisfied with the overall management of court custody centres, which provide crucial services to the WA community. The Department will continue to work in collaboration with WLG and Ventia in an effort to improve the services provided at court locations Statewide.

## Response to Recommendations

### 1 Provide clean and hygienic blankets to all people held in court custody centres.

<b>Level of Acceptance:</b>	Supported in Principle
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Operational Support

#### Response:

The provision of clean and hygienic blankets is supported by Ventia who have undertaken a number of actions to ensure this occurs, including the completion of a stocktake of blankets Statewide to ensure each location has adequate stock, and the engagement of drycleaning services at each location to ensure frequent washing of used blankets.

The CS&CS Contract Management Team will monitor Ventia's compliance with the ongoing provision of clean blankets to ensure this recommendation is addressed.

The Department has liaised with WLG regarding the provision of blankets within the DCB and CLC and the provision of blankets within both centres is not supported by WLG due to the risks associated with blankets which may be used by persons in custody to:

- shield themselves from observation by in-cell CCTV cameras during self-harm attempts;
- obstruct visual welfare checks undertaken by G4S officers; and
- be used as a tool during self-harm attempts.

### 2 Invest in body scanning technology at court custody centres to minimise the use of strip searching.

<b>Level of Acceptance:</b>	Supported in Principle
<b>Responsible Division:</b>	Court and Tribunal Services
<b>Responsible Directorate:</b>	Strategic Business Development

#### Response:

While the Department supports the principle of this recommendation, there are potential practical impediments to the installation and use of such systems across the court custody centres Statewide.

Research would be required to be undertaken in regard to potential radiation exposure levels along with potential facility issues surrounding the required space to install and safely operate such a unit. In addition, the system would be operated by a security contractor and as such training would be required and potential turnover of staff may become an issue.

Although body scanning is already utilised at certain custodial facilities including Hakea, Melaleuca and Casuarina, further research and discussion would need to be undertaken with these facilities in regard to the benefits of such a system. Additional consideration would be the number of times a person in custody would be exposed to such a system and potential radiation exposure of frequent use.

The Department will therefore form a policy position for consideration by the Director General and Government on this matter.

**3 Ventia and G4S to revise policies on searching to incorporate strip search safeguarding provisions contained within the Department of Justice's Commissioner's Operating Policy and Procedure (COPP) 11.2 – Searching.**

**Level of Acceptance:** Supported  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Operational Support

**Response:**

Best-practice strip search safeguarding provisions are already incorporated in G4S policies, procedures and training materials.

Ventia SOP Chapter 5 has recently been updated to align with *COPP 11.2 – Searching (Adult)* and is currently under review by the Department for final approval.

**4 Ventia and G4S to ensure strip searching of young people is used in exceptional circumstances only, and policies and procedures are aligned with the Department of Justice's policy on searching, and the Court Security and Custodial Services Act 1999.**

**Level of Acceptance:** Supported  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Operational Support

**Response:**

Noting the rarity that Ventia Officers will have custody of and be required to strip search young people, as part of its review and endorsement of SOP Chapter 5, the Department will ensure a provision is included stipulating that Ventia Officers must refer to and follow all procedures outlined in *COPP 9.6 – Searching (Youth)* if ever required to strip search a young person.

This recommendation is not applicable to G4S as young people are not held in either the DCB or CLC custody centres.

**5 To ensure the safety and wellbeing of staff and people in custody, the Department should conduct an audit of court custody centre infrastructure across the state to identify priority improvements.**

**Level of Acceptance:** Supported in Principle  
**Responsible Division:** Corporate Services  
**Responsible Directorate:** Infrastructure and Environment Directorate

**Response:**

A funding submission to undertake building condition assessments (BCAs) of all court buildings maintained by the State has been included as part of the 2025-26 budget process.

If successful, the data from the BCAs will inform maintenance planning for all court locations, noting any major infrastructure improvements identified will require additional capital expenditure.

All court custody centres continue to be maintained in accordance with their respective infrastructure and maintenance plans that outline their ongoing maintenance requirements and infrastructure replacement schedules, noting critical infrastructure shortfalls that may impact the safety and wellbeing of staff and people in custody will continue to be investigated and remedied where possible.

In respect of the DCB, this infrastructure is owned by WLG who are responsible for the ongoing building maintenance and upgrades in accordance with the CBD Courts Contract.