



3 April 2025

Office of the Inspector of Custodial Services



Dear [REDACTED],

Thank you for inviting our response to the Draft Report of the OICS review of Access to Religious and Faith Services in Western Australian prisons and youth detention facilities.

The Council of Churches of WA is disappointed in some negative findings of the review in terms of their premise and accuracy in respect of our chaplains' work.

From the draft report, it appears that the responsibilities for delivering Religious and Spiritual Services in WA prisons and detention centres require greater clarity. The draft report and recommendations seem to conflate the roles and expectations of DOJ staff, service providers, and Serco.

There seems to be a rigid view that we are providers of a one-stop Christian-only chaplaincy, a view that fails to recognise the diverse, non-denominational nature of our pastoral work pertaining to the general well-being of prisoners and detainees; the diversity in ethnicity and languages of our member churches from which our pool of chaplains are drawn; our close collaboration with religious representatives of other faiths who come into the prisons to lead worship or to administer pastoral care that has been requested by prisoners; and the lengths to which the council goes to source and provide religious materials for people of all faiths across the custodial estates.

The commitment to supporting individuals in need is a fundamental principle of Christian theology, rooted in the example of Jesus and his Parable of the Good Samaritan. In the context of prison chaplaincy, pastoral care plays a vital role, not as a response to the high number of individuals in custody without religious affiliation, but as an expression of a Christian commitment to meet the daily needs of all prisoners.

We currently employ 48 chaplains to work in WA prisons and in youth detention, a number that has remained static over the course of the five-year DOJ contract while WA's prison population has increased by 22.96% from an October 2020 'snapshot' muster of 5,551 to 6,826 in March 2025, according to DOJ figures. (These figures do not include the Serco Acacia contract.)

In accordance with the DOJ and Serco Acacia contracts, our chaplains provide pastoral care to detainees, prisoners, prison officers and administrative staff of all faiths and to those of no faith. It is never the role of a prison chaplain to proselytise or convert. Nor are prisoners ever compelled to speak with a chaplain.

We treat each prisoner or detainee as an equal in our encounters, regardless of their religion, or lack of religion, their ethnicity, age, intellectual capacity, background or the nature of the charges or any sentence they are facing. While it is our faith that informs this neutral approach, the issue of faith does not enter into an encounter unless and until a prisoner or detainee invites it in.

The chaplains understand and respect their professional boundaries. Chaplains are trained to be cautious about blurring the lines between their roles and those of others who are more qualified to

respond to prisoner's physical, social, and mental health needs. Chaplains adhere to their supportive role for the team of specialists to whom they are quick to pass on referrals that are beyond their remit or training.

Chaplaincy Teams are made up of people from different ethnic backgrounds, language and religious affiliations who understand the importance of Ecumenism and inter-faith dialogue. They are attentive listeners, well-versed in the human condition, and able to maintain a respectful silence or to communicate to the extent to which they are invited.

While the provision of religious services is part of chaplains' responsibilities, these services typically occur on a weekly basis and should not be considered the primary focus. The central function of chaplaincy is to provide consistent support and pastoral care to prisoners, detainees, prison officers and administrative staff in the metropolitan and regional custodial estates. Operational challenges during the COVID-19 pandemic and recent disruptions have made the regular scheduling of religious services more difficult.

Please find following our response to sections of the draft report that we feel would benefit from clarification. By way of example, we've included some anecdotal information from our Chaplain Coordinator at Hakea Prison.

We remain committed to working collaboratively with all stakeholders to ensure the continued success of the chaplaincy program and its positive impact on the incarcerated population.

We're open to incorporating non-Christian and Aboriginal organisations into chaplaincy and would embrace all efforts to better accommodate the religious and pastoral needs of prisoners and staff of other faiths.

Kind regards,



Ms Simone Micke
CCWA General Secretary

THE COUNCIL OF CHURCHES OF WESTERN AUSTRALIA INC.



Hakea Prison's Worship Centre is adorned with a 1.8m high by 2.4m wide mural painted by Indigenous inmates to reflect a multi-faith approach.

Response to
Office of the Inspector of Custodial Services Report on
ACCESS TO RELIGIOUS AND FAITH SERVICES

OICS EXECUTIVE SUMMARY

'In Western Australia, people's religious affiliation is only recorded on their initial intake into custody (DOJ, 2023; DOJ, 2021A; DOJ, 2021B). It is not re-recorded when they transfer to another custodial facility. If a person in custody wants to alter their religious affiliation, they must put their request in writing and undergo an assessment by chaplaincy to determine the authenticity of their request, particularly around the time of cultural events. This is not aligned with departmental policy as it is inappropriate for chaplaincy to determine the authenticity of prisoner requests.' (pg.vi)

As the review identified, people's religious affiliation is recorded only on their initial intake into prison. For some, it will be the first time they have been incarcerated and the whole intake process – fingerprinting, relinquishing civilian clothing and other effects, strip-searching, losing their autonomy – may be extremely daunting, especially in the context of their fears of the unknown that awaits them beyond the clank of the prison gate.

As individual prison chaplains reported to the review, chaplains have encountered several cases in which recording of a prisoner's religion has slipped through the cracks of the intake processes that are, as the draft report states, "often delayed, inconsistent or superficial because of current population and staff shortages".

When it comes to a prisoner attempting to rectify this by having their religious affiliation recorded or if they wish to change their denomination, departmental policy stipulates that a prisoner must first complete a request form that is provided to chaplaincy and that must be approved by security.

The review found that prisoners may undergo "an assessment by chaplaincy to determine the authenticity of a prisoner's request".

CCWA believes that there have been only limited incidences of a chaplain taking it upon themselves to do such an "assessment", and that there have been no such incidences in the latter part of the current contract because of our efforts to bring about cultural change within the chaplaincy.

We acknowledge that it would be inappropriate for a chaplain to judge the authenticity of a prisoner's request. We take the view that prisoners have the sole right to determine their religious affiliation.

Once a prisoner completes their form, there is a section for a chaplain to sign as a mere formality. A chaplain plays no role in a prisoner's decision to nominate a religion or to change their religion. The coordinating chaplain then sends the form to the prison executive for processing.

"You have truly made a difference in my life and direction."

~ Prisoner's letter to a CCWA chaplain, 24/12/24

'The CCWA is a Christian organisation bringing together Christian denominations with an ecumenical focus. CCWA has been involved in prison chaplaincy for over 20 years and has three core roles: advocating for Christian unity; providing religious and pastoral services to prisons and hospitals; and arranging disaster relief (CCWA, 2024)'. (pg. vi)

From this paragraph's structure, it could be misconstrued that CCWA advocates for Christian unity within its prison chaplaincy and this is not correct. It would be clearer to say:

The CCWA is a Christian organisation bringing together Christian denominations with an ecumenical focus. CCWA's three core roles are advocating for Christian unity; providing religious and pastoral services to prisons and hospitals; and arranging disaster relief. CCWA has been involved in prison chaplaincy for more than 20 years.



1.1 CLEAR REPORTING REQUIREMENTS ARE NOT FOLLOWED

‘Contractual reporting was consistent, though partial and errored (sic). CCWA are contractually obliged to provide quantitative and qualitative information demonstrating performance against specific measures. However, when they advised CMT its chaplains lacked the skill and/or time to input the required information this task was taken over by CMT. Collecting the required quantitative information is manual and therefore time-consuming process. Consequently, and due to limited staffing within its own team, CMT only spot check bi-annual performance review reports and were unaware of the errors in reporting we identified.’ (pg. 2)

As part of their training and induction, CCWA stresses to each chaplain that it is imperative that they enter on the relevant prison management data system every significant pastoral and religious encounter in the prison.

As a remand facility with a large and more transient prison population, Hakea Prison presents its Prison Chaplaincy Team with greater challenges in developing a rapport with individual prisoners who seek a referral.

On a typical day, the Hakea Chaplaincy Team meets in the morning to ‘triage’ the day’s cases. This is done by opening the *Total Offenders Management System* (TOMS) to check new Religious and Spiritual Referrals. Usually there are around 20 -30 per day and they are shared between up to five chaplains, according to our Hakea Chaplain Coordinator. There may be two chaplains one day, three another.

Referrals can be automatic *At Risk Management System* (ARMS) referrals. They can emanate from Prisoner Risk Assessment Group, individual Prison Units, a prisoner’s verbal request or their request via a Unit Interview Form, or requests from families and friends.

Prisoners on ARMS and the *Supports and Management System* (SAMS) are given first priority, followed by first-time prisoners and young offenders. Regular prisoner visits begin only after the priority list is completed. No prisoner or youth detainee goes unseen.

Each chaplain is allocated their list of referrals for the day, with prisoners and chaplains matched according to individual needs and gifts such as language and cultural understanding whenever possible. At no time does religion play a part in the chaplaincy visits allocation.

In the case of at-risk prisoners, chaplains are required to input a report into ARMS immediately after each visit with each prisoner. If there are three at-risk prisoners, the chaplain will return to the office three times in succession to input each individual report.

Recording is an essential part of the role. Chaplains record each visit on TOMS and on the ARMS and SAMS supervision logs where appropriate. On occasions chaplains also write additional notes under Assessments. Much of this essential administrative work is done at the end of an often-demanding day of chaplaincy.

“As you may remember, I was highly suicidal when I first came into prison, only my faith was keeping me alive. The PHS team organised a meeting with you on my behalf – it was the best decision they ever made. Your words resonated with me when I was in a dark place, and you have continued to reach me.” ~ A transferred prisoner’s letter to a CCWA chaplain, 22/01/25

All relevant visits and interactions recorded on TOMS form the quantitative part of the reporting requirements. The current tender has more reporting requirements than in previous Service Agreements. DOJ has endeavoured to limit the administrative burden in relation to this quantitative reporting that would have required the CCWA General Secretary to perform the onerous task of extracting and collating data from TOMS in respect of all religious and pastoral contacts of all the prisoners in all the prisons every six months. It needs to be remembered that TOMS is only accessible within the prisons or DOJ.

The qualitative component is evidenced in a bi-annual report to the Contract Management Team.



'Across the custodial estate there is misunderstanding of reporting lines, with several chaplains mistaking local management for their line management. But within both contracts line management responsibility rests with CCWA. The practical expectation on site to follow prison management direction causes confusion and tension among the parties. This misunderstanding by chaplains and prison management alike, has meant a minority of incidents, including potential behavioural or conduct issues, were not reported to CCWA as per contractual protocols.

'At the time of this review, poor communication has led to a misunderstanding of CCWA's role as a sub-contracting service provider with responsibility for reporting issues, incidents, and changes to CMT and Serco Rehabilitation and Reintegration. Both CCWA and CMT now routinely contacted prisons, and Serco Rehabilitation and Reintegration observed daily chaplaincy practices. However, we question the adequacy of this contact given the lack of formal reporting directly to CCWA, which has resulted in ongoing, unreported incidents and issues across regional sites.

Increased site visits by CCWA since 2021 have aimed to mitigate risks and clarify its role in consulting with chaplains, prison management, CMT and Serco Rehabilitation and Reintegration to resolve breaches, incidents, or issues while on site with a combination of performance development and training. CCWA reported a strong desire to clarify their role as line management for all chaplains, as opposed to prison management, to support chaplains in their roles while ensuring consistency and accountability across all sites.' (pg. 4, 5)

CCWA has been clear and consistent in outlining the proper reporting lines for chaplains throughout the duration of the contract. CCWA acknowledges that despite these efforts, a small number of chaplains have at times failed to adhere to these reporting protocols. When issues have arisen, CCWA has addressed them through performance management, providing additional support and clarification to ensure all chaplains understand and follow the established channels.

CCWA remains committed to fostering a positive and effective working environment and views adherence to reporting lines as essential for operational integrity and the smooth delivery of services. By maintaining these standards, CCWA aims to support chaplains in their roles while ensuring consistency and accountability across all levels of service.

Cultural change takes time and requires a consistent approach, and that is our ongoing commitment.

1.2 CHANGED RECRUITMENT PRACTICES AND LIMITED PROFESSIONAL DEVELOPMENT MEANT INCONSISTENT KNOWLEDGE AND ERODED SUPPORTS

"At the commencement of both contracts separate job description forms (JDFs) outlined essential and desirable criteria for both chaplains and coordinating chaplains. Essential criteria included in both JDFs included:

- *a tertiary degree in Theology*
- *minimum one unit of Clinical Pastoral Education (CPE)*
- *previous pastoral experience*
- *good standing with church or faith community*
- *attendance at spiritual retreats*
- *commitment to continuing education*
- *broad knowledge of faiths, traditions, and designated contacts.*

Coordinating chaplains had an additional essential criterion of at least five years pastoral care experience.

However, at the time of our review, the separate JDFs had been combined into one for both roles and all essential criteria were reclassified as desirable experience. A degree in Theology and minimum attainment of CPE points were no longer required for either position. They had been substituted for a demonstrated ability to:

- *promote religious and spiritual wellbeing through pastoral care*
- *respond to spiritual needs*
- *work with empathy with people from all ethnicities and religions*
- *understand the impact of trauma, grief, and loss.*



The Department was not aware of these changes. Nor were the changes aligned to the Department's contract which binds CCWA to ensuring its chaplains are qualified as per the CPE requirements for prison chaplaincy. CPE is a course undertaken by chaplains at local hospitals which involves self-reflection upon own issues and is therefore considered important by chaplains for a deep understanding of themselves and their role in providing pastoral care.

The changes significantly generalise the knowledge and experience of incoming recruits. Feedback from young people in custody suggested there was benefit in learning about different religions, while adult prisoners requested services from Aboriginal Elders, and specifically female Noongar Elders, Buddhist Monks, Muslim Imams, and Jehovah's Witnesses. Taken together, this highlights a need for greater theological understanding and religious and spiritual diversity within chaplaincy, as required under both contracts. (pg.6, 7)

Below we cite the relevant clause of the DOJ contract to clarify actual DOJ qualification requirements. While you have quoted the original CCWA JDF that we have since modified to allow a more expansive selection pool, it has never been stipulated in the DOJ or Serco contracts that it is essential for a chaplain to have a degree in Theology. A lot of our chaplains have degrees in Theology. Some have Masters or Doctorates. Others have multiple degrees and have been industry leaders in different Ministries.

A Clinical Pastoral Education certificate (CPE) or equivalent is the minimum requirement stipulated by DOJ as per the following excerpt from the contract and addendum.

5.6 Appointing and Employing Chaplains

All staff of Service Providers must undergo a Pre-employment Clearance in accordance with the Department's Criminal Records Screening Policy prior to commencing work in any prison or detention centre.

Chaplains working at Banksia Hill Detention Centre will also need to undergo a Working with Children Check prior to commencement.

The Service Provider will be responsible for management, administration and oversight of Chaplains to ensure they are:

- Suitable;*
- Qualified as per the requirements to become a prison Chaplain under the Clinical Pastoral Education; and*
- In good standing prior to employment under this Service Agreement.*

Where qualifications are not met, the Service Provider, in consultation with the Department will determine if the gap can be suitably addressed through training and development.

Addendum 12 February 2020

Under 5.6 Appointing and Employing Chaplains, one of the requirements is to be "Qualified as per the requirements to become a prison Chaplain under the Clinical Pastoral Education". This provision is to be revised to add the following: "Consideration will be given to progress toward the Chaplaincy Pastoral Education qualification, as well as equivalent qualifications and/or experience".

As an aside, it is a requirement for chaplains working in Banksia Hill and Unit 18 to have a Working With Children Check (WWCC) clearance. We have gone a step further and require all CCWA chaplains to have a Working With Children Check clearance.

And we have moved on from the days when chaplains did their CPE in hospitals alone. Today, they undertake CPE through a university or professional body or undertake placement in different industry sectors, including hospitals, aged care and mine sites.

'By far the most lamented professional development opportunity that had eroded was the disbandment of the Prison Chaplains Association (PCA). The PCA was a group for both contracted chaplains and non-contracted practitioners of faith across the custodial estate, which gathered to discuss issues and exchange information relevant to providing religious and pastoral services. Active at the time both current contracts commenced, the PCA was included in the Department's contract as a tool for coordinating chaplains. The PCA was also a professional development resource for chaplains, and it was listed as a partner organisation which CCWA could regularly contact and share information.



Despite this, we were told the PCA was disbanded by the CCWA because some service providers allegedly dominated quarterly meetings. CCWA preferred having one organisation providing all services to streamline communication and reduce workload. Current chaplains and external faith practitioners advised us the PCA was a highly valued source of knowledge and support. Without the PCA, chaplains said they had no direct line of communication with other chaplains, were unaware of other chaplains across the custodial estate, and missed the sense of community and togetherness. Several practitioners expressed a desire for the PCA, or a similar body, to be restored so all religious and pastoral service providers could communicate and network.’ (pg.7, 8)

To suggest that CCWA disbanded the PCA group is erroneous and appears designed to reflect poorly on our organisation. As CCWA began the DOJ and Serco contracts, we offered to help PCA transition into a pastoral and peer support group for chaplains. However, the PCA leadership chose not to accept this offer and decided to disband. While some may have been disappointed, a significant number of chaplains expressed dissatisfaction with PCA, finding it to have become a politically charged, negative group led by a few dominant voices.

CCWA understands the importance of providing pastoral support for chaplains. In line with this, three retreats have been organised during the contract period — one led by a subcontractor and two facilitated by CCWA. Additionally, for chaplains in remote areas, CCWA covers travel and accommodation costs to ensure they can participate in retreats, meetings, and conferences.

The General Secretary, Chaplain Coordinator, and other chaplains have also made multiple visits to chaplains in metropolitan and regional facilities, providing on-site support and training. This continued engagement reflects CCWA’s commitment to the well-being and professional growth of its chaplains.

CCWA believes it is incorrect to state that ‘PCA was included in the Department contract as a tool for coordinating chaplains.’ We refer to the wording of 12 FEBRUARY 2020 ADDENDUM TO REQUEST DOCUMENT pertaining to our contract: *‘Representation from PCA on the Religious and Spiritual Services Board (the Board) is not required as the Department has no contractual relationship with the PCA.’*

‘Other training was sought to address gaps in contemporary understanding, such as family violence and FASD, or to upskill to meet the growing needs of a diverse and understaffed prison population such as substance use, complex trauma, and suicidal tendencies. Training in program facilitation was often at the request of prison management in response to a gap in service provision.

Chaplains should not be expected to arrange their own training, in lieu of sufficient training and development being provided by their employer under both contracts. Nor should they undertake training at the request of prison management to fill other gaps in services elsewhere across the facility. This is particularly important in light of mandatory training requirements in both contracts.’ (pg. 9)

CCWA provides training to chaplains from induction onwards and expects all chaplains to take part in DOJ Mandatory Training. All our chaplains have completed at least 90% of all DOJ Mandatory Training as required to date, a situation that would be corroborated by DOJ records.

CCWA allocates funds from its Professional Development budget to support chaplains who seek further training relevant to their roles. This funding underscores CCWA’s commitment to fostering professional growth and enhancing the skills of its chaplains in a way that aligns with their core responsibilities.

In providing this support, CCWA carefully assesses each training request to ensure that it directly benefits chaplains in their pastoral care duties and does not create overlaps with the roles of other agencies. This approach is taken to maintain clear distinctions in responsibilities, safeguarding the unique contributions of chaplains while respecting the expertise of other professionals within the prison system. By supporting targeted, role-specific training, CCWA enables chaplains to continue delivering high-quality pastoral care without blurring the boundaries of their role.

“I first met you in (XXX) Prison after requesting to speak with a psychologist; the Senior Officer recommended a Chaplain first! When I met you, I truthfully explained that I was of no particular faith; you immediately said that it was of no consequence. You made me feel comfortable, at ease, so the talk flowed. For me it was the first opportunity to have an interesting and educated conversation; I was in a foreign country with no contacts. You visited me regularly despite my



feelings of guilt for using your valuable time; you assured me that you were happy to meet with me. Over the months I grew to trust you as a friend and opened up on more of my life. I explained that trust had been a problem due to past experiences. We spoke on numerous subjects and I felt a rapport developed. I listened to your advice re prison life and being isolated;..... After many months and deeming you as a friend, I started to discuss my offences. You were the only person I felt that I could totally trust to speak the truth as I did not want someone who would just say what I would like to hear! It was embarrassing, but you listened and your observations were thoughtful, sincere and most helpful.” ~ Prisoner’s letter to a CCWA chaplain, 24/09/21

2.3 CHAPLAINCY SERVICES WERE ECUMENICAL NOT INTER-FAITH

‘It is a core contractual obligation that the role, conduct, and services of chaplaincy are equitable for all religions and faiths. This is described within the Department’s contract with CCWA as an ‘ecumenical’ approach whereby chaplains provide religious and spiritual service to prisoners of all religions and faiths, regardless of their own affiliation. But this is a misunderstanding of an ecumenical approach, which is defined as the unification of Christian Churches in accordance with the teachings of Jesus Christ (Britannica, 2024). Therefore, an ecumenical approach is not aligned with the provision of support or service for those religions that do not incorporate these aspects of Christianity.’ (pg. 13)

The goals of ecumenism are not the same as working ecumenically. The former refers to a movement within the Christian tradition which seeks to deepen and foster unity amongst the churches, while the latter describes an attitude of cooperation and common action by Christians from different churches. The ‘common action’ in this case is the provision of religious and spiritual services to people of all faiths and of none. To date, our chaplains have been successful in delivering services without prejudice and have actively collaborated with Religious Visitors from other faith traditions to meet the needs of all, as detailed more fully below.

As you said, writing letters is good, but nothing can replace our open and lively debate.”
~ Prisoner’s letter to a CCWA chaplain, 11/02/24

2.5 THE EXPERIENCE OF NON-CHRISTIAN FAITH PRACTITIONERS WAS MOSTLY POOR

‘Non-contracted religious practitioner experience was largely one of confusion, inaccessibility, and underappreciation. CCWA and CMT attitudes appeared somewhat indifferent to the needs of these practitioners, and we were told chaplains had been directed not to assist non-contracted practitioners applying for security clearances or arranging either ad hoc visits or ongoing services. While this direction is aligned with departmental policy, it had resulted in significant challenges for those outside of CCWA who wished to provide prisoner-requested services. Conversely, at Acacia, there was greater equity, but there was still capacity for increased access.’ (pg. 17)

CCWA takes exception to the claim that we are “somewhat indifferent” to other faith practitioners. After all, CCWA chaplains come from different ethnic backgrounds, speak different languages and have different religious affiliations under the umbrella of Christian religions. We do not adhere to an “us and them” ethos.

Using the situation at Hakea as an example, the Hakea Chaplain Coordinator meets with a representative of the Muslim faith, an Imam, each fortnight to facilitate scheduled Muslim Prayer services in Hakea’s multi-faith Worship Centre.

Facilitating Muslim Prayers is time-consuming and requires a strong working relationship with the Imam. The Chaplain Coordinator meets the Imam at the gatehouse, escorts him to the Worship Centre, provides him with a list of the names of prisoners who will attend prayers, returns to the chaplaincy office to contact the relevant prison units to remind them to escort their Muslim prisoners to the Worship Centre, escorts the Imam back to the gatehouse after prayers, and then returns to the office to record the worship attendance of each prisoner and any other relevant information on TOMS.

A similar scenario unfolds at other metropolitan prisons and at Bunbury Regional Prison where the same Imam visits.



Additionally, chaplains refer specific Muslim prisoners to the Imam upon request and help distribute essential religious items such as prayer mats, Qur'ans, and other Islamic literature to prisoners. Replenishing supplies of these items is done in collaboration with the Imam. While some of these items are supplied by the Imam who has repeatedly declined our efforts to remunerate him, CCWA procures some of these items independently. All such items must first be approved by the prison administration before they can be distributed.

Each Chaplain Coordinator in the metropolitan and regional prisons also maintains communication with representatives of the *Buddhist, Sikh and Jewish* faiths, *Jehovah's Witnesses* and *The Church of Christ of Latter Days Saints* to facilitate their visits to prisoners.

As with the Imam, each of Religious Visitor of the different faiths is accompanied through the prison to a place of worship or meeting room by a chaplain accordance with security clearance protocols. This is because chaplains have the appropriate level of security clearance and religious visitors do not. Chaplaincy Teams also help facilitate organisations like Prison Fellowship or even AA leaders to support and visit prisoners.

In addition, chaplains regularly distribute religious study materials of other faiths, including correspondence courses from groups such as Emmaus to prisoners engaged in religious education. This support underscores CCWA's commitment to fostering spiritual care and its respect for the diverse religious needs within the prisons. Again, this literature must first be approved by prison administration.

We would like to reiterate the ethnic diversity and array of languages spoken by CCWA chaplains that proves so beneficial in communicating with prisoners and Religious Visitors of many different faiths. Languages spoken by our teams include the Chinese languages of Mandarin, Hokkien, and Hakka, Vietnamese, Indian, Afrikaans, Arabic, the Sudanese languages of Bari and Dinka, Burmese, Filipino, German, Italian, Malay (the official language of Malaysia, Singapore and Brunei), Noongar, and Kimberley Kriol (the first language of many Aboriginal people in the East Kimberley and a variation of one of the most widely spoken Aboriginal languages in Australia).

In 2021, through the Contract Management Team, CCWA was advised that DOJ had reviewed and streamlined procedures for religious visitor security clearances. It was relayed to the chaplains that whereas they'd previously been involved in the process, applications for prison visits and the running of programs were to be directed in the first instance to the Superintendent of their facility for approval. *Refer to COPP 7.3*

"I had a visit from Chaplain (XXX) – thank you. It will take time. Trust and confidence must be built up, I appreciate his workload, however, you can be sure that I will do my best. It is hard to imagine anyone filling your shoes." Transferred prisoner to a previous CCWA chaplain 21/07/22

'Aboriginal prisoners' feedback added further depth to the argument for more diversity among chaplains. They wanted an integrated approach to religion, spirituality and culture through services and visits from Elders. Christianity is a dominant religion among Aboriginal prisoners (almost 87% of prisoners who identified as Christian on intake to prison were Aboriginal).' (pg. 15)

Recruiting and retaining more Indigenous chaplains remains a core goal of CCWA. Over the course of the contract, we have recruited some fine Noongar chaplains but retaining them is our greatest challenge.

In an endeavour to meet some of the religious needs of Indigenous prisoners, CCWA has procured bibles and religious texts in language and is in the process of seeking approval through DOJ for their use in the prisons and in youth detention.

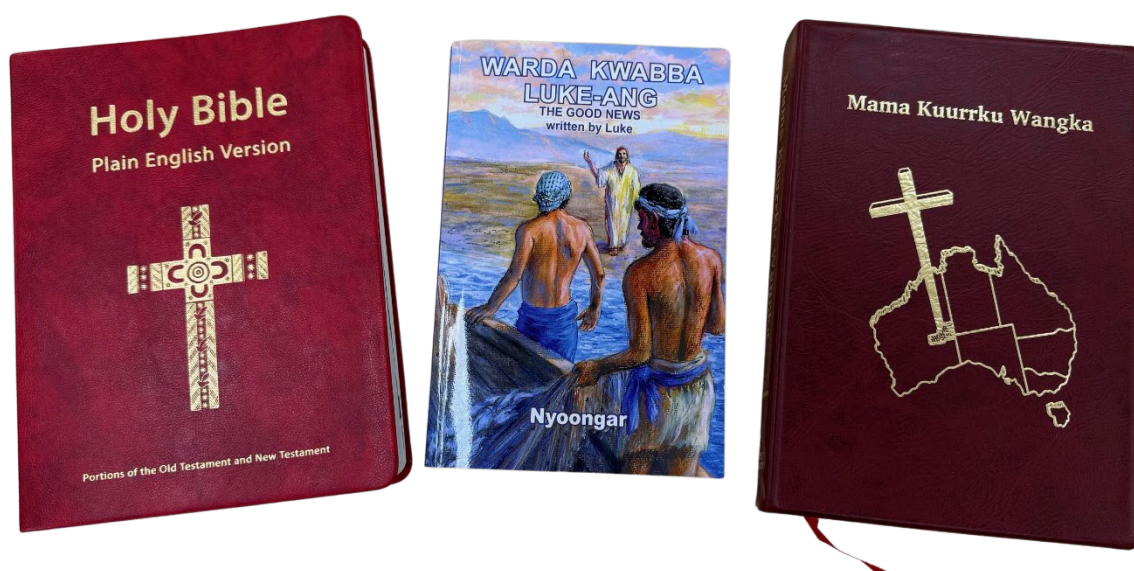


We have recently sourced a plain English version of the bible with portions of the Old and New Testament translated for speakers of Australian Indigenous languages for whom English is a second language. It uses the type of English they speak and understand. Think of terms like 'Pharisee mob' and 'Galilee country'. Through Uniting Church frontier chaplains, CCWA has road-tested this bible in Indigenous communities in Mount Magnet, Tom Price and other Pilbara region communities with great success. We will now seek approval from the various prisons for them to be distributed to Indigenous prisoners and detainees who want them. And we are exploring the possibility of making this bible available in a spoken word format.

'Jesus was born in Bethlehem, in Judea Country. At that time, the big boss over that country was called Herod.' ~ Holy Bible Plain English Version published by Bible League Inc.

Through the Bible Society, we have obtained bibles translated into the Ngaanyatjarra language of the peoples of the Goldfields-Esperance region that we are in the process of supplying these to the Eastern Goldfields Regional Prison.

We have also purchased copies of the Book of Luke in Noongar, the language of Indigenous peoples of WA's South-West. It is the first time a whole book from the Christian bible has been published in Noongar, a project many years in the making by a team of Noongar speakers together with facilitators and consultants from Bible Society Australia.



We have also sourced religious reading materials in a format that makes them more accessible to particular groups, such as a graphic novel for youth detainees.

For the visually impaired or those who are not literate, we are in the process of seeking approval from DOJ for a hand-held, solar-powered audio device that can play pre-recorded versions of the bible or other religious texts such as the Qur'an. There is also capacity to have these spoken holy books translated into other languages, subject to DOJ/prison approval.

'CCWA advised its chaplains they would be breaching contract if they facilitated Prison Fellowship programs, as chaplaincy were not funded to facilitate external religious visitors or services. This contradicts the role of Prison Fellowship as it is listed as a CCWA Associate Member within the Department's contract. The inconsistency has meant extra work for onsite prison management, confusion for members of the Prison Fellowship, and discomfort for chaplains wishing to assist. These actions represent a fundamental misunderstanding of a core role of chaplaincy to ensure the diverse religious needs of prisoners are met. Clarity around how external practitioners are to arrange onsite services and engage with chaplains is needed.' (pg. 20)



Prison Fellowship is not currently an associate member of CCWA. Chaplains do not have the authority to approve programs. It would be a breach of contract to do so without seeking the approval of DOJ. Some Prison Fellowship programs have been approved by DOJ but Prison Fellowship must still apply to run its programs through the proper channels and not seek approval through the chaplains. It is a chaplain's responsibility to refer a service provider to prison management.

CONCLUSION

This report contains several inaccuracies and misleading statements, particularly with respect to the distinct services and responsibilities outlined under the two separate contracts (Serco Acacia and DOJ). These contracts were procured using different methods and have different terms, so comparing them directly is not appropriate. We have consistently met all contractual obligations, including those related to updates in specific COPPs, and have remained flexible in accommodating changes within the current contract. We have worked closely with the Contract Management Team to ensure that outcomes benefit all parties involved.

Key points to highlight:

- **Commitment to Quality Chaplaincy Services:** We have remained fully committed to delivering high-quality chaplaincy services across all WA prisons, adhering to our contractual obligations, including under COVID restrictions for a significant part of the contracts.
- **Improved Governance:** Since the commencement of the contracts, we have made significant improvements to governance, streamlining processes to enhance efficiency and accountability.
- **Mandatory Reporting Compliance:** In October 2022, we implemented mandatory reporting protocols for all contracted chaplains, ensuring full compliance with the Children and Community Services Act 2004, governing the reporting of child sexual abuse in Western Australia. Additionally, all new chaplains will be required to complete a DOJ TOMS mandatory onsite training module (currently still under development) when they commence their role with CCWA.
- **Adaptation to Contractual Changes:** We have successfully adapted to and implemented changes approved under the contract, further ensuring that all requirements are met.
- **Ongoing Training and Development:** We have established a comprehensive training program for chaplains, which has been submitted for departmental approval. This program is designed to provide Clinical Pastoral Education (CPE) and ongoing professional development tailored to the prison environment. While we await approval, all our chaplains have either completed CPE or possess equivalent qualifications.
- **Commitment to Excellence:** We are fully compliant with all contractual requirements and are held in high regard by prison management and the Department of Justice across all facilities. CCWA continues to focus on maintaining high standards for chaplaincy services, adapting to the changing landscape of the prison system.
- **Respect for All Prisoners:** CCWA chaplains are dedicated to supporting every prisoner in the system, treating all individuals with respect regardless of their belief or background or the crimes that put them behind bars in the case of a sentenced prisoner.

Chaplains are consistently recognised as a vital and respected resource by prison management across both adult and juvenile facilities, according to the feedback we receive at our quarterly business meetings with Contract Management Team, often attended by prison superintendents. Chaplains' contributions are valued not only for the spiritual and emotional support that they provide to incarcerated individuals but also for their role in fostering a positive, rehabilitative environment. Prison management acknowledges the chaplains' professionalism, dedication, and ability to engage with diverse populations, including individuals from various cultural, religious, and socio-economic backgrounds. Their work is integral to the overall well-being of the incarcerated, supporting their personal growth, rehabilitation, and reintegration into society.

