

13 March 2025

Our ref: GEK 180930

Coroners Court of Victoria
By email: team8@courts.vic.gov.au

Greg King
Partner



Dear Registry

COR 2021 001217 - Michael Suckling

We confirm we act for The GEO Group in this matter.

We **enclose** The GEO Group's response to Coroner Peterson's recommendations.

Yours faithfully

Hall & Wilcox

Hall & Wilcox

Encl.

Recommendations for Health Care Providers of Health Services in Victorian Prisons - Forensicare, St Vincent Correctional Health Services, Correct Care Australasia, The GEO Group:

1. That Health Service Providers proactively consult with ACCHOs to explore further opportunities for ACCHOs to provide in-reach services for Aboriginal prisoners.
2. That Health Service Providers, in circumstances where an Aboriginal Health Worker position remains vacant for more than 3 months, ensure an ACCHO is contacted to determine if it is possible for the ACCHO to provide in-reach services until the vacancy is filled.
3. That Justice Health, SCVHS, CCA and GEO work with the Yilam and the Aboriginal community to identify opportunities to increase the pool of potential Aboriginal Health Workers, with the view of having a minimum of one full-time equivalent AHW at every prison in Victoria.
4. That Health Service Providers, with support from DJCS as required, explore opportunities to provide the services of traditional healers for Aboriginal and Torres Strait Islander prisoners.

The GEO Group response (#1-4):

The GEO Group accepts recommendations 1-4. Work has already commenced to improve the delivery of culturally appropriate health services at RCC and FCC through contracted service agreements with the Victorian Aboriginal Health Service (VAHS) and the establishment of relationships with local Aboriginal Community Controlled Health Organisations (ACCHO). GEO Healthcare Plus has successfully implemented a comprehensive Aboriginal health care staffing model at RCC and has introduced an innovative Aboriginal Health Practitioner Traineeship Program. It is proposed that this model will further support opportunities for Aboriginal people to work in the custodial environment and provide quality and culturally appropriate healthcare services to the people within our care.

The GEO Group, GEO Healthcare Plus and Forensicare will continue to work collaboratively with Justice Health, VACCHO, VAHS and the Yilam in support of implementing these recommendations.

5. That Health Service Providers ensure there is a policy or operating instruction addressing multidisciplinary case management for prisoners with complex health needs, including referral criteria.
6. That Health Service Providers develop a policy or operating instruction that identifies that a Senior Clinician in the relevant prison health service is appointed responsible for organising a multidisciplinary meeting at regular intervals to ensure that complex cases are reviewed and

discussed holistically, including specifically mental health and medication reviews, and a process for obtaining patient consent.

The GEO Group response (#5-6)

The GEO Group accept in principle recommendations 5-6.

As the Operator of the Ravenhall Correctional Centre, The GEO Group has worked closely with Forensicare, GEO Healthcare Plus, Honeywell, Bendigo Kangan Institute (BKI) TAFE and YMCA to develop an operating model of care at RCC that embraces service integration as an operational imperative that permeates throughout the Centre in line with The GEO Group's Continuum of Care Model. The Ravenhall Charter has been developed between The GEO Group and its partner agencies and represents a shared vision for RCC's collaborative and coordinated service delivery approach.

The GEO Group requests that the term 'Senior Clinician' or 'Key Clinician' is amended to reflect the collaborative approach to health care delivery at RCC and FCC and the complexity of the services and programs delivered. The GEO Group requests that the term '*appropriate multi-disciplinary representative*' is used and reflects the operating model and philosophy at RCC and FCC. Relevant policies and procedure documents are to be updated to reflect the above principles once terminology is confirmed.

7. That Health Service Providers consider developing additional KPI measurements that are outcome focussed rather than quantitative measurements.
8. That Health Service Providers review current KPI measurements and assess them for unintended consequences that impact on quality of delivery as has previously been covered in recommendations in the CRACCS.

The GEO Group response (#7-8)

Given the significant clinical and contractual implications of these recommendations and the scope of potential changes to service delivery, The GEO Group would welcome the opportunity to discuss these recommendations further with Justice Health and the Contracts and Infrastructure Branch.

To GEO:

9. That GEO educates its correctional staff about appropriate referral pathways for prisoners facing mental health or medical issues, including clarifying the role and function of the key clinician

The GEO Group response (#9)

The GEO Group accepts Recommendation 9. The National Health Services Manager and the Director of Rehabilitation and Reintegration are reviewing the pre-service information package to ensure it includes information regarding the mental health and medical issues referral process and the role of key clinicians. The healthcare providers currently offer an information session as part of the pre-service course, detailing the referral pathways.

10. That GEO continue work on addressing the issue of weight gain amongst prisoners and ensure that an iteration of the Obesity Management Work Group becomes a permanent feature of the healthcare system at Ravenhall.

The GEO Group response (#10)

The GEO Group accepts Recommendation 10. As part of the obesity management program at Ravenhall Correctional Centre, GEO Healthcare Plus has implemented an Obesity Management Framework that applies a holistic approach to weight management. The GEO Group will continue to work with GEO Healthcare Plus and will monitor the implementation of various strategies and outcomes aligned to this framework.

Since the recommendations for this investigation were issued, The GEO Group has implemented a 'traffic light system' for prisoners to order food items via the In-Cell prison canteen. In this system, unhealthy items are highlighted in red, and a healthier option is suggested as a swap. The GEO Group has also included more healthy food choices in the canteen. The GEO Group will continue to evaluate the efficacy of this program.

11. That GEO undertakes a feasibility study in relation to obesity, comorbidities, and complex case management interventions with a focus on determining the most appropriate level of obesity and the level and type of co-morbidity for referral criteria.

The GEO Group response (#11)

The GEO Group would welcome the opportunity to discuss this recommendation further with the State to establish the scope, design, and methodology of the study, and to collaborate with the State in undertaking the feasibility study as needed.