

14 January 2022

**Paul Stewart APM**

Commissioner  
Queensland Corrective Services  
69 Ann Street  
Brisbane QLD 4001

Per email: commissioner@corrections.qld.gov.au

Dear Commissioner

Together refers to part 2.2 'Issue Resolution' Reg 23 (5) of the Work Health and Safety Regulations 2011. In accordance with the default procedure, Together has been requested that Together be party to the dispute resolution as notified today in relation to the COVID-19 pandemic, currently affecting Correctional Facilities.

Members have raised serious workplace health and safety concerns in regard to the following;

**1. Management of COVID positive Prisoners**

Queensland Corrective Services are not adhering to your current and agreed upon policy, *Management of COVID-19 positive prisoners* version 0.6 which was published and updated on 21 December 2021. This policy clearly states the following:

*“When advised by QH that there is a COVID-19 Positive Prisoner in a centre the following is required:*

- *all staff and persons in the centre to immediately wear appropriate Personal Protective Equipment (PPE) as deemed required by QH;*
- *the Centre is to immediately be placed into stage 4 lockdown;*
- *staff are to cohort by location within the Centre;*
- *QH staff onsite will manage the medical needs of the COVID-19 prisoner;*
- *the General Manager is to urgently brief the Assistant Commissioner, Custodial Operations and/or the Commander, SCOC; and*
- *SCOC to appoint QCS member to an Outbreak Management Team in collaboration with QH.*

Currently, multiple centres across Queensland are experiencing COVID positive prisoners, however to date, no centre is currently declared a stage 4.

Further to this, QCS is not adhering to the below excerpt from your policy:

### ***“Management of COVID-19 Positive Prisoner(s) in Centre***

*Where ongoing health care to a diagnosed person or persons in a Centre is adopted as they do not require hospitalisation for clinical or infection control reasons the COVID-19 Positive Prisoner is to be managed by QH staff onsite.*

*The General Manager will consider activating the QCS COVID-19 Positive in Centre Plan.*

*COVID-19 Accommodation Unit(s) will be identified by the General Manager within each Centre to accommodate any COVID-19 Positive Prisoner(s). The COVID-19 Positive Prisoner(s) will be isolated in a single cell within a unit where possible. Other COVID-19 Positive Prisoners in the Centre will be moved to this Accommodation Unit(s) upon QH advice to be quarantined and medically managed.*

*Staff working in COVID-19 Accommodation Unit(s) will need to be:*

- *fully vaccinated;*
- *cohorted away from other staff for all activities including meals; and*
- *only work within this unit.*

*COVID-19 positive prisoners are not to be removed or released from the COVID Accommodation Unit unless approved by QH staff.”*

We hold great concern for our members safety in managing COVID-19 positive prisoners and the lack of consistency and appropriate control measures implemented puts our members at serious risk of contracting the disease. Our members advise that QCS has been negligent in their control measures and are such placing members at a higher risk of exposure to COVID-19.

## **2. Transfer of prisoners**

As per your policy, *Managing prisoner receptions, transfers, discharges and releases during COVID-19 restricted operations* version 5.3 published on 21 December, states that:

### ***“Prisoner movements and transfers***

*In general, prisoner transfers are to be restricted. Movements and transfers of prisoners should be to and from correctional centres within the **same COVID-19 response stages\***. The table below outlines the requirements for each type of movement and the approver during restricted operations.”*

Our members have raised concerns that this practice is not occurring and prisoners are continuing to move between centres which have been identified at different stages, for example a transfer occurred this week from BTCC and Palen creek. Further to this, WCC is

accepting transfers from AGCC, all of these centres are at a different COVID-19 response stage.

Members have raised great concerns for their health and safety and that Queensland Corrective Services is unreasonably transmitting COVID-19 between facilities in Queensland.

### **3. Cleaning and risk mitigation on the spread of COVID-19**

Queensland Corrective Services fact sheet, *COVID-19, start, during and end of shift preventative procedures* clearly states:

***“Health Advice:***

- *Frequently clean regularly touched surfaces such as counters and desks with detergent solution. Detergent wipes should be used in addition to routine cleaning of such surfaces.*
- *Clean regularly minimally touched surfaces such as floors, blinds and walls with detergent. Detergent wipes may be used for cleaning such surfaces.*
- *Clean regularly minimally touched surfaces such as sinks and basins with detergent solution.*

*Officers should consider the above points in ongoing cleaning arrangements regarding the maintenance of work areas and operational equipment under their control.”*

Together has raised multiple concerns in regards to cleaning and access to cleaning supplies in Correctional Centres, however this issue has still not been resolved. Members advised that by not maintaining regular sanitation and cleaning procedures, QCS is unreasonably allowing the spread of COVID-19 in Correctional Facilities.

### **Consultation over Risk Control Measures**

The policies set out above contain control measures to reduce the risk of COVID to as low as reasonably practicable and were introduced following consultation with Together and staff.

We are deeply concerned to learn that Queensland Corrective services have changed or updated the attached policies without consultation with our members, along with a change in control measures and procedures where our members have not been party to or been able to genuinely influence the outcome. This is in breach of *Part 5 Consultation, representation and participation, section 47, 48 and 48* of the Work Health Safety act 2011.

We hold great concern for our members during this pandemic and hold even greater concerns that Queensland Corrective Services have failed in their obligations under *Part 2, Division 1,*

*Subdivision 1 section 17 'Management of risks (a) (b)'* and have not eliminated risks as far as reasonably practicable.

We also note that while prisoners are exempted from the operation of the *Work Health and Safety Act 2011*, these issues are also likely to significantly impact on the welfare of prisoners who will be directly affected by the spread of COVID in centres

We seek to meet urgently in order to resolve these matters. Should you have any queries I can be contacted at [mst@together.org.au](mailto:mst@together.org.au).

Yours sincerely

**Michael Thomas**  
Assistant Branch Secretary

cc. [Police@ministerial.qld.gov.au](mailto:Police@ministerial.qld.gov.au)