

OPEN LETTER TO THE GOVERNMENT OF CANADA ON THE EVALUATION OF ITS “PRISON NEEDLE EXCHANGE PROGRAM”

March 20, 2019

The Hon. Ralph Goodale
Minister of Public Safety and Emergency Preparedness
Public Safety Canada
269 Laurier Avenue West
Ottawa, Canada K1A 0P8

Anne Kelly
Commissioner of the Correctional Service of Canada
National Headquarters
340 Laurier Avenue West
Ottawa, Ontario K1A 0P9

Dear Minister Goodale and Commissioner Kelly:

We write to you as scientists who have devoted much of our careers to researching, monitoring and evaluating programs and policies affecting the health of people who use drugs.

There is more than twenty years of research and evaluation of prison-based needle and syringe programs that demonstrate their numerous health benefits for people in prison and the broader community, and that also provide guidance to inform effective program design.

We were pleased to see the May 2018 announcement by the Correctional Service of Canada (CSC) indicating that it would introduce a “Prison Needle Exchange Program” (PNEP) at Grand Valley Institution for Women (in Kitchener, Ontario) and Atlantic Institution (in Renous, New Brunswick) in June 2018. We also welcomed CSC’s commitment to evaluate the PNEP at these two federal prisons and to scale-up PNEPs across all federal prisons beginning in January 2019.

As you know, the effectiveness of the PNEP will be contingent upon prisoners’ access to the program which is, in turn, determined by the program design. Program design must be evidence-based. Therefore, a rigorous monitoring and evaluation of the PNEP is of the utmost importance, and should adhere to best practices in the evaluation of public health programs. This must include engaging with the system of independent peer review, both for establishing the evaluation framework and for reporting the results. The evaluation should be premised on an uncompromising identification of any weaknesses in the current program design and of ways to improve access to the program so as to ensure its maximum benefits. This can only be done with sustained and meaningful consultation with prisoners, community groups that work with

people who use drugs, and with prisoners, harm reduction service providers, and knowledgeable experts with relevant experience.

Numerous studies have proven the benefits of prison-based needle and syringe programs. But if those benefits are to be realized in Canada's federal prisons, the design of CSC's PNEP must be based on a robust evaluation that thoroughly assesses prisoners' access to this health service and makes concrete recommendations to ensure that this is the case. We urge you to ensure that your evaluation fulfills these objectives. Transparency is essential, particularly when it comes to research in closed settings such as within the prison context. We therefore urge you to also share the evaluation protocol, information considered and the evaluation's findings with concerned stakeholders including prisoners, community groups that work with people who use drugs and with prisoners, and scientists to ensure accountability in the roll-out of this important health program.

Signed:

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