

2000



COUNCIL OF EUROPE CONSEIL DE L'EUROPE

CPT/Inf (2000) 10

**Response of the Government of
the Netherlands Antilles to the report
of the European Committee for the
Prevention of Torture and Inhuman or
Degrading Treatment or Punishment (CPT)
on its visit to the Netherlands Antilles**

from 25 to 29 January 1999

This response has been made public by the Government of the Netherlands. The CPT's report on its visit to the Netherlands Antilles is set out in document CPT/Inf (2000) 9.

Strasbourg, 25 May 2000

**Response of the Government of
the Netherlands Antilles to the report
of the European Committee for the
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from 25 to 29 January 1999

Permanent Representation of the
Kingdom of the Netherlands
to the Council of Europe
3, place Sébastien Brant
67000 Strasbourg
France



Permanente Vertegenwoordiging van het
Koninkrijk der Nederlanden

Ambassador

Strasbourg, 13 August 1999

Dear President Zakine,

Reference is made to your letter dated 17 March 1999 to the Netherlands Ministry of Foreign Affairs conveying the report drawn up by the CPT following its visit to the Netherlands Antilles from 25-29 January 1999.

I have the honour to transmit herewith the text of the letter of the Minister of Justice of the Netherlands Antilles dated July 1999 addressed to you.

Attached to Minister Martha's letter is the reaction of the Government of the Netherlands Antilles on the above mentioned CPT report.

While looking forward to continue our close cooperation, I shall be glad to transmit to my authorities in due course the reaction of the CPT on the steps and measures taken to improve the living conditions of prisoners held in the Koraal Specht Prison.

Yours sincerely,

H. Wagenmakers

Hendrik Wagenmakers
Ambassador
Permanent Representative of the
Netherlands to the Council of
Europe

The President of the European Committee
for the Prevention of Torture and Inhuman or
Degrading Treatment or Punishment
Mr. Ivan Zakine
Council of Europe
Strasbourg



NEDERLANDSE ANTILLEN

MINISTER VAN
JUSTITIE

Willemstad, July 1999

Dear Sir,

I have the honour to enclose herewith the reaction of the Government of the Netherlands Antilles on the report drawn up by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishing (CPT), following its visit to the Netherlands Antilles from 25 to 29 January 1999.

The beforementioned reaction will allow the CPT to monitor more closely the developments at the Koraal Specht Prison. The Government of the Netherlands Antilles has worked hard to accomplish the recommendations set out in the report. Because the Government has a high opinion of the CPT and is committed to work on the further development of the Koraal Specht Prison jointly with the CPT, the Government would very much like to obtain the opinion of the committee on the steps and measures taken to improve the living conditions of prisoners held in the Koraal Specht Prison.

The Government of the Netherlands Antilles remains at the entire disposal of the committee for any questions they might have.

Yours Faithfully,

dr. R.S.J. MARTHA, LL.M.
Minister of Justice of the
Netherlands Antilles

European Committee for
the Prevention of Torture and
Inhuman or Degrading Treatment
or Punishment,
Mr. Ivan ZAKINE, President
Strasbourg
Switzerland

As you are aware, in January last, at the invitation of the Minister for Justice of the Netherlands Antilles, Dr R S J Martha, LL.M., the CPT visited the Netherlands Antilles in order, together with the Government of the Netherlands Antilles, to set a timetable for carrying out the necessary fundamental changes in Koraal Specht prison.

Following receipt of the report at the end of March 1999, the government began implementing the recommendations.

Its reactions to the various points in the said report are set out below.

A. Preliminary remarks

As the CPT observes, compared with 1997 there has been a considerable reduction in the maximum number of detainees who may be held in Koraal Specht prison. The maximum is now set at 400. Further, it has been agreed with the Netherlands Minister of Justice that, should this appear necessary, it will be possible to transfer a number of prisoners (maximum 100) temporarily to the Netherlands.

B. Ill-treatment

The CPT was very concerned about the (alleged) ill-treatment said to be taking place within the prison. This is something which also has the attention of government of the Netherlands Antilles. The so-called Kleinmoedig Commission was specially set up in order to guarantee the physical integrity of prisoners. The conclusion may be drawn from the Commission's findings, after investigating the complaints submitted to it, that since the said Commission was set up there has been no culpably excessive use of force against prisoners by prison staff and/or police personnel. An evaluation of the work and findings of the said Commission will be available very shortly and will be submitted to the Minister of Justice.

As a result of the alleged irregularities said to have taken place on 14 July 1998 (these are still being investigated: a preliminary judicial investigation has been commenced, in the course of which a number of witnesses are being interviewed by the investigating judge), the presence of the *Dienst Bijstandseenheid* (the so-called riot team) in the *Huis van Bewaring* (short-term prisoners section) was strongly criticised. It is therefore appropriate to explain the role of the riot team.

As a result of the vandalism caused by prisoners on 2 and 3 January 1999 in the *Nieuwbouw* (new building) section and on 10 January 1999 in the *Extra Beveiligde Afdeling* (reinforced security unit) of both the long-term and the short-term sections of the prison, it was thought necessary to take the necessary precautionary measures in order to prevent further vandalism in the various sections of the prison.

In order to guarantee this, after consultation with the Minister of Justice and officers of the Netherlands Antilles police force, the help of the latter's so-called riot team was sought. Among its functions are the following:

- a. to prevent vandalism occurring in the various sections;
 - b. to patrol the various sections at regular intervals;
 - c. to provide backup in connection with cell searches in the various sections.
- a. Possible escape plans, riots, and damage to cells, material and other (emergency) equipment are prevented by the presence of members of the riot team in the prison.
 - b. Every day, at varying times, the riot team patrols the establishment in order to see that all is quiet and orderly within the sections. The physical presence of the riot team has a preventive effect on prisoners and is a factor for security, both within and outside the prison.
 - c. On the occasion of cell searches, the riot team is called in to supervise prisoners in a specially designated area, so that the warders can then carry out the cell searches undisturbed. With the prisoners under observation in this way, staff can spend more time thoroughly searching the cells and other places where forbidden objects are thought to have been concealed.

An account of the way in which the riot team operates, provided by the head of the uniformed branch of the Netherlands Antilles police force, is attached. It will be seen from this that the riot team's commanding officer evaluates the situation (in the case of vandalism, riots, serious incidents etc) and action is then taken to prevent escalation. Following intervention of this kind, the Public Prosecutor's Department and the Minister of Justice are informed. The Minister has agreed to provide the location director with a copy of the report as rapidly as possible.

The riot team's commanding officer arranges for a daily minimum of two patrols in the various sections. Cell searches take place (every day) under the leadership of the relevant section head, and as has already been pointed out, the riot team provides back-up. For more details, see the attached (draft) service order No. GWC-001-99.

As has been said, no incidents have occurred since the riot team has been present. This success may be explained by the fact that prisoners show a healthier respect for the members of this unit. That respect derives partly from the reputation which the riot team has acquired (no nonsense/zero tolerance), but also from the fact that the unit has only minimum contact with the prisoners. As a result, the riot team acquires a psychological superiority, making the use of (excessive) force quite unnecessary.

Bearing the foregoing in mind, it was decided in October 1998 to divide the existing personnel into two groups: one group which is occupied solely in dealing with prisoners (the internal service) and one group exclusively concerned with surveillance/security in the institution. The internal service consists of eight sections in which the prisoners are kept. The purpose of this is to ensure that the work is performed correctly and that more attention can be paid to the primary management processes of ensuring security and dealing with prisoners. Each section has its own section head. Under the section head are the prison supervisors (team leaders) who direct the work of the prison warders, the latter being solely occupied in dealing with prisoners. Section heads are accountable to co-ordinators, who have

responsibility for overall co-ordination of two or more sections. The semi-open institution also has a team of supervisors and warders whose sole job is to work with prisoners in the final phase of their sentence. A great deal of attention is paid here to the various activity programmes geared to prisoner rehabilitation. This division into groups ensures that the surveillance/security group has only minimum contact with the detainees. Another advantage of this approach is that it leaves one group of personnel free to focus entirely on working with prisoners.

Because the government is genuinely concerned about the recommendations made by the CPT, it is anxious that the function now performed by the riot team should be taken over in due course by a new *Mobiele Eenheid* (mobile unit). Two alternatives are put forward in order to achieve this. From the group of guards who are currently responsible for surveillance/security duties, and who are to be boosted by further members (to be recruited), a sub-group is to be designated by a process of very strict selection and trained to form part of the mobile unit. Another alternative has also been put forward because great difficulties are currently being encountered in recruiting new staff. Members of the Antilles militia are to be attached to the present riot team for three months prior to their discharge. Suitable candidates for positions with the mobile unit can then later be recruited from this group. A phased plan, appended to this report, has been drawn up for the purpose.

The co-ordination of these two initiatives is in the hands of the location director.

The government is delighted that the CPT has been able to acquaint itself with the various measures taken in order to counter the ill-treatment of prisoners. As has been said, the Kleinmoedig Commission was set up by the Minister of Justice in order to guarantee that the physical integrity of prisoners is safeguarded. That Commission should be seen as a special supervisory board alongside the existing one. Once the new *Landesverordening Beginselen Gevangeniswezen* (regional ordinance on prison service principles) comes into force, the Kleinmoedig Commission will be subsumed in the supervisory board to be appointed. That board will have a special complaints bureau which will deal solely with prisoners' complaints.

Because there is an awareness of the need to have accurate data about prisoners in order, for example, to classify them properly, but also for the purposes of central registration of complaints about ill-treatment of prisoners, a *Bureau Gedetineerdzaken* (prisoners' affairs bureau) has been set up. This project is being co-ordinated by a criminologist attached to the institution. As of September 1999 the bureau will operate independently under the supervision of an administrative officer specially recruited for the purpose. Further to the CPT's recommendation, warders who were responsible in the past for discharging administrative functions will be replaced by civilian personnel.

The *Landsrecherche* (criminal investigation department), which is responsible for investigating the irregularities in Koraal Specht prison, has provided the Minister of Justice with an overview of the cases it has dealt with to date (see appendix). As the Minister of Justice is not satisfied with the result, particularly of the enquiries into the circumstances of the irregularities on 7 August 1997 and 30 December 1997, he has written to the Attorney General, who is head of the criminal investigation department, to say that he considers further enquiries desirable. As soon as more detailed information is available on this, the CPT will be informed.

C. Staff and management issues

The government shares the CPT's view that the safety of the establishment's staff should be paramount. Various measures have been taken in order to improve the safety of the security staff:

1. reducing the number of prison inmates;
2. introduction of new instructions on the use of force;
3. modification of the reinforced security unit (lookout posts);
4. courses in motivation and training for warders;
5. recruitment of new security staff;
6. setting up a social-medical team in order to combat absenteeism;
7. recruitment of a special safety officer.

As the CPT observed earlier, the prison staff are aware that ill-treatment of prisoners is not permitted and will not be tolerated by the competent authorities. Together with the management, the government has worked hard to eliminate the critical conditions which can lead to ill-treatment of prisoners. As has already been observed, the Minister of Justice has set up a commission with the task of guaranteeing that the physical integrity of prisoners is safeguarded. That commission found that working conditions in the prison were such that neither the security of prisoners nor the safety of the warders could be guaranteed. As a result, it has addressed itself to the Minister of Justice and the Secretary of State for General Affairs and Justice. Following approval by the Council of Ministers, the commission was empowered under a regional decision to have a number of fundamental improvements carried out within Koraal Specht prison. This has led to an improvement in the living and working conditions within the establishment. Nonetheless, it needs to be pointed out again that the Kleinmoedig Commission was set up primarily to ensure the physical integrity of prisoners.

Day-to-day management of Koraal Specht prison is in the hands of the location director. Because the government is aware that the existing management structures and the resultant bureaucracy present huge obstacles to the effective functioning of the establishment, this problem has been addressed. The Council of Ministers took a decision in August 1998 to take over the Finance and Personnel functions and perform them on behalf of the judicial services. This means that these functions have been decentralised to the services in question. The fact that these central services were dependent was seen as a pressure point in the day-to-day management of affairs. The services were unhappy about the time taken by the central services to deal with financial, staff and material matters. Perpetuating that situation would have been seen as an obstacle to the rapid implementation of the reorganisation plan in the prison service.

In order to guarantee safety within the establishment, and in particular to eliminate contraband, an officer has been appointed one of whose tasks is to assist the head of surveillance and security. This officer has a number of different functions. Apart from being a sniffer-dog handler, he is jointly responsible for available safety resources and, in close conjunction with the head of surveillance and security, he sees to safety questions and enforcement of rules by carrying out inspections, both inside and outside the establishment. Examples of this work include daily checks at the main entrance and key points outside the establishment, checks on service vehicles and special inspections.

In order to counter an appalling level of unauthorised absenteeism and frequent sick leave, the social/medical team (SMT) was brought into being on 22 February 1999. The SMT comprises officials of the occupational medical services (BGD) and Koraal Specht prison officers. The SMT endeavours to ascertain the background to sick leave in relation to internal/external and to social factors.

The approach focuses principally focused on tackling avoidable absence (including unlawful absence) by giving attention to the individual staff member. The team also arranges referrals to outside experts such as psychologists, psychiatrists etc.

The necessary measures have been taken to pursue a rational policy on sick leave and thus reduce absenteeism to a minimum. In the meantime, 47 staff members have received (serious) written warnings about (unauthorised) leave, and 40 of these have been made subject to the principal of "no work, no pay". The SMT is very aggressive in its approach. Nevertheless, staff are given a fair chance. However, disciplinary measures are proceeded with in the case of those who are not prepared to improve their service record despite various interviews, and may go as far as dismissal. The figures and results assembled to date are attached as an appendix.

It is also worth noting that the present location director, who was originally appointed for six months, has now agreed to an extension of his contract for an indeterminate period. Further, the central staff affairs office has completed the official job description for the general director and the location director. This has provided greater clarity with regard to the demarcation of the two directors' tasks and responsibilities.

The location director has also received stronger administrative support. The foregoing should contribute to greater efficiency within the establishment.

Another positive development is the fact that the general management no longer has its offices in Koraal Specht prison itself, but is accommodated in a separate building outside.

Although the primary task of the Kleinmoedig Commission has been mentioned several times already in this report, it may be useful to clarify it once again. Although the Kleinmoedig Commission was given specific powers to have specific work carried out within the prison, this should be seen against the following background. The task assigned to the Commission was to ensure the protection and safeguarding of the physical integrity of the prisoners, because it had been observed that press reports were constantly appearing about alleged ill-treatment, particularly in Koraal Specht prison. The conclusion was reached that the existing complaints possibilities and procedures were inadequate. The Minister of Justice then proceeded to set up the said Commission, which was to function as a special supervisory board pending the institution of the new supervisory board to be appointed when the regional ordinance on the principles of the prison system came into force. That board is to have an administrative support office to deal with complaints. After the Kleinmoedig Commission was set up, its members came to the conclusion that the situation prevailing in the prison might (in part) be the cause of the alleged ill-treatment. They were of the opinion that, unless changes came about in the situation existing at that time, they could not guarantee the safety/physical integrity either of the prisoners or of the warders. Against this background, under a regional decision and with the approval of the Council of Ministers, the Commission was empowered to enter into agreements on behalf of the government for the execution of work designed to bring about improvements in providing for a number of elementary needs,

both of the prisoners and of the warders. This work has in the meantime been carried out and completed. It is not intended that the aforesaid Commission should have a free hand for an indefinite time in the re-organisation plan for Koraal Specht. That role is assigned to the general project leader, who was appointed recently. The Kleinmoedig Commission was set up in the first place in order to prevent the alleged ill-treatment said to have occurred in Koraal Specht prison. Under the aforesaid regional decision, the Commission was only empowered to have a number of elementary changes carried out within the prison establishment during a clearly specified period.

D. Conditions of detention

On 29 March 1999 a co-ordinator was appointed with responsibility for co-ordinating and supervising the activities organised for the benefit of prisoners. The co-ordinator has nine assistants under him (activity leaders, sports instructors) and about four part-time staff (education, manual work etc) who run a range of activities on the basis of an activity programme in the eight sections.

The possibility of including more prisoners in the work process has also been stepped up. Various projects are shortly to begin for this purpose. By taking in work from outside, more scope is achieved for putting more prisoners to work. The project leader is currently engaged in talks with *Feffijk* (a training institute) with a view to starting a training course in the near future for warders and supervisors, specifically aimed at skill transmission. In a second phase the supervisors will follow a course of vocational training to enable them to specialise in their own field.

Another point to note is that the problem of water (inadequate pressure) has been solved. The prisoners have clean running water available to them. The arrangements for supplying meals are also working excellently now. Meals are supplied by the Capriles Hospital kitchens, and are delivered hot and on time.

There is a stock of mattresses and there are sufficient beds. The section heads in the various sections are responsible for distributing mattresses. The stock is kept up constantly, so that there is no question now of a shortage of mattresses.

The Government of the Netherlands Antilles is aware that merely increasing the capacity of the prison will not solve the problem. Alternative punishment methods are required. The committee looking into alternative punishments and the development team should be seen against this background. The latter will be concentrating on young first offenders and will try to resocialise them through tough discipline and a strict regime. In this way an effort will be made to bring wayward young people back into line and keep them there.

With regard to extending the prison capacity, please note the following. Recently, the Netherlands Government again expressed its willingness to fund the construction of a new prison. The amount made available is 69 million guilders. As was explained earlier in detail to the CPT, the Government of the Netherlands Antilles has investigated alternative building methods, because the original construction plans entailed too long a timeframe and excessive cost. Both the construction costs and the running costs were found to be too high. At the same time, the possibility of alternative funding methods has been looked into, since it may still take some time before financial settlement between the Netherlands and the Netherlands

Antilles has been finalised. The advantage is that the work can begin earlier. The three successive phases are summarised chronologically below: first, the process by which the project was awarded to the Wackenhut Corrections (WHC) Company, secondly an account of the letter of intent signed with that company, and thirdly the preliminary funding for the project.

The procurement process

When the present government took office on 1 June 1998, as has been said, there was already a plan for the construction of a new prison, based on building costs amounting to 90 million ANG. That plan was immediately dismissed as unacceptable, partly because it was not financially feasible. On the basis of the regional decision of 16 June 1998 on the reorganisation and renovation of the prison service, a buildings project group set to work to draw up a new specification.

On the basis of that specification, a number of firms of architects were invited to submit tenders for a scheme to renovate Koraal Specht prison, the traditional process of building project procurement being followed.

On the basis of the aforesaid regional decision of 16 June 1998, a finance project group also began work. According to calculations made by that project group, following renovation and new building the running costs would rise by 50%. It was also calculated that the building work would take 2½ years, which was regarded as prohibitively long in view of the pressure to achieve a rapid process of reorganisation and the need to end overcrowding in the prison.

Against that background, and after consulting local experts, the conclusion was reached that this project was not in the interests of the Netherlands Antilles. For these reasons, this approach was abandoned and the Department of Justice began to look for alternatives whereby the building and renovation could be tackled immediately but at the same in a professional manner. This led to a proposed approach based on the following fundamental conditions:

- a. building and management of a new prison in accordance with the above-mentioned new specification;
- b. the contractor must be able to pre-finance the construction;
- c. the constructor must be able to guarantee a construction period of not longer than one year.

From a survey of the international market, it seemed clear that there were a number of companies able to meet these essential preconditions. These companies were then sounded out to see whether they were interested in submitting tenders for the construction, prefinancing and (possibly) management of a new prison in accordance with the aforementioned specification, which was also sent to a number of local building companies.

In order to assess the written tenders received on the basis of these invitations, an independent committee was set up comprising prominent figures in Netherlands Antilles society.

That committee submitted two opinions on 6 April and 10 May 1999 recommending that the contract for the design, construction and possibly (pre)financing of the new establishment should be awarded to the company Wackenhut Corrections Corporation (WHC), with registered offices in Palm Beach Gardens, Florida, USA.

Letter of intent

On 27 April this year a letter of intent (LOI) was signed between the government and WHC concerning the construction and management of the new Koraal Specht prison. That LOI (which came into force on 7 May) laid down the essential points on the basis of which the parties were to negotiate in good faith in order to reach agreement on mutually acceptable conditions. These negotiations are likely to result in firm agreements soon. The starting point for the negotiations is set out below.

WHC takes responsibility for the design and construction of a new prison establishment and also for the modification/renovation of part of the existing establishment. The new design (comprising 601 beds) provides for an appropriate allocation of space, with separate accommodation for the different categories of prisoner. In this regard, international standards will be observed in order to ensure reliable and safe containment and the humane treatment of prisoners. The relevant CPT reports have been made available to WHC in this connection, in order to keep the company informed of the framework within which this project must be carried out.

By spreading the construction and renovation work over a number of different phases, disruption in the operational management of the prison will be kept to a minimum. Furthermore, WHC will employ materials and systems such as to afford maximum cost efficiency in terms of maintenance throughout the life of the facility. During a period of six months after the final agreement comes into effect, WHC will make its services available by providing know-how on the operational management of the prison. For this purpose, WHC will apply its own prison management methods (including operational instructions), techniques and expertise in the Koraal Specht establishment. For a period of six months, WHC will provide new staff training and implement procedures in order to streamline the operational management and improve the organisational climate. This will be done in accordance with the guidelines applicable in the Netherlands Antilles. After the said period of six months, the government has the option of accepting (and/or further negotiating) another tender to be drawn up by WHC for a contract covering several years for the operational management of the entire prison establishment (732 beds including the semi-open establishment). In this connection, WHC has submitted a first draft which is now being examined by the government. Because great importance is attached to the CPT's opinion, the government would welcome the CPT's comments on this draft, which is appended hereto. The government wishes to ensure that the proposals, which will ultimately result in firm agreements, satisfy the CPT's requirements.

Prefinancing

WHC will prefinance the instruction and modification/renovation. For this purpose, WHC is to set up an Antilles company as a legal entity. The government is to grant WHC a long-term lease on the land in order to construct the new facility. The costs of construction

and renovation work are estimated at ANG 33 million, and the total construction time is set at a maximum of 12 months.

In accordance with the aforementioned LOI, WHC will be prepared to finance the said new building and renovation for the government during the construction period. Under a transfer agreement to be signed by the parties, the government will take delivery of the building on condition that WHC meets the agreed contractual terms. This purchase by the government will have to be accompanied by so-called "take-out financing", whereby WHC's claim on the government by virtue of the completed construction work will be settled.

With regard to the aforesaid "take-out financing", on 25 June 1999, in a closed session of the Centrale Commissie van de Staten (Central Provincial Council), the policy of the Minister of Justice with regard to prison problems received the support of the Antilles Parliament.

On 8 July 1998 a groundbreaking ceremony took place to symbolise the start of the construction work.

The above-mentioned regional decision of 16 June 1998 has been amended in order to appoint a project leader responsible for co-ordinating the construction projects described above, in addition to the general project leader for the reorganisation process.

With regard to privatisation of the prison: this possibility is only one option which the government has investigated in order to achieve greater efficiency in the operation and functioning of the establishment. Account has certainly been taken of the fact that the government needs to preserve a sufficient degree of influence. As stated above, WHC have been asked to make a proposal in this connection.

E. Health care services

The medical service was restructured on 1 April 1999. This service now comprises five nursing officers (one of whom is responsible for day-to-day management of the service), one nurse and two warder/nurses. Thus the staff complement of the medical service has been extended by four nursing officers, in accordance with the CPT's recommendations. This staff increase is already of practical benefit, since Koraal Specht prison now has a total of four new nursing officers in post.

F. Further measures required and proposed timetable

As already explained, the maximum prisoner population is set at a total of 400. At the same time, conditional pardon, together with deportation, in the case of foreigners who have already served half their sentence, are to be applied on a structural basis.

As has been said, the Prisoners' Affairs Bureau became operational on 1 September 1999. It keeps a central register of information on prisoners. Furthermore, the establishment's doctors are required to observe the procedure laid down by the Kleinmoedig Commission when complaints concerning alleged ill-treatment are received. This means that the prison doctor draws up a report on all cases of ill-treatment occurring within the establishment, and a copy is sent as rapidly as possible to the location director and to the

Kleinmoedig Commission. Prisoners complaining of alleged ill-treatment can always report the incident to the criminal police.

As has been said, there is now a clear distinction between the tasks and functions of the general director and location director respectively. The latter has agreed to the extension of his contract for an indefinite period.

As we have said, the SMT is doing its utmost to reduce unauthorised absence. The figures obtained to date point to the cautious conclusion that the methods used seem to be achieving their target.

The division of the staff into two groups, as proposed by the CPT (one group dealing with prisoners and the other concentrating on guard duties and security in the establishment) is already a fact. In addition, civilian staff have been recruited to carry out administrative tasks. The result of this is that those guards who carried out such tasks in the past are now free to work with prisoners.

With regard to the presence of the riot team, it is again pointed out that no incidents have arisen since it has been present in the prison. The principal task of the riot team is to supervise prisoners and patrol the various sections. There is no direct contact with prisoners. However, in keeping with the CPT's recommendation, a start has been made on reducing the involvement of the police support unit.

Concerning the recruitment of new prison warders (applicants), this recruitment process is now under way in the establishment. The process is not running very smoothly at the present time. The poor publicity which the prison attracted in the past may be partly the cause of this. Now that the situation has improved considerably, and in view of the building and renovation works and upgrading possibilities, it is to be expected that interest in working in the establishment will increase.

Now that the Prisoners' Affairs Bureau is operational (since September), the proper classification of prisoners will be made considerably easier. As has been mentioned, there is already a daily activity programme, and this will shortly be extended to include more occupational activities.

The basic necessities of the prisoners are now adequately catered for.

An evaluation of the work of the Kleinmoedig Commission will be completed very shortly and submitted to the Minister of Justice.

As explained in detail earlier in this report, the construction work which will eventually produce a new facility and a renovated establishment has already begun. A separate project leader has been appointed to co-ordinate the project. The company carrying out the construction work has also submitted a tender with regard to so-called "commissioning services", which means that it is also able to provide training for the staff. The government is currently examining these proposals in depth, following which a firm agreement is expected. The government would greatly appreciate the CPT's comments on the proposals so that they can be borne in mind in the negotiations.

As explained above, the prison's medical service has been expanded in accordance with the CPT's recommendations.

Willemstad, July 1999

**NETHERLANDS ANTILLES POLICE CORPS
ISLAND OF CURACAO**

Modus operandi of the Support Unit in the short-term prison

Introduction

Following the riot by prisoners in the short-term prison yesterday, the Minister of Justice decided, as a preventive measure and in order to avert further escalation, to station the police support unit squad in the establishment for an indefinite period.

The purpose of their presence there is to back-up the prisoners' own security staff. Consequently, they do not carry out any warder duties. Each time they begin service, the groups report to the deployment centre, whereupon the unit moves to the short-term prison.

- Duty hours: Daytime and evening duties (07.00 to 15.00 and 15.00 to 23.00)
- Staff deployed: Groups 1, 2 and 3 of the KoCur police support unit led by a senior officer
- Period: 13 January 1999 until further notice
- Tasks: General: 1. To prevent damage taking place
Special: 2. To carry out patrols at irregular times
3. To provide backup for prison staff carrying out cell searches
- Duties performed: 1. If incidents occur, for example vandalism or rioting, the group commander assess the situation and reports the circumstances immediately to the public prosecutor on duty. Action is taken on instructions received from the (acting) unit commanders. A report is written within 2 x 24 hours on the action taken and the unit commander sends the report to the Compol.
- Except in the case of incidents of a minor nature, action is taken only when ordered by a Kotop member and in the presence of the public prosecutor.
2. During each period of service, a minimum of two patrols are carried out in the various sections.
3. As needed.
- Reporting: Normal operations are recorded every day in a log book.
- Incidents are reported in writing immediately (within 2 x 24 hours) to the corps command.

Cell searches and other special operations are reported in detail and in writing to the corps command.

Clothing: Riot gear

Equipment: Full equipment

Weapons: Long truncheon (riot stick) Walther P-88/Glock 17
Officers and men H&K

Rations: Individually organised (meal tickets)

Accommodation: Barracks in short-term prison

Transport: Buses NA-175, NA-176 and NA-177

Communications: 8 portable telephones (to be hired) are to be made available to the unit(s) on the spot. Communication using frequency 3.

Alert: The group on duty is alerted first as and when the case arises.

Rio Canario, 20 April 1999
Head of the Uniform Branch
RAV ANTONIUS

Order No. GWC-001-99

PURPOSE: Following the vandalism by prisoners on 2 and 3 January 1999 in the New Building section and on 10 January 1999 in the Reinforced Security Unit, we took precautionary measures to prevent further damage.

DISTRIBUTION AND NUMBERS OF PRISONERS AT 11 JANUARY 1999:

A.	New building:	89 prisoners (on remand)
B.	Reinforced security unit:	13
C.	Transitional section:	45
D.	Short-term section:	67 (prisoners serving long and short sentences)
E.	Long-term section:	93 (prisoners serving long sentences)
F.	Women's section:	33 + 1 baby
G.	Foba:	18
H.	Semi-open institution:	72
I.	Punishment cells:	01
J.	Sick bay:	04

Total 435 prisoners + 1 baby

EXTRA UNITS:

9 members of the police riot team (the remainder on call)

9 members of VKC (Volunteer Corps Curacao)

TASK:

- A. To prevent vandalism occurring in the sections
- B. To patrol the various sections regularly
- C. To provide backup on the occasion of cell searches in the various sections.

EXECUTION:

- A1. If vandalism/riots occur, the commanding officer of the police riot team/VKC assesses the situation and acts immediately to prevent escalation.
- A2. Following intervention, the public prosecutor is informed.
- B1. The commanding officer of the police riot team/VKC sees to it that a minimum of two patrols are carried out each day in the various sections.
- C1. Cell searches are carried out every day in one of the aforementioned sections under the leadership of the relevant section head, and the police riot team provides backup.

ORGANISATION AND TASKS:

A1.a: In accordance with internal planning

B1.a: " " " " "

C1.a: Monday - New building
Tuesday - Long-term section
Wednesday - Short-term section
Thursday - Transitional section
Friday - Reinforced security unit
Saturday - Semi-open institution

SUMMARY:

1. To prevent vandalism and riots
2. To patrol the various sections at regular intervals
3. To act as backup on the occasion of cell searches in all sections

LOGISTICS:

A.	Clothing:	Riot/combat gear
B.	Equipment:	Riot equipment
C.	Weapons:	" "
D.	Ammunition	" "
E.	Food:	Individually arranged
F.	Medical care:	Nursing officer on standby/out-patients department

Interim Director
RC RICARDO

Netherlands Antilles

STRAFGEVANGENIS AND HUIS VAN BEWARING (long-term and short-term prison)

To the Interim Director of the Department of Justice

Phased plan

The phased plan for the recruitment of members of the Antilles militia and possible (temporary) commissions is briefly described below.

1. After the necessary contacts between the parties and when agreement has been reached, the members of the Antilles militia are given the opportunity, three months prior to their discharge, of accompanying members of the police riot team in order to acquire the necessary know-how on the way in which a riot team operates in a closed establishment such as a prison.

This novel scheme makes it possible to bring young men directly into the work environment, so that they are less likely to end up in criminal circles later.

The scheme as defined will be able to commence on 1 September this year, after the members of the Antilles militia have received the appropriate information and pre-selection has taken place.

2. After accompanying members of the riot team for about three months and having served in the look-out posts in the surveillance and security section, the members of the Antilles militia are given an opportunity, after a thorough selection procedure, to follow a course of basic training for assistant warders (surveillance and security) lasting about six weeks; see the appended copy of letter No. 188/98, dated 31 August 1998 (4475/PZ) entitled "Proposal for recruitment of assistant warders".
3. In the meantime, the legal position of the persons concerned must be made clear by giving them the status of assistant warder.

In my humble opinion, those concerned need to be appointed for a maximum of two years as assistant warders, and in the meantime - when they have satisfied the recruitment conditions laid down in P.B. 1986 No. 134 - after thorough selection, may qualify for the basic training needed for them to be appointable as prison warders on permanent contract.

4. Once they have completed the basic training qualifying them for appointment as prison warders on permanent contract, they will be permanently deployed in the surveillance and security section.

The members of the mobile unit (the prison riot team) which is to be set up will then be selected from the staff assigned to the surveillance and security section.

5. The staff of the surveillance and security section can then, in future, serve as a reservoir from which warders and other prison staff can be selected.

Acting Director
SJ CANDELARIA

Overview of Criminal Police Department cases relating to Koraal Specht prison during the period 1997 to date

1. 7 August 1997
Suspected ill-treatment of several prisoners by warders/riot team
Report completed on 12 March 1999
Results of the investigation and conclusions are appended (Appendix 1)
2. 30 December 1997
Suspected ill-treatment of several prisoners by warders
Report completed on 24 August 1998
Results of investigation and conclusions are appended (Appendix 2)
3. 29 June 1998
Suspected ill-treatment of a prisoner by a warder
Report completed on 24 August 1998
Investigation completed: dismissal
4. 14 July 1998
Suspected ill-treatment of several prisoners by the police support unit (KPNA)
The investigation continues. A judicial inquiry has begun and a number of witnesses are being interviewed by the investigating judge.
5. 10 February 1999
Suspected ill-treatment of a prisoner by the police support unit (KPNA)
Investigation in final stages
6. 26 April 1999
Suspected smuggling of a bottle of alcohol by a warder
The investigation continues
7. 31 May 1999
Investigation into the manner in which irregularities within the prison are reported.
All reports and documents present in the offices of the prison management or the internal supervision department were taken away for examination by the criminal police department.
The investigation continues.

Source: Criminal Police Department
Mr CP Dronkers

date: 20 July 1999

(signature)

Attorney General

Netherlands Antilles

STRAFGEVANGENIS AND HUIS VAN BEWARING (long-term and short term prison)

To the Minister of Justice

For the attention of the State Secretary for Prison Affairs,
Curacao

Your ref: your letter of...: our ref: 610/A.P.A.

Willemstad, 18 June 1999

Subject: CPT report

With reference to your request to receive further information with regard to the social/medical team (SMT) and security, I have the honour to inform you as follows:

Social/Medical Team (SMT)

In order to obtain an overall picture of sick leave and unauthorised absence, having set up the SMT on 22 February of this year, we recorded the percentage of sick leave and unauthorised absence over a period of three months (1 March to 1 June) and compared it with the same period of the previous year.

The number of recorded days of sick leave amongst the staff for the period 1 March 1998 to 1 June 1998 is 1931, compared with a figure of 1600 for the same period in the current year. This is expressed as a percentage (staff complement 171): 2% in 1998 and 1.6% in 1999 - a decrease of 0.4% this year.

The number of recorded days of unauthorised absence from 1 March to 1 June 1998 was 514, compared with a figure of 386 for the same period in the current year. This represents a decrease of 128, or in percentage terms 24.9 (say 25)% (see appendix).

From the above information it is clear that both sick leave and unauthorised absence are on the decrease since the institution of the social/medical team.

As has already been pointed out, we shall need to make a big effort to eliminate unauthorised (illegal) absences, to prevent them forming part of the culture of the organisation.

Sick leave and unauthorised absence (UA) during the period 1 March to 1 June for the years 1998 and 1999

Staff complement	Sick leave		Percentage		UA		Percentage
	1998	1999	1998	1999	1998	1999	
271	1931	1600	2.0	1.6	514	386	24.9

NETHERLANDS ANTILLES

KORAAAL SPECHT PRISON COMMISSIONING SERVICES

STATEMENT OF WORK

Wackenhut Corrections Corporation (Wackenhut) proposes to enter into a contract with the Government for the Netherlands Antilles (Government) for certain Commissioning Services during the Phase 1 construction of new secure housing at the site of the existing secure detention and prison facility in Koraaal Specht. These services will commence on or about a date consistent with the implementation of the construction project. The intended outcome of the Commissioning Services is to provide the government with assessments and management tools for enhanced operation and services at the Koraaal Specht prison.

Consistent with the Letter Of Intent executed by Wackenhut and the Ministry of Justice for the Netherlands Antilles, the Commissioning Services shall include the development and delivery to Government, and if requested by Government, training with respect to the following items:

1. New Operating Policies and Procedures;
2. An Officer and Employee Training Curriculum;
3. Recommendations with respect to Officer Deployment;
4. Recommendations for new Prisoner Education, Vocational, Medical and Mental Health, Counseling and Work Programs;
5. A new Prisoner Classification Program; and
6. Recommendations with respect to Procurement Practices for Goods and Services.

The development of management tools and recommendations will be provided based upon a four-step plan. Step One of the Plan will include a review and assessment of current management tools and practices. Step Two of the Plan will develop site specific draft documents and recommendations covering the six items listed above that incorporate, to the extent appropriate, current management tools and practices. Step Three of the Plan will provide government officials with an opportunity to review and provide input on the drafts developed during Step Two. Finally, based upon comments and clarifications received during Step Three, Step Four of the Plan will result in the final development of recommendations, assessments and the six items listed above.

Wackenhut intends to implement this Four-Step Plan by selecting an On-Site Coordinator to manage the project. The Coordinator will serve as the local contact for Wackenhut and Government for this project. The Coordinator will establish task schedules and manage other Wackenhut staff assigned to the project. The Coordinator will interface with

Koraal Specht management and staff to facilitate prisons access, document review and interviews for project staff. The Coordinator will review all documents developed by project staff to ensure that tasks are completed on a timely basis and that the documents developed are consistent with expectations. Although the Coordinator will be dedicated full-time to the project, other Wackenhut staff will be assigned on a task and as needed basis to fulfill the Project objective.

Wackenhut proposes to use the American Correctional Association (ACA) Guidelines for the Development of Policies and Procedures for Adult Detention Facilities, dated March 1995 and the American Correctional (ACA) Standards for Adult Correctional Institutions, 3rd Edition, dated January 1990 in reviewing the current management tools and practices at the Koraal Specht prison and in making recommendations and providing new management tools. All documents prepared by Wackenhut will be in the English language. Wackenhut will review with Government substitutive differences between ACA Standards and the United Nations Minimum Standards for the Treatment of Offenders and the principals developed by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT). Government will advise Wackenhut which standard to follow when conflicts in standards arise.

Wackenhut has been provided with a copy of CPT reports based upon visits to the Koraal Specht Prison. Wackenhut will review these reports and ensure that issues raised in the CPT reports as they relate to the management and operation of the Koraal Specht Prison are addressed in the documents and recommendations developed by Wackenhut in this Commissioning Service Project.

PROJECT SCHEDULE

Step One (3 Months)

1. Upon acceptance by the Government of the Wackenhut Commissioning Plan, Wackenhut will select the Project Coordinator and submit his/her credentials for review and approval by the Government.
2. Coordinator will review the Commissioning Plan and organize an expert team to assist with the project.
3. Coordinator will meet with Government Officials to review Project Plan.
4. Coordinator will organize logistical support for temporary housing, transportation, office space, equipment and access to the prison, personnel and records.
5. Coordinator will develop and maintain open communications with prison and other government representatives to facilitate successful completion of project.
6. Coordinate the development of an assessment report of the Korzaal Specht Prison reviewing the following:

Part I	Administration & Management
Part II	Physical Plant
Part III	Institutional Operations
Part IV	Institutional Services
Part V	Inmate Programs
Part VI	Juvenile Detention Services
Part VII	Female Detention Services

Each part contains certain sections listed below. A total of 45 administrative, security, operational, medical and programmatic activities will be inspected, reviewed and assessed. In developing documents and recommendations based upon this review, broad policy expectations or "desired outcomes" will be identified. Sections are identified as follows:

- Administration & Organization
- Policy & Procedures
- Staff Job Descriptions
- Fiscal Management
- Human Resources
- Staffing
- Training
- Case Records
- Information Systems Management
- Maintenance & Repair
- Fire Safety
- Inmate Housing
- Environmental Conditions
- Administrative & Staff Areas
- Property Accountability
- Emergency Power
- Security Operations
- Post Orders
- Disciplinary Procedures
- Special Management
- Transportation
- Emergency Procedures
- Safety
- Intake & Orientation
- Classification
- Food Service
- Health Care Services
- Mental Health Services

- Social Services
- Inmate Rights
- Laundry Services
- Necessities
- Barber Services
- Release
- Inmate Work
- Education
- Recreation & Activities
- Mail, Telephone & Visiting
- Library Services
- Religious Programs
- Citizen Involvement & Volunteers
- Juvenile Operations
- Female Operations
- Management/Union Relationship
- Management/Staff Relationship

Step Two (Two Months)

Develop the following draft items for delivery to the Government:

1. New Operating Policies and Procedures
2. An Officer and Employee Training Curriculum
3. Recommendations with respect to Officer Deployment
4. Recommendations for Prisoner Educational, Vocational, Medical and Mental Health, Counseling and Work Programs
5. A New Prisoner Classification Program; and
6. Recommendations with respect to Procurement Practices for Goods and Services

Step Three (Two Weeks)

Submit the draft management tools and recommendations described above for review by Government. Meet with Government representatives to review draft and receive input.

Step Four (Two Weeks)

Finalize management tools and recommendations based upon Government input on draft and submit completed documents to Government. If Government requests training, Wackenhut will provide a cost to the Government for these services. If authorized, it is anticipated that training be conducted during Phase 2 of the Project.

RESOURCE REQUIREMENTS

Personnel

The successful fulfillment of the project objectives requires the assignment of uniquely qualified and experienced correctional staff. Wackenhut will assemble the project team recruited from its Corporate Office, its Regional Offices and its correctional facilities. The budget was developed based upon estimated costs for personnel, travel, subsistence, and support. Personnel and the percentage of time (annualized) anticipated that they will be assigned to the project is listed below.

<u>Position</u>	<u>No. Staff</u>	<u>Time</u>
Corporate Manager	1	15%
Project Coordinator	1	50%
Projects Specialists	10	15%

In addition, other personnel will be assigned on an "as-needed" basis to ensure that the project is completed on schedule. Executive, clerical and research support will be provided through the Corporate Office. Local support may also be contracted, including translation services.

Travel

All staff participating in this project will follow the Wackenhut Corrections Travel Policy. Wackenhut will consider the feasibility of renting a furnished home or apartment for use by staff during their stay in Curacao, if such rental is more cost-effective and desirable than hotel rentals. The same type of analysis will be conducted in regards to car leasing.

Support

A quiet and well-equipped office setting will be organized to ensure that project staff have the proper setting, equipment and support necessary to organize, research and compile their work. In reviewing the housing rental for staff as discussed above, it may be determined that the housing rental may also be appropriate to serve as the office.

WORK PLAN

The Assessment Report discussed in the Project Schedule will be subdivided by section and appropriate staff will be assigned to conduct the review of current policies and practices. The Work Plan will be organized and staff assigned based upon the following outline.

1. SECURITY/CONTROL/INMATE ACCOUNTABILITY

- a. Staffing**
 - Staffing Plan
 - Staffing Deployment
 - Staffing Roster System
 - Security Post Orders

- b. Property and Supply (Security/Security Administration)**
- c. Drug Enforcement Security Procedures (Prison Security)**
- d. Front Gate/Front Entrance Security**
- e. Short Term Release Housing & it's Front Office Security**
- f. Personnel and Training**
- g. Counts**
- h. Armory Operations**
- i. Perimeter Security**
- j. Use of Force**
- k. Inmate Workers**
- l. Administrative Segregation**
- m. Contraband and Contraband Control**
- n. Control of Keys, Locking Mechanisms, Tools and Equipment**
- o. Emergency/Contingency Plans**
 - Escape Plan
 - Riot & Disturbance Control
 - Bomb Threat Plan
 - Hostage Plan
 - Adverse Job Action Plan
 - Power Outage Plan
 - Natural Disaster Plan
 - Fire Emergency Plan
 - Hazardous Chemical/Radiological Plan
 - Hunger Strike Plan
 - Gas Leak Procedures
- p. Security Equipment Review**

2. PERSONNEL & TRAINING

- a. Unit On-the-Job Training**
- b. In-Service Training**
- c. Employee Orientation Program**

- d. Additional Training Review Items
 - Staff Training & Development Plan
 - Specific Training Program Requirements
 - Pre-Service
 - In-Service
 - Specialized
 - Correctional Emergency Response Teams (CERT) Training
- e. Hiring Practices
- f. Equal Employment Opportunity

3. HEALTH SERVICES

- a. Responsible Health Authority
- b. Administrative Meetings and Reports
- c. Policies and Procedures
- d. Comprehensive Quality Improvement Program
- e. Disaster/Emergency Plan
- f. Communication on Special Needs Patients
- g. Privacy of Care
- h. Notification in Emergency, Notification of Next of Kin
- i. Procedure in the Event of an Inmate Death
- j. Grievance Mechanism
- k. Infection Control
- l. Environmental Health and Safety
- m. Kitchen Sanitation and Food Handlers
- n. Ectoparasite Control
- o. First Aid Kits
- p. Credentialing
- q. Continued Education for Qualified Health Services Personnel
- r. Training for Correctional Officers
- s. Medication Administration Training
- t. Inmate Workers
- u. Job Description
- v. Staffing Levels, Correctional Health Coordinator
- w. Orientation Training for Health Service Staff
- x. Pharmaceuticals
- y. Clinic Space, Equipment and Space
- z. Diagnostic Services
- aa. Hospital and Specialized Ambulatory Care
- bb. Receiving Screen
- cc. Information on Health Services
- dd. Oral Screening
- ee. Health Assessment
- ff. Daily Handling of Non-Emergency Medical Request
- gg. Sick Call

- hh. Emergency Services
- ii. Written and Verbal Clinicians' Orders
- jj. Patient Transport
- kk. Mental Health Evaluation
- ll. Dental Treatment
- mm. Assessment Protocols
- nn. Continuity of Care
- oo. Health Evaluation of Inmates in Segregation
- pp. Health Education and Promotion
- qq. Diet
- rr. Exercise
- ss. Personal Hygiene
- tt. Tobacco
- uu. Special Needs Treatment Plan
- vv. Infirmary Care
- ww. Suicide Prevention
- xx. Intoxication and Withdrawal
- yy. Prenatal Care, Pregnancy Counseling
- zz. Chemically Dependent Inmate/Inmate's with Alcohol or Other Drug Problems
- aaa. Sexual Assault
- bbb. Prostheses – Orthoses, Prostheses and Other Aids of Impairment
- ccc. Health Record Format and Contents
- ddd. Confidentiality of Health Records
- eee. Transfer of Health Records
- fff. Retention of Health Records
- ggg. Medical Restraints and Therapeutic Seclusion
- hhh. Forced Psychotropic Medication
- iii. Forensic Information
- jjj. Informed Consent
- kkk. Right to Refuse Treatment
- lll. Medical Research

4. FACILITIES MAINTENANCE, REPAIR & SAFETY

- a. Maintenance Work Orders
- b. Requisitions
- c. Stock Record Cards
- d. Preventative Maintenance
- e. Major Structural Deficiencies (MSD's)
- f. Deficiency Detection
- g. Certification
- h. Boiler Plant
- i. Emergency Generator
- j. Trash Collection
- k. Occupational Safety and Health
- l. Hazard Communication (Right to Know)

m. Safety and Health

5. INMATE ADMISSION, CLASSIFICATION, PROGRAM & TRANSFERS

- a. Classification
- b. Capacity
- c. Inmate Grievance
- d. Language Assistance
- e. Bilingual Translation of Certain Documents
- f. Use of Interpreters for Unit Activities
- g. Inmate Disciplinary Process
- h. Access to Courts
- i. Inmate Grievance Procedure
- j. Inmate Discipline
- k. Requests from Security Staff to Classification Staff for Emergency Housing Moves for Reason of Safety and Security
- l. Protection/Emergency Housing Moves Log
- m. Countroom Process
- n. Incident Data Forms
- o. Disciplinary Process
- p. Intake/Release
- q. Booking and ID
- r. Transportation
- s. Education Programming
- t. Religious Programming
- u. Substance Abuse Programming
- v. Volunteer Programming
- w. Miscellaneous Programs

6. FOOD SERVICES/LAUNDRY & NECESSITIES

- a. Laundry/Necessities
- b. Food Service
- c. Sanitation (personnel)
- d. Dry Storage Areas
- e. Refrigerated Storage Areas
- f. Vegetable Preparation Area
- g. Meat Cutting Area
- h. Bakery Area
- i. Food Preparation Area
- j. Pot Wash Area
- k. Serving Line Area
- l. Dining Room Area
- m. Dishroom Area
- n. Garbage, Trash and Disposer Area
- o. Restroom Area

- p. Miscellaneous
- q. Knife Accountability
- r. Bread Accountability
- s. Milk Accountability
- t. Meat Accountability
- u. Fresh Vegetable Accountability
- v. Soap Accountability
- w. Cook's Worksheet
- x. Stock Record Cards
- y. Requisition Form
- z. Miscellaneous

7. INMATE SERVICES

- a. Visitation
- b. Inmate Mail
 - i. Outgoing Correspondence
 - ii. Incoming Correspondence
 - iii. Incoming/Outgoing Packages
 - iv. Publications
- c. Telephone Calls
- d. Indigent Postage and Writing Materials
- e. Mail Boxes
- f. Recreation and Crafts
- g. Access to Courts
- h. Barber Shops

8. QUALITY CONTROL

- a. Property Accountability
- b. Commissary/Canteen
 - i. Inmate Workers
 - ii. Security Procedures
 - iii. Commissary Sales Procedures
 - iv. Merchandise and Inventory Procedures
- c. Unit Clearing Fund Transactions

9. BUSINESS OFFICE OPERATIONS

- a. Payroll, Employee Benefits, etc.
- b. Fixed Assets
- c. Monthly Billing
- d. Petty Cash/Permanent Advance Funds
- e. Inmate Welfare Account/Commissary
- f. Miscellaneous Financial Considerations

- g. Procurement**
- h. Software Accountability**

10. ADMINISTRATION

Facility General Operations and Administration

- a. Review of Policies and Procedures**
- b. Review of Facility Organization Structure**
- c. Review of Staff Job Descriptions**
- d. Review of Salaries, Benefits, Labor Costs**
- e. Information Management Review**
- f. Use of Staff Overtime, etc.**

COMPENSATION

The Government will pay Wackenhut the total sum of US\$500,000 within thirty (30) days of the delivery of the completed Commissioning Services as identified in the Statement of Work. Payment shall be made by wire transfer to the U.S. based bank designated by Wackenhut. No deductions will be made for taxes, tariffs, bank commissions, bank fees or any other reason. The Government shall obtain whatever licenses, waivers, and permission required to make the total payment by bank transfer prior to giving Wackenhut notice to proceed with the Commissioning Services.

BILLING RATES

Wackenhut has submitted a guaranteed price for completion of the Commissioning Services. Wackenhut is solely responsible for all of its personnel costs associated with these Services as well as all travel and support costs. The compensation established by Wackenhut for this project is based upon the following time and expense estimates:

- Personnel Billing Rates:

1. Corporate Manager	\$200/hour x 312 hrs =	\$ 62,400
2. Project Coordinator	\$100/hour x 1040 hrs =	\$104,000
3. Project Specialists	\$ 75/hour x 3120 hrs =	\$234,000

- Travel and Support Services \$ 99,600.

Total \$500,000.