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Constrained to Capable

Enhancing prison operations through positive change

March 2026 | Version 1.0

Operational Development Team
Department of Justice

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Caveat

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Disclaimer

It is acknowledged that the observations, findings and recommendations in this review are limited by the information available or provided to the project team at the time of the composition of this document and the time frame available.

Terms of Reference

1. Establish the reasons for short staffing across the Risdon Prison Complex and the impact this is having on out of cell hours.

2. Establish the barriers for internal service providers and community partners in accessing prisoners.

3. Consultation and engagement with staff to establish patterns for absenteeism and workplace dissatisfaction.

4. Make recommendations based on data and staff feedback, for increasing workplace satisfaction for staff, increasing prisoner out of cell hours and stakeholder access to prisoners.

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Executive Summary

The Risdon Prison Complex (RPC) is experiencing sustained operational pressure due to frequent lockdowns, resulting in reduced out of cell hours (OOCH) for prisoners and limitations on access by internal stakeholders and community partners. These impacts extend beyond the RPC, creating flow on effects across other services and facilities within the Tasmania Prison Service (TPS).

The intention of this report is to collate evidence and findings relevant to determining the causes of short staffing and subsequent lockdowns at the RPC, identify barriers to prisoner access for community partners and internal stakeholders and to make recommendations to improve unlocks, service access and, by extension, prisoner engagement. The review focuses on unplanned lockdowns, excluding those associated with routine security operations, disciplinary matters, or special events. The scope of this report is specific to the RPC but acknowledges that other TPS facilities face their own challenges.

The review conducted to inform this report relied on qualitative and quantitative data, collected over a seven week period between 26 November 2025 and 14 January 2026. Extensive consultation was undertaken with correctional officers at the RPC through face to face discussions, anonymous surveys and written feedback, ensuring that staff had multiple ongoing opportunities for participation. Additional qualitative data was gathered from non-uniform internal stakeholders and community partners.

Quantitative data was drawn from multiple internal systems, including Astria, TimeFiler, the Prison Performance and Compliance Unit data records, the RPC Operations 24-hour briefs, and lockdown records. While these data sources provide valuable insight, it is noted that several systems rely on manual data entry and filtering, and therefore some figures should be interpreted as a close approximates.

The findings confirm that there is no single cause or immediate solution to the lockdowns in the RPC. Lockdowns are the result of a complex combination of operational issues, staff dissatisfaction and cultural problems, which contribute to higher than expected levels of personal leave and psychological workers compensation claims. Addressing these will require commitment to a range of solutions implemented over time.

Exempt - s 35 [redacted]

Regular short staffing is the primary reason for unplanned lockdowns at the RPC. Analysis of staffing data and staff feedback indicates that absenteeism is influenced by a combination of factors including fatigue, perceived lack of organisational support, limited access to leave, and low morale, due in part to a general sense that there is a lack of accountability and that performance standards are not enforced or managed. Additionally, staff shortages due to high levels of workers compensation, and other vacancies influenced by operational requirements were noted. There are several operational factors that contribute to short

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staffing, one of the most impactful being unplanned medical escorts to the Royal Hobart Hospital (RHH), as well as the restrictive nature of the current RPC staffing strategy.

Exempt - s 35 [redacted]

Exempt - s 35 [redacted]

Exempt - s 35 [redacted]

Exempt - s 35 [redacted]

This report makes recommendations aimed at improving staff wellbeing and workplace satisfaction, reducing lockdowns and improving access to prisoners. Some recommendations have natural overlaps. Key themes include:

- Exempt - s 35 [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

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- Exempt - s 35 [redacted]

The recommendations are designed to operate collectively, with no single initiative expected to resolve the lockdown issue in isolation. Implementation will require commitment from TPS leadership, coordination, and ongoing monitoring and oversight to ensure sustained improvement.

Unplanned but regular lockdowns at the RPC are the result of systemic workplace and operational challenges, rather than an isolated problem or individual behaviours. Absenteeism due to perceived inflexibility, cultural, structural and accountability issues is significant. Operational challenges such as unplanned medical escorts and restrictive operating processes further contribute to lockdowns and access issues. These lock downs negatively impact community partner engagement and reduce capacity for the TPS to adhere to prisoner rights under the *Corrections Act 1997*.

Meaningful, sustainable improvement will require a shift from reactive responses to proactive, through a range of initiatives that enhance operations through positive change.

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Data collection

Qualitative data collection was conducted through engagement with correctional officers via face to face conversations, anonymous surveys and direct email feedback. Additional feedback and engagement from non-uniform TPS staff, community partners and other stakeholders makes up the qualitative data used in this report.

Quantitative data has been sourced from internal TPS records including Astria, the roster system (TimeFiler), the Prison Performance and Compliance Unit, RPC Operations 24-hour briefs and records of lockdowns.

Data collection, including staff feedback, indicates that various factors contribute to lockdowns. For clarity, information has been grouped into sections within the report that most closely link together. There is significant overlap in many areas, and this should be considered when reading this report.

Feedback has been provided by correctional officers from the RPC over a period of seven weeks, between 26 November 2025 and 14 January 2026.

This data has been collected through hard copy and electronic surveys to ensure maximum coverage for RPC correctional officers. The project team conducted various face to face meetings with individuals and groups and collected feedback via email from individual staff. See Table 1 for a breakdown of the number of responses received from correctional officers against each feedback collection method.

According to the Prison Rostering Office, at time of writing there are 244 correctional officers assigned to the RPC, therefore approximately 44% of current RPC correctional officers provided direct input. Noting that in some cases there may be overlap due to the anonymous nature of some surveys.

Table 1

Feedback collection method	Number of responses from Correctional staff
Face to Face	**49**
Survey Responses	**52**
Email Responses	**7**

Note on data used throughout this report:

In many cases, TPS record keeping systems require manual reporting or filtering and can be subject to human error. Some data is approximate, based on manual access that relies on accurate input of information, particularly with reference to data collected from TimeFiler and the RPC Operations 24-hour brief.

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Findings

Records indicate that the RPC is regularly short of the full complement of staff required to unlock the prison and provide all available services, based on existing industrial agreements. The RPC operates in 3 states of unlock:

1. **Full unlock**

   All units unlocked for the full routine morning and afternoon unlock periods with full access to all services being available to all prisoners.

2. **Partial unlock**

   Some or all units unlocked for at least a minimum one hour out of cell or more but were not unlocked for the full routine morning and afternoon unlock periods. Access to services such as programs and education and individual rehabilitation and reintegration (R&R) sessions is usually available to prisoners when there is an unlock of their accommodation area, but services are often cancelled or restricted in accommodation areas that are not unlocked. Cancelled or restricted services do not typically include visits or court appearances that generally go ahead regardless of lockdowns.

3. **Fully locked down/full lockdown**

   Prisoners in all units do not have access to a minimum of one hour out of cell in the open air as per legislated requirements, and reportable out of cell hours are recorded as zero (0) hours. Prisoners can be out of cell for essential activities such as court appearances and visits but under current reporting guidelines this does not count as out of cell hours.

Analysis of available data shows that the review period was impacted by high amounts of personal leave, a higher than usual number of prisoners on unplanned medical escorts to the RHH, in some cases admitted for multiple days, the result being a notable decrease in partial and full unlocks across the period. A breakdown of reasons for posts not covered (PNC) can be seen in Table 2 below and available data shows that in addition to the PNC, an average of 3 correctional officers per day and another 3 per night shift were required for RHH escort cover contributing to additional short staffing. On some days there were up to 6 correctional officers redeployed to the RHH to cover unplanned medicals.

As per the TPS Rostering and Overtime Policy (2021, current at the time of this review), PNC are filled with staff listed as spares, then by staff available for overtime. Despite the use of overtime and the redeployment of spare staff the number of staff present on site still predominantly falls short of the number required for a full unlock, as outlined above.

Considering the challenges associated with working in the prison environment and expected unplanned absences due to personal leave, some shortages are to be expected and could be covered with redeployment of spares and overtime. Once high levels of personal leave use, often at short notice, high levels of workers compensation claims and preventable operational factors contribute further to those shortages, redeployments and overtime use are not able to ensure sustainable staffing levels on any given day most of the time.

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A number of these shortages have the potential to be reduced, although not eliminated entirely, by addressing some of the findings below through subsequent recommendations made within this report. As noted, information has been grouped into sections within the report that most closely link together, including findings.

Data informing unlock and lockdown information within this report is drawn from a combination of TimeFiler and the RPC Operations 24-hour brief documents.

Note in relation to unlock records: Occasionally, uncontrollable operational matters may impact access to services, delay unlocks or bring forward lockup times by small amounts. Examples of uncontrollable operational matters include incidents and emergencies, significant search operations or maintenance activities. Tracking these across the review timeframe is difficult. Record keeping practices do not support the level of detail required to identify the impact of uncontrollable operational matters, so those matters are excluded from consideration in this report.

Table 2

Data source: TimeFiler data provided by the TPS Rostering Office and manually accessed data for vacancies.

Month **2025**	**Not reporting for duty (NRFD)** Includes personal, bereavement and carers leave.	**Workers compensation (WC)** Excludes staff on long term WC that have been removed from roster.	**Other leave** Includes parental leave and defence leave.	**Leave out of sequence** Includes long service leave.	**Vacancies** Caused by secondments, staff acting up to other positions, staff removed from roster etc.
	Average per day	**Average per day**	**Average per day**	**Average per day**	**Average per day**
September	**14.4**	**8.3**	**2.2**	**2.3**	**8.4**
October	**11.6**	**8.8**	**2.5**	**2.8**	**8**
November	**13**	**8**	**1.8**	**2.7**	**9**
Average per day over three months	**13**	**8.4**	**2.2**	**2.6**	**8.4**
Total average vacancies per day: ***Before redeployments and overtime allocation**		**34.6**			

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Rosters and leave

Exempt - s 35 [redacted]

Forward planning: Based on the current Rostering and Overtime Policy published in 2021, rosters are required to be released (available for staff to view on the roster system) at least 28 days ahead of time. Staff with a substantive roster line can see their projected roster years ahead and although it can change when released, it rarely changes much if at all. At the time of writing, there are forty-seven staff at the RPC who aren't assigned a substantive roster line and therefore are on available for redeployment (AFR) lines also known as 'spare' lines, meaning they only get to see their roster twenty-eight days ahead and can't predict what it will look in the future any sooner than the twenty-eight day lead time. AFR staff do have rostered leave blocks. This arrangement means that for staff assigned to AFR lines, planning their personal life, childcare and family and other arrangements can be challenging. Exempt - s 35 [redacted] See Appendix A for examples of a projected roster for staff who hold a substantive line and a roster for staff who hold an AFR line. Based on the number of staff currently assigned to the RPC, this means almost 20% of them are currently on an AFR line.

Shift swaps: Shift swaps are available to staff within a set of rules established in the Rostering and Overtime Policy. Exempt - s 35 [redacted]

Frustrations around leave: The current Rostering and Overtime Policy includes a cap on the amount of LOOS that can be booked at any one time, which includes recreational leave outside of rostered block leave (using excess recreation leave) and long service leave (LSL). The project team could not find a written explanation of how the cap on LOOS has been determined. LOOS is broken up into available "slots" per week, with any one booking by one employee counting as taking up an entire slot regardless of how many days in the week are taken off.

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Exempt - s 35

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Exempt - s 35

Staff work environment and facilities

Exempt - s 35

Exempt - s 35

Exempt - s 30

Exempt - s 35

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Exempt - s 35

Exempt - s 35

Exempt - s 35

Exempt - s 35

Staff wellbeing and support

Exempt - s 35

Noting that the TPS is working through further recruitment in the Wellbeing Unit and made commitments to invest in the wellbeing of staff, this is an area that is already in focus which is positive. Exempt - s 35

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Exempt - s 35

Culture and accountability

Exempt - s 35

Exempt - s 35 Patterns that emerged include:

- Exempt - s 35

Exempt - s 35

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Exempt - s 35

Exempt - s 35

Recruitment and training

Exempt - s 35

Exempt - s 35

Exempt - s 35

Exempt - s 35

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Exempt - s 35 [redacted]

Exempt - s 35 [redacted]

Exempt - s 35 [redacted]

Mandatory training: There are significant gaps in mandatory training completion for correctional officers Exempt - s 35 [redacted]. At the time of writing, the following percentage of RPC staff are out of date for mandatory training:

- 46% for Control and Restraint
- 41% for Fire and BA
- 42% for CRP and First Aid

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Exempt - s 35

Career development

Exempt - s 35

Exempt - s 35

Exempt - s 35

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Unplanned medical escorts to the Royal Hobart Hospital

On weekdays, local escort correctional officers are rostered to the RPC, tasked with facilitating planned medical escorts that have been booked by the Correctional Primary Health Service (CPHS). In addition to planned medical escorts, unplanned medical escorts are regularly required to occur, usually via ambulance to the RHH. These unplanned escorts can occur due to assaults, medical episodes, or other issues that the onsite or on-call CPHS doctor determine require immediate treatment that cannot be provided within the RPC health clinic or Inpatients unit. Some of these unplanned medical escorts result in the prisoner being admitted to the RHH for treatment over one or more days, which requires the TPS to assign correctional officers for the purpose of supervising the prisoner whilst at the RHH 24 hours a day. The TPS has an increasing number of aged and infirm prisoners with multiple health issues, which can result in extended admission times to the RHH. This has a direct impact on staffing levels at the RPC and other TPS facilities, with all unplanned medical escorts requiring redeployment of staff from rostered posts or the use of overtime.

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Exempt - s 35

Exempt - s 30

Exempt - s 30

Barriers to out of cell hours and other prisoner rights

All prisoners and detainees have a range of rights under *section 29* of the *Corrections Act 1997*, which are referenced below. Exempt - s 35

The RPC short staffing strategy document is used to determine when the RPC is locked down and what services are prioritised once certain levels of short staffing are reached. See Appendix C of this report for a copy of the current strategy. The strategy document is still in draft form but has been in place for an extended period and therefore is considered custom and practice in the RPC. The document was developed by union delegates and consulted on with RPC staff at the time.

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Exempt - s 30

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Exempt - s 30

Exempt - s 30

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Exempt - s 30 [redacted]

Exempt - s 35 [redacted]

Community partner and visitor access

Exempt - s 35 [redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

Exempt - s 35 [redacted]

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Exempt - s 35 [redacted].

Exempt - s 35 [redacted]

The RPC visits centre is only open on Monday, Thursday, Friday and weekends meaning that professional visits slots are only available three days per week. This low availability is further reduced by the parole board using the area every second Friday and blocking out the full day, effectively meaning there are only five days per fortnight where professional visitors can book to see prisoners face to face.

To understand this impact further, the project team reviewed data concerning visits cancellations. There was a period of cancelled visits, including personal visits, in the September to November 2025 period caused by staff shortages. Seven of the ten occasions were on weekends, resulting in an impact to personal visits only. The other three were on weekdays, impacting personal and professional visits. Noting that weekend visits are particularly important for maintaining family and social connection and that cancellation of personal visits fails to ensure that prisoners have access to legislated rights. Cancellations during the week are significantly impactful and, particularly when professional visits are cancelled, can have flow on effects to the prisoner's capacity to participate in the court process. Exempt - s 35 [redacted] A record of cancelled visits at the RPC during September to November 2025 is below in Table 4.

Table 4

Date	Reason	Visits Affected
Saturday 13th September 2025	Short staffing	Personal
Monday 6th October 2025	Short staffing	Personal and Professional
Friday 24th October 2025	Short staffing	Personal and Professional
Saturday 25th October 2025	Short staffing	Personal
Saturday 8th November 2025	Short staffing	Personal
Monday 10th November 2025	Short staffing	Personal and Professional
Saturday 15th November 2025	Short staffing	Personal
Sunday 16th November 2025	Short staffing	Personal
Saturday 27th November 2025	Short staffing	Personal
Sunday 28th November 2025	Short staffing	Personal

Data provided by the Visitor Reception Centre.

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Recommendations

Recommendations are intended to address issues identified within findings of the report and have been broken down by section, consistent with the findings. Some recommendations overlap across categories. Each recommendation has a subsequent *intention of recommendation* to provide additional information and clarity on the intended outcome and to allow decision makers to determine suitable success measures.

Note: Some recommendations are already being actioned by individuals or groups outside of the project team. Some recommendations are for minor changes that, if accepted, can occur with minimal planning and development in consultation with relevant staff and stakeholders, whereas others are likely to require longer term investment, commitment and, in some cases, additional resources. All recommendations are intended to improve capability, performance and culture.

Rosters and leave
Recommendation 1: Exempt - s 35 [redacted]
Recommendation 2: Exempt - s 35 [redacted]

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Exempt - s 35

Recommendation 3: Exempt - s 35

Recommendation 4: Exempt - s 35

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Exempt - s 35 [redacted]

Recommendation 5: Exempt - s 35 [redacted]

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- Exempt - s 35 [redacted]

Recommendation 6: Exempt - s 35 [redacted]

Work area review and upgrade of staff facilities

Recommendation 7: Exempt - s 35 [redacted]

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Exempt - s 35

Recommendation 8: Exempt - s 35

Recommendation 9: Exempt - s 35

Recommendation 10: Exempt - s 35

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Exempt - s 35

Recommendation 11: Exempt - s 35

Wellbeing and support

Recommendation 12: Exempt - s 35

Recommendation 13: Exempt - s 35

Recommendation 14: Exempt - s 35

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Exempt - s 35 [redacted]

Recommendation 15: Exempt - s 35 [redacted]

Recommendation 16: Exempt - s 35 [redacted]

Culture and accountability

Recommendation 17: Exempt - s 35 [redacted]

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Exempt - s 35

Recommendation 18: Exempt - s 35

Recommendation 19: Exempt - s 35

Recommendation 20: Exempt - s 35

Exempt - s 35

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Exempt - s 35

Recommendation 21: Exempt - s 35

Training and recruitment

Recommendation 22: Exempt - s 35

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Exempt - s 35 [redacted].

Recommendation 23: Exempt - s 35 [redacted]

Recommendation 24: Exempt - s 35 [redacted]

Recommendation 25: Exempt - s 35 [redacted]

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Recommendation 26: Exempt - s 35

Recommendation 27: Exempt - s 35

Career Development

Recommendation 28: Exempt - s 35

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Exempt - s 35

Recommendation 29: Exempt - s 35

Recommendation 30: Exempt - s 35

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Management of unplanned medical escorts to the Royal Hobart Hospital

Recommendation 31: Exempt - s 35

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Exempt - s 35

Recommendation 32: Exempt - s 35

Recommendation 33: Exempt - s 35

Recommendation 34: Exempt - s 35

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- Exempt - s 35 [redacted]

[redacted]

Barriers to out of cell hours and reduction in redeployments

Recommendation 35: Exempt - s 35 [redacted]

[redacted]

Recommendation 36: Exempt - s 35 [redacted]

[redacted]

Community partner and visit access

Recommendation 37: Exempt - s 35 [redacted]

[redacted]

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Exempt - s 35

Recommendation 38: Exempt - s 35

Recommendation 39: Exempt - s 35

Recommendation 40: Exempt - s 35

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Exempt - s 35

Recommendation 41: Exempt - s 35

Recommendation 42: Exempt - s 35

Recommendation 43: Exempt - s 35

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Exempt - s 35

[redacted]

Conclusion

Short staffing and lock down issues at the RPC are complex and often interlinked with no single overarching solution. Improvements to culture, staff wellbeing and satisfaction in the workplace are fundamental areas that, once addressed, will improve the environment and begin to reduce the frequency and occurrences of factors associated with short staffing. Lockdowns due to high absenteeism rates through workers compensation and unnecessary personal leave are a significant concern and require a continued and well-resourced focus.

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Structural changes to unlock strategies and management of escorts, including those related to the RHH may address other compounding issues contributing to lockdowns, both short and long term, improving flexibility through better utilisation of resources.

If recommendations aimed at improving staff wellbeing and satisfaction in the workplace can be implemented with an aim to improve culture, it is likely the number of workers compensation absences and unnecessary use of personal leave will reduce. The effect of this would be less instances of short staffing and more regular unlocks. The TPS would meet its legislated obligations relating to prisoner rights, would more effectively be able to ensure the safety of staff and by extension improve the service provided to the wider Tasmanian community.

Appendix A: Examples of roster projections

Example 1. Roster projection for a correctional officer with a substantive line

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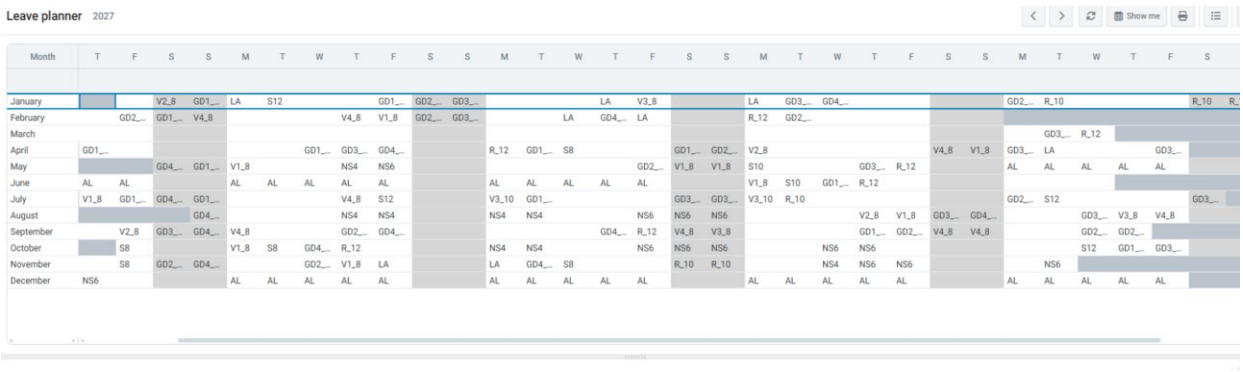
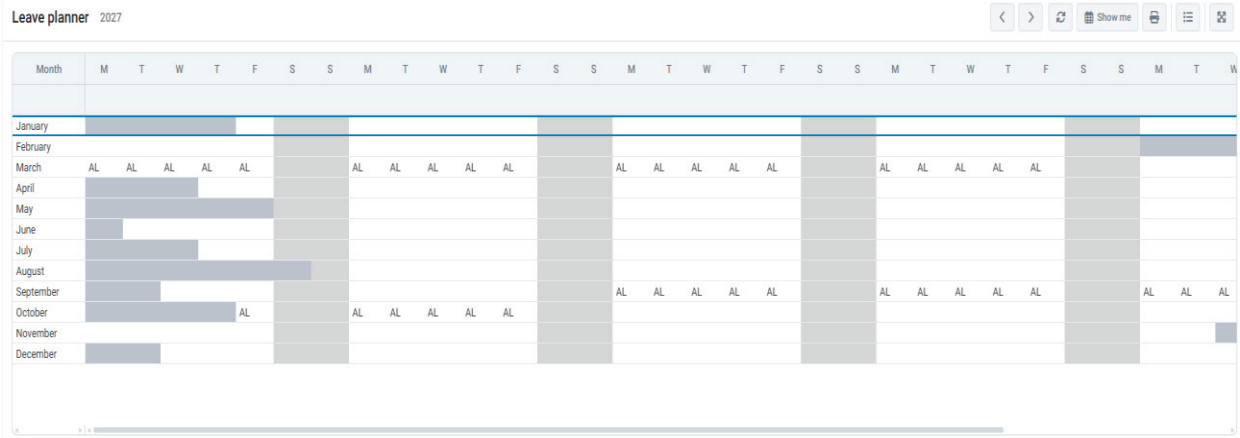


Example 2. Roster projection for a correctional officer on an AFR line



As can be seen in example 1, there is a full year of projected shifts for that staff member as well as their annual leave (AL) blocks. Example 2 is of the roster projection for a staff member currently on an AFR, only the AL is projected.

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Appendix B: Workplace feedback survey

Workplace Feedback Survey

1. **What are the most common reasons you have taken personal leave days in the last few months?** (Number 1 – 9 with one being the most common and nine being the least common) ☐ Physical illness

☐ Mental health/stress

☐ Workload related

☐ Family or childcare responsibilities/carer's leave

☐ Regular redeployments

☐ Rejected LOOS

☐ Rejected shift swap

☐ Interpersonal (i.e. not wanting to work with particular other employee)

☐ Insufficient break from rostered night shift to next rostered day shift

☐Other _____

☐ I haven't needed to take personal leave in the last few months.

Comments about above answers:

_____
_____
_____

2. **What changes would most improve your wellbeing at work?** (Number 1 – 11 with one being the highest priority and eleven being the lowest priority)

☐ More regular unlocks
☐ More predictable scheduling

☐ Less redeployments
☐ More mental health/wellbeing support

☐ Make it easier for staff on workers compensation to get back to work
☐ A more objective, supportive process for shift swaps
☐ A genuine PDP process that prioritises professional development and training opportunities
☐ Access to food/coffee for purchase on site or available to order to site
☐ Increased team building opportunities

☐ Improved culture (add any thoughts or ideas in the comments)
☐ More flexibility in shift lengths including for over time (for example, recalls for 4hrs, 6hrs, 8hrs etc.)

☐Other _____

Comments about above answers:

_____
_____
_____

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3. Thinking about quality of life or improvements to how your area operates, if you could change one (or more) thing/s about your work environment, what would those changes be?

_____
_____
_____

4. How satisfied are you with your current roster pattern? (circle the most appropriate to you)

1. Very satisfied – wouldn't change a thing
2. Fairly satisfied – some small changes might help
3. Neutral
4. Unsatisfied – there are a lot of things I'd like changed
5. Very unsatisfied – my roster doesn't work for me at all, most of the time

What changes would you like to see to your roster? Examples: more or less night shifts, shift pattern changes, different length shifts i.e. 8hrs/12hrs, or start times etc.

_____
_____
_____

5. Is there anything else you'd like the project team to consider? This might include raising difficult issues in particular areas that haven't been able to be resolved, broader strategies around the topics above or how we should best communicate with staff about the work we're doing and how people can get involved.

_____
_____
_____

If you have any other feedback, would like to contribute suggestions or arrange to chat in person, please email me at Exempt - s 36 [redacted] .

If you need additional support at any time, please reach out to the Wellbeing Team, MATES, the EAP service, or myself directly. Phone: **6165 6718** | Email: wellbeing.support@justice.tas.gov.au

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Appendix C: RPC short staffing strategy

** DRAFT** Stages of RPC Lockdown 2025 ** DRAFT** V4.5

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Posts counted, By Area											
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	Exempt - s 30 [redacted]	[redacted]
[redacted]	[redacted]		[redacted]	[redacted]		[redacted]		[redacted]	[redacted]		
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]											
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]		[redacted]	[redacted]		[redacted]		[redacted]	[redacted]		
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

1. Exempt - s 30 [redacted]

[redacted]

[redacted]

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LOCK DOWN WORK ALLOCATION SHEET

Exempt - s 30 [redacted]

[redacted]	[redacted]	[redacted]
Exempt - s 30 [redacted]	Exempt - s 30 [redacted]	Exempt - s 30 [redacted]
[redacted]	[redacted]	[redacted]
[redacted]		
[redacted]		
[redacted]		
[redacted]		
[redacted]	[redacted]	[redacted]
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RPC OVERALL ESTABLISHMENT AND AGREED 'COUNTED' POSTS					
Position	Times	Position	Times	Position	Times
Exempt - s 30		[redacted]		[redacted]	
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