

**Progress Report**  
**An Investment for Change: Promoting Human Rights in Prison Corporations,**  
**A Project of the Jesuit Social Research Institute**

**Organization Name:** Jesuit Social Research Institute (JSRI), Loyola University New Orleans

**Project Name:** An Investment for Change: Promoting Human Rights in Prison Corporations

**Project Number:** #3043

**Project Start and End Dates:** July 1, 2015, to June 30, 2018

**Report Submission Date:** January 29, 2016

**Total Grant Amount:** \$206,348

**Installment Amount:** \$68,323

**Funds Received to Date:** \$68,323

**Expenditures to Date:** \$18,138.83

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## **Narrative Content for JSRI Progress Report: July 1, 2015 to December 31, 2015**

### **1. Goals and Objectives**

The goal of this multi-year shareholder engagement project is to promote and protect human rights at prisons and detention centers operated by Corrections Corporation of America (CCA) and The Geo Group, Inc. (GEO), by having both companies fully implement Human Rights policies consistent with the U.N. Declaration on Human Rights.

Objective 1: Companies develop and implement effective training on human rights for their front-line personnel, executive leadership, and the inmates and detainees within their custody;

Objective 2: Companies commit to tracking, demonstrating, and reporting in detail on the implementation of their human rights policies and the impacts such policies are making in reports to shareholders.

### **2. Project Implementation**

This is a joint project between JSRI and the Jesuits USA of the Central and Southern Province, who have purchased stock in both CCA and GEO. We are working in collaboration with 21 other religious institutions who are members of the Interfaith Center for Corporate Responsibility.

#### **PROJECT IMPLEMENTATION WITH THE GEO GROUP**

1. In June 2015 our shareholder's group had agreed to hold an engagement/dialog with the GEO Group on August 31, 2015, at their immigration detention center in northwest Washington State. The dialog would begin with a tour of the facility. However, in late July, when company officials learned that our shareholders group was interested in speaking with detainees during the tour, company officials indicated they found such action "offensive" and that it demonstrated that our group still did not "get their business model." On July 24 GEO officials cancelled the planned August 31 dialog, and indicated they would only speak to consultant Keith Vernon and Fr. Bill Kelley, SJ, Secretary of Social and International Ministries of the Jesuit Conference, in future engagements.
2. Our shareholders group held a conference call on August 3, 2015, to discuss the dialog cancellation and next steps. On August 6 our GEO shareholder's group sent a letter to GEO's Vice President and Corporate Counsel, seeking to re-establish dialog with GEO, and listed topics that still needed to be fully discussed at the next dialog, including an adequate roll-out of a fully developed Human Rights Policy, complete with a satisfactory training mechanism for all GEO staff and verifiable implementation of the policy.
3. The GEO counsel reached out to our group in mid-September, but indicated an unwillingness on their part to engage our group of matters of great concern for us, i.e. in person (vs. video) trainings on human rights and a process to develop meaningful, measurable, and verifiable outcomes.
4. Repeated lack of response from GEO led our shareholders group to file another resolution with the Security and Exchange Commission (SEC) for consideration and action by shareholders at the GEO's 2016 Annual Meeting. The shareholder resolution our group filed in 2011 received 29% of shareholder votes at the 2012 GEO Annual

Meeting and brought GEO back to the dialog table. This time we plan to also file a notice of exempt solicitation to garner even more support from other shareholders.

#### PROJECT IMPLEMENTATION WITH CORRECTIONS CORPORATION OF AMERICA

1. The Jesuit Province that includes New Orleans is the lead filer in the CCA faith-based shareholders engagement. In late July after a series of emails with the Chief Ethics Officer at CCA—our lead contact in this engagement—JSRI was able to confirm the next date for a shareholder engagement: October 2, 2015.
2. On August 5 JSRI sent to the CCA shareholder group the minutes JSRI prepared from the June 4, 2015, CCA dialog and Tour at CCA's South Texas Family Residential Center (in Dilley, Texas), where over two thousand women and children from Central American are detained after crossing the U.S./Mexican border seeking asylum. The group was informed that next dialog with CCA will take place in New York City during the annual meeting of the Interfaith Center for Corporate Responsibility on Friday, October 2.
3. On August 7 project consultant spoke with the Chief Ethics Officer at CCA, our lead contact with CCA on this engagement. He had reviewed the material the consultant sent on training CCA's leadership on human rights vs. constitutional rights in CCA prisons. CCA's Chief Ethics Officer informed our consultant that the company was committed to such a training for its senior leadership, it was only a matter of "when" and not "if."
4. On September 4, 2015, JSRI received another list of complaints that advocates working at the South Texas Family Residential Center compiled about conditions at the detention center, including lack of access to legal counsel, late releases of families to a dangerous area of the San Antonio bus station, and sleep deprivation caused by a CCA Residential Supervisor forcing families to sleep with the lights on.
5. On September 8<sup>th</sup> our shareholders group sent another letter to CCA's Chief Ethics Officer outlining our concerns about the treatment of families at the Dilley family detention center.
6. On October 2, 2015, eleven members of our shareholders group met with three CCA officials in New York City, including their Chief Ethics Officer, to discuss progress on the implementation of CCA's Human Rights policy. This was the second CCA shareholder's engagement for 2015. At the meeting we learned that the company had made progress in several areas of human rights policy implementation and assessment, including the following:
  - The Chief Ethics Officer's office is "staffing up" with a Senior Director of Ethics Compliance and a coordinator of a newly established ethics hotline.
  - Ethics liaisons (staff) are being recruited for each facility. These are not full-time positions – about 10% of their work will be related to ethics. Liaisons will have a monthly project related to ethics and human rights that they will be responsible for.
  - The board has established a Risk Assessment Committee for Ethics Compliance and Human Rights.
  - An implementation plan with benchmarks has been developed and will be shared with investors.
  - An ethics culture survey and focus groups were conducted by an outside organization; it found that there was not great employee awareness of CCA's Human Rights Policy, but there is basic understanding of respecting inmate rights and the need to "protect" them.

- The CCA Training and Communications Director will be doing a gap analysis of current staff training to insure that it covers the key components that investors identified as critical. The results of this analysis will be reported at the next dialog.
  - Chief Ethics Officer is working with our consultant to present an Executive Level Training on Human Rights to wardens and administrators at CCA.
  - Our consultant has also been invited to meet with key staff leaders at a CCA facility in Arizona to discuss most effective means of introducing human rights training to line staff.
7. On November 3, 2015, minutes of the October 2 engagement were prepared and sent to our shareholders group.
  8. On November 19, 2015 a follow-up letter on our Oct. 2 dialog was sent to CCA's Chief Ethics Officer, thanking him for the meeting and outlining issues that need to be discussed at the next engagement, including providing shareholders with a copy of the CCA's Ethics and Compliance/Human Rights implementation plan and how the company will assess and address gaps in training on human rights.

## PROJECT IMPLEMENTATION INVOLVING BOTH COMPANIES

1. JSRI continues to compile, on a weekly basis, media reports on human rights abuses in CCA and GEO facilities. These are entered into a data base and updates are shared with shareholders before each engagement.

### 3. Challenges

The major challenge this project now faces is to get GEO officials to negotiate in good faith. Should our latest shareholder's resolution gain more than 50% of shareholder votes at the GEO annual meeting in May, 2016, the company will be legally obligated to implement the reforms we are demanding.

### 4. Logic Model (Attached).

### 5. Population Served: N/A.

### 6. Next Steps:

We must work on gaining wide support from GEO shareholders for the resolution we have filed with the SEC insisting that GEO fully implement and assess training on human rights at all their facilities. JSRI will continue to work with prison reform experts to develop an introductory training for front-line staff on how a human rights orientation to corrections work will lead to safer, more humane prisons. We must get CCA to commit to a date to hold a training on human rights vs. constitutional rights for its executive leaders.

**7. Project Director's Opinion and Reaction:** We are making excellent progress with CCA. In contrast, GEO officials have been extremely difficult to work with. The resolution we have filed may be our last chance to get the company to truly commit to observing and protecting human rights in their facilities.

### 8. Attachments. See Logic Model.

**Objective 1:** Companies develop and implement effective training on human rights for their front-line personnel, executive leadership, and the inmates and detainees within their custody.

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
<p>JSRI Staff</p> <p>Prison Reform Consultants</p> <p>Literature from international human rights bodies on training for human rights</p> <p>Funding for travel to dialogs and company annual meetings</p>	<p>JSRI Staff coordinates and plans for shareholder planning sessions, consultations with project's prison reform experts, dialogs with company officials, and possible re-filing of resolutions with SEC.</p> <p>Consultants develop training recommendations, and products (e.g. training curricula) and participate in planning meetings and dialogs with companies.</p> <p>Staff and consultants study and draw from literature on human rights approach to prison management for products and meetings.</p>	<p>JSRI staff, consultants, coalition shareholders are well prepared to participate in at least two face-to-face dialogs with the companies a year.</p> <p>One day training curriculum for executive level management on the intersection of constitutional and international human rights law curriculum developed by consultants.</p> <p>Recommendations for meaningful, interactive training, including learning outcomes, for staff and inmates provided to company leadership.</p>	<p>More deliberate requests of CCA and GEO management at shareholder dialogs.</p> <p>Executive level management at both companies participates in training on intersection of constitutional law and international human rights law in the prison context.</p> <p>Front-line staff and inmates/detainees participate in meaningful, interactive orientation and training on human rights in the prison context.</p>	<p>Increased pressure from shareholders will cause CCA and GEO to be more responsive regarding requests for action and meetings.</p> <p>"Buy-in" from Executive Leadership for a Human Rights approach to prison management will increase, resulting in a more ethical corporate culture.</p> <p>Improved health-care for inmates and detainees, improved safety within their facilities, and more rehabilitated citizens upon their release.</p>	<p>Companies will report to shareholders on executive level management training on human rights, including when it was held, who participated, cost of training, data from executive training evaluations, and plans for such training for new executives and for follow-up training to executive leadership.</p> <p>Companies will report to shareholders data on front-line staff and inmate trainings on Human Rights, including staff in-service and pre-service trainings, costs, number of participants, and data on learning outcomes as measured by pre and post-tests.</p>

**Progress Covered in This Report**

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
	<p>JSRI Staff coordinated and planned 2 shareholder planning sessions, consulted many times with project's prison reform experts, held 1 dialog with company officials (1 was cancelled), and assisted in re-filing of resolution with SEC.</p> <p>Consultants developed training recommendations, one consultant developed a training curriculum for executives, and consultants participated in planning meetings and dialogs with companies.</p>	<p>JSRI staff, consultants, coalition shareholders were well prepared to participate in the face-to-face dialog with CCA held in the project period. However, GEO canceled the dialog that was schedule for August 2015.</p> <p>One day training curriculum for executive level management on the intersection of constitutional and international human rights law curriculum was developed by consultant but not yet provided.</p> <p>Recommendations for meaningful, interactive training, including learning outcomes, for staff and inmates is currently being developed by project consultants.</p>	<p>More deliberate requests of CCA management made at shareholder dialogs.</p> <p>CCA committed to holding an executive level management training on the intersection of constitutional law and international human rights law in the prison context, but this training has not yet occurred.</p>	<p>CCA appointed a Chief Ethics Officer who has been given resources to staff up his office. The CCA board established a Risk Assessment Committee for Ethics and Compliance and Human Rights.</p> <p>Ethics liaisons are being recruited and trained at each CCA facility on communicating/explaining ethics policies to other staff members.</p>	

**Objective 2:** Companies commit to tracking, demonstrating, and reporting in detail on the implementation of their human rights policies and the impacts such policies are making in reports to shareholders.

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
<p>JSRI Staff</p> <p>Funding for travel to dialogs and annual meetings</p> <p>Legal and prison reform consultants</p> <p>Spreadsheets or reports on human rights abuses</p> <p>Literature on human rights reporting methodologies for prisons and detention centers.</p>	<p>JSRI staff will keep an up-to-date spreadsheet on reports of violations of human rights at CCA and GEO prisons and detention centers.</p> <p>JSRI staff will convene at least two face-to-face dialogs each year of the project with key staff from CCA and GEO.</p> <p>Consultants will develop recommendations to measure “consumer satisfaction” on human rights observance in the company’s respective prisons.</p> <p>Consultants will develop recommendations on how to identify human rights violations in their operations and track key human rights issues in prisons, e.g. quality of healthcare, use of force, assaults, segregation, out-of-cell opportunities, and conditions of confinement.</p>	<p>Violations will be reviewed during dialogs to point out the need for improved conditions and protections, and to determine progress made by the companies.</p> <p>The companies will be provided with recommendations for the process and questions to be proposed to randomly selected inmate focus groups to ascertain “consumer satisfaction” in the area of human rights in their respective prisons, as well as other ways to measure human rights policy impacts.</p> <p>A report or training curriculum will be presented to companies on how to use COMPSTAT methodology to track key human rights issues in prisons, especially quality of health and mental health care, use of force, assaults, segregation, out-of-cell opportunities, and conditions of confinement.</p>	<p>Companies will report significant progress toward measuring impacts of their human rights policies. If this does not occur, shareholders will re-file resolutions to be considered during annual meetings.</p>	<p>Meaningful reports on the impact of companies’ respective human rights policies will be produced on a regular basis and shared with shareholders</p> <p>Improved health and mental healthcare for inmates and detainees, improved safety within their facilities, and more rehabilitated citizens upon their release.</p>	<p>Measuring improvement in human rights conditions through use of COMPSTAT process (which focuses on tracking complaints).</p> <p>Verbal and written reports on implementation of the human rights policy are given to shareholders annually.</p>

**Progress Covered in this Report**

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
	<p>JSRI staff continues to keep an up-to-date spreadsheet on reports of violations of human rights at CCA and GEO prisons and detention centers.</p> <p>JSRI staff convened one face-to-face dialog with CCA in project period. Shareholders unable to meet with GEO in project period--company canceled dialog planned for Aug. 31.</p> <p>Consultant developed recommendations to measure “consumer satisfaction” on human rights observance in the CCA prisons in the form of focus groups.</p>	<p>Violations were discussed during dialogs and identified in letters to companies.</p> <p>CCA was provided with recommendations for the process and questions to be proposed to randomly selected inmate focus groups to ascertain “consumer satisfaction” in the area of human rights in their respective prisons, as well as other ways to measure human rights policy impacts.</p>	<p>Because GEO officials refused to negotiate in good faith, shareholders filed another resolution with the SEC to bring them back to the table and to commit to implementing human rights trainings and tracking outcomes.</p>		

## Budget Report

A.	B.	C.	D.	E.
	Total Langeloth Funding	Funding Received to Date	Expenditures To Date	Unexpended Funds To Date)
<b>I. Personnel</b>				
Dr. Sue Weishar	63,158	20,740	10,473	10,267
Jennifer Price	11,146	3,660	1,904	1,756
<b>I. Subtotal</b>	74304	24400	12377	12023
<b>II. Other Direct Costs</b>				
Office Operations				
Supplies	0	0	0	0
Duplicating	0	0	0	0
Telephone	0	0	0	0
Postage	0	0	0	0
Equipment Rental	0	0	0	0
Communications/Marketing	0	0	0	0
Software	0	0	0	0
Meeting Costs	0	0	0	0
Travel	44425	14808	1263.98	13544
Custom: DTW Dues	750	250	0	250
<b>II. Subtotal</b>	45175	15058	1263.98	13794.02
<b>Sutotal Sections I &amp; II</b>	119479	39458	13641	25817
<b>III. Indirect Costs</b>	29870	9865	3410.27	6454.73
<b>IV. Equipment</b>	0	0	0	0
<b>V.</b>				
<b>Consultant/Contractual Agreements</b>	57000	19000	1087.5	17912.5
<b>Total</b>	206349	68323	18138.8	50184.2

Principal Investigator:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Financial Officer:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_