

Victorian Government  
*Inquiries Act 2014 (Vic)*  
 BOARD OF INQUIRY  
 INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

**WITNESS STATEMENT OF SHAUN D'CRUZ**  
**On behalf of Crown Melbourne Limited**

I, Shaun D'Cruz, of 8 Whiteman Street, Southbank, Victoria, state as follows:

*Question 1:*

*What is your title and role in relation to Crown Promenade and Crown Metropol?*

*Question 2:*

*What is your relevant employment background and work history?*

1. I am the Executive General Manager of Crown Melbourne Hotels, and I am authorised to make this statement on behalf of Crown Metropol Melbourne and Crown Promenade Melbourne (the **Hotels**) in response to the Notice to Produce issued by the Board of Inquiry into the COVID-19 hotel quarantine program dated 13 August 2020 (**Notice to Produce**).
2. In this statement, I refer collectively to the companies owned by Crown Resorts Limited (the ultimate holding company), including Crown Melbourne Limited, as "Crown", unless expressly noted to the contrary.
3. For the purposes of the preparation of this statement, where matters were not within my own knowledge, I have made enquiries of relevant employees of Crown and reviewed documents of Crown so as to understand matters relevant to the Notice to Produce. Schedule 1 contains a table listing the employees of Crown of whom I have made enquiries, and the questions from the Notice to Produce about which they each informed me.
4. I have been employed by Crown since July 2003 and have held leadership positions within the Crown Hotels divisions since 2005. In 2012 I was appointed as General Manager of Crown Metropol in Perth. In 2015 I returned to Melbourne to the position of General Manager of Crown Towers.
5. I was appointed to the position of Executive General Manager of Crown Melbourne Hotels in January 2017. In my role as Executive General Manager of Crown Melbourne Hotels, I am responsible for the management and oversight of the Hotels in Melbourne (as well as Crown Towers). As a result, I am involved on a daily basis with a wide range of Crown's activities in Melbourne and am very familiar with its operations.

*Question 3:*

*To whom do you report?*

6. I report to Mr Peter Crinis, Chief Operating Officer for Crown Hotels and Crown Food and Beverage.

## INVOLVEMENT OF CROWN PROMENADE AND CROWN METROPOL IN THE HOTEL QUARANTINE PROGRAM

### Question 4:

*To what extent, prior to the hotel quarantine program, had your hotels (or any entity in their corporate group) provided services to the Victorian government?*

7. From time to time, Crown has been contracted to provide conference and event facilities to Victorian Government departments and statutory authorities. Crown also has a room rate that is available to Commonwealth, State and Territory Governments and their representatives.
8. Most recently, Crown provided a number of hotel rooms free of charge to the Victorian Government via the City of Melbourne to accommodate persons displaced as a result of the bushfires that occurred during the 2019/2020 summer period.

### Question 5:

*When and how did your hotels or their corporate group first become aware that there was to be a role for hotels in accommodating returned travellers in quarantine?*

9. Crown corporate group first became aware there was to be a role for hotels in accommodating returned travellers through a public statement made by the Prime Minister on 27 March 2020.

### Question 6:

*When did each of your hotels enter into an agreement with the Victorian Government to provide services as part of the hotel quarantine program?*

10. Crown Melbourne Limited (trading as Crown Promenade and Crown Metropol) regards itself as having committed to providing services to the Victorian Government as part of the hotel quarantine program on or about 27 March 2020 arising from communications with the Department of Jobs, Precincts and Regions (**DJPR**).

### Question 7:

*When was the agreement formalised in writing?*

11. Crown and the Victorian Government (represented by DJPR) executed a written agreement on 2 April 2020 (the **Agreement**).<sup>1</sup>

<sup>1</sup> CML.0001.0009.0154

**Question 8:**

*Prior to any agreement being reached with the Victorian government, was there any discussion or negotiation regarding –*

- a) infection control,*
- b) personal protective equipment and*
- c) specialised training for hotel staff who would be involved in the hotel quarantine program?*

12. As far as I am aware based on my own knowledge and enquiries I have made within Crown in preparing this statement, prior to 27 March 2020, Crown did not have discussion or negotiation with the Victorian Government regarding infection control, personal protective equipment (**PPE**) or specialised training for hotel staff who would be involved in the hotel quarantine program.

**Question 9:**

*Was the agreement changed or varied over time? If so, give details.*

13. On 22 April 2020, the Agreement was varied as follows:<sup>2</sup>
- (a) the end date of the Agreement was extended by one month to 28 May 2020;
  - (b) the total fees payable were changed to align with the new end date;
  - (c) changes were made to clarify that:
    - (i) Crown was to provide fresh linen, towels and toiletries to guests on request;
    - (ii) representatives or contractors of DJPR were to be allowed access to the premises for reasons including, but not limited to, the provision of support and medical care for the guests;
    - (iii) meals provided to each guest must comply with any necessary dietary requirements; and
  - (d) various amendments were made regarding contributions to and reimbursement of guests' personal laundry costs.
14. On 25 May 2020, the Agreement was further varied as follows:<sup>3</sup>
- (a) the end date of the Agreement was extended by one month to 28 June 2020;
  - (b) the total fees payable were changed to align with the new end date; and
  - (c) a new clause was inserted in relation to requirements around Occupational Health and Safety.
15. On 26 June 2020, the Agreement was varied as follows:<sup>4</sup>

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<sup>2</sup> CML.0001.0001.0205

<sup>3</sup> CML.0001.0009.0162

<sup>4</sup> CML.0001.0009.0161

- (a) the end date of the Agreement was extended by one month to 28 July 2020; and
  - (b) the total fees payable were changed to align with the new end date.
16. On 3 July 2020, changes were made to the Agreement to reflect the transfer of responsibility for the Agreement from DJPR to the Department of Health and Human Services (**DHHS**).<sup>5</sup>
17. On 23 July 2020, the Agreement was varied as follows:<sup>6</sup>
- (a) the end date of the Agreement was extended by one month to 28 August 2020; and
  - (b) the total fees payable were changed to align with the new end date.

*Question 10:*

*Is the involvement of your hotel in the hotel quarantine program ongoing? If not, state the date of last involvement and the reason why your hotel is no longer involved.*

18. On 12 August 2020, Crown was asked to submit an offer in response to a Request for Tender to supply accommodation services in the hotel quarantine program. Crown decided not to submit an offer as it considered it was unable to provide a compliant tender. Crown has not had any hotel quarantine program guests in the Hotels since 15 July 2020.

#### **TOTAL QUARANTINE GUESTS AT YOUR HOTEL**

*Question 11:*

*When did the first guests arrive as part of the hotel quarantine program?*

19. As part of the hotel quarantine program, the first guests arrived at the Hotels on around 29 March 2020.

*Question 12:*

*How many guests stayed at your hotel as part of the hotel quarantine program?*

20. Approximately 5600 guests stayed at the Hotels as part of the hotel quarantine program.

#### **THE PHYSICAL ENVIRONMENT OF THE HOTEL**

*Question 13:*

*Please briefly describe the physical layout of each of your hotels and provide floor plans*

21. Crown provided hotel quarantine from two premises. Floor plans of the Hotels are contained in the response to question 14 below. The physical layout of the Hotels is broadly as described below.
22. Crown Promenade consists of 22 floors:
- (a) The ground floor contains the lobby, along with some back office space, a restaurant, bar, a kitchen and a loading area.

<sup>5</sup> CML.0001.0001.0199

<sup>6</sup> CML.0001.0008.0003

- (b) Level 1 contains a conference centre and meeting rooms.
- (c) Level 2 contains a business centre, with two meeting rooms and a break out area.
- (d) Level 3 contains a pool, a gym and fitness centre and an outdoor deck area. The pool, gym and fitness centre were not used for the purpose of the hotel quarantine program.
- (e) There is no level 4 at Crown Promenade.
- (f) Levels 5 to 23 contain 465 guestrooms rooms.

23. Crown Metropol consists of 28 floors:

- (a) Level 1 (the ground floor) contains the lobby and reception areas.
- (b) Level 2 contains a back of house area and is inaccessible to hotel guests.
- (c) Level 3 contains a business centre, with various meeting rooms and offices and a function space.
- (d) Levels 4 to 7 are inaccessible by the public and hotel guests, and were not used as part of the hotel quarantine program.
- (e) Levels 8 to 26 contain 658 guestrooms rooms.
- (f) Level 27 contains a pool, a gym and fitness centre. The pool, gym and fitness centre were not used for the purpose of the hotel quarantine program.
- (g) Level 28 contains a lounge, and outdoor deck area and back of house areas.

*Question 14:*

*Which areas of your hotels were used as part of the hotel quarantine program? Please indicate these areas on the floor plans that you provide.*

*Question 15:*

*How was each relevant area of your hotels used?*

*Question 16:*

*What were the restrictions and requirements (if any) on people entering and leaving each of those areas?*

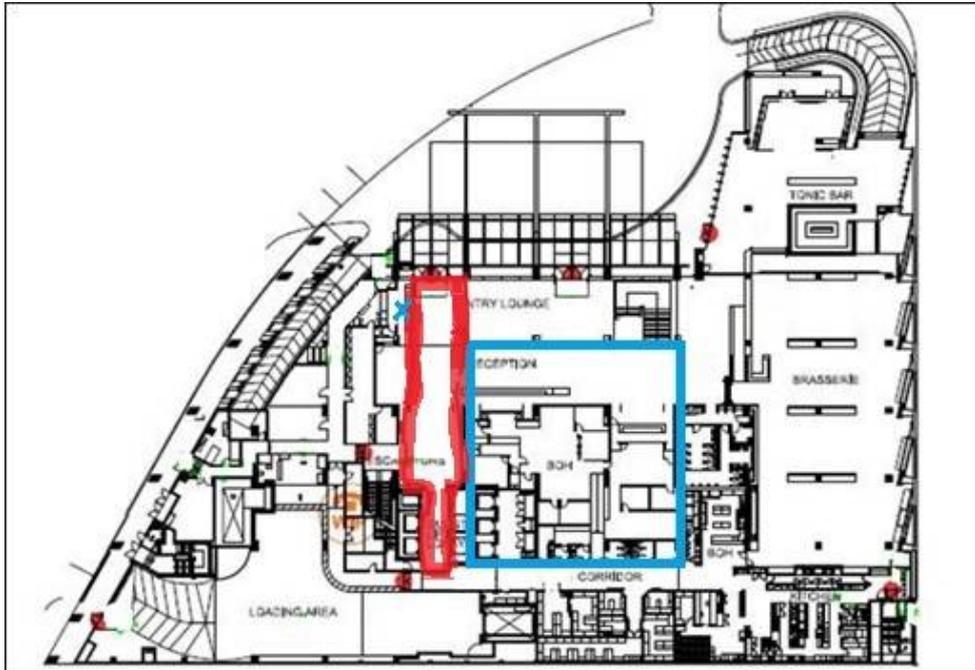
24. In responding to this question, for the areas of the Hotels used as part of the hotel quarantine program, I have set out an explanation of how the area was used, and restrictions on access, together with a floorplan with areas used marked in red and blue, as explained below. While I have focused on the areas of the Hotels used for the hotel quarantine program, for completeness I have also included a high level description of the other areas.

#### Hotel lobby

25. The hotel lobbies and reception areas in the Hotels were used to process guests arriving from the airport. Floor plans for both hotel lobbies are shown below. The area used by guests, nurses and the security personnel engaged by Victorian Government (**Government**

**Security**) are marked in red. The area used by Crown staff are marked in blue. The blue crosses are where Crown staff were located to complete check-in services.

*Crown Promenade*



*Crown Metropol*



26. When guests arrived at the Hotels, Crown staff, standing behind desks in the reception area, took guest details and provided guests with their relevant room access card. Administrative processing by Victorian Government personnel occurred in the lobby area. Once Crown staff provided guests with their access pass, the guest was processed by Victorian Government staff, and then accompanied by Government Security to their room. Crown's security staff were at no time instructed to accompany guests to their room. I have made enquiries of our security staff and am not aware of any Crown security staff who did accompany guests to their room.
27. The lobbies could be accessed only by hotel quarantine guests (when checking in and out of the hotel, and at Metropol, when accessing the fresh air walk area which required the guest to walk from the front of house lifts through the lobby), Crown staff, authorised Victorian Government personnel and Government Security. The lobbies of the Hotels were

not open to members of the general public during the hotel quarantine program. Government Security were stationed at the entrances to the Hotels and managed access to the lobbies. Crown staff, including Crown security, used the areas marked in blue. When in front of house areas at the same time as guests, Crown staff were instructed to wear PPE.

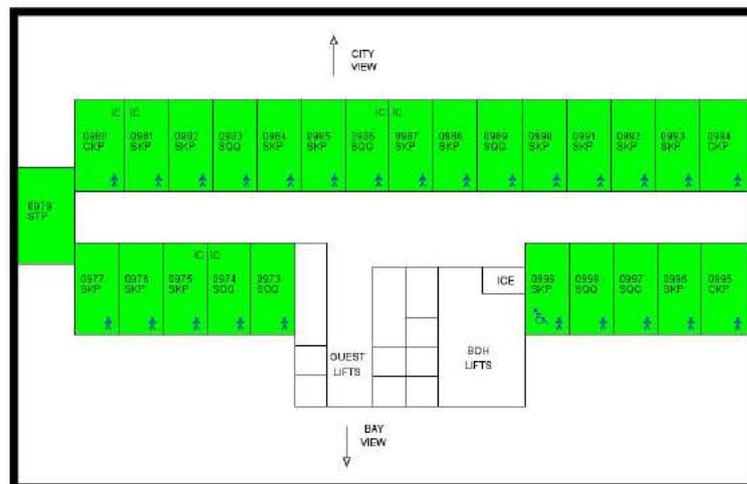
### Lifts

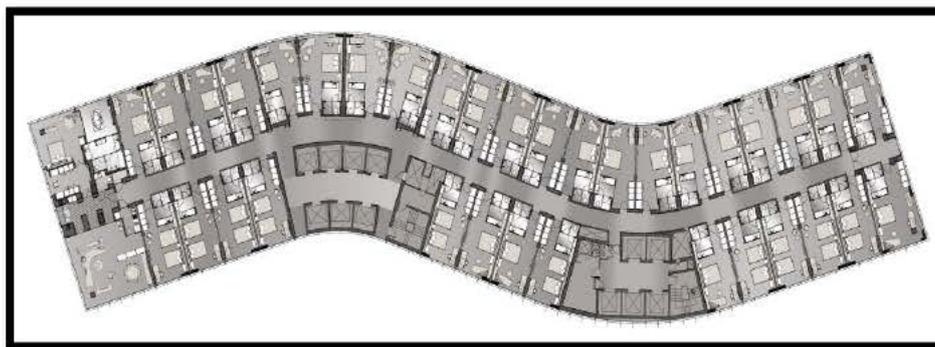
28. There are two kinds of lifts in the Hotels, 'front of house' lifts (which would ordinarily be used by guests at the Hotel), and 'back of house' lifts, used by Crown staff. Front of house lifts are dealt with in this section. Back of house lifts are discussed in the back of house section below.
29. Front of house lifts could be accessed by Victorian Government personnel, Government Security and hotel quarantine guests. Crown did not monitor access to front of house lifts, as this was done by Government Security. Access passes were needed to operate front of house lifts to guestroom levels and, for Crown Metropol, Level 28 to access the fresh air walk area.
30. Access to lifts by hotel quarantine guests from lobby to guestrooms was arranged by Government Security. Crown did not accompany guests as they used front of house lifts to access rooms.
31. Government Security also used front of house lifts to transport guest luggage from the lobby to guestrooms. Crown staff did not bring luggage to guestrooms.
32. Crown cleaning staff conducted touchpoint cleaning (meaning traffic areas commonly touched such as lift buttons) of the front of house lifts every 4 hours, but were instructed by Crown to only use back of house lifts.

### Guestrooms

33. Guestrooms were occupied by hotel quarantine guests at each Hotel over several floors as part of the hotel quarantine program. The Hotels were not used by other guests during the hotel quarantine program.
34. A typical floor layout for each Hotel is shown below.

### *Crown Promenade*

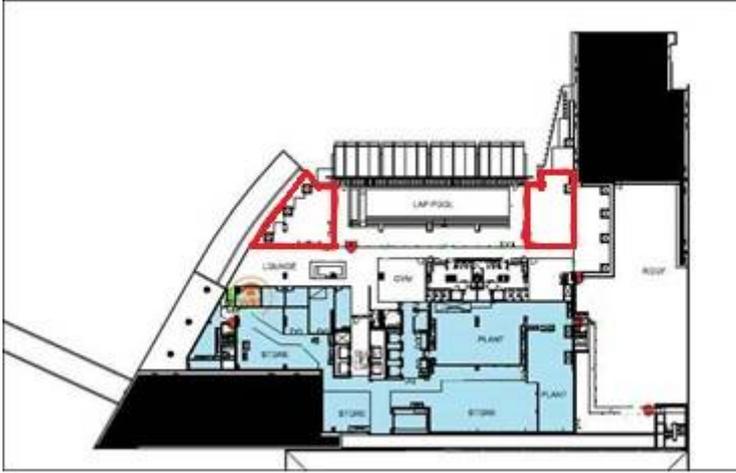


*Crown Metropol*

35. Guestrooms were deep cleaned by Crown cleaning staff, to a standard consistent with the most recent recommended public health standards in respect of COVID-19, before initial entry and after the guest had completed their 14 day stay. Otherwise, Crown staff were instructed not to access guestrooms during a guest stay. Government Security oversaw access to rooms, and ensured that guests remained in their rooms.
36. Crown security was instructed by Crown not to attend guestroom levels whilst occupied by hotel quarantine guests, but could inspect guestroom floors where the floor had been vacated, provided they had first been deep cleaned. The only exception to this was for emergency situations. To my knowledge, there were no emergency incidents which required Crown security during the hotel quarantine program.
37. At DJPR's request, Crown provided, guest rooms at both Hotels for day to day use by nurses in connection with their duties. These were on levels which were not being used for hotel quarantine guests.
38. Crown cleaning staff entered the common hallway and pantry areas of the guestroom levels to deliver meals and other necessary amenities (fresh towels, toiletries). These were left outside the doors of the relevant guestrooms.

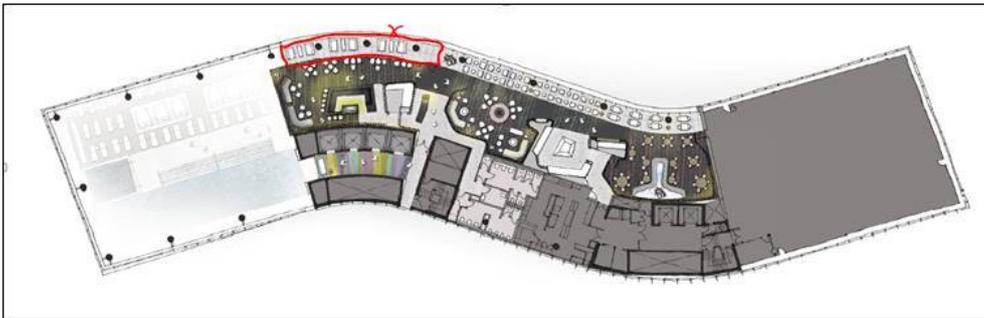
*Fresh air walk areas*

39. Fresh air walks were undertaken as directed by DHHS. All fresh air walks were subject to scheduling and escort arrangements arranged by Government Security and Victorian Government personnel.
40. At Crown Promenade, fresh air walks were permitted on Level 3 at the outdoor deck area. The areas used for fresh air walks, accessed using the front of house lifts, are shown in the below floorplan in red. The pool and gym were locked and could not be accessed by guests, Victoria Government personnel or Government Security. The back office areas coloured in blue, could only be accessed by Crown staff (who had staff access passes).



41. At Crown Metropol, fresh air walks were permitted on the Level 28 outdoor terrace and on the Hotel Driveway. The areas used for fresh air walks, using the front of house lifts, are shown in the below floorplans in red.

*Level 28*



*Ground floor, with driveway marked*



42. Guests could access fresh air walk areas in the Hotels at designated times when accompanied by Government Security. Crown was not involved in the scheduling of fresh air walks, save that I requested that scheduled fresh air walks not occur during meal delivery times, so that Crown staff were not on guest floors at times when guests left their room. The fresh air walk areas could otherwise be accessed by Government Security and Victorian Government personnel. Access to fresh air walk areas was managed by Government Security.

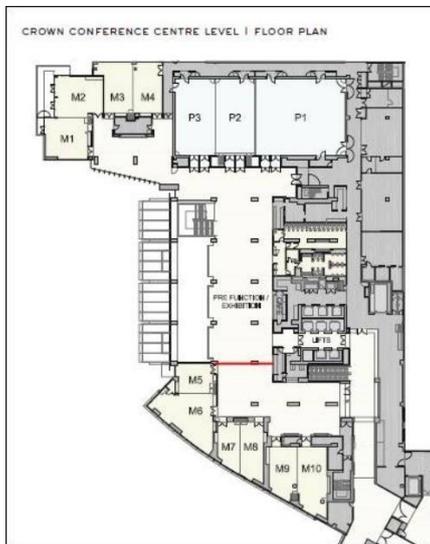
43. Crown cleaning staff entered fresh air walk areas to conduct cleaning when not occupied by guests.

Business Centres and Meeting Rooms

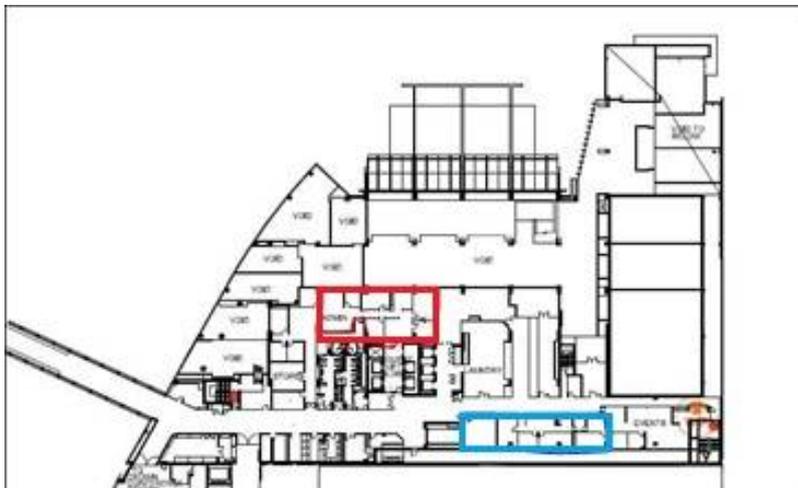
44. The Business Centre at Crown Promenade and meeting rooms at Crown Metropol were typically used by Victorian Government personnel (eg nurses engaged by DHHS) for administration and storage. The Business Centre at Crown Promenade and meeting rooms at Crown Metropol could be accessed by Victorian Government personnel and Government Security but not by guests. Crown cleaning staff entered these areas to conduct cleaning and replenish refreshments.

*Crown Promenade*

45. The meeting rooms marked P1, P2 and P3 on Level 1 were used by DHHS as a storage room. This floor was not otherwise used for the hotel quarantine program. A floorplan of Level 1 is shown below.

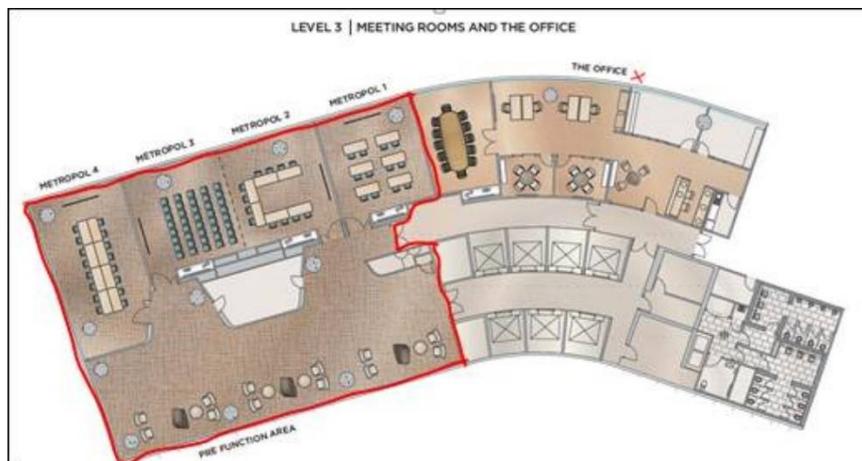


Level 2 (the Crown Promenade Business Centre) was used during the hotel quarantine program as a base for administration for nurses and other Victorian Government personnel. A floorplan is shown below. The area marked red was used by Victorian Government personnel. The area marked in blue shows the housekeeping offices which were used by Crown staff. Back of house lifts are shown adjacent to the Guest Lift Lobby.



### *Crown Metropol*

The Level 3 meeting rooms were used during the hotel quarantine program as a base for administration for nurses and other Victorian Government personnel. A floorplan is shown below. The area marked red was used by Victorian Government personnel.



### Back of house areas

46. Back of house areas (being designated staff areas such as the kitchen, staff lifts, pantries located on levels for storage of hotel supplied amenities, loading dock, the plant room and laundry) were only permitted to be accessed by Crown staff. These areas were used for Crown staff to manage hotel quarantine arrangements (such as meal preparation, delivery of meals to rooms, housekeeping supplies and waste disposal).
47. These areas could only be accessed using a security pass permitting back of house entry. Government Security and Victorian Government personnel could not access the back of house areas with their access passes. They could only access it if they were accompanied by Crown staff, for example to collect deliveries from the loading dock. Crown security were responsible for monitoring back of house areas.

### **COMMUNICATION AND INFORMATION SHARING**

*Question 17:*

*What lines of communication were in place between your hotels and government departments?*

48. The established lines of communication in place between Crown and the Victorian Government for the purposes of the day to day management of the hotel quarantine program were as follows:
  - (a) Email: Members of DHHS and DJPR were provided with a dedicated email address for the Crown Duty Manager. Relevant personnel of DHHS and DJPR also had direct email addresses for myself, the General Manager of each Hotel and various other Crown staff as necessary.
  - (b) Telephone: A shared mobile number was used to facilitate contact between the Hotel Duty Manager and nursing staff. Relevant personnel of DHHS and DJPR also had direct phone numbers for myself and other relevant Crown staff.
  - (c) Face to face: Crown also communicated in person with DJPR and DHHS personnel on site at the Hotels. Crown staff were instructed to maintain appropriate social distancing and PPE requirements for in-person interactions.

*Question 18:*

*What information did you receive about the persons being quarantined at your hotels?*

49. Typically, DJPR personnel provided Crown with flight numbers and the time of arrival of guests. From time to time, the names of the guests and other details were also provided by DJPR.

*Question 19:*

*How did you receive that information?*

50. A member of DJPR typically emailed this information to relevant Crown staff.

*Question 20:*

*What reports were you required to make to government departments about the persons being quarantined at your hotels?*

51. I understand this question as referring to requirements specific to the hotel quarantine program as required under the Agreement, as varied from time to time described in paragraph 13 above. Under the Agreement, Crown was required to:
- (a) immediately notify DJPR/DHHS (as applicable) of any issues in relation to the provision of the rooms and/or services, including but not limited to anything which may create a risk that the accommodation service would cease to be provided such as staff unavailability, financial distress, or known exposure or infection of COVID-19;
  - (b) from 25 May 2020, provide DJPR/DHHS (as applicable) with a written incident report within 24 hours for general incidents or immediately if a notifiable incident under the *Occupation Health and Safety Act 2004* (Vic) occurred; and
  - (c) from 25 May 2020, immediately report to DJPR/DHHS (as applicable) any unsafe or non-compliant issues that could not be rectified during routine maintenance.

## **DIRECTION AND DECISION MAKING**

*Question 21:*

*Who was/is your contact at the Department of Health and Human Services?*

52. Since around 1 July 2020, my main point of contact at DHHS has been [REDACTED] (Deputy Commander, Strategy and Planning, Emergency Operations Centre).
53. Prior to 1 July 2020, my main point of contact in relation to the hotel quarantine program was Mr Tim Sullivan (A/g Executive Director, Global Partnerships and Projects) as described in paragraph 68 below.

*Question 22:*

*What directions and requests have been given to you by Department of Health and Human Services, in relation to the quarantine program?*

*Question 23:*

*Did the directions and requests given to you by Department of Health and Human Services change over time? If so, please provide details.*

54. The terms of the Agreement contained directions to Crown, for example, to perform a deep clean of rooms before and after guest stays, to provide meals, amenities and cleaning products and to allow access to the Hotels by hotel quarantine guests, and Victorian Government personnel or Victorian Government contractors for the purpose of ensuring guests remain in isolation and for the provision of support and medical care.
55. In addition to the directions contained in the Agreement, from time to time, Crown was issued with directions and requests by DHHS about various matters. Under the Agreement, Crown agreed to provide the rooms in accordance with any reasonable directions given by DJPR (or DHHS when administration of the Agreement transferred) from time to time (clause 2.1(c)). Such directions and requests were typically communicated by email, but were also made verbally. Based on my own knowledge and enquiries I have made within Crown in preparing this statement, I have set out below the subject matter of those requests to the extent that I am aware of the requests.

*Exercise and fresh air for guests in quarantine*

56. On about 10 April 2020, Crown was advised by email that recreational breaks for guests would commence and that this would be overseen by the Authorised Officer (being the main Victorian Government decision maker in respect of hotel quarantine operations (**Authorised Officer**)).<sup>7</sup> Crown requested clarification of this process. Following discussions between Crown and DHHS about the process for implementing exercise and fresh air walks for guests, Crown agreed to the DHHS *A Fresh Air Implementation Plan*.<sup>8</sup> In around June 2020, DHHS sent Crown an email requesting that the frequency of the fresh air walks for guests be increased at Crown Metropol and suggested a process for this to occur.<sup>9</sup> Crown considered the process proposed by DHHS and agreed to an amended process which it considered to be safe and consistent with social distancing requirements.<sup>10</sup>

*Safety matters*

57. On about 2 April 2020, DHHS emailed Crown a correct cleaning guidelines solution for the non-health sector.<sup>11</sup>
58. On 16 April 2020, Crown's First Aid Officer attended a meeting with DHHS personnel and was asked to run a "mock scenario" for emergencies. The file note of this meeting states that Crown's First Aid Officer advised DHHS that Crown would supply emergency equipment and clarified that DHHS staff would manage guest emergencies.<sup>12</sup>

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<sup>7</sup> CML.0001.0001.0258

<sup>8</sup> CML.0001.0001.0214

<sup>9</sup> CML.0001.0001.0225

<sup>10</sup> CML.0001.0001.0215

<sup>11</sup> CML.0001.0007.0058

<sup>12</sup> CML.0001.0004.0049

59. In around April 2020, Crown commenced disposing of clinical waste at the Hotels. In around May 2020, DHHS emailed Crown advising that the frequency of the collection of clinical waste bins would increase and asked Crown to manage the collection of waste bins.<sup>13</sup>
60. On about 17 June 2020, Crown was provided with a DHHS document entitled *Advice for cleaning requirements for hotels who are accommodating quarantined, close contacts and confirmed COVID-19 guests*.<sup>14</sup>
61. During the course of June 2020, representatives from DHHS met with Crown staff to undertake a walk-through of Crown practises. In these meetings, DHHS provided guidance on various matters including the use of PPE, cleaning procedures and additional precautions that could be taken during the arrival process (for example, DHHS advised that gloves should not be worn for anything other than tasks Crown staff wore gloves for prior to the pandemic). Crown was also provided with a DHHS document entitled *PPE advice for hotel security staff and AO's in contact with quarantined individuals*.<sup>15</sup> I understand that a similar walk-through was undertaken at Crown Metropol, but I am not aware of any further guidance being provided as a result of this walk-through.

#### Food safety

62. On about 10 April 2020, DHHS sent Crown an email directing that specific guests that DHHS deemed to be a high risk of food-safety related issues due to health related matters be granted access to food delivery services.<sup>16</sup>
63. In around 22 April 2020, DHHS advised Crown that guests with declared allergies could order their meals through UberEats or Menulog and be reimbursed by DHHS. The DHHS Team Leader at Crown Promenade provided the Crown Duty Manager with a document entitled *Meal order information for people with food allergies*.<sup>17</sup>
64. In around May 2020, DHHS advised Crown that it had received feedback about diabetic meals not meeting the health requirements of guests with diabetes. In consultation with DHHS/DJPR, Crown changed its breakfast food offering provided to guests.<sup>18</sup> On 15 May, Crown was provided a DHHS document entitled *Procedure for provision of food to guests with food allergies while under quarantine order*.<sup>19</sup>

#### Transition to DHHS administering the Hotel Accommodation Program

65. On 8 July 2020, DHHS emailed Crown explaining the involvement of Alfred Health, Spotless Cleaning and the Department of Justice and Community Safety (including Corrections Victoria) in the hotel quarantine program.<sup>20</sup> DHHS asked Crown to confirm that these arrangements met Crown's needs and if DHHS could commence the transition at Crown. For a number of reasons, Crown did not agree that Spotless Cleaning staff could attend the Hotels. There were various other discussions regarding the transition arrangements.

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<sup>13</sup> CML.0001.0001.0299

<sup>14</sup> CML.0001.0001.0209

<sup>15</sup> CML.0001.0001.0267

<sup>16</sup> CML.0001.0001.0049

<sup>17</sup> CML.0001.0001.0264

<sup>18</sup> CML.0001.0001.0076; CML.0001.0001.0024

<sup>19</sup> CML.0001.0001.0196; CML.0001.0001.0197

<sup>20</sup> CML.0001.0001.0156

Other

66. On 7 April 2020, DHHS met with a Crown Promenade staff member to discuss if Crown could provide space to store and manage the distribution of PPE and other equipment to hotels in the quarantine program. This request was followed up in writing and Crown confirmed it could offer the Promenade Conference Room.<sup>21</sup> DHHS appointed a logistics officer to undertake the distribution of PPE to other hotels participating in the hotel quarantine program and asked Crown to arrange contractor induction training and a contractor security pass for the logistics officer.
67. Crown also, from time to time, received various other requests (often verbally) from DHHS in relation to food and beverage or welfare requirements for guests, the use of facilities, logistics or to provide administrative services (eg printing, room configuration and access to tea and coffee).

*Question 24:*

*Who was/is your contact at Department of Jobs Precincts and Regions?*

68. My main contact at DJPR was Mr Tim Sullivan (A/g Executive Director, Global Partnerships and Projects).

*Question 25:*

*What directions and requests were given to you by the Department of Jobs Precincts and Regions, in relation to the hotel quarantine program?*

*Question 26:*

*Did the directions and requests given to you by the Department of Jobs Precincts and Regions changed over time? If so, please provide details.*

69. The terms of the Agreement contained directions to Crown, for example, to perform a deep clean of rooms before and after guest stays, to provide meals, amenities and cleaning products and to allow access to the Hotels by hotel quarantine guests, and Victorian Government personnel or Government contractors for the purpose of ensuring guests remain in isolation and for the provision of support and medical care.
70. In addition to the directions contained in the Agreement, from time to time, Crown was issued with directions and requests by DHHS about various matters. Under the Agreement, Crown agreed to provide the rooms in accordance with any reasonable directions given by DJPR (or DHHS when administration of the Agreement transferred) from time to time (clause 2.1(c)). Such directions and requests were typically communicated by email, but were also made verbally. Based on my own knowledge and enquiries I have made within Crown in preparing this statement, I have set out below the subject matter of those requests to the extent that I am aware of the requests. As Crown understood that DJPR directions were aimed at protecting guests' safety, Crown considered each direction that DJPR gave it to be 'reasonable' for the purposes of the Agreement.

Initial implementation of the hotel quarantine program

71. Prior to the Agreement being signed on 2 April 2020, DJPR made a number of directions and requests of Crown in relation to the logistics of the hotel quarantine program. Crown

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<sup>21</sup> CML.0001.0001.0250

discussed and communicated these directions and requests internally through email correspondence and in two meetings on 27 and 28 March 2020.<sup>22</sup>

72. In around 28 to 30 March, DJPR emailed Crown with various requests for information from Crown in relation to logistical matters, including proposed food delivery processes, how to contact guest rooms and laundry.<sup>23</sup>
73. On about 8 April 2020, DJPR provided Crown with a document entitled *Exit Process*.<sup>24</sup>
74. On 9 April 2020, DJPR emailed Crown and requested information regarding the size of the Hotel driveways and lobbies in order to organise logistics for guests leaving the Hotels.<sup>25</sup>

#### Exercise and fresh air for guests in quarantine

75. On about 24 April 2020, DJPR sent Crown an email requesting that guest fresh air walks be increased and be able to take place in the driveway of Crown Metropol in addition to Level 28.<sup>26</sup> Crown confirmed that this could be organised as long as Government Security and an Authorised Officer was present.

#### Food delivery

76. Between late March and early April 2020, DJPR emailed Crown requesting Crown confirm that procedures were in place to cater for, and identify, guests with dietary requirements. DJPR advised that it was finalising the process for receipt of deliveries and would communicate with guests about this. DJPR also requested that Crown offer a limited menu through Crown's own food service for guests to purchase.<sup>27</sup>
77. During the course of April 2020, DJPR made various requests in relation to catering requirements for guests.
78. On 14 May 2020, Crown met with DJPR personnel to discuss changes to Crown's food offering. Following this meeting, Crown confirmed via email that it would make various changes to its breakfast offering (as referred to in paragraph 64 above).<sup>28</sup>

#### Other

79. Crown also, from time to time, received various requests (often verbally) from DJPR in relation to food and beverage or welfare requirements, the use of the facilities, logistics, the provision of administrative services (eg printing, room configuration and access to tea and coffee).

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<sup>22</sup> CML.0001.0001.0078; CML.0001.0001.0079

<sup>23</sup> CML.0001.0001.0232; CML.0001.0001.0257

<sup>24</sup> CML.0001.0005.0005

<sup>25</sup> CML.0001.0005.0002

<sup>26</sup> CML.0001.0001.0247

<sup>27</sup> CML.0001.0001.0108; CML.0001.0001.0088

<sup>28</sup> CML.0001.0001.0076

**Question 27:**

*Were directions, information or requests given to you by any other government department or agency? If so, please provide details.*

80. From time to time, directions, information and/or requests have been provided to Crown by other government department or agencies, including:
- (a) The City of Melbourne, Council House: In April 2020, City of Melbourne emailed Crown asking Crown to coordinate a clean-down of the kitchen used to prepare food for guests at the Hotels. This request did not relate to COVID-19.<sup>29</sup>
  - (b) Corrections Victoria: Corrections Victoria requested assistance with administrative tasks (such as provision of operational headquarters, chairs and tables, meals, signage and parking spaces) when it commenced providing Government Security services in place of the outgoing Government Security contractor. Crown confirmed the assistance it would provide in email correspondence dated 10 July 2020.<sup>30</sup>
  - (c) Department of Justice and Community Safety: In July 2020, the Department of Justice and Community Safety requested information from Crown about infection control practices being undertaken by Corrections Victoria. Crown provided the requested information via email on 16 July 2020.<sup>31</sup>

**INVOLVEMENT OF HOTEL STAFF****Question 28:**

*Who of your staff have been involved in the quarantine program?*

81. In answering this question, I have limited my response to Crown staff directly involved in the hotel quarantine program. The response does not address other staff (such as central Crown business units) which may have had indirect involvement in the program, but did not have operational involvement.
82. At the time of the hotel quarantine program, Crown had already stood down most of its staff because of COVID-19. During the hotel quarantine program, Crown adopted a skeleton staff model in relation to the hotel quarantine program. All Crown staff were at a management level, except for Crown cleaning staff, who were retained under a pre-existing subcontracting relationship which met Crown's quality standards. The focus of Crown staff during the hotel quarantine program was to facilitate Victorian Government access to Crown property, check-in guests, coordinate meals for guests, and attend to cleans prior to and after guest stays.
83. The skeleton staff typically consisted of a duty manager (based on a 24 hour roster), who was responsible for checking and processing information and managing issues relating to the hotel quarantine program, and a supervisor, a general manager and front office manager who shared their duties (such as front of house duties to coordinate guest arrivals, packing food bags and other ad hoc duties). Crown also had a First Aid Officer rostered at all times, responsible for staff health.
84. Crown also retained a small number of contracted housekeepers who were responsible for guest floors and attended to meal deliveries, laundry collection and delivery and cleaning

<sup>29</sup> CML.0001.0001.0271

<sup>30</sup> CML.0001.0001.0162

<sup>31</sup> CML.0001.0001.0168

before and after hotel quarantine stays. Housekeeping staff were subcontracted to Crown through Silk Hospitality. A small number of contracted public area cleaning staff also attended to scheduled cleaning of other front of house areas, the back of house and front of house lifts and replenishment of refreshments in the business centre and meeting rooms. These housekeeping and cleaning staff were subcontracted to Crown through Ikon Services. I have referred to these staff as Crown cleaning staff throughout my statement.

85. Crown also had Crown security guards who were responsible for protecting Crowns' staff and assets. Their duties included accompanying non-Crown staff in back of house where required (eg. deliveries), monitor back of house access, emergency management (see paragraph 36), inspection of guest rooms (once vacant – see paragraph 36) and perimeter patrols to ensure the safety and security of Crown property.

*Question 29:*

*What were the roles and responsibilities of staff involved in the quarantine program?*

86. As Crown was operating with significantly reduced staff numbers, the roles and responsibilities of staff involved in the hotel quarantine program (except for Crown cleaning staff) were modified from their usual roles and responsibilities. The roles and responsibilities of staff involved in the hotel quarantine program have been described to the extent possible in answer to Question 28 above.

*Question 30:*

*As far as you are aware, have any hotel staff involved in the quarantine program tested positive for COVID-19?*

87. No. As far as I am aware, Crown has not been notified by any Crown staff that they have tested positive to COVID-19.

*Question 31:*

*To your knowledge, were any hotel staff rostered to work at your hotels also working at other locations?*

88. No, not to my knowledge or based on the enquiries made in the preparation of this statement.

## **TRAINING AND SUPERVISION**

*Question 32:*

*What (if any) training was provided to your staff by any government department regarding COVID-19 and how to work in a safe manner?*

89. No specific training was provided by any Government department in connection with the hotel quarantine program. Instead, I understood that Crown was expected to monitor the ongoing guidance that the Government departments provided either by way of direct communication to Crown or by way of public announcement and reflect this in its ongoing management of the hotel quarantine program, and Crown did so.

*Question 33:*

*What (if any) training was provided to your staff by your organisation regarding COVID-19 and how to work in a safe manner?*

90. Crown implemented and delivered training and ongoing guidance in respect of COVID-19 and provided staff with procedures and protocols to allow staff to work in a safe manner. Specific operational guidance provided to the business units directly involved in the hotel quarantine program is outlined at paragraph 97.
91. Commencing in January 2020, Crown provided ongoing COVID-19 related guidance to staff. Information sheets were displayed on notice boards in high traffic, back of house areas, the Crown staff intranet page, and generally distributed by email, or in person to Crown staff. These were updated as necessary to increase awareness of any updates to COVID-19 guidelines. The substance of the information sheets and the expectations of staff were also reinforced through daily briefings with Crown's skeleton team and personal coaching opportunities, in particular as updates occurred, provided as part of staff supervision. The information sheets addressed topics including isolation requirements, the proper use and disposal of face masks and social distancing guidelines. Crown also displayed DHHS guidance which was publicly available and Crown branded posters regarding hygiene and handwashing instructions throughout Crown Promenade and Crown Metropal to ensure staff were practising good hygiene standards. Where necessary, Crown updated such guidance to ensure consistency with the Government department guidelines.
92. Since June 2020, Crown has also developed and promoted its "COVID-19 10 Standards", a set of 10 guiding principles that all Crown staff were required to adhere to in the conduct of their duties at Crown.<sup>32</sup> Posters setting out the 10 Standards were placed in prominent positions in back of house staff areas and distributed electronically to staff by email, through Crown's "Workplace@" page, and available on Crown's staff intranet page to ensure awareness of their obligations. By consolidating these principles, Crown sought to simplify the communication around workplace safety in a COVID environment, given the rapidly developing guidance being received or published.
93. In addition, where specific clarifications on COVID protocols or procedures were received from DHHS or DJPR, these were circulated to all relevant business unit managers who were responsible for informing their respective teams through briefings, email or text messages.
94. In or around April 2020, Crown commenced preparation of health, safety and risk management plans, which were intended to consolidate all of the various COVID-19 protocols and practices across all parts of Crown's business to ensure that it was able to adopt best practices in its operations and potential re-opening to the public. Plans were, and continue to be, developed by Crown's Workplace Health and Safety and Risk Management teams that applied across broad sectors of Crown's business. Individual business units were directed to prepare more detailed plans to cover the specific areas and day to day procedures their units were responsible for. These plans set out guidelines, processes and protocols for staff to operate in a COVID-19 environment. These included physical distancing measures, entry screening, patron movement, staff and contractor hygiene, cleaning and sanitisation, reporting of symptoms, management of shared staff areas and record keeping standards. Each business unit prepared their plans in consultation with the COVID-19 Response Manager (**CRM**) and relevant staff were provided with the plan and briefed on the plan's requirements. The *Crown COVID-19 Rapid Response Plan* and *BOH Plan 2.3.1 - Hotel Reservations* are examples of these plans.<sup>33</sup>

<sup>32</sup> CML.0001.0002.0007

<sup>33</sup> CML.0001.0003.0003; CML.0001.0004.0040

95. Business units also created a checklist (included in their business unit plans) to monitor compliance by staff with the relevant plans. The CRM was responsible for undertaking inspections of the various business unit areas to confirm compliance against the business unit's checklist document.
96. Since around 1 June 2020, all Crown staff have been required to complete the "Crown COVID-19 Awareness and Response" online training module,<sup>34</sup> which reinforces the health and safety measures adopted by Crown, prior to returning to work. It is intended for the training module to be updated as necessary to ensure it remains consistent with Victorian Government directions. The completion of this training is mandatory for all staff returning to work and attendance is recorded and monitored by Crown's HR team.
97. Specific operational guidance was also provided to the business units directly involved in the hotel quarantine program. As set out in paragraph 119 below, Crown developed a set of standard operating procedures,<sup>35</sup> also referred to as work instructions, relevant to the hotel quarantine program. These procedures were communicated to relevant staff by business unit managers and more recently made available on Crown's intranet site.
98. Relevant business unit managers briefed staff on the procedures specific to their roles and responsibilities. The requirements of relevant procedures were reinforced during daily briefings which were attended by Crown staff and DHHS representatives and were the main forum for the transfer of knowledge to operational teams. Training also occurred during shifts with demonstrations of steps specified in the procedures by managers and supervisors responsible for monitoring staff. Managers and supervisors also confirmed awareness of requirements through conversations with team members and providing one on one coaching if required. Crown updated its procedure documents from time to time as new guidance from Government departments became available. These updates were communicated to staff in the same manner described above.
99. Additionally, Crown requires staff (including staff at the Hotels) to complete a compulsory biosecurity safety training where engaged in positions considered at risk of exposure to infectious diseases, including Hotel Room Attendants, Duty Managers, Wardrobe Attendant, Valet Laundry Attendant and First Aid Officers. Completion of the online training module by relevant staff every 2 years, was a Crown requirement prior to the hotel quarantine program. The training module identifies processes to undertake when exposed to biological substances and what steps to take when physical items are exposed to substances, including disposal and cleaning of items.
100. Crown's First Aid Officers were also provided with detailed biosecurity safety guidance which covers the handling of bio-hazardous waste, biological exposure and first aid treatment and post treatment clean-up of a patient with Coronavirus. This guidance supplemented their required health care qualifications. All Crown First Aid Officers are expected to be conversant and compliant with these guidelines.
101. Crown First Aid Officers and Crown's security personnel have also been required to undergo a Cardiopulmonary Resuscitation training session provided by Crown Melbourne's Registered training organisation Crown College. The training was initially confined to the provision of Cardiopulmonary Resuscitation but since May this year, it has been expanded to include COVID-19 relevant content. This included the appropriate method of wearing and removing PPE, and measures to prevent contamination.

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<sup>34</sup> CML.0001.0007.0002

<sup>35</sup> CML.0001.0003.0012; CML.0001.0003.0013; CML.0001.0003.0019; CML.0001.0003.0020; CML.0001.0003.0017; CML.0001.0003.0006; CML.0001.0003.0021; CML.0001.0003.0022; CML.0001.0007.0001; CML.0001.0003.0025; CML.0001.0003.0018

*Question 34:*

*What onsite supervision was in place for your staff at your hotel, in relation to the hotel quarantine program?*

102. Crown has an existing health and safety compliance and supervision framework with health and safety representatives providing ongoing support to individual business units. The manager of each business unit and relevant supervisors were and are responsible for monitoring the performance of their team for compliance with Crown's Health and Safety policies and procedures. The same supervision framework has applied to the implementation of the hotel quarantine standard operating procedures.
103. Senior managers and supervisors were responsible for ongoing supervision of their relevant team members during shifts to ensure compliance with the applicable standard operating procedures. For some requirements, compliance can be easily observed through active monitoring, such as the use of mandatory PPE. These can be addressed in situ where directly observable by supervisors through dialogue. Managers and supervisors also conduct regular spot checks to ensure staff or Crown contractor compliance with aspects which are not as easily observed through day to day supervision, such as lift and luggage trolley sanitisation. Throughout the hotel quarantine program, Crown's staff and contractors had a heightened awareness of the importance of complying with the COVID-19 procedures and protocols, having regard to the significance of the issue for the organisation and also arising from awareness of personal risk to themselves and close contacts. I am informed that there were, therefore, limited incidence of non-compliance and no incidents of repeated non-compliance by Crown staff and Crown contracted staff, such that Crown's usual performance management processes needed to be engaged.
104. As noted above at 95, the CRM and COVID Response Team (**CRT**) assisted managers and supervisors responsible for monitoring compliance by Crown staff and Crown engaged contractors with the various COVID plans and checklists. As part of this role, the CRM and members of the CRT would regularly observe the day to day practices of various business units and, where necessary, remind staff of the need to comply with Crown's COVID-19 protocols.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)***Question 35:*

*What PPE (if any) was provided by your organisation for hotel staff to use?*

105. Crown provided PPE to all Crown staff involved in the hotel quarantine program. For all staff, disposable gloves and disposable masks (**Standard PPE**) were available at designated PPE stations located in both the 'front of house' and 'back of house' areas of the Hotels. For all staff in roles which had direct exposure to quarantine guests, such as front desk staff or Crown security staff, P2 masks (a higher level of protection than disposable masks) and disposable gloves were provided.
106. Standard PPE and P2 masks were also available from the Crown wardrobe counter which all staff had access to and on request from individual business unit managers. All Crown staff could access Standard PPE, as required, at all times from these sources, consistent with Crown's requirements for staff to regularly replace PPE.
107. For First Aid Officers responsible for handling and disposing of clinical waste and responding to medical incidents, Crown provided "Level D" PPE which was required to be worn when attending a patient and when disposing of clinical waste. Level D PPE comprised disposable gloves, P2 masks, goggles / face shields and disposable gowns. Level D PPE can be obtained from designated triage destinations within Crown Metropal and Crown Promenade.

*Question 36:**What PPE (if any) was provided to hotel staff by any government department?*

108. Crown had an arrangement in place with DJPR for the supply of Standard PPE. Crown managers could access supplies from the storage space provided by Crown for DHHS use on Level 1 of Crown Promenade. All other PPE equipment was supplied by Crown to its staff.

*Question 37:**Were hotel staff at any time required to provide their own PPE?*

109. No, Crown provided all staff involved in the hotel quarantine program with access to PPE.

*Question 38:**What directions (if any) did your organisation give to your staff about when to use PPE?*

110. From the commencement of the hotel quarantine program, all Crown staff involved in the program were directed to wear Standard PPE when working within designated areas, which were areas where a risk of exposure was identified. This direction was communicated to relevant staff in the following ways:
- (a) COVID-19 standard operating procedures, in particular "CHQ5 – PPE Usage" (referred to at [119] below) which referred to PPE usage requirements which could be accessed by all staff through Crown's intranet;
  - (b) managers and supervisors briefed their teams daily on the expectations to comply with the work instructions on an ongoing basis. Constant monitoring and supervision of performance occurred with a keen focus on compliance with the PPE usage requirements;
  - (c) Crown First Aid Officers and security staff were briefed daily during security musters, attended by Crown security and First Aid Officers, on the ongoing obligations to use PPE; and
  - (d) COVID-19 information sheets with directions regarding PPE were placed prominently throughout Crown's premises and distributed electronically to staff by email, through Crown's "Workplace@" page, and available on Crown's staff intranet page.
111. Once the additional health restrictions in relation to masks were announced by the Victorian Government, Crown directed all Crown staff to wear a face mask at all times in all areas while working on site.
112. Existing training received by Crown First Aid Officers informs them of the circumstances where PPE is required to be worn, irrespective of COVID-19. This is supplemented with biosecurity safety guidance referred to above which directs first aid officers to don Level D PPE when at risk of biological exposure, when providing care to all individuals, irrespective of whether they show signs or symptoms of infection or not and in all aspects of first aid treatment and post treatment clean up at Crown resorts.

*Question 39:*

*What training (if any) was given to hotel staff regarding the correct use of PPE? Who provided that training?*

113. The following training and guidance was provided to staff regarding the correct use of PPE:
- (e) "CHQ5 – PPE Usage" standard operating procedure<sup>36</sup>, which sets out the proper use and disposal of Standard PPE could be accessed by all staff on Crown's intranet.
  - (f) Various infographic posters and COVID-19 Alerts, which describe the correct use and disposal of Standard PPE were placed prominently in high traffic back of house areas, distributed electronically to staff by email, through Crown's "Workplace@" page, and available on Crown's staff intranet page.
  - (g) Crown's First Aid Officers and COVID-19 Response Manager provided informal, face to face training to duty managers, security and front office staff on request or as part of Crown's ongoing supervision of staff compliance to COVID-19 standard operating procedures.

*Question 40:*

*Did your organisation at any time experience a shortage of PPE? If so, how was that shortage managed?*

114. No, Crown did not experience a shortage of PPE. Crown PPE was readily available to staff at all times.

*Question 41:*

*Was your organisation ever asked to provide PPE to anyone other than hotel staff? If so, please provide details?*

115. No. Crown was never asked to supply PPE to anyone other than its own staff. Crown made PPE available at all times throughout the designated areas which Crown staff had access to.

**COMPLAINTS AND CONCERNS***Question 42:*

*Who was responsible for identifying and addressing health and safety risks to hotel staff arising from the quarantine program?*

116. As the Executive General Manager for Crown Hotels Melbourne, I had overarching responsibility for identifying and addressing health and safety risks arising from the hotel quarantine program. At an operational level, the Duty Manager for each shift had responsibility for identifying and escalating risks which may arise on a day to day basis. The General Manager and the Executive General Manager – Food and Beverage, Crown Melbourne were responsible for identifying and addressing health and safety risks, and would escalate issues to me as required.
117. All Crown staff had a role in identifying and raising concerns regarding health and safety risks to Crown staff, and staff could raise any concerns or issues with Crown directly. Staff

<sup>36</sup> CML.0001.0003.0017

also had a health and safety representative affiliated with the staff Union who could identify concerns or risks and raise them with Crown management.

*Question 43:*

*What risks were identified? What was done (if anything) to mitigate those risks? In your opinion, were those measures adequate and effective?*

118. Prior to commencement of the hotel quarantine program, Crown implemented procedures, designed to mitigate the risk of Crown staff becoming infected with COVID-19 while at work with Crown. These processes included social distancing measures and biosecurity management strategies consistent with the biosecurity training module referenced above.
119. After the hotel quarantine program commenced, Crown identified operational risks relevant to the health and safety of staff relating to the hotel quarantine program, in particular, the role performed by Crown staff. In response, Crown developed standard operating procedures to mitigate the identified operational risks. These standard operating procedures nominated the steps that needed to be taken for employee safety and are entitled: CHQ 1 Arrivals Process Quarantine Guests; CHQ 2 Recording Guest Food Allergies; CHQ 3 Food Delivery Service to Quarantine [sic] guests; CHQ 4 Valet Laundry Guidelines; CHQ 5 PPE Usage; CHQ 6 Staff Temperature Check; CHQ 7 Sanitising Lifts Used For Positive COVID 19 [sic] transport; CHQ 8 Disinfect luggage trolley; CHQ 9 – Disinfect Personal Devices Workstation; CHQ10-Cleaning of Covid-19 Postive [sic] Rooms;\_and CHQ11-Linen Toweling [sic] from a guest room COVID19 [sic].<sup>37</sup>
120. These documents were first prepared on or around 31 March 2020. As far as I am aware based on my own knowledge and enquiries I have made within Crown in preparing this statement, the procedures were implemented in or around mid-April 2020. While the procedures changed from time to time to ensure they reflected up-to-date guidance from the Victorian Government, I have annexed to this statement the current versions of these documents (being dated July 2020).
121. The content of these procedures (as varied from time to time) were communicated to Crown staff in shift briefings, electronic notices to staff and on notice boards. More recently, they have been placed on Crown's intranet site.
122. Crown also developed or updated other processes relevant to mitigating risks to staff which are discussed at paragraph 94 above.
123. In addition to the formal standard operating procedures and processes, when specific workplace health and safety concerns presented, Crown put in place strategies to manage the relevant risk. Some examples of risks identified, and Crown's response to them, are as follows:
- (a) Use of PPE: Crown identified a risk to occupational health and safety to staff in relation to front of house staff with guest contact. Crown required all front of house staff to wear Standard PPE when performing front of house duties.
  - (b) Contamination of back of house areas: Crown identified a risk of contamination of back of house areas when Crown staff members moved between front of house areas to back of house areas. Crown established a station at the entrance to the back of house areas containing PPE, hand sanitising facilities and a yellow clinical waste bin. Crown instructed its staff to remove PPE before moving to back of house areas.

<sup>37</sup> CML.0001.0003.0012; CML.0001.0003.0020; CML.0001.0003.0017; CML.0001.0003.0022; CML.0001.0003.0025; CML.0001.0003.0013; CML.0001.0003.0018; CML.0001.0003.0006; CML.0001.0003.0021; CML.0001.0003.0019; CML.0001.0003.0016

- (c) Appropriate disposal of biohazard waste: Initially, Crown was responsible only for clinical waste disposal relating to Crown staff usage (for example, disposal of PPE for Crown staff). DHHS was responsible for removal of clinical waste for Government Security and Victorian Government personnel. Crown raised concerns with Victorian Government personnel because this waste was not being appropriately removed by DHHS, and an arrangement was put in place for Crown to take responsibility for biohazard waste for a fee.
- (d) Fresh air walk procedures: Following the introduction of the fresh air walk requirements, Crown identified a potential risk in relation to contamination and contact with guests. Crown agreed to provide hotel quarantine on the basis that Crown staff would not have direct contact with hotel quarantine guests except at check-in and departure. To mitigate this risk, Crown required that these walks needed to be scheduled outside meal delivery times so that Crown staff would not come into contact with guests.

124. In my opinion, the measures referred to in response to this question were adequate and effective to address the risks referred to in response to this question. As stated in paragraph 87 above, I am not aware of any Crown staff who were involved in the hotel quarantine program having contracted COVID-19.

*Question 44:*

*Who was responsible for identifying and acting on complaints or concerns regarding work conditions for hotel staff in relation to the quarantine program?*

125. As the Executive General Manager for Crown Melbourne Hotels, I had overarching responsibility for identifying and addressing complaints or concerns regarding work conditions for Crown staff relating to the hotel quarantine program.
126. The Duty Manager for each shift, the General Manager, the Executive General Manager – Food and Beverage, Crown Melbourne, the Executive Director of Security, the Group General Manager – Regulatory and Compliance and the Executive General Manager – Human Resources were each responsible for identifying and acting on concerns about work conditions, and would escalate issues to me as required.

*Question 45:*

*What complaints and concerns (if any) were raised? In relation to any complaints and concerns:*

- a) what were the details;*
- b) how was the complaint or concern dealt with; and*
- c) what was the outcome?*

127. Based on Crown's review of its existing records undertaken in the time since being asked for this statement, I have set out in Appendix A the complaints and concerns regarding work conditions of Crown staff in relation to the hotel quarantine program which have been identified. The review of records commenced when Crown was asked to provide this Statement and is ongoing.

*Question 46:*

*Did you or your organisation identify or receive notice of poor or unacceptable conduct by any person in connection with the hotel quarantine program? [Without limiting the generality of this question, it includes hotel staff, contracted cleaning, catering and security personnel, authorised officers and government departmental personnel]*

*Question 47:*

*If so:*

- a) what were the details*
- b) how were those issues dealt with; and*
- c) what was the outcome?*

128. Based on Crown's review of its existing records undertaken in the time since being asked for this statement, I have set out in Appendix B instances of poor or unacceptable conduct by persons in connection with the hotel quarantine program identified by Crown. The review of records commenced when Crown was asked to provide this Statement and is ongoing.
129. Where a complaint identified risk to Crown staff safety and also poor or unacceptable conduct, details of the complaint have been included in the response to Question 45 above (refer to Appendix A), and have not been repeated in the answer to Question 47. Details of any other additional identified complaints or concerns are set out in response to Question 47 (refer to Appendix B).
130. For completeness, Crown received various complaints from guests regarding the quality, quantity and variety of food and meals provided during the hotel quarantine program. During the hotel quarantine program, Crown supplied approximately 17,000 meals. Of those meals, around 60% of the guests nominated special food requirements (the industry standard is 25%), including in relation to food allergies and intolerances, cultural meals and specific food preferences.
131. I have taken the approach that the intention of the question was not to capture such complaints about the food provided to hotel quarantine guests, unless the complaint related to guest safety or welfare.

#### **ADDITIONAL INFORMATION**

*Question 48:*

*If you wish to include any additional information in your witness statement, please set it out below.*

## Appendix A

### Appendix A - complaints and concerns regarding work conditions for hotel staff in relation to the quarantine program

<b>Complaint /concern raised by</b>	<b>What were the details?</b>	<b>How was the complaint/ concern dealt with?</b>	<b>What was the outcome?</b>
Health and Safety Representative, Crown United Workers Union	On 1 April 2020, a Health and Safety Representative from Crown's Workers Union contacted Crown's Group General Manager with various queries regarding how Crown was ensuring the safety of staff at Crown Promenade and Crown Metropol, including: whether staff had a health and safety representative on site, PPE, whether there was a risk of contact with guests during meal delivery and room cleaning and back of house security.	The Union representative contacted Crown's Group General Manager regarding the issue.	On 2 April 2020, Crown's Group General Manager responded to the questions raised, and no further concerns were raised.
Linen Services Manager	On 1 April 2020, the Laundry Services Manager informed the Rooms Division Manager of Crown Towers that a number of laundry staff were hesitant to attend work and had requested to take leave from work.	The concerns were escalated by Crown on 2 April 2020 by the Rooms Division Manager to the Executive General Manager. This was further escalated on 2 April 2020 by the Executive General Manager to the Human Resources Manager.	Following consultation, Human Resources agreed that the Laundry Services Manager was able to approve leave for employees based on operational demands, and Crown implemented additional control measures to address the concerns raised by laundry staff, including mandatory use of additional PPE, increased availability of hygiene products and reinforcement of hygiene practices, no direct contact with guests or visitations to guest rooms and floors.

<b>Complaint /concern raised by</b>	<b>What were the details?</b>	<b>How was the complaint/ concern dealt with?</b>	<b>What was the outcome?</b>
Hotel Duty Manager, Crown Promenade	On 1 April 2020, a Hotel Duty Manager at Crown Promenade raised a concern regarding the need for staff to remove PPE before entering the back of house area.	On 1 April 2020, the Hotel Duty Manager notified Housekeeping Administrative staff, Duty Managers, Food and Beverage Managers and Front Office Support of the issue and requested that staff dispose of PPE prior to entering the back of house area.	On or about 1 April 2020, the Hotel Duty Manager set up a station outside the entrance to the back of house with a bin for staff to dispose gloves and masks in before entering the back of house area and fresh masks and gloves for staff to put on as they exited the back of house area.
Crown First Aid Manager	On 6 April 2020, the Crown First Aid Manager informed the Executive General Manager that DHHS clinical waste bags were not being removed, and several bags were placed behind the Concierge desk at Crown Promenade.	<p>On 6 April 2020, Crown contacted Tim Sullivan of DJPR and requested immediate removal of the clinical waste and offered for Crown to attend to removal for a fee.</p> <p>On 7 April 2020, Crown informed DJPR the waste had not been removed, and indicated it would remove the clinical waste and invoice DHHS.</p> <p>On 8 April 2020, the Room Division Manager contacted the DHHS Emergency Management Contact on site regarding the issue.</p>	<p>The waste was removed by Crown on or about 7 April 2020.</p> <p>On 8 April 2020, DHHS instructed Crown to continue removing clinical waste for the time being.</p>
Casino Organiser, United Workers Union	On 21 April 2020, a Casino Organiser from the United Workers Union contacted the Human Resources Manager for Hotels, Retail and Food and Beverage regarding concerns from a number of laundry staff. The laundry staff wanted to discuss risk of COVID-19 virus spread (amongst other concerns unrelated to hotel quarantine).	The Union Representative contacted the Human Resources Manager regarding the staff concerns.	Crown arranged for a risk assessment of the activities to be undertaken by laundry staff in accordance with CrownSAFE procedures.

<b>Complaint /concern raised by</b>	<b>What were the details?</b>	<b>How was the complaint/ concern dealt with?</b>	<b>What was the outcome?</b>
General Manager, Crown Metropol	On 23 April 2020, the General Manager of Crown Metropol informed the Executive General Manager about lack of communications relevant to a guest who took a fresh air walk on the hotel driveway (rather than Level 28) without Crown staff receiving prior notice.	On 23 April 2020, Crown contacted Tim Sullivan of DJPR and requested that DJPR or DHHS inform Crown if fresh air walks were being conducted outside Level 28 to allow staff to be notified and keep clear of the area.	Crown requested that DJPR and DHHS provide prior notice to Crown of fresh air walks.
Hotel Duty Manager, Crown Promenade	On 28 May 2020, the Hotel Duty Manager raised a concern with DHHS about delays in it being provided with information about guest departures so that staff have time to prepare and follow correct procedures.	On 28 May 2020, a Hotel Duty Manager at Crown Promenade contacted DHHS regarding the issue.	The Hotel Duty Manager asked that DHHS better communicate with Crown to allow staff to prepare and follow correct procedure.
DHHS Authorised Officer, Team Leader	On 7 June 2020, the Crown Metropol Front Office Supervisor was informed by a DHHS Authorised Officer of a concern about cleaning and sanitising of lifts used to transport guests for fresh air walks. The Authorised Officer who identified the issue proposed that three more exclusive lifts be used for fresh air walks, leaving one lift for any positive guests and three for general service.	On 7 June 2020, the Front Office Supervisor contacted the Executive General Manager regarding the issue.	On 7 June, the Executive General Manager contacted the Front Officer Supervisor stating that there had been no previous discussion with DHHS around additional cleaning processes or multiple lifts and that cleaning processes for fresh air walks would remain according to current processes.
DHHS	On 27 June 2020, DHHS attended Crown Promenade to review Crown's practices to reduce cross-contamination, in response to an outbreak in another quarantine program hotel.	DHHS made recommendations about processes relating to use of gloves for delivering food or checking in guests, placement of signs reminding guests of social distancing sanitisation of luggage trolleys, installation of Perspex shields for reception staff, placement of a table for sanitising equipment on each guestroom floor, use of face masks, linen bag procedures, cleaning processes, nurse practices and equipment for Government Security.	Crown actioned any recommendations and implemented processes for those areas which Crown was delivering under the hotel quarantine program.

<b>Complaint /concern raised by</b>	<b>What were the details?</b>	<b>How was the complaint/ concern dealt with?</b>	<b>What was the outcome?</b>
Crown First Aid Manager	On or about 29 June 2020, a First Aid Manager identified that the clinical waste-bins at Crown Promenade and Crown Metropol had not been collected and emptied according to the current process.	On 29 June 2020, the First Aid Manager informed Hotel Duty Managers for Crown Promenade and Crown Metropol and the First Aid team of the process for collecting and emptying the bio-bins.	Crown Promenade communicated the revised process to Government Security as necessary.
Housekeeping, Crown Promenade	On 2 July 2020 during meal delivery, a Crown housekeeping staff member at Crown Promenade identified that a guest's room door was being propped open by a chair. The staff member noticed that the Government Security guards were talking in a group nearby but had not taken action in relation to the open door. The Crown staff member brought the issue to the Government Security guards' attention and the Government Security guards then asked the guest to close the door.	On 3 July 2020, the Crown housekeeping staff member reported the issue to the Assistant Executive Housekeeper.  On 3 July 2020, the Assistant Executive Housekeeper for Crown Promenade requested that Crown report the matter to the Government Security company.	On 3 July 2020, the Rooms Division Manager reported the issue to Tim Sullivan of DJPR. On the same day, Tim Sullivan stated he would report the issue to Government Security.

**Appendix B - notice of poor or unacceptable conduct by persons in connection with the hotel quarantine program**

<b>Raised by</b>	<b>What were the details?</b>	<b>How was the issue dealt with?</b>	<b>What was the outcome?</b>
Guest's parents	<p>On 1 April 2020, Crown was notified of a complaint that vegetarian dietary requirements were not being met for a guest at Crown Promenade.</p> <p>The guest's family was told they could deliver food to the hotel but were refused when they attended the hotel.</p>	DJPR asked that Crown ensure that dietary stickers are on all room doors.	On the same day, Crown applied stickers to the doors of guests rooms to signify if the guest has a dietary requirement to prompt the Crown team member to double check the food package.
DJPR	On 2 April 2020, DJPR informed Crown of a complaint from two Crowne Plaza guests that they were not being provided a sufficient quantity of food.	On 2 April 2020, DJPR asked Crown to address the complaint and send through a list of guests with dietary requirements.	Crowne explained to DJPR that Crowne Plaza is not associated with the Hotels.
Guest	On 2 April 2020, DJPR informed Crown of a complaint from a Crown Metropol guest with coeliac disease who had been receiving food which was not gluten-free. The guest had been advised that she could not have other people deliver food for her.	On 2 April 2020, DJPR asked Crown to check the guest's dietary requirements record, which Crown looked into that same day.	Crown made arrangements for gluten free food for the guest.
DHHS Senior Food Safety Project Officer	On 3 April 2020, DHHS informed Crown that it wanted to discuss Crown's food safety program and how it was managing medically diagnosed allergies to ensure guests were safe. DHHS' concern was that Crown does not say anywhere that it could guarantee a 100% allergen free meal. A specific allergen issue was raised in relation to Crowne Plaza.	DHHS attended Crown and inspected the food being provided.	On 3 April 2020, Crown verified that the allergen complaint, in fact, related to Crowne Plaza, and not the Hotels. No issues were raised from the inspection in relation to Crown's allergen safety.

<b>Raised by</b>	<b>What were the details?</b>	<b>How was the issue dealt with?</b>	<b>What was the outcome?</b>
Hotel Duty Manager, Crown Metropol	On 20 April 2020, a Hotel Duty Manager at Crown Metropol was notified that Government Security guards had been accessing towels from back of house pantries and using them to take naps in the corridors during the night, and then putting them back in the pantries for housekeeping to remove and clean.	On 21 April 2020, the Hotel Duty Manager contacted the General Manager of Crown Metropol regarding the issue.	The Hotel Duty Manager asked the overnight houseman to ensure that pantries were locked in the evening.  On 21 April 2020, the General Manager of Crown Metropol emailed Tim Sullivan of DJPR regarding the issue and asked him to inform Government Security to monitor the issue.
Crown First Aid Manager	On or about 17 April 2020, the First Aid Manager identified that the clinical waste bins contained prohibited waste items (such as food).	On 17 April 2020, the First Aid Manager contacted the business unit managers regarding the issue.	On 17 April 2020, the First Aid Manager provided a list of items permitted and prohibited for the clinical waste bins and asked that the list be provided to Government Security.
Guests' parent/grandparent	On 21 April 2020, DHHS notified Crown of a complaint that two guests in Crown Promenade were not being served nutritious food that they could eat (with one of the guests being pregnant and the other guest being a 1 year old). The complainant was refused by DHHS to deliver food to the guests. The complainant requested that she be permitted to deliver food to the guests. The complainant also noted that the room did not contain a bath for the 1 year old.	On 21 April 2020, DHHS requested that Crown contact the guests to discuss the food requirements.	On 21 April 2020, Crown Promenade's Room Division Manager contacted the guest to discuss her concerns. The guest advised that she was happy with that day's dinner. On 22 April 2020, Crown confirmed the dietary requirements of the guest and her child.
Anonymous complainant [whistleblower]	Crown was notified of a complaint regarding inappropriate conduct of various members of Government Security in the course of the hotel quarantine program at Crown.	Crown reported the complaint to a DJPR Hotel Quarantine Agency Commander.	DJPR advised that it would raise the complaint with Government Security.

Raised by	What were the details?	How was the issue dealt with?	What was the outcome?
DJPR	On 27 April 2020, DJPR informed Crown of an issue identified by DHHS regarding working facilities for nursing staff at Crown Metropol, including lack of access to photocopier and printer and cleanliness and spaciousness of rooms utilised by nursing staff.	Crown escalated the issue to the General Manager of Crown Metropol.	On or about 27 April 2020, Crown arranged for the nursing staff area to be moved to Level 8 and arranged for a photocopier and additional meeting rooms on Level 3 for nursing work spaces.
Front Office Manager, Crown Metropol	On 4 May 2020, the Front Office Manager of Crown Metropol identified that Government Security guards on guest floors had been smoking in the fire stairwell and that chairs and wall furnishings had been damaged.	<p>On 4 May 2020, the Front Office Manager reported the issue to Crown Surveillance requested monitoring of smoking and the Government Security guards sleeping or damaging property.</p> <p>Crown investigated the issue, and found evidence of smoking on the floors, broken furniture, stains and other mess and rubbish bins on each floor were overfilling, including with medical waste.</p>	<p>Crown added additional surveillance to its regular monitoring and reported the issue to Tim Sullivan of DJPR on 6 May 2020.</p> <p>Government Security agreed to implement the following actions: clearing of staircases from levels 9 to 26; staircase patrols; regular collection of rubbish.</p>
DJPR	On 10 May 2020, Crown was informed that DJPR was getting a larger than usual amount of guest feedback regarding food and asked Crown to provide copies for the menus for Crown Metropol and Crown Promenade. The main issue was that the breakfasts were too sugary.	The issue was escalated to the Executive General Manager for Food and Beverage.	On 11 May 2020, Crown provided a copy of the menus.

Raised by	What were the details?	How was the issue dealt with?	What was the outcome?
DHHS ██████████ for CID-19 (Crown Metropol)	On 11 May 2020, DHHS notified Crown that it had received feedback about meals not meeting the requirements of guests with diabetes (either containing too much sugary food or sugary food being removed and not replaced with suitable alternatives). A specific complaint was raised in relation to a ██████████ guest who could not eat any of ██████████ breakfast items.	On 11 May 2020, DHHS asked that Crown inform it of what the particular guest would be provided for breakfast, as well as provide a response generally to the concerns raised regarding meals for diabetic guests.	On 11 May 2020, Crown confirmed the particular guest's meals and explained that the meals had been prepared in accordance with the nurses' instructions. On 11 May 2020, Crown also discussed the dietary requirements with the specific guest and organised changes to ██████████ meals. Crown also sought approval from DJPR for the guest to have food delivered.  On 14 May 2020, Crown met with DJPR and agreed to make further changes to its breakfast offering.
Crown Guest Services Leader	On 11 May 2020, Crown was notified of food related feedback obtained by Crown Guest services from guests at Crown Metropol and Crown Promenade relating to, including in relation to undercooked eggs.	On 11 May 2020, the Executive General Manager for Food and Beverage requested that Crown's chefs investigate the egg issue.	On 11 May 2020, Crown investigated the issue.
Guest (who states that the complaint was made on behalf of 200 other guests)	On 12 May 2020, Crown was notified of a complaint regarding the quantity, quality and variety of food for guests at Crown Metropol. Crown also received telephone complaints about this issue.	The issue was escalated to Crown's Executive Manager for Food and Beverage. Crown arranged a meeting with its caterer.	Crown met with its caterers.  On 14 May 2020, Crown met with DJPR and agreed to make further changes to its breakfast offering.
Uber Eats delivery driver and guest	On 20 May 2020, a Government Security Guard was involved in an altercation with an Uber Eats driver at the Crown Promenade driveway. The police attended the incident and viewed footage of the altercation and spoke to both parties. The Uber Eats driver left the site and the Government Security contractor returned to work.	On 20 May 2020, Crown logged the incident in its Security Log.  On 21 May 2020, Crown notified a DJPR Hotel Quarantine Agency Commander of the complaint. DJPR advised that it had asked Government Security to investigate the issue.	Government Security and Victoria Police dealt with investigation of the issue.

Raised by	What were the details?	How was the issue dealt with?	What was the outcome?
WorkSafe Inspector	On 25 May 2020, a Worksafe Inspector contacted Crown's Health and Safety Manager regarding a service request received by a Government Security guard in relation to rostering and working hours.	The Worksafe Inspector raised the issue with the Health and Safety Manager.	The Health and Safety Manager advised Worksafe that that security company was not contracted by Crown and that Worksafe should contact DHHS as it was responsible for managing the contract.
Eastern Health Security Manager	On 2-3 June 2020, Eastern Health asked to view Crown's CCTV footage at Crown Promenade to assist in an investigation Eastern Health was conducting into one of its security guards.	Eastern Health contacted Crown's Executive Director for Security and Surveillance regarding the issue.	Eastern Health attended Crown to review CCTV footage of the incident.
DHHS	On 4 June, DHHS informed Crown of a proposal to increase the frequency of fresh air walks so that guests could undertake at least one fresh air walk per week.	The proposal was considered by DHHS, DJPR and Crown.	Crown considered the proposal and liaised with DHHS and DJPR about the proposal. Crown considered the process proposed by DHHS and on 7 June agreed to an amended process which it considered to be safe and in accordance with social distancing requirements.
Crown Surveillance	On 13 June 2020, Crown identified that a number Government Security Guards had been involved in tail-gating incidents in the Crown car park to avoid paying for parking.	Crown's Operations Manager for Surveillance reported the issue to Crown's Executive Manager for Security and Surveillance.	Crown Surveillance continued to monitor the car park in relation to the issue.  On 15 June 2020, Crown surveillance contacted the Government Security Manager and provided a list of relevant vehicles. The Government Security Manager arranged for payment for each of the car park stays and supplied the names of the relevant security guards to Crown. Crown issued Withdrawal of Licence Notice to the guards so that they were not permitted onsite in any part of the Crown complex.

Raised by	What were the details?	How was the issue dealt with?	What was the outcome?
Hotel Duty Manager and Hotel Team Leader, Crown Promenade	On or about 18 June 2020, a Hotel Duty Manager identified that Government Security guards at Crown Promenade were not wearing masks while performing deliveries.	On 18 June 2020, a Hotel Team Leader contacted DHHS regarding the issue and advised that guests were complaining that Government Security guards were not following protocol. The Hotel Team Leader stated that Government Security guards in green zones (non-PPE zones) were wearing disposable gloves and using hand sanitiser on the gloves.	The matter was escalated by Crown. DHHS responded that Government Security guards would only need to wear PPE if they have direct contact with guests, and would not need to wear PPE if they made contactless deliveries for guests.
██████ guest	On 27 June 2020, Crown was notified of a complaint that Crown staff were removing rubbish from a guest's room every 7 days, rather than on a daily basis, in addition to other food related concerns that the guest's dietary concerns were not being met and that food quality was poor.	<p>DJPR asked that Crown confirm it knew the guest's food requirements and that appropriate food was being provided.</p> <p>Crown did not deal with the concern about rubbish removal from guest rooms, as Crown staff did not enter guest rooms.</p>	<p>Crown resolved the food related concerns raised, but the complaint was otherwise escalated through DHHS:</p> <ul style="list-style-type: none"> <li>• Crown confirmed it had the guest's dietary requirements and discussed with the guest what meals ██████ would receive for the remainder of ██████ stay.</li> <li>• The DHHS ██████ at Crown Promenade confirmed no food concerns had been raised by the guest. DHHS suggested the ██████ could deliver food or Uber Eats could be ordered.</li> </ul>
Crown Executive General Manager	On 7 July 2020, Crown identified that two Corrections Victoria staff entered the Crown Metropal Lobby unannounced without PPE during guest departure.	On 7 July 2020, Crown contacted ██████ of DHHS regarding the issue.	Crown asked DHHS to provide details of operational contacts from Corrections Victoria, DHHS and Department of Justice who would attend on site in the future.

Raised by	What were the details?	How was the issue dealt with?	What was the outcome?
Operations Manager, Crown Surveillance	On 13 July 2020, the Crown Surveillance Operations Manager reported an issue in relation to the conduct of Government Security guards departing from Crown Promenade following completion of the first phase of the hotel quarantine program. CCTV footage showed that Government Security were gathered in large numbers at reception, not wearing PPE and not adhering to physical distancing requirements.	The Surveillance Operations Manager reported the issue to the Head of Security, who escalated it to Crown's General Manager for Tourism.	Crown reported the issue to DHHS.
Crown Security	On 15 July 2020, Crown was notified that a Government Security personnel had been involved in an incident at Crown in 2016 and was prohibited from being on Crown property.	Crown's Security Team investigated the matter.	Crown did not permit the individual from Government Security to be on Crown property.
DHHS	On or about 16 July 2020, Crown was notified by Department of Justice and Corrective Services ( <b>DJCS</b> ) of an allegation by DHHS that Corrections Victoria had caused an infection control risk at Crown Metropol by breaching protocols around the correct disposal of PPE. DJCS asked Crown to provide information based on CCTV footage.	Crown provided information to DJCS about the content of video footage relating to incidents of inappropriate disposal of PPE, and provided a written report to DJCS.	Crown provided information as requested to DJCS about the content of video footage relevant to DJCS's enquiry but did not otherwise take any steps, because the issue did not involve Crown staff.

**Schedule 1: Employees of Crown of whom I have made enquiries**

<b>Crown employee</b>	<b>Topic on which information was provided</b>
Chris Reilly	Questions 4, 5, 8,
Mark Geerlings	Questions 14, 15, 16, 28, 33, 34, 35, 38, 39, 43 and 45
Greg Moore	Questions 14, 15, 16, 22, 23, 25, 26, 28, 33, 34, 35, 38, 39, 43 and 45
Tony Graham	Questions 32, 33, 34, 35, 36, 37, 38, 43, 44 and 45
Declan Marley	Questions 30, 33, 34, 35, 36, 37, 38, 39, 40, 41, 43 and 45
Craig Walsh	Questions 14, 15, 16, 28 and 47
Enda Cunningham	Questions 22, 23, 25, 26, 43 and 47