

STATE OF VICTORIA

Inquiries Act 2014

BOARD OF INQUIRY INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

Response to a request for a statement pursuant to NTP-074

Wilson Security Pty Ltd

Statement of: Shaun Edwin Hogan

Address: Level 3/6 English St, Essendon Fields VIC 3041

Occupation: National Manager Corporate Risk

Date: 21 August 2020

CONTENTS

A. INTRODUCTION	2
B. MY ROLE AND BACKGROUND	2
C. THE HOTELS AT WHICH YOUR COMPANY PROVIDED SECURITY SERVICES	6
D. ROSTERS AND SALARY ARRANGEMENTS	28

A. INTRODUCTION

On 21 August 2020, I, Shaun Edwin Hogan, of Level 3/6 English St, Essendon Fields VIC 3041, say:

1. This statement is made in response to and in compliance with a Notice to Produce from the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**the Inquiry**) issued on 11 August 2020 pursuant to section 64 of the *Inquiries Act 2014* (Vic). It is produced to the Inquiry on the basis that it will be tendered and received in evidence by the Inquiry pursuant to that Notice to Produce and on the basis that the statement will be treated as evidence pursuant to section 80 of the *Inquiries Act*.
2. Shown to me at the time of making this statement is a bundle of documents marked "**Exhibit SEH-1**".
3. Where in this statement I refer to documents, I refer to them by reference to their tab number within **Exhibit SEH-1** and their unique document number beginning with "**WILS**".
4. The matters set out in this statement are based on my knowledge and experience and information provided to me.
5. Where I have been provided with information, I believe that information to be true and correct.
6. As requested, this statement is arranged by reference to the questions I have been asked to address (as set out in the letter to me from the Hon Jennifer Coate AO of 11 August 2020).

B. MY ROLE AND BACKGROUND

Question 1

What is your title and role within Wilson Security Pty Ltd?

7. I am employed by Wilson Security Pty Ltd (**Wilson**) as the National Manager – Corporate Risk. I have been in this role since 2018. I report directly to [REDACTED] (General Manager – Specialist Security, Wilson).
8. I have been employed by Wilson since 2007 and over that period of 13 years, have held various senior roles. As I explain below, I have been involved in the preparation and deployment of security personnel in a number of large-scale events such as being the Operations Director during Wilson Security's involvement in the G20, the Financial Services Royal Commission in 2018 supporting security operations in Melbourne, Sydney and

Brisbane. I also supported the Wilson operations for the 2018 Commonwealth Games with the management and mobilisation of large numbers of security staff across multiple venues.

9. In my current role, I lead the Corporate Risk team which currently has three staff (including myself). My team is responsible for:
- a) helping in planning and deploying large-scale projects that Wilson is involved in;
 - b) assisting Wilson's clients to plan and design their security systems, such as:
 - i) specialist security for clients' annual general meetings;
 - ii) security risk assessments for universities; and
 - iii) training to and support for human resources staff of clients in relation to "high risk" employee terminations.
 - c) supporting other parts of the broader Wilson Group with project management and designing measures and systems to address risks.
10. I have three people directly reporting to me in my current role. They are:
- a) ██████████ (National Project Manager, Wilson);
 - b) ██████████ (Senior Risk Specialist, Wilson); and
 - c) ██████████ (Client Services Officer, Wilson).
11. I first became aware of Wilson's potential involvement in the Hotel Quarantine Program (HQP) on Saturday, 28 March 2020 around 10am during a telephone call with various senior managers from Wilson including Mr Nick Frangoulis (Chief Executive Officer, Wilson), my direct manager ██████████, and Mr Gregory Watson (General Manager – Regional Operations (Victoria & Tasmania), Wilson). The purpose of that call was to discuss Wilson's response to a request by the Victorian government for assistance with the HQP.
12. On the call on 28 March 2020, Mr Frangoulis explained that he thought the best way for the HQP to be delivered by Wilson was through a dedicated 'cell' of risk specialists that reported to Mr Watson (who would oversee Wilson's involvement in the HQP). ██████████ advised me that Mr Frangoulis requested that my team (myself, ██████████ and ██████████) and ██████████ all form this 'cell' to assist with Wilson's delivery of security services as part of the HQP.

13. In practice, my role in the HQP became one of implementing the day-to-day requirements of the HQP on behalf of Wilson. That role is also known as the 'Operational Lead'. As part of that responsibility, I needed to work with others at Wilson to:
- a) manage the availability of security officers;
 - b) determine how the security services could be provided, whether Wilson was able to deploy its own employees or alternatively, whether it was able to source officers from contractors;
 - c) identify the risks that might arise for officers and guests through the HQP, design measures and processes to manage those risks and then implement those measures and processes;
 - d) to liaise with third parties at hotel sites and relevant individuals in the Wilson Group;
 - e) oversee the delivery of security services as part of the HQP, including to:
 - i) review incident reports and take action to resolve any incidents, as well as to implement measures to mitigate the risk of similar future incidents;
 - ii) review 'exceptions' in the Declarations of Fitness that were submitted by Site Supervisors via Formstack; and
 - iii) plan to ensure that Site Managers were able to attend each hotel site;
 - f) provide daily updates and in addition, when necessary, ad hoc updates to the leader of the project (Mr Watson); and
 - g) implement the directions that Mr Watson conveyed to me, including those that he had agreed with the Victorian government.

Question 2

What is your relevant professional background and work history?

14. Prior to my employment with Wilson, I worked in the following roles:
- a) **from 1990 to 1993**, Infantry Soldier in the 2nd / 4th Battalion of the Royal Australian Regiment, Australian Army;

- b) **from 1993 to 1996**, Security Specialist (in a self-employed consultancy capacity), based in London;
- c) **from 1997 to 1998**, Operations Manager, Protec Security, Port Moresby, Papua New Guinea; and
- d) **from 1998 to 2007**, Branch Manager of Brinks Australia, Brisbane (an armoured car and cash in transit business).

15. I have held the following roles at Wilson:

- a) **from December 2007 to January 2014**, I was employed by Wilson as the State Manager for Queensland. In this role, I oversaw Wilson's operations in Queensland. I remained in this role until January 2014;
- b) **from January 2014 to August 2016**, I was the National Manager – Specialist Security;
- c) **from January 2014 to around December 2014**, I was the Operations Director for the G20 Host Year. This involved oversight of the security operations involved in Brisbane hosting the G20, including the G20 Summit in November as well as smaller satellite events throughout the course of 2014. This required me to work in conjunction with the Commonwealth Department of Prime Minister and Cabinet to develop measures that would ensure the security of high-profile guests that were staying in commercial hotels used during the G20 Summit;
- d) **from January 2015 to June 2015**, I was temporarily in the role of General Manager of Offshore Operations;
- e) **from November 2016 to January 2018**, I was the Victorian State Manager for Government Services, overseeing Commonwealth and State government contracts in Victoria such as the Department of Health and Human Services (**DHHS**), AirServices Australia, NBN Co and the Australian Taxation Office (**ATO**); and
- f) I have held my current role since **February 2018**.

16. I hold a Certificate IV in Security and Risk Management and a Diploma of Risk Management.

C. THE HOTELS AT WHICH YOUR COMPANY PROVIDED SECURITY SERVICES

Question 3

For each hotel at which your company provided security services, please state -

- (a) the number of persons rostered to each shift;*
- (b) the number of shifts per day; and*
- (c) the duties of the staff rostered for each shift.*

(a) **Number of persons rostered to each shift**

17. The number of persons that Wilson rostered to each shift to provide security services changed through the HQP. As I explain below, there were three general components of deployment as part of the HQP:
- a) **Component 1:** determination of the number of security officers to be deployed to each floor and to the hotel more generally (for example, to secure entry and exit points to the hotel site);
 - b) **Component 2:** deployment and removal of security officers to floors based on the number of travellers that arrived (or departed) at each hotel site, as well as additional officers to account for changes in scope to the HQP; and
 - c) **Component 3:** a decrease to the number of officers deployed to each floor at the request of officials from the DJPR, which I discuss in further detail in Question 5 below.
18. As part of **Component 1**, before Wilson deployed officers to a hotel site, a combination of Mr Watson, [REDACTED], [REDACTED] or I attended the hotel site to assess how many officers were required on each floor. There were representatives of other government departments present at these site visits – being the DHHS, the Department of Jobs, Precincts and Regions (**DJPR**) and Victoria Police. The Wilson representatives that were at the site visit agreed on the number of officers that would be deployed to each floor and the hotel generally, and the location of 'posts' or specific locations to be manned, with the Victorian government's representatives.
19. The number of officers that were deployed to each floor depended on:
- a) the particular hotel site and its particular floor layout and number of exit points (and therefore the number of 'posts' that needed to be covered); and

- b) the duties that DHHS and DJPR required Wilson to perform as part of the HQP (noting that those duties changed over time, as I describe in more detail as part of my response to Question 4).
20. Other than the change in scope that I describe in my response to Question 4 below, the number of officers rostered as part of **Component 2**, depended on:
- a) the number of quarantine guests in each hotel, which varied depending on the number of passengers on incoming flights as well as guests departing hotel quarantine; and
- b) consequently, the number of floors occupied by those quarantine guests needing to be manned.
21. I discuss **Component 3** in further detail at Question 5 below.
22. As I describe at 18 above, Mr Watson and I agreed with the Victorian government officials present at each site visit:
- a) the number of security officers that were to be present on each floor at each hotel; and
- b) the number of security officers that were to be present at other parts of the hotel.
23. The total number of officers present at each shift at each hotel varied depending on the number of floors in a hotel that were 'activated'. Officers were only placed on floors on which returned travellers were located ('activated floors'). As I describe in 20 above, the number of activated floors in a hotel changed regularly depending on the number of incoming passenger arrivals and the number of individuals leaving quarantine.
24. Based on my initial site visits at each hotel, Mr Watson and I identified that the following numbers of officers were required on each floor:
- a) **Crowne Plaza: 3;**
- b) **Pan Pacific: 3;**
- c) **The Pullman: 2; and**
- d) **Mercure Welcome: 3.**
25. Security officers were also deployed to secure other parts of the hotel, such as entry and exit points of each hotel:

- a) **Crowne Plaza: 2;**
- b) **Pan Pacific: 2**
- c) **The Pullman: 2; and**
- d) **Mercure Welcome: 1**

26. In addition to the above, each hotel had the following guards:

- a) 1 'reliever' for approximately every 6 security officers;
- b) 1 Site Supervisor; and
- c) 1 Site Manager (during the day, noting my comments at 92.a) below).

27. For completeness, I note that there may have been small variations between shifts.

28. As I describe in detail in Question 4 below, security officers' duties changed throughout the HQP. Some of these changes necessitated changes to the number of security officers rostered per shift, as follows:

- a) when recreational walks were introduced (see 48 below), a further 3 security officers;
- b) when security officers were required to assist with inspections of food deliveries (see paragraph 57 below, a further 2 security officers; and
- c) when the Victorian government required that the overall headcount be reduced (see paragraph 43 below) 1 security officer posted on each 'activated' floor, rather than the numbers that I include above.

29. Once the hotel site layout was confirmed for each of the hotels (through the process I describe below in Question 5), staffing levels were increased or decreased as required to provide coverage for the number of floors occupied by quarantine guests in each site.

(b) Number of shifts per day

30. Initially, at each hotel there were two 12-hour shifts per day, of either 6.00 am - 6.00 pm and 6.00 pm - 6.00 am, or 6.30 am - 6.30 pm and 6.30 pm - 6.30 am. Wilson had coverage at each site 24 hours per day, 7 days per week. In addition to officers stationed at specific posts, as I describe in paragraph 79 below, Wilson appointed a 'reliever' system on both shifts to ensure that security was maintained when officers went on breaks.

31. When recreational walks were introduced (which I describe in Question 4 below) , a further shift was added at each hotel, from 8.00 am - 8.00 pm, being the hours during which officers typically conducted the recreational walks.

(c) Duties of the staff rostered for each shift

32. The core duties of security staff were set out in a document called 'Duties / Actions On' (**Core Duties Document**). I started developing this document with [REDACTED] on 2 April based on information that Mr Watson advised me Mr [REDACTED] ^{Personal Information} (Principal Policy Officer, DJPR) had communicated to him. The purpose of this document was to make clear the obligations of staff working in the HQP. [REDACTED] and I circulated the document on about 7 April, when we became confident of its content based on our experience. It was made readily available to all security staff, including by being stuck on the wall or floor at each designated security post in each hotel and on the walls of the designated security room. I refer to this document as the Core Duties Document and exhibit behind **Tab 1 to Exhibit SEH-1 [WILS.0001.0003.0096]**

33. Relevantly, the Core Duties Document set out the following:

- *Our main objective is to observe and report, ensuring that the guests who are quarantined remain inside their rooms.*
- *You are to remain on your post at all times, when not on a break and at the beginning of your shift note down and record the Mobile number of your shift supervisor. This is on the white board and given at the briefing time in the morning or evening at shift change.*
- *You are to ensure that guests comply with the order they have signed and must escalate all issues and people exiting their room immediately to your shift supervisor.*
- *Should a guest fail to listen to your request, you are to advise them that they are not complying with the order they signed and that you will have to report this immediately.*
- *Please note a detailed description and or what room number the guest has been in and call your supervisor, they will need details to escalate to DHHS or Victoria Police.*
- *At no time are you required to physically stop, restrain or touch the persons in Quarantine. Always maintain social distancing, hand hygiene, report to your supervisor if you are feeling unwell.*
- *Please ensure you are vigilant and paying attention to your surroundings and adhere to all OH&S procedures on shift and complying with the Social Distancing guidelines. All OH&S issues or concerns need to be escalated to the shift supervisor or the Wilson representative onsite.*
- *Staff are to use the security office space for eating and taking their breaks, please keep this area clean, and free from rubbish.*

- *DHHS 1800 960 944 help line for any guests queries and advise them to call the room service or reception for any Hotel issues.*
- *When you are relieved for a break please ensure you tell the oncoming staff member of any issues or concerns in your area. We thank you and appreciate what you are doing during such an important time.*

34. On around 30 March 2020, I attended a physical meeting with Mr Watson at which Mr David Clements (Deputy Secretary from the Inclusion team of the DJPR) and [Personal Infor] were present. At that meeting, Mr Clements forwarded me an email that set out the duties of security officers as part of the HQP. Based on that document, I formed the view that the role of security officers was to 'observe and report'. 'Observe and report' is well understood in the private security services industry to describe the role of security officers to not physically touch another person, except in lawful self-defence. In this context, I understood that this meant that if a guest wanted to leave their room, we were to politely request that they were to return to their room. If the guest did not comply, we could not prevent the guest from leaving and we were to follow the procedure that I describe in more detail at paragraph 35.g) below. As noted above, these duties were consistent with the role that security officers normally perform, noting that they do not have the power to detain individuals.
35. Practically, the officers that Wilson deployed had different duties depending on the nature of their interaction with returned travellers. The duties that Wilson's officers performed initially were:
- a) **On arrival:** Returned travellers arrived at hotel quarantine sites on buses. When returned travellers arrived, security staff were positioned inside the hotel lobby as well as outside, near the area that buses were arriving, to support in the 'observe and report' capacity described above. Victoria Police were responsible for cordoning off areas through which travellers were transiting to the general public and representatives of DHHS were also present.
 - b) **Arrival and registration:** Security staff directed quarantine guests to enter the hotel lobby to be checked in by hotel staff at the reception desk. Guests were then directed by hotel staff to register with DHHS representatives, which included a process through which the guests could advise the DHHS representatives of any medical issues, dietary requirements or other matters. This was done by way of a questionnaire. All officers present wore facemasks and nitrile gloves.
 - c) **Accessing lift:** The DHHS employees then directed the travellers to the lift area, where an officer was stationed. After returned travellers entered the lift, guests swiped their access key card (which granted them access only to their designated

floor) and pressed the button for their designated floor. Officers directed guests into lifts with members of their family or travelling party. The officer did not enter the lift to minimise the infection risk. Mr Watson advised me that [Personal Inform] had directed that officers were to escort returned travellers in lifts to their rooms. However, I understand through my discussions with [redacted] and [redacted] that representatives of the Victorian government that were onsite ultimately agreed with Wilson's approach. I believed that this solution balanced the need to ensure guests would not go to floors or rooms where they were not designated, together with managing infection risk.

- d) **Entry into rooms:** As noted above, a further officer was stationed at the lift area on each floor and when guests arrived at their floor, the officer directed them to their rooms (but did not escort them).
- e) **Exit points:** A further officer was stationed at each emergency exit door. This meant that each floor was secure because at least one officer had line of sight on each hotel guest as they approached and entered their room. Each officer was required to remain at their post during their shift, unless they were on a break.
- f) **Supervision duties:** Officers' duties at this point, in practice, were to supervise the hotel corridors and if a quarantine guest opened their door or attempted to leave their room, to direct the guest to return to their room and close their door (other than in certain authorised situations).
- g) **Guest refusal of directions:** Mr Watson advised me that if guests attempted to leave a hotel, [Personal Inform] instruction was for officers to tell guests to return to their room. If guests did not comply, officers were to tell the Site Supervisor or a Site Manager. The Site Supervisor or Site Manager would in turn, advise the Authorised Officer (**AO**) on duty or Victorian government representatives. If it appeared that a guest was attempting to abscond from the hotel, the Site Supervisor or Site Manager would call Victoria Police (by dialling 000) if the AO was not immediately available. [redacted] and I included these instructions in the Core Duties Document that I describe above. I am not aware of any instances where guests attempted to abscond from hotel quarantine from a Wilson-serviced hotel. However, there were several occasions during which a quarantine guest would open their door and be directed by an officer to close it. Based on my review at the time of Formstack incident data, instances of non-compliance included things like where a guest had difficulty contacting the reception desk, so they opened the door to explain the issue to the officer. The officer told the guest to return to their room and then contacted hotel staff.

- h) **High-risk situations:** In appropriate situations (e.g. in cases of suspected domestic violence or self-harm), in accordance with the Core Duties Document, the Site Supervisor was required to contact Victoria Police directly on 000 immediately if no Site Manager or AO was present.
- i) **Non-compliance:** Wilson referred to any incident of a quarantine guest opening their door or leaving their room other than in an authorised situation as “non-compliance”. Security officers were required to report incidents of non-compliance to the Site Manager or Site Supervisor, who was then required to log the report using Formstack (a web-based communication platform which enables the user to submit an electronic form on any device with internet access). Security officers had the capacity to log these incidents themselves but this was usually done by the Site Supervisor or Site Manager.
36. As the HQP progressed, officers’ duties evolved, as I explain in Question 4 below. By way of overview, the major changes in duties related to:
- a) the implementation of recreational walks;
- b) officer involvement with quarantine guest property (e.g. handling luggage, bag and parcel inspection processes, the identification of certain “prohibited items” for removal by an AO); and
- c) management of food deliveries (e.g. UberEats and “care packages” dropped off for hotel guests).
37. Some security staff were appointed by Wilson as Site Supervisors during the HQP. I provide greater detail about who Site Supervisors were and their interaction with other staff in Question 11.
38. ██████████ prepared specific guidance for Site Supervisors by creating a document called ‘Supervisor Handover Notes / Checklist’. I reviewed ██████████’s draft document and we sent it to Site Supervisors and Site Managers on 2 April 2020. This document remained unchanged and continued to apply throughout the HQP. That said, new requirements or directions were communicated separately. A PDF version of the Handover Notes was provided by ██████████ by email, SMS or WhatsApp. I refer to this document as the **Supervisor Notes** and exhibit it behind **Tab 2 to Exhibit SEH-1 [WILS.0001.0001.9056]**. The Supervisor Notes set out:

- *Please use the briefing sheets provided to us by the Government, and please note that DHHS can change a process and standard without informing us, and so we need to be adaptable and polite in our response.*
- *All staff are to receive a face mask that is in the sealed sterile bag, if staff feel they need to wear the mask they are welcome to and the mask is then owned by them. Staff used on busses and dealing with guests face to face should be instructed to wear a mask whether they feel they need to or not and provided with gloves.*
- *Staff sign in is to be completed by the shift supervisor and you are responsible for what happens in your shift, this includes escalation of events and form stacks for any and all incidents.*
- *You are to ensure staff presentation is neat and tidy, clean shaven, black suit, white shirt and black tie, or complete Wilson uniform. Staff arriving for work not in this attire should be sent home and use the additional staff rostered to cover.*
- *All staff are to be issued a key card that allows staff to access the lift wells and the rooms, this must be wiped down on shift hand over, all passes must be accounted for. ...*
- *We are keeping staff on the floors to ensure we minimise and potential cross contamination, so minimise any staff from moving floors.*
- *Staff are to use the security office for eating and are welcome to use the lounge area outside the security office to sit down, keep eating to the security room only.*
- *Full briefing is to occur in the room before staff are put on post, staff must know their roles and how its completely no hands on with any guests, the escalation point is you, Mobile number to be provided and DHHS 1800 960 944 is to be given to staff in case guests in the hotel complain or want to voice their concerns.*
- *On duty DHHS officer will be displayed on the white board for you the supervisor to call and liaise with.*
 - *Security room key is handed over?*
 - *Security are issued masks and gloves?*
 - *All staff issued key cards for floors and rooms?*
 - *Full list of names and follow up calls made to the relevant companies and Wilson updated?*
 - *Oncoming supervisor is aware of any information handed over to you for your shift?*
 - *Emailed complete list and your shifts confirmed roster to Guarding services?*
 - *Form stacked and completed any issues and concerns?*

39. Site Supervisors were also provided a document called the “WHS Guidelines - Managers attending / working at isolation hotels” (**WHS Guidelines**). The WHS Guidelines set out key requirements for any Wilson managers that may attend the quarantine hotels in a support role or supervisory function. I exhibit the WHS Guidelines behind **Tab 3 to Exhibit SEH-1 [WILS.0001.0001.5204]**. The WHS Guidelines provided guidance as to:
- a) isolation from other parts of the business;
 - b) completion of Declarations of Fitness;
 - c) logistics and support;
 - d) limitations and requirements for visits to the hotels;
 - e) limitations on subsequent office visits; and
 - f) dealing with confirmed / suspected COVID-19 cases.

Question 4

Did the numbers of persons and shifts or the nature of the duties change over time? If so, please detail the nature of those changes.

40. Yes. During the HQP, there were changes to both the number of persons on shifts, and the duties that were performed.
- (a) **Changes to number of persons**
41. As indicated at 17 above, staffing levels varied throughout the HQP due to:
- a) changes in demand due to flight arrivals;
 - b) variation at the request of the Victorian government;
 - c) quarantine guest departures; and
 - d) changes in duties, which I describe in my response to part (c) of Question 4.
42. **Changes in demand due to flight arrivals:**
- a) Information about incoming passengers was provided to me in one of two ways – via email from a representative of the DJPR or from a Site Manager. The email from the

DJPR contained details of incoming flights, the number of passengers on those flights and the hotels that those passengers had been allocated to quarantine in (including Wilson's sites). These emails were typically received the day before or the day of the flights arriving in Melbourne and were frequent, almost daily. Accordingly, there were times that Wilson received these notifications with very little notice of the guests' arrival. Examples follow, and each necessitated changes to staffing levels.

- i) **8 April 2020:** at around 7.00 pm, I received an email from Personal Information (Senior Project Manager - Trade, Global Victoria), advising the arrival of a flight the following day at 5.30 pm, estimating 38 passengers to be allocated to Wilson hotels. I exhibit this correspondence behind **Tab 4 to Exhibit SEH-1 [WILS.0001.0001.8573]**.
- ii) **16 April 2020:** at around 10.30 am, I was copied into an email by [REDACTED] (Operations Manager, Wilson) advising the arrival of a flight later that day at 6.55 pm, estimating 55 passengers. I exhibit this correspondence behind **Tab 5 to Exhibit SEH-1 [WILS.0001.0001.8683]**.
- iii) **28 April 2020:** at 11.43 am, I received an email from [REDACTED] (a Site Manager) providing "tentative" advice about the arrival of a flight the following day, estimating 350 passengers. This demand necessitated increased PPE supplies and an estimated 12 hour check-in period, resulting in Wilson ensuring all officer movements were to be conducted via emergency exits. I exhibit this document behind **Tab 6 to Exhibit SEH-1 [WILS.0001.0001.8776]**.

- b) Site Managers were responsible for determining whether staffing changes (i.e. to numbers of staff) were necessary at a hotel site. After having made those changes, we updated AOs and hotel staff as to those changes. If guests were to be placed on a floor where officers were already present (an 'activated' floor), then no staffing changes were necessary. However, if there was a floor where officers were not already present, then a new floor would be 'activated' which would require additional security staff. I had oversight over this process because when necessary, I coordinated PPE supplies and the requirements for meals at each hotel site.

43. Variation at the request of the Victorian government: Staffing changes in late June 2020:

- a) On 20 June 2020, I received a telephone call from Ms Gonul Serbest (Chief Executive Officer, Global Victoria), during which she told me that Global Victoria was seeking to decrease headcount across all levels of the HQP (such as the headcount

of nursing staff, for example) to reduce the risk of transmission in the HQP. Ms Serbest made reference to up to date data evidencing:

- i) a low risk of quarantine guests attempting to abscond; and
 - ii) a low infection rate in returned travellers (around 1%).
- b) I relayed the contents of that call to Mr Watson. In accordance with Ms Serbest's direction, I prepared a proposal to reduce the number of officers on each floor by 50%. Under that revised proposal, one officer was allocated to each floor (in a roving capacity), rather than three. Additional officers were to remain stationed at other locations (e.g. the lift area of the lobby). This would ensure full coverage of the hotel could be maintained. I discussed that proposal with Mr Watson and sought his approval to implement those changes. At Mr Watson's direction, I sent that proposal to Ms Serbest on 21 June 2020. Mr Serbest approved that proposal. I exhibit the email chain at **Tab 7 to Exhibit SEH-1 [WILS.0001.0001.9264]**.

44. **Variation due to quarantine guest departures:** As quarantine guests completed their mandatory quarantine period, it was sometimes the case that a previously 'activated' floor became vacant. However, Site Supervisors and officers proactively conducted floor walks to ensure that each room was in fact empty before it considered the floor to be 'vacant'. Although the Victorian government did not require this, I regarded this as an important risk management step to ensure that floors were fully vacant before confirming any decrease in security staff. Once a floor was completely vacated, and there were no incoming guests that would need to be accommodated on that floor, the number of security staff was decreased accordingly.

(b) **Changes to shifts**

45. As I explain in further detail in paragraph 48 below, a third shift (8.00 am - 8.00 pm) was introduced to facilitate the implementation of recreational walks. The introduction of the third shift occurred on 10 April 2020.

(c) **Changes to duties**

46. Throughout the HQP, the duties required of Wilson by DJPR and DHHS evolved. As noted above, this required Wilson and security staff to adopt changes quickly.

47. As I mentioned in 28 above, the major changes in duties or requirements of officers related to the following, which I explain in further detail below:

- a) the implementation of recreational walks;

- b) officer involvement with quarantine guest property (e.g. handling luggage, bag and parcel inspection processes, identification of certain “prohibited items” for removal by an AO); and
- c) management of food deliveries (e.g. UberEats and “care packages” dropped off for hotel guests).

Implementation of recreational walks:

48. On 6 April 2020, an AO at the Pan Pacific Hotel directed a Wilson Site Manager to implement a ‘trial’ plan whereby guards would escort hotel guests outside the hotel and to certain designated areas, for a limited time, before returning to their room (‘recreational walks’).
49. On 18 April 2020, Mr Watson forwarded me an email from [Personal Inform] that contained an “Exercise Area Implementation Plan” that had effect from 20 April 2020. I note that the implementation of the Exercise Area Implementation Plan formalised directions that security officers had been receiving from AOs about recreational walks, including the 6 April 2020 direction above. I exhibit that correspondence behind **Tab 8 to Exhibit SEH-1 [WILS.0001.0001.8699] [WILS.0001.0001.8700]**.
50. AOs communicated to security officers that guests were to be permitted cigarettes during recreational walks (smoking was previously prohibited). If guests did smoke, officers were required to ensure:
- a) smoking occurred in designated areas; and
 - b) cigarette butts were removed from public areas (to reduce the transmission risk associated with a member of the public coming into contact with a used cigarette butt).

Officer involvement in hotel guest property

51. Guest luggage: When Wilson started delivering security services under the HQP, Mr Watson, [Redacted] (Health, Safety and Environment Advisor, Wilson Group) and I agreed that we would direct officers to not assist guests with their luggage. We considered this to be an infection control measure because there had been recent media reports of COVID-19 potentially being transmitted to baggage handlers via travellers' bags. On or around 3 April 2020, Mr Watson informed me that, following a request from [Personal Inform], he had agreed that Wilson officers would assist with the loading and unloading of bags on a case-by-case basis (e.g. with elderly travellers). In order to perform this, a Site Supervisor nominated officers to specifically undertake this duty including in the correct use of facemasks and gloves in this context.

52. Searching guest property: At the commencement of the HQP, a DHHS AO informed me in a conversation at the Crowne Plaza Hotel on or around 1 April 2020, that alcohol, cigarettes and non-prescription drugs were prohibited in the hotels. In the event that any officer saw any such item being brought into the hotel (including through searches of deliveries), the officer was required to notify the AO, who would then remove that item, to be returned to the guest at the conclusion of their quarantine period.
53. At the outset of the HQP, officers were not involved in the searching or delivery of packages received by guests. Almost immediately after Wilson commenced providing the security services, while I was at the Crowne Plaza Hotel, an AO requested a Wilson officer to assist by conducting a physical search of deliveries. I noted to the AO that security officers do not have the power to conduct physical searches. I immediately advised Mr Watson of the request.
54. On 4 April 2020, Mr Watson advised me that he had agreed with Personal Inform that officers would undertake a “footy bag search” of incoming goods such as food deliveries or “care packages” (which I discuss below at 56 below). This is a visual inspection of a bag, checking for prohibited items in the presence of another officer, conducted under the view of the hotel’s CCTV. No items in the bags are handled directly by the officers. At around the same time, Mr Watson informed me that he had agreed with Personal Inform that security officers would be present while AOs conducted an inspection of guests’ mail and parcels, but security officers were not to open mail and parcels.
55. Alcohol: It was my observation that some AOs on certain shifts allowed quarantine guests to have access to alcohol, while others did not. In those cases, the officers were required to notify the AO, who then removed the alcohol for the duration of the quarantine period.

Management of food deliveries

56. At the start of the HQP, the General Manager of the Crowne Plaza Hotel informed me that the hotel did not allow hot food being delivered to quarantine guests. As a result, guests were not permitted to order food delivery services (e.g. UberEats) to the hotels or receive “care packages” delivered or sent to them (e.g. by family or friends).
57. On around 9 April 2020, I was informed by Mr Watson that Personal Inform had instructed him that some ‘high risk’ guests would be allowed such services. When such deliveries were made, AOs required officers to conduct inspections of incoming food or grocery packages. Officers did this by opening the bag or package (i.e. by the handles) and conducting a visual inspection only, without touching anything inside the bags or packages. Prohibited items (e.g. alcohol) were removed (subject to my comments at paragraph 55 above). Shortly after 9 April 2020, access to food delivery services and care packages was opened up to all quarantine

guests by DHHS. Guests were permitted to receive other deliveries such as supermarket deliveries that they placed themselves, for instance by online order. Officers continued to conduct visual searches of these deliveries in the same manner.

58. Following a discussion between myself and an AO at the Pan Pacific Hotel, I directed that two additional officers per shift be rostered on for this purpose and for the searches to occur in sight of CCTV footage.

Process for alteration of duties

59. Wilson considered each request that was made to alter officers' duties. Wilson did not implement changes requested by AOs and other Victorian government representatives where we considered the requested task was beyond the scope of security officers' legal authority (e.g. opening and searching mail). On more than one occasion, after declining to implement such a request given to me by an AO, the AO said to me words to the effect of "other providers are doing this". I took this to mean that some other security providers in the HQP were implementing similar requests made by AOs and that we were viewed as being unhelpful.
60. I also note that from time to time during the HQP, Wilson security officers were required to change the way they performed their duties as a result of individual directions from AOs and hotel staff. In the case of hotel staff for example, the General Manager of the Mercure Welcome and Pullman hotels required that officers not wear facemasks in the lobby of the Mercure Welcome hotel because it was designated a 'green zone' (being a 'guest free' zone).
61. In the context of the HQP, a change to duties meant the need to assess, firstly, whether there were any risks, and then to ensure those risks were properly managed. This was a role that I undertook, but in conjunction with advice from Wilson occupational health and safety representatives. By way of example, if an officer was to physically inspect bags, that in itself creates a risk of injury or infection associated with placing hands in amongst people's belongings. If an officer is to move luggage, this creates a manual handling risk. Secondly, officers need to be appraised of the changes, together with any relevant limitations. This is dealt with further below in response to Question 10. No guidance was provided by DJPR or DHHS in respect of infection control requirements associated with any of these changes in duties.

Question 5

How were decisions made about the number of staff to be rostered on?

62. I explain part of the process by which the number of staff were to be rostered in my response to Question 3, above. I provide further detail below.
63. I attended the following site visits:
- a) Crowne Plaza Hotel on 29 March 2020;
 - b) Mercure Welcome Hotel on 26 May 2020; and
 - c) Pullman Hotel on 26 May 2020.
64. I did not attend the Park Royal or Pan Pacific site visit. I understand Mr Watson attended the Park Royal site visit (with [REDACTED]) and the Pan Pacific site visit (with [REDACTED]).
65. At each of those site visits, the attending parties:
- a) confirmed that at each of the hotels, the layout on each guest floor was the same as other guest floors at that hotel;
 - b) visited one guest floor of the respective hotels to assess entry and exit points to the hotel. These access points included:
 - i) lifts;
 - ii) doors;
 - iii) fire stairwells;
 - iv) lobby; and
 - v) goods area.
66. Following this assessment (which I discuss in further detail at paragraph 18 above) and consideration of the number of floors in the hotel, the representatives discussed their respective views on the number of security staff that would be required as a minimum to man and secure the sites. Basically, the posts / locations were identified as those requiring manning, to enable officers to observe movement of guests.

67. In addition to those minimum manning requirements, Wilson decided to roster additional “relievers” to ensure that each site had sufficient staff to cover each post including while officers took breaks. I discuss “relievers” in further detail at paragraph 78 below.
68. I refer to Question 4 as to the changes to staffing levels made during the course of the HQP.

Question 6

For each hotel at which your company provided services -

(a) who was your contact at DHHS; and

(b) what directions, information and requests were given to you by DHHS regarding the way in which security services should be performed?

69. I did not have one particular contact at DHHS in respect of each hotel to which Wilson provided services.
70. I understood from my discussions with DJPR and DHHS representatives at the initial Crowne Plaza site visit on 29 March 2020 that DHHS had appointed AOs from itself and other Victorian government departments to give directions, information and requests on behalf of DHHS.
71. AOs gave directions, information and requests to Wilson either directly to me, to another Wilson manager (usually either [REDACTED] or [REDACTED]), the Site Managers, the Site Supervisors or to security staff.
72. I cannot recall each and every direction, piece of information or request given to me by an AO. However, I refer to Question 4 as typical examples of matters in relation to which AOs gave directions, information and requests. As I explain in Question 4, AOs would provide directions on things like incoming flight arrivals, new policies and procedures that had been implemented and directions with regards to specific guests.
73. I understand that Mr Chris Lindsey (Manager, Procurement Management, DHHS) was the DHHS contact responsible for finalising the transition of the contract from DJPR to DHHS in early July.

Question 7

For each hotel at which your company provided services -

(a) who was your contact at DJPR; and

(b) what directions, information and requests were given to you by DJPR regarding the way in which security services should be performed?

74. I did not typically have contact with individuals at DJPR. I understand, however, that my colleague Mr Watson had regular contact with representatives from DJPR.
75. In general terms, DJPR relayed multiple directions, information and requests to Mr Watson regarding the performance of security services (including on behalf of DHHS).

Question 8

What were the arrangements in place at each hotel for security staff to meet, eat, use toilet facilities and take breaks?

76. Security staff were required to remain on their post at all times, except when they were on an authorised break and at the beginning of each shift when they were required to attend a daily briefing in the designated security room.
77. In relation to each of the arrangements that the Inquiry has asked me about, I note:
- a) **meeting:** security staff attended a daily briefing at the beginning of each shift in a designated security office. This was conducted by either the Site Manager or Site Supervisor.
 - b) **eating:** Wilson organised catered meals for all of its security staff at its own expense, other than the Pan Pacific Hotel. I understood that the Pan Pacific Hotel did not have the resources to provide catered meals to both security staff and quarantine guests. Hot drinks and snacks were provided by the hotels (including the Pan Pacific Hotel). Wilson decided to provide meals to security staff in part as an infection control mechanism because Wilson wanted to limit security staff leaving the hotel area and taking breaks at nearby food outlets.
 - c) **breaks:** in addition to meal breaks, unscheduled rest and toilet breaks were regularly provided.

78. Wilson put in place steps to ensure that each post was covered at all times, either by the officer designated to that post, or if that officer was on a break, a “reliever”.
79. A “reliever” is an officer who is not designated to any particular post during a shift. Their role is to cover other officers' posts while they are taking a break (or otherwise rove the floors if there are no posts to cover). A reliever may be a Wilson employee or a contractor worker. Security officers selected by the Site Supervisor to be relievers were typically more experienced and higher-performing officers. In this way, relievers were also able to play a quasi-supervisory role by ensuring that other officers were at their designated posts and performing their duties as required. There was typically a ratio of one reliever for every five or six other security staff on shift, with 24/7 coverage.
80. The process for an officer taking a break was as follows:
- (a) meal breaks would be scheduled for each officer by the Site Supervisor;
 - (b) a reliever would attend an officer's post prior to their break commencing;
 - (c) the officer would take the break;
 - (d) the officer would return to their post following that break;
 - (e) the reliever would return either to their roving role or cover another officer's post;
 - (f) rest breaks were generally managed by the Site Supervisor in such a way that ensured there was full coverage of all posts and best allowed relievers to work on as few floors as possible per shift;
 - (g) officers would request to take other breaks on an “as needs” basis, by contacting the Site Supervisor (by mobile phone if the officer could not see the Site Supervisor from their post); and
 - (h) if a reliever was available, the Site Supervisor would contact them and direct them to cover the officer's post for the duration of their break.

Question 9

What if any training was provided to your staff by DHHS, DJPR or any other government department regarding COVID-19 and how to work in a safe manner?

81. No formal training (that is, by way of “hands on” instruction) was provided to our staff by DHHS, DJPR or any other Victorian Government department regarding COVID-19 and how to work in a safe manner.
82. From time-to-time (but only on a few occasions) demonstrations and briefings as to how to use face masks and gloves, wash hands, utilise hand sanitiser, were provided by DHHS nursing staff. To the best of my knowledge, this was done on the initiative of those nursing staff. This only occurred at the Mercure Welcome Hotel.
83. Certain policies and guidance materials were provided from time-to-time. Wilson was issued with a copy of the following:
- a) a document called “Operation Soteria - PPE advice for hotel-based security staff & AOs in contact with quarantined clients” (referred to in Question 4 above as the “DHHS PPE Guidance” and exhibited behind **Tab 9 to Exhibit SEH-1 [WILS.0001.0005.7961]**). This was provided by DJPR on or around 29 May 2020 and dated 5 May 2020. DJPR provided an update to this document on or around 11 June 2020. Wilson understood that this document set a minimum standard of PPE use. However, Wilson independently required a higher standard.
 - b) a document called “Operation Soteria - Exercise and fresh air implementation plan” (referred to in Question 4 above and exhibited behind **Tab 10 to Exhibit SEH-1 [WILS.0001.0001.8700]**). This was provided by DJPR on or around 18 April 2020 with effect from 20 April 2020. This document set out the procedures by which recreational walks were conducted.
84. Additionally, Wilson required all its employees and all contractors’ staff to complete the Commonwealth Government’s online COVID-19 infection control training module, and provide evidence of completion.

Question 10

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

85. Wilson requires all its employees and all contractors' employees that it engages to hold current individual Victorian security licences. A prerequisite to obtaining such a licence is the completion of relevant training (specifically, a CPP20218 Certificate II in Security Operations). It is expected therefore that security staff are trained and competent to perform all duties of a security officer as form part of that licencing regime. There are dedicated aspects of this training that go to working in a safe manner. Specifically, modules CPPSEC2103 ("Apply WHS, emergency response and evacuation procedures to maintain security") and CPSEC2104 ("Apply risk assessment to select and carry out response to security risk situations").
86. Wilson provided specific guidance to officers on infection control. Generally, this was done in the following ways:
- a) **Toolbox talks:** meetings conducted on a 'needs' basis where Site Supervisors or Site Managers would introduce any new specific policies, procedures or instructions (typically from DJPR or DHHS);
 - b) **Daily briefings:** meetings conducted at the beginning of each shift during which the Site Supervisors or Site Managers reminded security staff of and reinforced the core duties and any recent changes (as opposed to going through them in detail); and
 - c) **Display of materials:** where relevant materials were contained in physical documents, those documents were stuck on walls in the security room and in highly visible locations on the hotel floors. For example, a document setting out officers' core duties was stuck on the wall or floor at each designated security post in each hotel. Other documents (e.g. the COVID-19 Pack and "cheat sheets" described below and posters reinforcing hand hygiene and social distancing measures) were displayed in the security room and lift areas.
87. As noted above, the key document containing COVID-19-specific information and guidance was a document referred to as the "COVID-19 Pack". The COVID-19 Pack was prepared with support from Wilson's HSE team and its Chief Medical Advisor, Dr Pramodh Nathaniel. The COVID-19 Pack was updated a number of times during the HQP to incorporate evolving knowledge about COVID-19, having regard to independent medical advice and public health

advice. For example, it was updated when new guidance about face masks or the definition of a “close contact” was made available, or when the duties required of Wilson were changed.

88. The COVID-19 Pack comprised general information about COVID-19, Wilson’s role in the HQP and its legal responsibilities, together with four “cheat sheets”, behind **Tab 11 to Exhibit SEH-1 [WILS.0001.0003.2137]**, which respectively contained detailed information on the following:
- a) hand hygiene (including how to hand wash, when to wash your hands and how to use hand sanitiser);
 - b) cough etiquette;
 - c) social distancing; and
 - d) use of PPE (face masks, gloves, safety glasses).
89. Each time the COVID-19 Pack was revised, or when any new specific policies, procedures or instruction were implemented, a toolbox talk was developed and implemented at the hotels. In other words, a Site Manager or Site Supervisor made specific reference to these to any officers coming on shift.
90. Additionally, all Wilson employees and contractors’ staff were required to complete the Australian Commonwealth Government’s online COVID-19 infection control training module. This was required under Wilson’s contract with the Victorian state government. However, Wilson, through the COVID-19 Pack and other training materials, ensured that masks were worn whenever there was a potential risk of interaction with guests (in contrast to the information about the effectiveness of face masks contained in the module). Attendance at toolbox talks and completion of training materials / modules was recorded in by the Site Supervisors at each hotel.
91. If any Wilson employee or contractor worker attended for duty and had not completed any of the above toolbox talks or training, they were required to do so before commencing their shift (usually on the spot). Site Supervisors and Site Managers reviewed rosters in advance of each shift alongside the spreadsheet referred to in the paragraph above to identify any security officer that had not completed all the above requirements and directed them to complete any outstanding items.

Question 11

What onsite supervision was in place for your company's security staff at each hotel?

92. Wilson had in place the following onsite supervision at each hotel:
- a) **Site Manager:** at each quarantine hotel, during each day, Wilson allocated an employee who was responsible for supervising each site. The Site Manager was also typically the most senior employee regularly working at each hotel. This is apart from when either myself, [REDACTED] or [REDACTED] was onsite (which was frequently). There were six Site Managers in total, each of whom directly reported either to myself or [REDACTED]. Site Managers were onsite from approximately 9.00 am to 8.00 pm (usually around 9 to 12 hours days). This was structured so that the Site Manager would be there during times of peak activity of quarantine guests, such as meal times and during recreational walks, and so that a Wilson employee would provide the highest level of supervision of security staff wherever possible. The Site Managers typically worked a "4 on / 4 off" roster for the entire duration of the HQP. Site Managers and other managers were typically available and contactable 24 hours per day, 7 days per week during the HQP.
 - b) **Site Supervisor:** a Site Supervisor was allocated for each shift and they reported to the Site Manager. Site Supervisors were rostered for duty at each quarantine hotel continuously, that is 24 hours per day, 7 days per week. The Site Supervisor would be in consistent contact with the Site Manager. By this I mean there would be numerous communications each day between them. The Site Supervisor could be either a Wilson employee or a contractor's employee. Wilson employees who were Site Supervisors were rostered predominantly at times where there was no Site Manager on duty (i.e. at night) to ensure 24/7 supervision by a Wilson employee at some level.
93. Site Managers provided day-to-day directions to the contractor employees either directly or through a Site Supervisor. Wilson did not charge the Victorian Government for the presence of the Site Managers.
94. The Site Manager and Site Supervisor regularly moved throughout the hotel in a "roving" capacity so as to maintain supervision and oversight of the officers on each floor, in addition to "relievers" (as described in Question 10 above). Neither was designated a particular post throughout any given shift.

95. As noted above, I also regularly attended hotel sites to observe how security services were operating and to meet and discuss operations with Site Managers and Site Supervisors.

Question 12

In cases where all or some of the staff on duty were engaged via a subcontractor, did that subcontractor also provide onsite supervision? If not, how were the subcontractor's staff supervised?

96. From time to time, managers from the contractors would attend the shift handovers also to see their employees and action any issues arising with their employees where we requested.
97. As I note in my response to question 11 above, Site Managers and Site Supervisors provided onsite supervision. Some Site Supervisors were engaged through contractors and therefore may have been in a position where they supervised other officers. That said, Wilson tried to avoid circumstances where a non-Wilson Site Supervisor was onsite without a Site Manager (who were each Wilson employees).
98. For completeness, I note that a Site Supervisor was responsible for all officers rostered on a particular shift regardless of whether they were Wilson officers or contractor officers.

D. ROSTERS AND SALARY ARRANGEMENTS

Question 13

Who was responsible for the recruiting and rostering of staff?

99. Mr Watson was primarily responsible (and had final decision-making power over) the selection of Wilson's contractors. The contractors were responsible for recruitment of its employees.
100. As noted above, Wilson used a combination of direct employees and contractor employees on the HQP.
101. In relation to the HQP, Wilson did not recruit new employees to work on the HQP, but rather Wilson employees were drawn from other Wilson client sites at short notice. For example, a substantial portion of the direct employees used by Wilson in the HQP (at least initially) were drawn from Wilson's client site at Melbourne Airport, where the need for Wilson's presence

significantly declined as a result of travel restrictions imposed by the State and Commonwealth Governments.

102. Wilson's employee recruitment process is carried out by the Human Resources team, who makes final decisions as to hiring employees.
103. Wilson has a dedicated rostering team who make decisions pertaining to rostering. In respect of the HQP, this team was led by the State Patrols Manager for Victoria and assisted by an Operations Coordinator.

Question 14

Where subcontractors had been engaged, what if any limitation was placed on the means by which they could recruit and roster staff?

104. As to limitations on recruitment, each contractor was required to and did agree in its contract with Wilson that:
- a) it would not further subcontract without approval by Wilson. I am not aware of any circumstances in which Wilson gave approval for "tiering" or subcontracting in relation to the HQP (or otherwise); and
 - b) that all officers provided to Wilson by the contractor were and remained employees of the contractor throughout the engagement.
105. As to limitations on rostering by contractors, I refer to Question 13, above. All rostering was the responsibility of Wilson.

Question 15

What factors were relevant to how frequently staff were rostered on?

106. Two key factors were relevant to how frequently staff were rostered on:
- a) the requirements of the *Wilson Security Victoria Agreement 2018* and the *Security Services Industry Award 2010* (and any enterprise agreement that applied to any contractor employees), including the requirement for minimum breaks between shifts in those documents; and

b) fatigue management considerations.

107. In order to address these, Wilson typically rostered staff:

- a) in a way to ensure they received a minimum break between shifts of at least 8 hours (but usually minimum 12 hours); and
- b) on 12 hour shifts, on a "four on / four off" basis. This means that security staff would typically work four shifts across four days, followed by four consecutive days off. In my experience, such an arrangement is commonplace in the security industry.

Question 16

What records were kept of hours worked?

108. Wilson recorded hours worked on the HQP on site sign-on records. This was in addition to rosters (pre-shift) and site sign in records and payment records (including payslips and invoices).

109. The site sign on records are the contemporaneous record of the hours worked by each individual, detailing the site, date, individual's name, commencement time and end time. It was recorded in the following way. The supervisor was required to check the roster and as each officer arrived for the shift, the officer was required to show their security license to the Site Supervisor, who was required to make a record of their attendance. Only the Site Supervisor handled the record sheet and pen to minimise the risk of infection.

Question 17

What were the applicable hourly rates of pay?

110. The applicable hourly rate of pay for Wilson employees during the HQP were as follows:

- a) permanent employees: \$22.53 to \$56.33 per hour; and
- b) casual employees: \$28.16 to \$61.96 per hour.

111. I do not have first-hand knowledge of the hourly rates paid to contractor employees.

Question 18

How were security staff paid?

112. Wilson paid its employees through its usual processes. That is, via fortnightly bank deposit to a bank account nominated by the employee. All necessary superannuation contributions were paid, and taxes withheld in accordance with Wilson's legal obligations.
113. Wilson paid its contractors the applicable services fee by way of electronic funds transfer through its accounts payable systems.

Question 19

To your knowledge were any security staff rostered to work at your hotels also working at other locations and/or for other security contractors?

114. I became aware that in or around late June 2020:
- a) one Wilson employee had worked one shift at the Brady Hotel, for another security contractor (as part of the HQP). This was a breach of his contract with Wilson and the protocols Wilson had in place to prevent this occurring (as I describe above). This conduct was promptly dealt with through Wilson's usual disciplinary processes; and
 - b) one employee of AMG Security Services, who was engaged by Wilson on the HQP, had worked one shift at the Park Royal hotel for another contractor, and was removed from all Wilson engagements.

Question 20

What PPE was provided by your company for staff use?

115. Throughout the HQP, Wilson provided security staff with the following PPE:
- (a) face masks;
 - (b) hand sanitiser;

(c) nitrile gloves; and

(d) safety goggles.

116. The quantities of PPE sourced by Wilson is set out in Question 24 below.

Question 21

What PPE was provided by DHHS or any other government department?

117. Approximately three or four medical gowns were provided by the DHHS. These were provided in the event that security personnel had reason to enter a hotel quarantine guest's room. This did not eventuate so the gowns were not used.

118. On around two occasions, DHHS nursing staff brought boxes of gloves or face masks with them. I do not know how many boxes were brought, but the number was not a significant source of that PPE for security staff. I recall generally that at the time PPE was in relatively short supply across the country.

Question 22

Were your staff at any time required to provide their own PPE?

119. No. As set out in Question 20 above and Question 24 below, Wilson provided all necessary PPE, continuously and without gaps in supply, to all of its employees and contractors' employees.

Question 23

What training was given to your staff regarding the correct use of PPE? Who provided that training?

120. I refer to Questions 9 and 10 above.

Question 24

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

121. As per Question 22 above, no. Wilson provided all necessary PPE, continuously and without gaps in supply, to all of its employees and contractors' employees.
122. Wilson sourced PPE as set out in Question 20 and 24 above and ensured that stock levels at all sites remained adequate throughout the HQP. There were ongoing communications as to the stock levels available at sites, and arrangements made then to deliver the necessary PPE items to the site as requested. Wilson already had in place a team dedicated to the sourcing and supply of PPE, given Wilson's involvement with other security work during the pandemic. I was responsible for ascertaining Wilson's PPE requirements in respect of the HQP and communicating that to those responsible at Wilson for the supply.
123. Over the course of the HQP, Wilson supplied approximately over 54,000 gloves, over 30,000 face masks and over 150 litres of hand sanitiser.

Question 25

What if any arrangements were in place at the hotels for which you had responsibility for temperature checking of security staff? Who instituted and monitored any such arrangement?

124. From 5 April 2020, Wilson introduced a requirement for every security officer (both its employees and contractors) to be temperature-checked before their shift started once they arrived at the site. This was conducted by the Site Supervisor.
125. Each site had a designated temperature testing area, self-isolation area, and nominated roles for the testing and further checks to be conducted.
126. Our health and safety team developed a written Temperature Screening Guideline in May 2020 .
127. Any worker who returned a temperature reading greater than 37.4 degrees (in line with medical advice) was not permitted to enter the workplace, and the worker was required to

answer further questions before determining whether they could re-take the temperature test, or not be permitted to commence work.

128. From 24 June 2020, the DHHS confirmed that it was also mandating temperature checks at all hotel sites and so from this date, the checks were conducted by DHHS nurses. Wilson was asked to share (and did share) information with the Department about its temperature testing framework including information about the instruments used and training provided to staff. I exhibit the email correspondence behind **Tab 12 to Exhibit SEH-1 [WILS.0001.0005.8448]**.
129. I am not aware of any instance on the HQP whereby one of our security officers was unable to work a shift on the basis of returning a high temperature reading.
130. Also, from on or around 7 April 2020, we included a question in the pre-shift Declaration of Fitness asking for confirmation if an officer had a fever.

Question 26

Who was responsible for identifying and acting on instances of poor or unacceptable conduct by security staff?

131. Any complaints or concerns relating to security staff (whether regarding work conditions or otherwise) were primarily directed to myself and [REDACTED] via the Formstack system. I was responsible for dealing with complaints or concerns in my capacity as operational lead of the HQP. I made decisions in conjunction with Mr Watson given his role.
132. Complaints or concerns could be received by:
- (a) a guard, Site Supervisor or Wilson Site Manager submitting an incident report form submitted through Formstack;
 - (b) a Site Supervisor or Wilson Site Manager contacting myself, Mr Watson or [REDACTED] directly, for example, by email, phone or SMS;
 - (c) a person (any of the above, but also a hotel quarantine guest or member of the public) submitting a form through the "Contact Us" page on Wilson's website. These were monitored by a single Wilson employee who referred them to myself, Mr Watson and [REDACTED] as required; and
 - (d) an AO reporting back to DHHS, who would then raise matters with Wilson through the appropriate contacts (generally, [REDACTED] Personal Informant for DHHS and Mr Watson for Wilson).

Question 27

Who was responsible for identifying and acting on complaints or concerns regarding unsafe work conditions for security staff?

133. As with other complaints or concerns described in Question 26 above, Mr Watson, [REDACTED] and myself were together responsible for identifying and acting on complaints or concerns regarding unsafe work conditions for security staff.

Question 28

Did your company identify or receive notice of poor or unacceptable conduct by any security staff?

134. Wilson became aware of certain unacceptable or poor performance or conduct by security staff during the HQP. This involved:
- (e) officers leaving their post other than on an authorised break;
 - (f) officers taking longer breaks than authorised;
 - (g) an officer falling asleep at their post and another sleeping during a break;
 - (h) isolated incidents of officers making unwelcome advances towards guests;
 - (i) officers being distracted by their phone and / or using headphones during their shift; and
 - (j) officers failing to follow directions regarding security operations or PPE.

Question 29

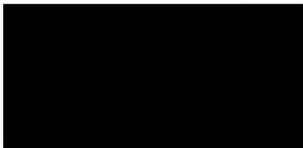
Did your company identify or receive notice of unsafe work conditions? How were those issues dealt with?

135. Wilson did not identify or receive notice of unsafe work conditions.

Question 30

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

136. I do not have any further information that I wish to include.



Signed: _____

Date: 21st August 2020