

Board of Inquiry into the COVID-19 Hotel Quarantine Program**WITNESS STATEMENT OF MICHAEL GIRGIS**

I, Michael Girgis of professional address 3-9 Wreckyn Street, North Melbourne VIC 3051, say:

1. I make this statement in response to a notice to produce from the Board of Inquiry into the COVID-19 Hotel Quarantine Program in Victoria, dated 19 August 2020 (**NTP**).
2. I make this statement from my own recollection, knowledge and belief except where otherwise indicated.
3. I have been asked in the NTP to answer a list of questions, and list each question and my answer, which I do so below.

Background

Question 1: What is your title and role within IKON Services Australia Pty Ltd (company)?

4. I commenced employment with IKON Services Australia Pty Ltd (ACN 087 163 120) (**IKON**) on 27 May 2017. I am currently employed by IKON in the position of General Manager. I have held this position since 1 February 2019. Prior to this, I held the position of Operations Manager. In my current role I am responsible for managing IKON's cleaning and services contract with one of IKON's largest corporate clients. In this role I am responsible for managing all aspects of the account and the relationship, from customer service to pricing and operational matters. I have a number of people ultimately reporting up to me, including an Operations Manager, five Package Managers, ten supervisors and approximately 370 cleaning staff.
5. Since I commenced my current role in 2019, I have reported to George Tahan, Managing Director of IKON.

Question 2: What is your relevant employment background and work history?

6. I have worked in the commercial cleaning industry for approximately 16 years. I have been employed with IKON for over 3 years. Prior to commencing employment with IKON, I worked for ISS Australia, a leading global provider of facility and cleaning services.

Services provided by IKON

Question 3: What services does your company usually provide?

7. IKON is a cleaning and facilities management company founded in 1999 which now directly employs over 1,100 employees. IKON is a family company and its philosophy is to directly employ its workforce rather than engage contractors or sub-contractors as other companies in the cleaning industry do. This means that IKON uses staff to provide its services that it knows and who are trained by IKON. IKON provides tailored, commercial cleaning and facilities services to clients in both the public and private sectors in Australia. Specifically, it offers general cleaning services including infectious cleaning, property maintenance services, waste management, hygiene services and since the outbreak of COVID-19 in Australia, COVID-19 specialised infectious cleaning.
8. Following the outbreak of COVID-19 and the demand for infectious cleaning services, IKON made the decision to source and obtain sufficient stock of Personal Protection Equipment (PPE) and infectious cleaning chemicals so we could meet the anticipated increased demand for infectious cleaning without having to rely on third parties for the provision of appropriate PPE and cleaning chemicals. We also implemented a number of measures for staff aimed at reducing the spread of COVID-19 including the use of masks (prior to masks being compulsory in Victoria) and temperature testing.

Question 4: What is your company's usual client profile?

9. IKON operates throughout Australia and across a number of industries servicing a range of public and private sector clients including sports stadiums, high rise offices, 24/7 entertainment complexes, casinos, heritage buildings, gardens and markets.
10. IKON is contracted to a number of high profile clients including Crown Casino, Federation Square, Melbourne Airport, JLL Australia, the City of Melbourne and Knox City Council. IKON is proud to have long-term relationships with these iconic clients based on excellent customer service and mutual trust.

Question 5: Prior to the hotel quarantine program, what services (if any) had your company (or a company in your corporate group, if relevant) provided to the Victorian government?

11. I am aware that IKON regularly provides cleaning and facilities services to public sector clients such as local councils and the National Gallery of Victoria.

Involvement of IKON in the hotel quarantine program

Question 6: What services has your company provided as part of the hotel quarantine program?

12. IKON was engaged by the Department of Jobs, Precincts and Regions (**DJPR**) to provide infectious cleaning services to hotels involved in the COVID-19 Hotel Quarantine Program in Victoria. Specifically, IKON was engaged to provide cleaning services at rooms within the quarantine hotels where the occupier of the room had been quarantining as part of the Hotel Quarantine Program and may have had a positive confirmation of COVID-19 (**Infectious Cleaning**). The Infectious Cleaning included:

- (a) cleaning, sanitising and disinfecting of the rooms; and
- (b) the use of a fogging machine within each room to ensure surfaces were free of bacteria and germs.

IKON also occasionally provided cleaning services at common areas and other areas of the hotels as directed by DJPR. IKON was engaged for each specific job by DJPR who provided a scope of works which would include the rooms and areas which required Infectious Cleaning.

13. It is my understanding that the Department of Health and Human Services (**DHHS**) took over the management of cleaning of the quarantine hotels from 1 July 2020 from DJPR and they engaged us for each specific job from that date until our last Infectious Clean of a quarantine hotel on 2 July 2020.

Question 7: Does your company currently provide services as part of the hotel quarantine program?

14. As far as I am aware IKON is not currently providing any services to the Victorian Government as part of the COVID-19 Hotel Quarantine Program. The last occasion that IKON provided its Infectious Cleaning services was on 2 July 2020 at the Novotel, 270 Collins Street, Melbourne, 3000.

Question 8: How did your company come to provide services as part of the hotel quarantine program?

15. George Tahan, Managing Director of IKON, contacted me on 11 April 2020 to advise that IKON had been asked to give a quote to provide Infectious Cleaning services for the Hotel Quarantine Program on an ad hoc basis. I understand that he was contacted by DJPR and asked to provide a quote for these services.

16. I was subsequently contacted by a member of DJPR, Katrina Currie, to discuss the initial scope and price of the work to be undertaken by IKON. IKON's proposal and quote was ultimately confirmed on 12 April 2020. IKON completed its first Infectious Clean for DJPR on 16 April 2020 at the Crown Promenade hotel on 8 Whiteman Street, Southbank.

17. From that date, I was generally contacted by an employee from DJPR to confirm our next Infectious Clean. Some of the DJPR employees I dealt with included Katrina Currie and [REDACTED] and [REDACTED].

(a) Did you reach an agreement with the Victorian Government to provide services as part of the hotel quarantine program? If so, please provide details.

18. IKON was provided with an Agreement for Professional Services (**Agreement**) from DJPR on 28 April 2020. Following a period of discussion about the terms of the engagement, IKON signed and returned the Agreement on 25 May 2020.

19. Attached to this statement and marked "MG-1" is a copy of the Agreement.

(b) Did you reach direct agreement with any hotel or hotels which were participants in the hotel quarantine program to provide services as part of the hotel quarantine program? If so, please provide details.

20. No, as far as I am aware there was no direct agreements between IKON and any hotels in the hotel quarantine program for IKON to provide services to the hotels. IKON's services were always provided pursuant to the Agreement with DJPR. On some occasions the request to provide services pursuant to the Agreement came from someone I understood to be an employee of the hotel itself rather than DJPR but I was always satisfied that DJPR were aware of the requests as there was usually a DJPR representative at the hotel. If the request came from someone I believed to be an employee of the hotel itself, I would ask for confirmation in writing that the request for Infectious Cleaning was part of the Hotel Quarantine Program and approved by DJPR.

Question 9: Prior to any agreement being reached with the Victorian government/a hotel (as applicable) was there any discussion or negotiation regarding infection control, personal protective equipment and specialised training for cleaning staff who would be involved in the hotel quarantine program

21. DJPR provided information about the nature of the Hotel Quarantine Program and the Infectious Cleaning services that were required. Based on this information we were able to develop a procedure for infection control and PPE for staff who would undertake the Infectious Cleaning.

22. To the best of my knowledge, IKON was not provided with any instructions on infection control, PPE or specialised training from the Victorian Government or any hotel. It was understood that IKON employees undertaking Infectious Cleaning in the quarantine hotels would complete or had already completed the Australian Government Department of Health COVID-19 infection control training module.

23. I believe that the Victorian Government was aware that IKON had expertise and experience in infectious cleaning, provided appropriate training to our employees regarding infectious cleaning and would have appropriate infection controls and PPE in place as part of provision of these services.

Question 10: Is your company currently providing services as part of the hotel quarantine program?

24. I refer to my answer to question 7 in this statement.

Services provided by IKON at quarantine hotels

Question 11: In respect of each quarantine hotel at which your company has provided services, please provide details of:

- (a) *What services were provided;*
 (b) *What areas of the hotel staff worked in; and*
 (c) *Which staff of your company provided those services.*

25. Attached to this statement and marked “**MG-2**” is a table setting out each quarantine hotel at which IKON has provided services, the services that were provided, the date those services were performed and the areas of the hotel that IKON staff performed those services.

26. The IKON staff who provided these Infectious Cleaning services at the quarantine hotels were [REDACTED] and [REDACTED].

Question 12: To your knowledge, were any of your staff rostered to work at quarantine hotels also working at other locations (including aged care facilities)? If so, please provide details.

27. It is my understanding that IKON staff were not working at any other locations outside of their rostered hours for the Hotel Quarantine Program. I believe that staff working on providing Infectious Cleaning services for the Hotel Quarantine Program worked solely on providing these services for the duration of IKON's engagement to provide Infectious Cleaning services to the program. All of the IKON staff who performed cleaning services as part of the Hotel Quarantine Program were direct employees of IKON and not contractors.

Direction and Decision Making

Question 13: What directions, information or requests have been given to your company by any government department or agency, in relation to the hotel quarantine program? Please provide details.

28. I believe that the only directions, information or requests given to IKON by DJPR are those contained in the Agreement and the specific requests to provide Infectious Cleaning services

at particular hotels or quotes for such services. These requests consisted of advising the specific rooms or common areas that required Infectious Cleaning and liaising about the timing of the provision of these services.

29. On some occasions when IKON employees would arrive at a hotel, a hotel employee or DJPR representative would indicate that rooms required Infectious Cleaning that were additional to those originally in the request. Because the number of staff we sent to do an Infectious Cleaning job was based on the numbers of rooms that required Infectious Cleaning, where this occurred we would tell the hotel we could not complete Infectious Cleaning of the additional rooms at that time. We would then offer to make alternative arrangements to provide Infectious Cleaning of those rooms.
30. One specific request that I received from DJPR for Infectious Cleaning services to be provided at the Stamford Plaza Hotel on 19 June 2020 by email contained a "Deep clean procedure for hotel rooms". The email is attached to this statement and marked "**MG-3**".
31. While the procedure contained in this email largely reflected the procedure we had been following, it did require steam cleaning of all soft furnishing and carpets. We had not previously been required to steam clean soft furnishing and carpets in the hotel rooms. Given this, I needed to provide an updated quote to account for this additional service. I provided this quote to DJPR on 24 June 2020. Ultimately, we were not engaged to provide these cleaning services at Stamford Hotel.
32. On 2 July 2020 I received an email from DJPR requesting all future cleans be put on hold. A copy of this email is attached to this statement and marked "**MG-4**". The email said new requirements confirmed that fogging was not approved as a clean and disinfection method and topical application was preferred. I am not aware why fogging was no longer approved.
33. During our cleans we had been using a fogging machine which emits a high grade disinfectant to sanitise surfaces. However, the process we followed for the Infectious Clean was to clean all surfaces, sanitise and disinfect all surfaces and then use the fogging machine as an additional method to sanitise and disinfect, and reach any surfaces which may be difficult to sanitise topically, i.e. ceilings. IKON did not provide any cleaning services to the Hotel Quarantine Program after 2 July 2020.
34. I am aware that IKON was subsequently asked by DHHS to provide a quote for further Infectious Cleaning services to quarantine hotels. I understand that this quote was then passed onto the Department of Justice and Community Safety (**DJCS**), who took over the management of the Hotel Quarantine Program from DHHS. I understand we have not heard from DJCS in relation to this further quote.

35. Other than these discussions, requests and the Agreement itself, I am not aware of any direction, information or requests given to IKON by DJPR or any other government department or agency, in relation to the hotel quarantine program.

Question 14: Did the directions, information and requests given to you by any government department or agency change over time? If so, please provide details.

36. Other than what is set out above in my answer to question 13, I am not aware of any other changes over time in directions, information or requests given to IKON by any government department or agency.

Question 15: What directions, information or requests have been given to your company by the hotel/s at which it was providing services, in relation to the hotel quarantine program? Please provide details

37. I am not aware of any directions given to IKON by the hotels at which we were providing services in relation to the hotel quarantine. The only information and requests given to IKON by the hotels were in relation to the specific rooms and areas that required cleaning, and the timing of those cleans. As I said above, these requests generally came from DJPR representatives at the hotels.

38. Other than staff of the hotels liaising with IKON staff about practical matters such as location of rooms, timing of cleans and the best way to access areas of the hotel, I am not aware of any other specific direction, information or request given to IKON by the hotels at which we provided services.

Question 16: Did the directions, information and requests given to you by the hotel/s change over time? If so, please provide details.

39. I refer to my answer to question 15 above.

Training and Supervision

Question 17: What (if any) training was provided to your staff by any government department or agency regarding COVID-19 and how to work in a safe manner?

40. When IKON was first engaged by DJPR, IKON employees were required to complete the Australian Government Department of Health COVID-19 infection control training module, if they had not done so already. There was otherwise no induction or specific training provided by any department of the Victorian Government that I am aware of.

Question 18: What (if any) training was provided to your staff by your company regarding COVID-19 and how to work in a safe manner?

41. In 2019 IKON opened a training facility in Ravenhall where all new employees receive their training directly from IKON, and existing employees also complete training programs there.
42. Prior to the COVID-19 pandemic, because IKON provided infectious cleaning services for many of its clients and had done so for a long period of time, staff who undertook these infectious cleaning services received internal training and instruction in undertaking this kind of cleaning. Most recently, on 15 October 2019, a number of IKON staff who undertook infectious cleaning completed a training course with Victoria University called Comply with Infection Prevention and Control Policies and Procedures – HLTINF001 (**Infection Control Training**). I understand that this unit taught the skills and knowledge required to follow organisational infection prevention control procedures, including implementing standard and transmission-based precautions and responding to infection risks.
43. Following the emergence of the COVID-19 outbreak in Australia, IKON is providing its staff with training on COVID-19 and Good Hygiene and Infection Control at Work through Safety Toolbox Meetings which provide information about COVID-19 and how it spreads, as well as training about infection control and hygiene to prevent and reduce the spread of COVID-19. IKON is also providing staff with training at its Ravenhall facility which includes practical demonstrations of infection control procedures such as the correct application and removal of PPE. As part of this training staff are also undertaking:
- (a) the COVID Work Safe-And-Clean online training program provided by Hand Hygiene Australia (**HHA Training**);
 - (b) the Australian Government Department of Health COVID-19 infection control training module.
44. Following IKON being engaged to provide Infectious Cleaning in the Hotel Quarantine Program, an audit of staff who would be involved in providing those services was undertaken and any who had not yet completed the HHA Training or the Australian Government Department of Health COVID-19 infection control training module did so before carrying out Infectious Cleaning under the Hotel Quarantine Program.
45. The Infectious Cleaning services provided by IKON as part of the Hotel Quarantine Program were managed operationally by [REDACTED], Kitchen Package Manager and Infection Prevention & Control and his team. [REDACTED] is my direct report. In his day-to-day role with IKON, [REDACTED] oversees approximately 28 industrial kitchens, which necessitates a thorough understanding of protocols for managing infection control. [REDACTED] and his team are experienced in infectious cleaning due to the nature of their work which is why they were tasked with undertaking the Infectious Cleaning services.

46. █████ completed the Infection Control Training and an online module in relation to SARS-CoV-2/COVID 19 and cleaning and disinfecting from the Global Biorisk Advisory Council.
47. █████ has also completed the following training relevant to infectious cleaning services:
- (a) Infection Control Cleaning – Ausmed
 - (b) HHA Training
 - (c) Prevention of Spread of Infection in a Hospitality Environment – Alchemy Academy
 - (d) Donning and Doffing of PPE - Ausmed
48. The principles of infection control and safety when working in cleaning with infection risks could be applied to the risk posed by COVID-19. █████ was responsible for providing specific training, instruction, information and supervision to his staff members involved in providing Infectious Cleaning services as part of the Hotel Quarantine Program. Based on █████'s expertise and experience in infectious cleaning, he was considered suitably qualified to train and supervise IKON staff involved in providing cleaning services to the Hotel Quarantine Program. He provided training to his staff on the principles of infection control and correct use of PPE prior to them commencing cleaning and throughout their work in the program.
49. IKON also had a number of work instruction policy documents on infectious cleaning which staff were trained on including:
- (a) *WI – 1102: Sanitising (Disinfecting) Cleaning*, to be used when an area needs to be sanitised and the potentially infectious materials in the area is inactive;
 - (b) *WI – 1100: Infectious Area Cleaning – PPE Pre & Post Clean*, to be used by a trained person in preparing to clean a declared infectious contaminated area and the correct sequence of fitting and removing PPE;
 - (c) *WI – 1104: Forensic Cleaning*, to be used when an area has been declared as contaminated by an infectious or contagious agent, and the area needs to be sanitised and the infectious materials removed or inactivated.
50. Given the current demand for COVID-19 related infectious cleaning, all 1,100 plus IKON cleaning staff are being trained in infectious cleaning.

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

51. To my knowledge, no training was provided to employees of IKON by any other person outside of IKON other than what I have set out above in relation to COVID-19 or how to work in a safe manner. IKON has a culture where staff can raise issues about their work

environment and those issues will be acted upon and resolved by IKON. This includes staff raising any additional training that was required. No staff raised any such requests.

Question 20: What onsite supervision was/is in place for your staff at each quarantine hotel?

52. On the majority of occasions that IKON was engaged to provide infectious cleaning services at a quarantine hotel, [REDACTED] was onsite to supervise the cleaning. On the occasions when [REDACTED] was not onsite to supervise IKON staff during the provision of cleaning services, one of his supervisors would be onsite to supervise the infectious cleaning. All supervisors had completed a number of Infectious Cleans supervised and instructed by [REDACTED] competently and without incident prior to being left to supervise an Infectious Clean. The supervisors have significant experience in infectious cleaning.

Personal Protective Equipment (PPE) and Other Equipment

Question 21: What PPE (if any) was provided by your company for your staff to use when working at a quarantine hotel?

53. IKON provided all employees undertaking work for the Hotel Quarantine Program with a hazmat suit, goggles or a visor, an N95 or P2 face mask, gloves and boot covers.

Question 22: What PPE (if any) was provided to your staff working at a quarantine hotel by any government department or agency?

54. To my knowledge, no PPE material was provided by any government department or agency to IKON employees. IKON provided its employees with all appropriate PPE and so there was no need to obtain PPE from the government.

Question 23: Were your staff at any time required to provide their own PPE when undertaking work at a quarantine hotel? If so, please provide details.

55. IKON provided all of its staff with all appropriate PPE. IKON employees have never been required or expected to provide their own PPE. Based on my experience with IKON, it would never place its staff in a high risk situation without adequate protective wear.

Question 24: What directions did your company give to your staff about when to use PPE at a quarantine hotel?

56. IKON implemented the following measures at each quarantine hotel to ensure that employees were appropriately protected before commencing an infectious clean and the risk of cross contamination was minimised:

- (a) face masks were to be worn on entering a quarantine hotel and physical distancing maintained when interacting with any hotel staff about locations of rooms and access to rooms;
- (b) for each room that needed to be cleaned, a 'green zone' would be designated close to the room in which employees were to sanitise and dress in the relevant PPE;
- (c) the room requiring the Infectious Clean would be designated as the 'red zone' and employees were not to enter the 'red zone' until appropriately dressed in PPE;
- (d) Following the Infectious Clean of the room, employees would return to the 'green zone' to de-robe, sanitise and dispose of their PPE at the end of each Infectious Clean of a room and before the next Infectious Clean or exiting the premises. This included each occasion that the employee left the premises (such as for a lunch break) or moved to another room of the building.
- (e) Finally, the green zone would be cleaned and sanitised prior to leaving site.

Question 25: What training was given to your staff regarding the correct use of PPE at a quarantine hotel? If there was training, who provided that training?

- 57. IKON employees involved in Infectious Cleaning as part of the hotel quarantine program engage in infectious cleaning in their regular employment with IKON, such that they are experienced and adequately trained in the use of PPE.
- 58. Training in the correct use of PPE is part of the infection control training outlined in paragraph 42 of this witness statement.
- 59. IKON employees have been trained regarding the correct use of PPE in accordance with IKON Work Instruction – 1100 Infection Area Cleaning – PPE Pre & Post Clean referred to above. A copy of this work instruction is attached to my statement and marked "MG-5".
- 60. The correct use and disposal of PPE at a quarantine hotel was reinforced to IKON employees providing cleaning services at the hotels by [REDACTED] or one of his supervisors prior to each shift.

Question 26: As far as you are aware, was there ever a shortage of PPE at a quarantine hotel? If so, how was that shortage managed?

- 61. I am not aware of any shortage of PPE at a quarantine hotel. There was never any shortage of PPE for IKON employees providing cleaning services at a quarantine hotel because IKON provided all of its own PPE to its staff and had sourced sufficient supplies of appropriate PPE when the COVID-19 outbreak emerged, so that IKON would not be reliant on other parties for the supply of adequate PPE.

Question 27: Was your company ever asked to provide PPE to anyone at a quarantine hotel other than your own staff? If so, please provide details.

62. I am not aware of IKON being asked to provide PPE to anyone at quarantine hotel other than our own staff.

Other equipment

Question 28: Other than PPE, what equipment and cleaning products (if any) were provided by your company for its staff to use at quarantine hotels?

63. Our employees were provided with the following equipment and cleaning products:

- (a) Fogging machines (a chemical application method where very fine droplets of disinfectant are sprayed throughout a room);
- (b) Virex II disinfectant cleaner, produced by Diversey Australia Pty Ltd;
- (c) RF-12, a chemical developed by Agar Cleaning Systems Pty Ltd;
- (d) chlorinated and/or bleach based detergents;
- (e) yellow biohazard bags for disposing of any contaminated material;
- (f) other general cleaning equipment including mops, brooms, buckets, spray bottles and microfibre clothes.

64. Virex II is approved by the Department of Health's Therapeutic Goods Administration for use against COVID-19.

65. RF-12 was initially used for cleaning quarantine hotels. IKON discontinued its use of this product after the Therapeutic Goods Administration (**TGA**) released a list of approved disinfectants for use against COVID-19 and RF-12 was not on that list. From this point on only Virex II was used in the Infectious Cleaning.

Question 29: Other than PPE, what equipment any products (if any) were provided by any government department or agency or by the hotels for your company's staff to use at quarantine hotels?

66. I am not aware of any equipment or products provided to IKON by any government department or agency or by the hotels for IKON's staff to use at quarantine hotels.

Question 30: As far as you are aware, was there ever a shortage of equipment (other than PPE) or cleaning products at a quarantine hotel? If so, how was that shortage managed?

67. I am not aware of any shortage of equipment or cleaning products at a quarantine hotel. There was never any shortage of equipment or cleaning products for IKON employees providing cleaning services at a quarantine hotel because IKON provided all of its own

equipment and cleaning products, and had sufficient supplies of this equipment to ensure there was no shortage.

Question 31: Was your company ever asked to provide equipment (other than PPE) or cleaning products to anyone at a quarantine hotel, other than your staff? If so, please provide details.

68. I recall that during one of my regular discussions with [REDACTED], he advised that we had provided a small number of yellow biohazard bags to one of the quarantine hotels who had asked for some while we were undertaking cleaning services. I cannot recall the hotel.

69. Other than this, I am not aware that we were ever asked to provide equipment or cleaning products to anyone at a quarantine hotel, other than our staff.

Question 32: What cleaning products did your company use to perform its services at quarantine hotel(s)?

70. I refer to my answer to question 28 above. Those were the cleaning products we used to perform the Infectious Cleaning services at quarantine hotels.

Complaints and concerns

Question 33: Who was responsible for identifying and addressing health and safety risks to cleaning staff arising from the quarantine program?

71. From IKON, [REDACTED] was responsible for identifying and addressing health and safety risks to IKON cleaning staff arising from the quarantine program. Based on his experience and expertise in infectious cleaning, he was able to identify and address health and safety risks to IKON staff arising from the Infectious Cleaning. Based on his assessment of the Infectious Cleaning services, the procedure outlined at paragraph 56 of this witness statement was implemented.

72. [REDACTED], Risk and Compliance Manager is also responsible for advising on risks and health and safety concerns for IKON employees. Once IKON was engaged under the Agreement, I believe that [REDACTED] attended a number of sites to provide advice regarding health and safety risks to IKON staff arising from the work.

Question 34: What risks were identified? What was done (if anything) to mitigate those risks? In your opinion, were those measures adequate and effective?

73. The key risks identified were:

- (a) exposure of an IKON staff member to COVID-19 while cleaning one of the hotel rooms, given rooms being cleaned had been occupied by a person or persons who had tested positive to COVID-19;

- (b) cross-contamination of COVID-19 as an IKON staff member moved around the quarantine hotel after cleaning a room; and
- (c) exposure to COVID-19 upon entry to the hotel and moving around the hotel to gain access to the rooms given the quarantine hotels were occupied by returning travellers at a higher risk of having COVID-19.

74. The measures implemented to mitigate these risks are set out in paragraph 56. These measures were based on IKON's experience and expertise in undertaking infectious cleaning. The provision of full PPE to IKON cleaning staff and the proper removal and disposal of that PPE after each room was cleaned was key to eliminating and reducing the risk that any IKON staff member would be exposed to COVID-19 or cross-contaminate any other parts of the hotel with COVID-19.

75. In my opinion, these measures were adequate and effective to mitigate the identified risks. I believe that the fact that no IKON staff members who provided Infectious Cleaning services in the quarantine hotels tested positive to COVID-19 demonstrates that these measures were adequate and effective.

Question 35: Who was responsible for identifying and acting on complaints or concerns regarding work conditions for cleaning staff in relation to the quarantine program?

76. ██████ was responsible for identifying and acting on complaints or concerns regarding work conditions for IKON cleaning staff in relation to the Hotel Quarantine Program, as the operational manager of the provision of IKON's Infectious Cleaning services.

77. ██████ and I were in regular contact about the work undertaken by IKON staff in the Hotel Quarantine Program. We generally spoke after each Infectious Clean at a quarantine hotel. ██████ would have reported any complaints or concerns raised about work conditions of IKON cleaning staff during these conversations. To my knowledge, no such complaints or concerns were made regarding the work conditions for any cleaning staff involved in the program.

Question 36: 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?

78. I am not aware of any complaints or concerns that have been raised about work conditions for IKON cleaning staff working in the Hotel Quarantine Program, either by IKON employees

or anyone else. Had any such complaint or concern been raised, it would be reported up to me.

79. If a complaint had been made, I would have:
- (a) considered and assessed the complaint;
 - (b) conducted any necessary inquiries in relation to the complaint;
 - (c) sought advice as appropriate; and
 - (d) acted on the complaint as appropriate, in accordance with any advice. .

Question 37: Did you or your company identify or receive notice of poor or unacceptable conduct by any person in connection with the hotel quarantine program? If so:

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

80. I did not identify or receive notice of poor or unacceptable conduct by any person in connection with the Hotel Quarantine Program. I am not aware that anyone else from IKON identified or received notice of poor or unacceptable conduct by any person in connection with the Hotel Quarantine Program. I expect that if this was the case, it would have been reported to me.

81. If I had identified or received notice of poor or unacceptable conduct by any person in connection with the Hotel Quarantine Program, I would have reported it to the necessary person, conducted any necessary inquiries into the matter, and acted on the issue as appropriate.

Question 38: As far as you are aware, have any of the cleaning staff involved in the quarantine program tested positive for COVID-19?

82. As far as I am aware, none of the cleaning staff employed by IKON involved in the Hotel Quarantine Program have tested positive to COVID-19. Further, no IKON employee has tested positive for COVID-19 having been exposed while at work. One IKON employee has tested positive to COVID-19 and I understand they contracted it from a family member and had not worked for IKON while infectious.

83. Had any IKON employees involved in the Hotel Quarantine Program Infectious Cleaning tested positive to COVID-19, I would expect to know because employees were required to inform IKON of a positive test so they were able to access sick leave and other available

supports from IKON, and so appropriate arrangements could be made to inform government health authorities and follow the government advice.

Post-shifts Arrangements

Question 39: What (if any) direction or guidance was provided to your staff by any government department regarding what precautions to undertake after completing their duties at quarantine hotels?

84. I am not aware of any direction or guidance provided to IKON staff by any government department regarding what precautions to undertake after completing their duties at quarantine hotels.

Question 40: What (if any) direction or guidance was provided to your staff by your company regarding what precautions to undertake after completing their duties at quarantine hotels?

85. IKON staff were directed by IKON to:

- (a) correctly remove PPE and thoroughly sanitise at the end of each shift at a quarantine hotel;
- (b) monitor themselves for the development of any flu-like symptoms associated with COVID-19 following undertaking cleaning duties at a quarantine hotel and report any symptoms immediately to IKON; and
- (c) follow all government guidance and directions in relation to restrictions, physical distancing and hygiene to reduce the spread of COVID-19.

Additional information

Question 41: If you wish to include any additional information in your witness statement, please set it out below.

86. As at the date of this statement, no employees of IKON who were involved in the Hotel Quarantine Infectious Cleaning have tested positive for COVID-19. On the basis that over 1,000 rooms have been the subject of Infectious Cleaning by our employees in the Hotel Quarantine Program, I think this demonstrates the high quality service provided by IKON and our commitment to implementing and following the necessary safety measures to prevent the spread of COVID-19.

87. I believe the use by IKON of its direct employees as opposed to contractors to undertake the Infectious Cleaning services it was engaged to provide as part of the Hotel Quarantine Program has contributed to IKON being able to provide these services without having any staff test positive for COVID-19 or any significant incidents or close contacts occur. This is

because the staff used by IKON in this program were experienced and trained in infectious cleaning.

Signed: Michael Girgis

Dated: 26 August 2020