

STATE OF VICTORIA
Inquiries Act 2014 (Vic)
 BOARD OF INQUIRY
 INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

WITNESS STATEMENT OF JAMIE GRANT LACHLAN ADAMS

On behalf of MSS Security Pty Limited

I, Jamie Grant Lachlan Adams, General Manager, Victoria and Tasmania, MSS Security Limited (**MSS Security**), 650 Lorimer Street, Port Melbourne, in the state of Victoria, state as follows:

1. I am the General Manager of Victoria and Tasmania at MSS Security. I have held this position since July 2017.
2. I am authorised to make this statement on behalf of MSS Security and I do so from my own knowledge except where indicated to the contrary.
3. Where I refer to matters in this statement on the basis of information provided to me, I believe that information to be true and correct in every particular.
4. I have prepared this statement in response to a request for a witness statement received by MSS Security under cover of an email dated 10 August 2020 from Counsel assisting the Board of Inquiry into the COVID-19 Hotel Quarantine Program to General Counsel of MSS Security (the **Request**). Where I refer in this statement to numbered questions, those questions have been extracted from the Request.
5. For the purposes of the preparation of this statement, I have made enquiries of other employees of MSS Security and reviewed documents of MSS Security so as to provide me with an understanding about the topics referred to in the Request and to ensure that I am able to speak to the topics

RESPONSE TO THE QUESTIONS IN THE REQUEST

QUESTION 1 - TITLE AND ROLE WITHIN MSS SECURITY

6. I am the General Manager of Victoria and Tasmania at MSS Security. I am responsible for overseeing the management of all security contracts across Tasmania and Victoria across a wide range of sectors. I report to Geoff Alcock, Managing Director of MSS Security. I lead a team of 32 people to provide operational, administrative, commercial, financial and human resources functions.
7. MSS Security is one of the largest security services suppliers in Australia. The business has been operating since 1896. It was formerly known as Chubb Security. MSS Security provides services in all states and territories in Australia and has a state office in every capital city. We have over 6400 employees nationwide.
8. MSS Security's business is split into 2 service streams: guarding, which I describe in more detail in my statement; a separate national business unit which services the aviation sector (being a highly regulated industry).
9. The guarding business is typically split up into state based business units.
10. MSS Security provides guarding services across of broad range of sectors, such as the arts, the events and recreation sector, manufacturing, transport and logistics, aviation, major corporations, including banks, tertiary institutions, defence, state and federal government

departments, the Courts, and retail. I describe the services provide MSS Security provides in general terms at paragraph 15 below.

QUESTION 2 - RELEVANT PROFESSIONAL BACKGROUND AND WORK HISTORY

11. I have the following qualifications:
 - (a) Graduate Certificate of Management;
 - (b) Diploma of Security and Risk Management;
 - (c) Certificate II in Security Operations;
 - (d) Certificate IV in Workplace Training and Assessment;
 - (e) Certificate IV in Frontline Management;
12. I commenced employment with MSS Security (then known as Chubb Security Personnel) as the Northern Territory Manager in June 2004. From February 2010 to January 2012, I was State Manager, Operational Performance, New South Wales. In February 2012, I became State Manager, South East Queensland. In September 2015, I was promoted to General Manager, South East Queensland and Defence. In June 2016, I was appointed as General Manager, South Australia and Northern Territory. In July 2017, I was appointed to my current role.
13. Prior to joining MSS in 2004, I had 15 years' experience in retail management and the financial services sectors.

QUESTION 3 - WHEN WAS YOUR COMPANY FIRST LICENSED AS A PRIVATE SECURITY BUSINESS IN VICTORIA?

14. I have not been able, in the time available since receiving the Request, to find out exactly when MSS Security was first licensed as a private security business in Australia. MSS Security has held a private security licence ever since it has been a requirement in Victoria. LRD records which were easily accessible only go back to 2003.

QUESTION 4 – WHAT ARE THE USUAL SERVICES PROVIDED BY YOUR COMPANY? DO THEY EXTEND BEYOND SERVICES WHICH REQUIRE PRIVATE SECURITY LICENCES?

15. Primarily, in the guarding side of the business, MSS Security provides licenced security officers to provide services such as:
 - (a) static guarding in which guards monitor access points or a particular location on a fixed or static basis;
 - (b) concierge and front of house services in which the guards 'man' the front desk of a building and monitor access to the building;
 - (c) access control in which guards assist in the selective or restrictive access processes employed in a particular environment eg registering visitors, access via security pass;
 - (d) CCTV monitoring in which guards monitor security by viewing and reporting on issues arising from CCTV footage;
 - (e) control room monitoring in which guards monitor site security systems, business management systems and CCTV systems;
 - (f) event security and customer service. Event security governs security at public events which may encompass a number of the above, as well as crowd direction and control. Customer service is often part of the front of house/concierge service and involves directing and dealing with enquiries regarding access and security issues as the 'brand ambassador' of the client.

16. These services are provided to a wide range of industry sectors, some of which are referred to at 10 above.
17. The only time MSS Security provides services which do not require a private security licence is for selected roles within selected contracts such as hosting services at certain major events. In all other cases, all employees hold a private security provider's licence as a condition of their employment with MSS Security.

QUESTION 55 – WHAT IS YOUR COMPANY'S USUAL CLIENT PROFILE?

18. MSS Security provides licenced security officers to provide the services referred to at 15 above, to a wide range of industry sectors, of which the primary ones are identified at 9 above.

QUESTION 6 – TO WHAT EXTENT, PRIOR TO THE HOTEL QUARANTINE PROGRAM, HAD YOUR COMPANY PROVIDED PRIVATE SECURITY SERVICES TO THE VICTORIAN GOVERNMENT?

19. To the best I have been able to ascertain in the limited time since receipt of the Request, MSS Security has provided security services to the Victorian Government for at least 16 years.
20. There is in place a State Purchase Contract (**SPC**) between MSS Security and the Department of Treasury and Finance on behalf of the State of Victoria dated 1 February 2018 (see document number MSSS.0001.0009.0002). This provides for Victorian government agencies to engage MSS Security to provide security services under a Purchase Order Contract. MSS Security has long standing Purchase Order Contracts (**POC**) with:
 - (a) the Department of Health & Human Services (**DHHS**) to provide security officers to a number of public housing estates; and
 - (b) the Office of the Chief Examiner (**OCE**) to provide security services from Monday to Friday.
21. MSS Security also has a long-standing order arrangement to provide security officers to the Transport Accident Commission (**TAC**), primarily at Geelong, however historically this has also included a number of other TAC offices in metro Melbourne. When I started with the company in 2004 we were doing work with DHHS. I have not been able to find out, in the limited time since receiving the Request, how long we had been providing services to DHHS in the time before 2004.

QUESTION 7 – ON WHAT BASIS (EMPLOYEE/CONTRACTOR/OTHER) DO YOU ENGAGE STAFF TO PERFORM SECURITY SERVICES?

22. For the vast majority of our permanent and ongoing contracts MSS Security predominantly recruits and deploys directly employed, permanent full-time security officers for our services. Staff are recruited for vacant and new positions as they arise dependent on operational requirements.
23. MSS Security also utilises the services of contractors for other specified contracts, such as contracts under our Events Services business clients. MSS Security for instance, uses sub-contractors, to provide services at major sporting events throughout the year. The sub-contractors we engage are typically long standing and work with us at the events we provide security for, on a continuous basis, fairly consistently throughout the year.
24. For the month of March 2020, over 80% of the total of over 200,000 hours supplied to customers of MSS Security Victoria were worked by direct employees. This includes additional hours worked by subcontractors at a major event.
25. In 2010, when I was the State Manager, Operational Performance, for New South Wales, I implemented a formal tender process for subcontractors, which process I repeated in Queensland in approximately 2014 and in Victoria in 2018 and 2019.

26. The intention of the tender process was to give the sub-contractors a clear understanding of our expectations, what services we wanted their personnel to perform, but it was also intended to provide us with information about each sub-contractor's capacity, their personnel, information about financial liquidity, and how they engaged people.
27. Subcontractors selected to engage with MSS Security are required to enter into a Services Subcontract Security Services.
28. A copy of the precedent Services Subcontract Security Services which we ask our subcontractors to enter into is document MSSS.0001.0001.0004 (**Services Subcontract**).
29. The Services Subcontract includes various requirements that must be complied with by the sub-contractor including requirements in relation to the supply of services (clause 3); fees, invoicing and payment (clause 4); service orders (clause 7); personnel (clause 8); representatives and key personnel (clause 10); records, reports, meetings and audit (clause 11); work health and safety (clause 12) as well as various other clauses.

QUESTION 8 – HOW MANY PERMANENT EMPLOYEES DID YOU HAVE AS AT 27 MARCH 2020?

30. As at 27 March 2020, MSS Security - Victoria had 1,103 permanent employees.

QUESTION 9 – WHICH OFFICE HOLDERS WITHIN YOUR COMPANY THEMSELVES HOLD PRIVATE SECURITY LICENCES

31. The table below identifies the office holders within MSS Security who hold private security licences as at 14 August 2020:

Licence Holder	Position
	State Operations Manager
	Crown Manager
	State Operations Manager
	Major Events Manager
	Business Manager
	Business Manager
	Business Manager
	Business Manager
	Business Manager
	Major Events Coordinator
	Business Improvement Manager
	Service Delivery Coordinator
	Service Delivery Manager
	Service Delivery Coordinator

QUESTION 10 – HOW DO YOU RECRUIT STAFF?

32. In the following paragraphs, I describe the general process by which MSS Security recruits staff.
33. Business Managers (Account Managers) lodge an online recruitment requisition based on the needs of the sites for which they are responsible. These requisitions specify the inherent requirements of the role and the candidates, status of employment (Casual, part-time or fulltime), likely roster (if known) and rates of pay. This requisition is fielded by the Victorian Human Resources / Industrial Relations Team (**HR/IR team**).
34. The HR/ IR team advertises for candidates via SEEK, print media, the MSS Security Website, the Employee Portal, as well sometimes as targeted approaches to particular personnel. Applications are lodged online through the Talent Management System on the MSS Security website.
35. Candidates without requisite qualifications are automatically declined; having been deemed unsuitable, via automated system filters (e.g. not holding security licence or not holding required citizenship status/ work rights). Remaining candidates are screened by the HR/ IR team. This is more often than not done by the Recruitment Coordinator, based on each applicant's application and an assessment of whether a particular candidate meets the inherent requirements of the role. Candidates are then shortlisted.
36. Shortlisted candidates undertake a phone-screening and interview and are further shortlisted to participate in a face-to-face interview if successful at this phase.
37. Candidates successful at this point then progress to background and reference checking and where required, medical assessment (noting all staff undertake the pre-placement health checklist) and attend their face-to-face interview. This interview will usually include the Business Manager and the Recruitment Coordinator.
38. Dependent on the particular customer's requirements, candidates may also be scheduled for an interview with the customer for final approval.
39. Candidates successful through this process will then receive a letter of employment and accompanying paperwork (superannuation forms, Tax File Number Declaration etc.)
40. Once a candidate has accepted an offer of employment, candidates are scheduled for an MSS Security induction, following which they are assigned to their site, provided their uniform, roster and commence their site-based training.

QUESTION 11 – ARE STAFF EMPLOYED OR ENGAGED BY YOUR COMPANY UNDER ANY RESTRICTION ON ACCEPTING WORK FROM OTHER SECURITY BUSINESSES?

41. MSS Security's terms and conditions of employment include a restriction on accepting any work outside of the organisation which may give rise to an actual or potential conflict of interest. In any event employees are required to notify and seek approval prior to accepting work outside of MSS Security.

YOUR COMPANY'S INVOLVEMENT IN THE HOTEL QUARANTINE PROGRAM

Question 12 – When and how did your company first become aware that there was to be a role for private security companies in the Hotel Quarantine Program?

42. I first became aware that there may be a role for private security companies in the Hotel Quarantine Program on Sunday 29 March 2020. At approximately 10am that day, I received a text message from Geoff Alcock, Managing Director of MSS Security, asking me if I was available to talk, to which I replied 'yes'. Geoff then rang me and told me that he had been contacted by someone from the Department of Jobs, Precincts and Regions (**DJPR**) to ascertain if we were in a position to provide security personnel to the Hotel Quarantine Program. Geoff said that he had told that person that I would be in contact. I cannot now recall if Geoff mentioned the person's name during that telephone call.

43. Geoff then sent me an SMS with the contact details for Katrina Currie, then Executive Director, Employment Inclusion, DJPR. Shortly after receiving that email, I called Katrina Currie. She was unable to speak with me at that time and I received a call from her later, however, she was interrupted and we agreed to speak later that day. We then spoke on the telephone in the afternoon and had a lengthy conversation which I refer to at paragraphs 46 to 57 below.
44. Following my initial call with Katrina Currie, on Sunday morning, one of my managers Sam Daquino, who is responsible for looking after the Crown Casino, also texted me and said he was aware that Unified Security was providing the security for the hotels at the Crown Casino. He wanted to know why they were providing the security services to Crown because usually MSS Security is the contracted supplier of security services to Crown Casino outside the gaming floor.
45. Following my conversation with [REDACTED] I sent a text message to Katrina Currie at approximately 12.07pm on 29 March 2020 in which I provided information about services we could provide, via our subcontractor, for Ballarat, which she had mentioned in our initial conversation. I also mentioned we were an existing provider to Crown and it would be ideal for MSS Security's staff to continue to work there given our workforce was already in place and was familiar with the site. I provided Katrina with my email address. Katrina responded to my message with a SMS in which she said they had someone already in place at Crown (screenshots of text messages on 29 March 2020, document nos. MSSS.0001.0013.0028 and MSSS.0001.0013.0030).
46. After sending the text messages, I spoke with Katrina Currie in the afternoon. . At the outset of the call, after I introduced myself, I said to Katrina that I was going to type really rough notes as we talked and send them through to her at the end of the call. I also said that once she received my notes, if I had missed anything, she should let me know. Katrina said that was fine.
47. It is my usual practice to send an email following an important conversation, such as a discussion about a new contract. On this occasion, I tapped out the key points in an email while we were speaking because there was a high degree of urgency. A copy of my email, which I wrote as we were speaking and sent to Katrina Currie after the conversation is the email 'Hotels Work - notes from our discussion', document number MSSS.0001.0010.0017
48. In that conversation, Katrina Currie said the Victorian Government was starting a quarantine program in hotels for people returning from overseas and they were looking to engage, and had already engaged, private security companies for some of those hotels. She said they would probably have three providers and MSS Security would be one. At that stage the Mercure was one hotel mentioned and so was the Novotel and the Travelodge.
49. In that discussion Katrina talked about potentially some hotels in Geelong being used as well, but predominantly the hotels were to be Melbourne metropolitan hotels. She didn't tell me the ones in respect of which we would be assigned to provide security services. She said the sites would be confirmed following Monday and Tuesday when they received confirmation of incoming flights and we would need to be available on Monday or Tuesday to do a risk assessment and a walk through of the hotels allocated to MSS Security.
50. We talked about what type of services would be required and that it was essentially manning the floors to make sure people didn't leave their rooms, checking packages, and dealing with people who might turn up to deliver meals. She also said that we might be asked to escort people to recreation areas or for smoking breaks. Katrina said it was likely that the Victorian Police would have a presence at each site. The Police would be able to deal with any issues arising if people absconded or got aggressive. Those matters, I was told, would be dealt with by the Police.
51. Katrina explained to me that people in quarantine would be brought to each hotel via Skybus and anyone with symptoms of COVID-19 would not be brought to the hotels.
52. She asked me to indicate what our immediate available resources were. I said I felt comfortable committing to 100 security officers almost immediately because we had an almost simultaneous shutdown of another major client's site at the same time. I knew that over the course of a week

or so we could get 100 or more staff. I mentioned to Katrina that with a little more time we could source more people from our subcontractors and our aviation business as well. Katrina had no issue with us using sub-contracted staff. She mentioned that the hotel quarantine program was all part of providing work for people who had been stood down due to COVID-19. It was about creating employment opportunities for people who had lost work due to the shutdowns and restrictions.

53. Katrina told me all security officers would have to complete the COVID-19 on line training module. She couldn't provide me with the details during the call and I said I would find it and include it in my email. The way Katrina came across to me during the call, I perceived that she was under pressure with a lot going on. She came across as tense. I said I would locate the online training. I included the link to the training module in my email to Katrina dated 29 March 2020.
54. Katrina said we needed to source PPE to provide to our staff, but if there were any difficulties DHHS would have to supply it and to let them know. She referred to a requirement to provide gloves, masks and sanitiser as the PPE needed. I informed Katrina that I didn't think we would be able to source all of the PPE immediately. I was aware that even by that time difficulties were already being experienced in obtaining masks – which we used in other parts of our day-to-day business - because of the high demand.
55. Katrina talked about the different entities we would be interacting with. She said DJPR, DHHS and trained medical staff, being a nurse or doctor, would be present at each of the hotel sites. Katrina said a member of the Victoria Police would also be on site. She said if someone was trying to escape our job wasn't to tackle them to the ground. She also mentioned that there may be interactions between the Australian Defence Force and Borderforce; especially on buses during transit to hotels.
56. She asked whether we were interested in being involved. I said we were definitely interested and could commit to providing 100 guards immediately and probably more.
57. At the end of the conversation I was left with the impression that she would come back to me and reply to my email and give me more information and confirm whether what I had set out in my email was correct.
58. Immediately after the conversation ended that afternoon, I sent an email to Katrina Currie (see email 'Hotels Work – notes from our discussion' - MSSS.0001.0008.0004). That email was sent at approximately 3.43pm with the notes that I had typed as we spoke. In the email I informed Katrina that, as an indication I expected the hourly rate would be \$51 per hour to provide the equivalent of 1 officer for 24 hours a day, 7 days a week, but I would confirm the rate once we have a clearer indication of numbers. I asked her to let me know if there was anything I had missed.
59. I received a message that my email was undeliverable, and I then realised I had sent the email for Katrina to the incorrect email address. I sent Katrina a text message at 3.44pm on Sunday 29 March and she responded with her correct email address (screenshots of text messages on 29 March 2020, document nos. MSSS.0001.0013.0028 and MSSS.0001.0013.0030). At approximately 3.46pm on 29 March 2020, I forwarded my earlier email to Katrina Currie at the correct email address (see the email 'Hotels Work - notes from our discussion' document number MSSS.0001.0010.0017).
60. Katrina Currie responded to my email at about 11.43pm that night. Amongst other things, Katrina asked for further information and clarification about the pricing. In that email, Katrina acknowledged my earlier advice that PPE may be an issue and asked that I provide advice in writing of the numbers of daily gloves and masks required once they confirmed numbers for each site. (see the email 'Hotels Work - notes from our discussion' document number MSSS.0001.0008.0004 and document MSSS.0001.0010.0017).
61. On Monday 30th March 2020 at approximately 7.25am I replied to Katrina's previous email received on at 11.43pm on 29 March 2020 responding to some of the questions raised and also providing some clarity on our intention to supply officers, including subcontracted security

personnel through our approved subcontractors (see the 'email Hotels Work - notes from our discussion' document number MSSS.0001.0010.0017). Katrina did not come back to me or mention that anything in my earlier email was incorrect or not permitted, including the use of sub-contractors.

62. I refer to communications with DJPR after 30 March 2020, in the below paragraphs, in response to question 13.

Question 13 – When and how did your company first reach an agreement with the Victorian government to provide security services in the Hotel Quarantine Program?

63. Following communications with Katrina Currie on 30 March 2020, on Thursday 2nd April at approximately 10:41am I was first contacted via email by [REDACTED], Principal Policy Officer, Inclusion, Employment of DJPR. [REDACTED] introduced himself as someone working with Katrina in managing the security arrangements at hotels receiving incoming international travellers to serve out their compulsory isolation period. [REDACTED] asked me to provide a quote in the form of a schedule of hourly rates, details on PPE we could provide and/ or any restrictions we believed we might have had in providing PPE. He also provided some further clarity on the proposed form of contract (see the 'email Hotels Work – notes from our discussion' document number MSSS.0001.0005.0061).
64. I replied to this email at 12.03pm that same day with the requested rates schedule. I prepared the rates based on the ceiling rates in the SPC because MSS Security rates for a particular contract cannot exceed the ceiling rates stipulated in the SPC. In the email, I introduced Anthony Bandeira, Business Manager Client Services of MSS Security who I copied to that email, as the project lead for MSS Security. I also affirmed my previous discussions with Katrina Currie referred to at paragraph 54, above, that we envisaged supply of PPE to be problematic and informed the department that it would need to supply PPE until such time as our PPE, ordered previously, arrived (see the email 'Hotels Work – notes from our discussion' document number MSSS.0001.0005.0061).
65. At 3.44pm that same day, 2nd April 2020, [REDACTED] replied to my earlier email (see email Hotels Work – notes from our discussion document number MSSS.0001.0005.0061) advising that DJPR agreed to engage the services of MSS Security for the Hotel Quarantine Project, commencing on either 5 or 6 April 2020, depending on the numbers of international arrivals over the coming days. He said the Victorian Government was in negotiations with a number of hotels to host arrivals and he would be in touch as soon as a hotel at which MSS Security was to provide services had been confirmed. He also advised that they estimated that 40 – 50 staff would be required for the one hotel and there would potentially be 2 further hotels at which they would require MSS Security to provide services.
66. In the email, [REDACTED] mentioned that he was in contact with relevant on the ground staff regarding the provision of PPE and would keep me advised. He said we would need to be prepared to cover our own PPE requirements on commencement if possible. He said that they proposed to use a Purchase Order Contract under the SPC, at the rates outlined in my earlier email (see the email 'Hotels Work – notes from our discussion' document number MSSS.0001.0005.0061).
67. I replied to this email at 4.36pm that day, again reaffirming the likelihood we would not be able to supply PPE at commencement and that, as previously indicated, our stock was likely to be more than 3 weeks away (see the email 'Hotels Work – notes from our discussion' document number MSSS.0001.0005.0061). That email was acknowledged by [REDACTED] at 4.51pm 2nd April 2020 (see email 'Hotels Work – notes from our discussion', document number MSSS.0001.0005.0061). I might have had a conversation with [REDACTED] at some stage that day, but I can't now recall if I did and, if so, what we discussed. It would be unusual though for me to get an email like that from him and not contact the person by telephone.
68. There were further communications between DJPR and MSS Security over the subsequent days. Most of the communications were between [REDACTED] and Anthony Bandeira.

69. I had sent an email to my team at 3.34pm on 29 March 2020 following my calls with Katrina Currie (see email 'Potential Work', document number MSSS.0001.0005.3187) in which I informed Anthony that I was going to suggest that he manage the hotel quarantine project and sought his confirmation as to availability to do so. I received an email from him confirming his availability to assist at 10.39am on 30 March 2020 (see email 'Leave Compromise', document MSSS.0001.0005.2729)
70. Anthony was responsible for the operational matters, such as managing the staff and the provision of services. I introduced Anthony to [REDACTED] in my email dated 2 April 2020, referred to at paragraph 64 above, as the contact in that regard.
71. I am aware that I was copied in on emails between [REDACTED] and Anthony (amongst others). It is, and was my practice at the time, for emails on which I have been copied in to be automatically forwarded to a separate mail folder, labelled 'CC inbox'. I will sometimes read the emails, but not always.
72. In my email to the team at 3.34pm on 29 March 2020 (see email 'Potential Work', document number MSSS.0001.0005.3187) I also informed Charles Hooper, Health Safety and Environment Coordinator of MSS Security, that prior to the job beginning, a risk assessment of the site(s) needed to be undertaken. Very early on 30 March 2020, Charles Hooper confirmed his availability to me to conduct a risk assessment at the site(s).
73. Before commencing work at a new site, it is MSS Security's practice to conduct a risk assessment. A risk assessment is a site-visit where a review of the services to be performed relevant to the environment is undertaken to understand the occupational health and safety risks to staff of MSS Security. In this instance, those risk assessments were undertaken by Charles Hooper, Health Safety and Environment Coordinator of MSS Security, accompanied by Anthony (email sent by Jamie Adams to [REDACTED] and others, dated 2 April 2020, at 4.30pm, with subject 'RE: Hotels Work – Notes from our discussion' - document no. MSSS.0001.0005.0651). The Risk Assessment Form dated 06/04/2020 is document number MSSS.0001.0012.0195)
74. My understanding is that Charles and Anthony were trying to organise to do site visits and the risk assessments with the DJPR. I recall they did a site visit at the Novotel but we didn't end up working at the Novotel.
75. In the week commencing 30 March 2020 there were a lot of changes, including the hotels to which we were allocated and the times to attend the hotels. We were at the behest of the DJPR, but the DJPR was also at the behest of the other entities responsible for arranging the return of the travellers and their transfer to the hotels.
76. Following receipt of the email from [REDACTED] at 4.51pm on the 2nd April 2020 (see email 'Hotels Work – notes from our discussion', document MSSS.0001.0005.0061), [REDACTED] sent an email to me identifying a general list of responsibilities for the MSS Security on the ground crew (see email 'Hotels Work – notes from our discussion' document MSSS.0001.0005.0585). I had some further email correspondence with [REDACTED] in relation to billing arrangements for the job (see email 'Hotels Work – notes from our discussion' document MSSS.0001.0005.0585). The day-to-day arrangements in relation to which hotels we were going to be working at, arrangement of site visits and when guests were due to arrive, I left to Anthony.
77. Following those communications I liaised directly with [REDACTED] about the formal contract and, for example, whether there was a requirement for MSS Security to provide a bank guarantee.
78. On 10 April 2020, I received an email from [REDACTED] with a draft POC (see email 'Purchase Order Contract', document number MSSS.0001.0002.0014).
79. On Wednesday 15th April 2020 I emailed [REDACTED] with some requested changes to the draft POC attached to his email dated 10 April 2020 (see email 'Purchase Order Contract' document MSSS.0001.0005.3709). My email was acknowledged by [REDACTED] that same day (see email 'Purchase Order Contract', document number MSSS.0001.0005.1518) and on 16th April 2020 [REDACTED] confirmed acceptance by DJPR of the requested changes (see email 'Purchase Order

'Contract', document number MSSS.0001.0005.0147). The final POC was sent to MSS Security for execution with [REDACTED] email dated 16 April 2020 and subsequently executed by MSS Security and returned to DJPR on 17th April at 6pm (see email 'Purchase Order Contract', document number MSSS.0001.0005.0504).

80. DJPR subsequently executed the POC and returned it to MSS Security via email dated Thursday 23rd April 2020 (see email 'Purchase Order Contract', document number MSSS.0001.0002.0049). A copy of the signed POC is document number MSSS.0001.0002.0050.
81. When we were asked to provide security services for the Stamford Plaza Hotel a meeting was arranged by Paul Stagg from the DJPR for the purpose of readying the hotel for guests by the evening of 30 April 2020. The meeting was held at 11am on 29 April 2020 (see email 'Stamford Plaza – meeting tomorrow', document MSSS.0001.0005.0098). We used the risk assessment form we had developed for the other hotels to review what would be required for the Stamford Plaza Hotel. An example of the risk assessment form is MSSS.0001.0003.1209.

Question 14 – What precisely were the security services you agreed provide under the agreement?

82. The nature of the security services provided by MSS Securities to the Hotel Quarantine Program changed and evolved in the weeks leading up to the signing of the POC and also during the course of the program.
83. The security services MSS Security agreed to provide are described in:
 - (a) my email to Katrina Currie dated 29 March 2020 (see the email 'Hotels Work - notes from our discussion' document number MSSS.0001.0010.0017);
 - (b) [REDACTED] email to me dated 3 April 2020 (see the 'email Hotels Work - notes from our discussion' document MSSS.0001.0005.0607); and
 - (c) Schedule 3 of the POC (see document number MSSS.0001.0002.0050).
84. Schedule 3 of the POC set out the duties in general terms, for example:
 - (a) having someone available in the foyer;
 - (b) accompanying guests to their floor and their room;
 - (c) maintaining a presence on floors, lobby and front door;
 - (d) delivering parcels to rooms (once checked and approved by the DHHS authorised officer on site);
 - (e) accepting and delivering food deliveries to rooms for DHSS approved guests only;
 - (f) supporting outdoor breaks for guests in accordance with arrangements agreed at each location;
 - (g) escalating issues to the appropriate person: for example, health issues were to be escalated to either the DHSS Authorised Officer or Nurse;
 - (h) liaising with and following all reasonable directions made by DJPR;
 - (i) ensuring adequate training of staff; and
 - (j) ensuring that all personnel wore all necessary personal protective equipment at all times while performing the services.

85. During my conversation with Katrina Currie on 29 March 2020 I referred to packages coming to site which we might have to vet. Katrina said we would be given information on site about what could come in or not; we would also follow directions about passengers coming in from overseas. I also referred to cigarette or recreational breaks and escorting people out for those purposes.
86. In the same conversation, Katrina indicated that she thought the guards at other Hotels were delivering meals and potentially collecting rubbish as well. To the best of my knowledge I am not sure we did either of those things in our role, although collecting rubbish was referred to in the notes I created of my initial conversation with Katrina Currie (see the email 'Hotels Work - notes from our discussion' document number MSSS.0001.0005.0061).
87. I had feedback along the way from Anthony and I checked in with him on average, on a weekly basis. I needed to know numbers and the impact of this work on our business. I can't say exactly when I spoke to him. I recall that at times Anthony was getting frustrated because he didn't know if people in quarantine were sick and we were expected to escort them outside for breaks.
88. To my mind, what was required of MSS Security in relation to infection control was making sure our guards were trained in the mandatory infection control online module and that Katrina Currie had directed that they undertake and that there was an adequate supply of PPE and the guards were using PPE.
89. It is possible that if we look at what the guards were doing on a particular day, at a particular site and the services described in the POC there would be differences.
90. In this uncertain and rapidly changing circumstance, and based on my experience, I would have found it highly unusual if the scope of works in week 1 had been exactly the same as in week 2. It was moving so fast and the directions received at each site on any particular day changed depending on the individual who was giving the directions, including the information known about the disease and the most current advice in relation to PPE. There was a change in the advice from DHSS about PPE during the period MSS Security was engaged, which I refer to at paragraph 136 below.

Question 15 – When were such security services first provided?

91. MSS Security commenced services on Monday 6th April 2020 at the Park Royal at Melbourne Airport, on 7th April 2020 at the Four Points by Sheraton, on 8th April 2020 at the Holiday Inn Melbourne Airport, on 10th April 2020 at the Travelodge Docklands and 30th April 2020 at the Stamford Plaza.

Question 16 – When was that agreement formalised in writing?

92. The final POC was executed by MSS Security on 17th April 2020 and was returned to MSS Security, executed by DJPR, on 23rd April 2020 (Purchase Order Contract for the Provision of Security Services between State of Victoria and MSS Security Pty Ltd, undated, document number MSSS.0001.0002.0050).

Question 17 – was there any discussion or negotiation in advance of the agreement being reached regarding infection control, PPE and specialised training for security staff? If so what were there discussions.

93. As referred to at paragraph 54, I discussed PPE provision with Katrina Currie on 29 March 2020 and referred to it in my emails to Katrina of the same date. I indicated we would have some difficulties in providing the required PPE given the circumstances then existing in Victoria and

the short supply / lack of availability of PPE. Katrina Currie acknowledged my advice in an email dated 29 March 2020 and requested information in writing of the numbers of daily gloves/masks required once the numbers for each site were confirmed (the email 'Hotels Work - notes from our discussion' document MSSS.0001.0010.0017).

94. This issue was also referred to in emails between me and [REDACTED] dated 2 April 2020 (the email 'Hotels Work - notes from our discussion' document MSSS.0001.0005.2752) and I believe I spoke with [REDACTED] early on about this issue, but I cannot recall exactly when. I said that we couldn't provide PPE because we were having trouble sourcing it ourselves.
95. At that time, we were looking for latex gloves predominantly. In the usual course of our day-to-day business, for our existing and long term contract with DHHS, we supply our staff with gloves as a matter of course. For instance, to pick up rubbish. We were having trouble even at that point sourcing gloves. Once I found out the potential for this type of work and what it required, I recognised there may be a need to source masks as well. I knew that finding them would be problematic; we would need significant numbers of them and we would pay exorbitant rates for them. However, my concerns were allayed given that the initial government advice was that people did not need to wear masks, and the best prevention was hand hygiene
96. Eventually when services commenced we had been able to source sufficient supplies for our commencement, despite advising the department we would have some difficulties. Further, while MSS Security supplied large quantities of PPE, once services had commenced DHHS also supplied our staff posted to the hotels previously mentioned with PPE, which was freely available for staff to access during their shifts.
97. We send out weekly updates on safety to all employees. These are sent out by the MSS Security marketing department, via a push text message which refers an employee to the employee portal on the MSS website. That contains updates on safety information and links to government websites with safety information on corona virus and prevention. Copies of the COVID-19 updates posted on the MMS employee portal over the period from 31 January 2020 to 12 August 2020 are document nos. MSSS.0001.0013.0008 MSSS.0001.0013.0009, MSSS.0001.0013.0010, MSSS.0001.0013.0011, MSSS.0001.0013.0012, MSSS.0001.0013.0013, MSSS.0001.0013.0014, MSSS.0001.0013.0015, MSSS.0001.0013.0016, MSSS.0001.0013.0017, MSSS.0001.0013.0018, MSSS.0001.0013.0019, MSSS.0001.0013.0020, MSSS.0001.0013.0021, MSSS.0001.0013.0022, MSSS.0001.0013.0023, MSSS.0001.0013.0024, MSSS.0001.0013.0025, MSSS.0001.0013.0026 and MSSS.0001.0013.0027.
98. I also sent information to employees about hygiene and updated information in relation to COVID19, by email (see updates on COVID-19 provided to Victorian employees on 16 March 2020, 1 July 2020 and 24 July 2020, document nos. MSSS.0001.0013.0031 to MSSS.0001.0013.0032). I am aware that the MSS Security HR /IR Manager sent out emails in relation to Covid training including links to the Commonwealth health department online training (see the email 'Department of Health – Covid-19 Training' document number MSSS.0001.0004.0692).
99. I am now aware in relation to training in relation to infection control there were some guidelines around hand hygiene including the training around mid-June 2020 which was provided after the Covid-19 outbreak at the Rydges Hotel.
100. With regard to training, in my initial discussion with Katrina Currie (email 'Hotels Work - notes from our discussion' document MSSS.0001.0010.0017) she advised it would be a pre-requisite for staff to undertake the Infection Control Training, available as an online course from the federal government. MSS Security kept a copy of the training certificates issued to each employee once they, which we complied with. Every staff member who completed the online course was issued with a certificate of completion. I have checked the MSS Security training records and have ascertained that all MSS Security Staff completed the relevant training. A copy of an example of a certificate of completion is document MSSS.0001.0003.1002.
101. Other relevant matters discussed with Katrina Currie during that conversation, were that:
 - (a) each hotel would be staffed by DHHS and medical staff who would provide direction at all times to our security personnel regarding infection control protocols and requirements;

- (b) and
- (b) MSS Security staff were to follow the directions of the various government personnel, being representatives from DHHS, DJPR, and medical staff. AFP and Border Force were also mentioned.
102. I was not aware at the time of the precise arrangements made in relation to infection control. I have since become aware that training was provided by DHSS on about 12 – 16 June, after the outbreak at Rydges, which I refer to below.

Question 18 – Was the agreement varied over the time your company was providing security services to the Hotel Quarantine Program? If so, how and why?

103. No variations were made to the written agreement between the DJPR and MSS Security insomuch as the services and scope were quite generic in their descriptions in that document. In practice, the nature of the services did change; particularly with regard to when we would be required to provide services at a particular hotel, the number of passengers arriving, when PPE was required to be worn and when it wasn't (sometimes in opposition to the initial training received by our officers – the use of masks is an example) as well as the varying applications of the rules and infection control protocols from facility to facility and shift to shift.
104. I wasn't aware of the minute by minute duties the guards were performing. I wasn't aware of any overall changes in scope. For the most part, the scope was dependent on the number of travellers coming in.
105. On 9 April 2020 I was copied in on an email from [REDACTED] to Anthony, with the subject 'Health and Welfare Policy' (document MSSS.0001.0005.0592). The email referred to a Health and Welfare Policy, endorsed by the Chief Health Officer, in light of which DHSS requested that an additional three security staff be rostered for each shift between 8am to 8pm. The email referred to the following health and exercise provisions included in the Policy:
- (a) If the room has a balcony, ensure the residents can access it for fresh air;
 - (b) Advise residents to open windows/balconies where possible for fresh air and ventilation;
 - (c) If it is possible for residents to go outside to take some exercise for organised/supervised short periods of time, this should be facilitated where possible. Residents should ensure physical distancing is practised during this period. Only well residents from the same room should be able to go out to exercise at the same time.
 - (d) Residents should be provided with resources for exercise routines and yoga/meditation that they can perform safely within their rooms.
106. I considered the email to contain directions from DHSS and DJPR, of the type contemplated in the POC. I did not consider it amounted to a variation of the scope of work as set out in the POC.
107. On 20 June 2020, I was copied in on an email from Anthony to [REDACTED] Commercial Manager Victoria MSS Security and Sam Krikelis Business Manager Event Services MSS Security, in which Anthony said that the DHSS had requested that MSS Security re-assess the number of guards required at a hotel. I understood that this was because the MSS Security initial risk assessments had assumed a high number of attempted absconders, which had not eventuated (see email 'Hotels Changes' document number MSSS.0001.0005.1213). Anthony's email suggested fairly significant reduction. I responded to the email and asked how many officers would no longer be required (see email 'Hotels Changes' document number MSSS.0001.0005.1213).

Question 19 – Did the scope of the duties to be performed under your agreement change over time? If so, when and how?

108. As set out above, there was no formal change to the scope of the duties to be performed by

MSS Security set out in the POC, during the time we were engaged. MSS Security did receive

directions from the DJPR and the DHHS, including on site, some of details of which are referred to above.

Question 20 – At which hotels, and for what periods of time, did your company provide security services?

109. MSS Securities provided security services to five hotels, as identified below, for the periods specified, all of which are inclusive:
- (a) Park Royal Melbourne Airport, from 6th April 2020 to 10th July 2020;
 - (b) Four Points by Sheraton, from 7th April 2020 to 3rd July 2020;
 - (c) Holiday Inn Melbourne Airport, from 8th April 2020 to 10th July 2020;
 - (d) Travelodge Docklands, from 10th April 2020 to 25th April 2020;
 - (e) Stamford Plaza, from 30th April 2020 to 2nd July 2020.

Question 21 – How many security staff did you engage or authorise to be engaged under subcontracting arrangements –

- (a) in total; and
- (b) for each of the hotels at which you provided security services?

110. In total, approximately 500 guards were engaged under subcontracting arrangements with MSS Security. In the time available since receiving the request, I have not been able to obtain a breakdown of each of these personnel between the hotels at which MSS Security provided security services.

Question 22 – What licences were the staff you engaged or authorised to be engaged required to hold in order to be engaged? What records were kept of those licences?

111. All MSS Security staff and sub contactors were required to hold a Victorian Private Security Licence – Individual to be engaged to provide the security services for the Hotel Quarantine Program.
112. MSS Security keeps records of each staff member's security licence numbers in our centralised rostering system for our employees. The sub-contractors are required to keep details of each of their staff's licence numbers.
113. As a security business we hold a licence and a condition of that licence is that each of our employees have security licences. Each time a guard checked on for a shift they were asked to show their licence and it was checked to make sure it was current. In the case of each of the hotels except for the Stamford Plaza Hotel, Sam and Anthony kept crowd control registers. In the case of the Stamford Plaza Hotel this was not possible because the process was too time consuming given the greater numbers of staff involved. Anthony and Sam and the supervisors changed the process to try to streamline it. The planned roster was checked off to ensure that the people who were required to be there were in fact present. When a person arrived for a shift, his or her name was checked off against their name on the roster. At end of the week the sheets checking names off against the roster were combined into an excel spreadsheet. The excel spreadsheet was then checked off against the hours which were to be provided under contract. There was also a cross-checking process whereby the hours and officers' names provided by sub-contractors were also checked.

114. The sub-contractor cross-checking process involves several stages. First, the names of the sub-contractor personnel were provided to MSS Security. The names were checked with the supervisors to ensure that the relevant people had worked. A spreadsheet was then prepared by Sam Krikelis to track who had worked. At the end of each week an activity statement was provided to Sam from the subcontractor. This was checked against the excel spreadsheet which is received from the supervisors and that forms the basis of the master sheets that are then input into the computer to generate the recipient created tax invoice. MSS Security calculates the hours worked and generates the relevant invoices for each sub-contractor.
115. A copy of a spreadsheet identifying each MSS Security and subcontractor employee and their license numbers is at document no. MSSS.0001.0013.0034.

Question 23 – Did you engage subcontractors to perform any part of the security services you had contracted with the Victorian Government to provide? If so, give details of –

- (a) the firms subcontracted;
- (b) the hotels at which the subcontracting firm or firms provided services;
- (c) the dates on which the subcontracting firm or firms provided services;
- (d) whether you authorised that firm or firms to themselves engage in subcontracting or labour hire; and
- (e) if so, the hotels and dates on which the further subcontracting or labour hire occurred.

116. MSS Securities subcontracted part of the security services for the Hotel Quarantine Program to Australian Protection Group Pty Ltd, The Security Hub, Ultimate Protection Services and United Risk Management. We received confirmation that each of these subcontractors were approved by the DJPR on 10 June 2020 [see the email dated 10 June 2020, at 4.23pm from Anthony Bandiera to Chris Saunders and Jamie Adams, with subject 'FW: Sub Contractors – Approved', document number MSSS.0001.0001.0006 with attached Notices of Intent signed by dated 10 June 2020, documents MSSS.0001.0001.0007, MSSS.0001.0001.0008, MSSS.0001.0001.0009 and MSSS.0001.0001.0010].

117. The below table identifies the hotels where the subcontractors worked and the periods:

Hotel:	Contractor:	Date Commenced:	Date Ended:
Park Royal @ Melbourne Airport	The Security Hub (TSH) Ultimate Protective Services (UPS)	6/04/2020 7/05/2020	10/07/2020 26/06/2020
Holiday Inn @ Melbourne Airport	Ultimate Protective Services (UPS)	8/04/2020	9/07/2020
Sheraton Four Points @ Docklands	Australian Protection Group (APG) The Security Hub (TSH)	7/04/2020 29/04/2020	2/07/2020 17/06/2020
Travelodge @ Docklands	United Risk Management (URM) The Security Hub (TSH)	10/04/2020 10/04/2020	25/04/2020 25/04/2020
Stamford Plaza Melbourne	United Risk Management (URM) The Security Hub (TSH) Ultimate Protective Services (UPS)	30/04/2020 30/04/2020 17/06/2020	25/06/2020 2/07/2020 25/06/2020

118. MSS Security requires our subcontractor to directly employ all staff and accordingly did not authorise any of the subcontractors to themselves engage in subcontracting or labour hire. Our subcontractor agreements specifically prohibit our subcontractors from subcontracting security officers from other providers.
119. To the best of my knowledge there was no further subcontracting or labour hire at any of the hotels, during the period MSS Security provided security services for the Hotel Quarantine Program.

Question 24 – What training did you provide, or require to be completed, by security staff who were to be working at the hotels for which you had responsibility? In your answer please make any necessary distinction between:

- (a) Staff directly engaged by your company; and
- (b) Staff engaged by subcontractors and labour hire companies.

120. All security staff, whether directly employed or engaged via a subcontractor were required to undertake the government mandated infection control training online module. MSS Security kept a record of certificates issued to each employee when he or she completed the training, as referred to at paragraph 100 above.
121. MSS Security received emails from the subcontractors, attaching copies of certificates issued to their staff, to confirm they had completed the online module. One example is an email from [REDACTED] dated 6 April 2020 at 9.57pm, attaching induction certifications for staff members of The Security Hub (document no. MSSS.0001.0003.1321).
122. That was the only formal training required by the DJPR to be undertaken.
123. MSS Security also had an infection control training module which was available for all staff in the national business to complete. Some of what it covered were pretty simple reminders such as wash your hands (see screenshots of the MSS Infection Prevention and Control Training created in 2020, doc no. MSSS.0001.0013.0029).
124. I was verbally advised by the sub-contractor principals that they also provided some additional training to their staff and there are references to such training in MSS Security's documents.
125. In my view provision of on-the-job training is also an important aspect. From my discussions with Anthony at the time and later I was aware that when things changed and people needed to know about the changes, shift briefings happened on a regular basis to explain the changes. If things were happening on the job that needed to be changed, then the officers were told by a DHSS representative, the medical officer or a DJPR representative. For example, if a face mask was not covering the guard's nose properly, that was corrected.
126. I am now aware that there were at least 2 site meetings where information was conveyed to staff on site, on at least the following occasions:
 - (a) there were onsite meetings at the Stamford Hotel on 13 and 14 June 2020 for training and briefing of the guards following an outbreak at the Rydges hotel (doc MSSS.0001.0003.1609, doc no. MSSS.0001.0005.1432 and MSSS.0001.0005.1433, doc no. MSSS.0001.0005.1427);
 - (b) an infectious disease specialist arranged by DHSS, attended at the Stamford Hotel on 24 June 2020 and at the Park Royal on 26 June 2020, to provide training of 1 to 1.5 hours each session, in groups of 15 people at most (email entitled 'Final Security Guard education pack for ParkRoyal 26/6/20 session' document reference MSSS.0001.0005.1632, email entitled 'Re: Additional Training for Security Staff @ Hotels' document reference MSSS.0001.0005.0518, email entitled 'RE: Final Security

Guard education pack for ParkRoyal 26/6/20 session' MSSS.0001.0005.1632). It was the intention that similar training would be provided at other hotels. I am not aware if this occurred.

Question 25 – In relation to each of the hotels at which your company provided security services;

- (a) was there a formal line of communication between your company and government officials;
- (b) if so, who were the government officials with whom your company had that line of communication;
- (c) what issues were the subject of communication; and
- (d) when and how often did you communicate with those government officials?

127. Initially the line of communication between MSS Securities and DJPR in respect of the Hotel Quarantine Program was between me and Katrina Currie and then me and [REDACTED] as referred to above. I had a direct line of communication with [REDACTED], about anything significant associated with the contract. After I introduced [REDACTED] to Anthony Bandeira, [REDACTED] communicated directly with Anthony Bandeira on day to day operational matters. I was not involved in the day to day operational matters.
128. I am not aware of the communications that happened onsite at the hotels on a day to day basis. My understanding is that the supervisors at the hotels (predominantly MSS staff) communicated with DHHS and DJPR representatives on site, medical staff and hotel staff from time to time. The POC specified that MSS Security staff would need to take direction from people on site.
129. In early July 2020, I was contacted by Greg Lake, Executive Director Department of Justice and Community Services and advised that his department would be taking over control of the hotels from 1 July 2020 and this would lead to our services no longer being required. By the time I was contacted we had already ceased services at the Four Points by Sheraton and the Stamford Plaza Hotel.
130. Since then I have communicated directly with [REDACTED], predominantly in relation to responding to requests for further information from the department, relative to our service provision. I have also communicated directly with Greg Lake, largely in relation to arranging cessation of services and following up on invoicing arrangements and payment for services rendered.

Question 26 – What arrangements were in place for the provision of PPE to the security staff you placed or authorised to be placed at the hotels? Were those arrangements satisfactory to your company?

131. As referred to above, we advised the DJPR prior to commencement of any work at hotels in respect of quarantine security services, that we anticipated difficulties supplying PPE to staff on the basis we were having difficulties sourcing PPE due to short supply more generally. Notwithstanding the commitment from DJPR in our initial discussions that DHHS would supply PPE, the POC stipulated that MSS Security was required to supply disposable gloves, masks and sanitiser to our staff. As events transpired, we were able to source sufficient quantities of PPE for commencement and continued to supply PPE to our staff. No-one complained at the time that they didn't have PPE or that it couldn't be provided (although I have subsequently learned of a complaint by a girl to this effect). When PPE was needed it was provided. I am now aware DHHS also supplied PPE to our staff throughout the project to supplement the PPE provided by MSS Security.
132. We assumed responsibility for all PPE for all staff and subcontracted staff.

Question 27 – Did you have any concerns about the safety of the security staff you placed or authorised to be placed at the hotels? If so –

- (a) what were those concerns;
- (b) when and how did they arise;
- (c) what steps were taken to resolve them; and
- (d) what was the outcome?

133. I was concerned generally about the well-being of our employees and those of our subcontractors, as I always am. That is part of my job. This is partly why I assigned 3 full time management members to oversee the project to ensure it received the attention and focus it required.
134. On 10 April 2020, MSS Security was informed that a guest at the Four Points Sheraton had returned a positive COVID 19 test. We issued a direction to staff that all guards should wear gloves for the entirety of their shift at all times; supervisors were to reiterate the need to report to the business at each shift briefing; guards were not going to be required to sign anything but were required to notify their supervisor if they are symptomatic (email chain ending with email from J Adams to S Krikilis and others, dated 14 April 2020, at 1.16pm, doc no. MSSS.0001.0004.0310).
135. Prior to the first confirmed COVID case at the Stamford Plaza Hotel in mid-June 2020, I was advised that government representatives overseeing the hotels had advised our staff they were not to wear disposable gloves under any circumstances. Charles Hooper advised me via email dated 12 June 2020, at 6.55am that DHHS had issued new PPE Guidelines, in which the wearing of masks and gloves was recommended but not mandatory. I was concerned because this was in direct contravention of the directions under the POC, the discussions previously had with the DJPR and my understanding of infection control based on the government mandated infection control training.
136. I responded to Charlie's email on 12 June 2020 at 7.03am and directed them to continue to supply PPE to our officers and we continued to do so (email chain ending with email from J Adams to C Hooper, dated 12 June, 7.03am, with Subject "Re: PPE Guidance from DHHS for Quarantine Hotels, document no. MSSS.0001.0005.1715) I didn't want to be without gloves and have people challenging me on that. They had to act under the direction of DHHS representatives onsite, but to the extent PPE such as gloves was needed, it was provided.
137. I said to Anthony that we should be challenging them on the direction. I am not sure if Anthony did that or delegated that. I had concerns about the direction because from a contractual standpoint we had to provide PPE and make sure staff were wearing them.
138. It was around that time that the DHHS provided training about the use of gloves, The DHHS demonstrated to staff the effect of hand washing. The DHHS sprayed "glitterbug" over the hands of staff members and then got people to wash their hands.
139. This training was reasonably effective, but it was delivered quite late and certainly after the outbreak at the Rydges Hotel had occurred. In an email dated 26 June 2020, MSS Securities provided feedback to DHHS on the training. (Email chain ending in email from J Mendes to A Bandiera dated 26 June 2020 at 2.48pm, document no. MSSS.0001.0004.3112)

Question 28 – Did you terminate the services of, remove from site, or otherwise take action against any and which of the security personnel you engaged directly for unsatisfactory performance of their duties at quarantine hotels? If yes provided details of

- (a) who was so terminated, removed or acted against and when; and

(b) the nature of the unsatisfactory behaviour concerned.

140. During the project I was not aware of any staff member, directly employed or subcontracted, who was removed from the hotels for unsatisfactory performance. This is not unusual given that almost 1,700 staff are employed by MSS Security Victoria (excluding Aviation Services). Typically minor disciplinary matters are managed by Business Managers. Where subcontractors are concerned, any issues are addressed with the subcontractor who then takes whatever action they deem appropriate against their personnel.
141. Since the conclusion of the project I have been made aware of a small number of incident related to staff behaviour or performance which was required to be addressed.
142. The number was not so alarming that it would have given me cause to go to a subcontractor and say there was a clear problem and they needed to fix it. Typically though, I am not notified of problems unless termination or legal action are contemplated.
143. One example and perhaps the most significant I have seen relates to a subcontract employee, who failed to adhere to social distancing guidelines, was fraternising in a non-sexual way with a work colleague and was found to be insubordinate when her behaviour was addressed. The officer (along with the other officer involved) was removed from the Four Point Sheraton Hotel at the request of MSS Security after having completed only 4 shifts and did not return. This officer subsequently made serious and slanderous allegations to the media about her recruitment, employment, the conduct of other officers and the provision of PPE and training, all of which I believe were subsequently proven to be false.

Question 29 – What information did your company receive from the government regarding infection control, PPE or any other issues related to your security work over the course of your work at quarantine hotels?

144. Initially MSS Security was directed to the government mandated on line infection control training, <https://www.health.gov.au/resources/apps-and-tools/covid-19-infection-control-training>, which all staff undertook prior to commencement of their first shift.
145. Throughout the project I am aware some guidance was provided by DHHS representatives at the hotels. In mid-late June 2020 MSS Security was provided with further direction from DHHS and DJPR, of changes to the guidelines with respect to the wearing of PPE (refer response to question 27) (see document number MSSS.0001.0005.1715).
146. Further still in late June 2020 more detailed and structured guidelines were provided to MSS Security covering the use of PPE, which MSS Security provided to our staff in the form of briefings. In response to concerns MSS Security raised about a lack of formal training for the guards, the DHSS arranged for an infectious diseases' specialist to come to each hotel and deliver face to face interactive training to the guards, as referred to above. I believe Anthony received copies of the infection training delivered in late June, in the forma a Security Guard Education Pack (email chain ending with email from A Bandiera to [REDACTED] dated 25 June 2020, at 6.45pm, document number MSSS.0001.0005.1632). Beyond mid-April 2020 no- one from the government contacted me.

Question 30 – What if any arrangements were in place at the hotels for which you had responsibility for temperature checking or otherwise monitoring the health of, security staff? Who instituted and monitored any such arrangement?

147. I am not aware of any temperature checking processes which were in place at any of the hotels

Question 31 – Did any security staff employed or engaged by you (including via subcontractors or labour hire firms) contract COVID-19 in the course of their work at quarantine hotels? If so:

- (a) what were the circumstances in which they came to contract it;
- (b) how and when did your company become aware of it; and
- (c) what steps were taken by your company in response?

148. In total MSS Security had 17 security officers, all employed by subcontractors, contract COVID-19. All were engaged at the Stamford Plaza. We were made aware of the first positive test on 17th June 2020 (see email entitled 'RE: Stamford plaza' document number MSSS.0001.0004.2388, email entitled 'Re: COVID19 contact site', document number MSSS.0001.0005.1810, email entitled 'RE: Covid 19 Positive Case' document number MSSS.0001.0005.2581, and email entitled 'RE: Stamford plaza' document number MSSS.0001.0004.2389 and then on subsequent days as more positive cases were confirmed (see email entitled 'Re: Covid Stand Down – Immediately' document number MSSS.0001.0004.2752, email entitled 'FW: Message from the General Manager - COVID-19 Case of Staff Member at Melbourne APOD' document number MSSS.0001.0010.0033 and email titled 'RE: Google Alert - MSS Security' document number MSSS.0001.0010.0030).
149. I am unable to say what the circumstances were in which they came to contract COVID-19.
150. Once we were notified that staff members had contracted COVID-19, a number of steps were immediately taken. These included:
- (a) seeking clarification of the personal details and known circumstances of the officers who tested positive;
 - (b) seeking guidance and assistance from the DHHS as to the process we should follow in managing both the officers who tested positive as well as the testing of officers who were either confirmed contacts or considered at risk;
 - (c) Standing down 232 additional staff under a DHHS direction, and directed those officers to be tested and to self-isolate pending the results of those tests; None of these staff tested positive.
 - (d) directing our subcontractor to advise their employees who had tested positive to self-isolate and to provide regular updates as to the officers' health and well-being and follow-up test results;
 - (e) communicating with the DHHS to seek guidance as to officers returning to work following negative tests confirming they had not contracted the virus;
 - (f) seeking information as to the officers' conduct and adherence to PPE and social distancing guidelines; and
 - (g) re-affirming to staff at shift briefings each day, the requirement to follow the stipulated guidelines;
 - (h) delivering the additional information outlined in response to question 29.
151. As part of the investigations, MSS Security interviewed the guard. An example of the investigations undertaken by MSS Securities in relation the Stamford Outbreak are found in MSSS.0001.0005.0747, MSSS.0001.0005.0748 and MSSS.0001.0005.0749.

152. Shortly after the outbreak we were advised the services at the hotels would cease and DJCS would take control.

Question 32 – If you wish to include any additional information in your witness statement, please set it out below.

I have read the content of this my witness statement and I am satisfied that it is true and correct to the best of my knowledge, information and belief.

Signed:



Jamie Grant Lachlan Adams

Dated: 17th August 2020