

IN THE MATTER OF the *Inquiries Act 2014*

AND IN THE MATTER OF a Board of Inquiry into the COVID-19 Hotel Quarantine Program

WITNESS STATEMENT OF SORAV (SAM) AGGARWAL

I, Sorav Aggarwal, of Unit 433/189B South Centre Road, Tullamarine, Victoria can say:

- 1 I am both an employee and a director of Sterling Pixxel Pty Ltd (**Sterling Pixxel**), which operates under the trading name Sterling Services Group (**SSG**).
- 2 I make this statement in response to a letter addressed to me dated 11 August 2020 from the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Board of Inquiry**), which enclosed a list of questions (**List of Questions**) and a notice to produce (identified as 'NTP-067') requiring that I produce to the Inquiry a witness statement, along with any supporting documents, responding to each of the questions in the List of Questions.
- 3 I make this statement from my own knowledge, as well as information and documents provided to me by my fellow director Harry Singh. Where information has been provided to me by others, I have noted this in my statement.
- 4 In accordance with the approach which the Board of Inquiry has requested in its 11 August 2020 letter be adopted, I have in this statement listed each question from the List of Questions as a heading and provided my answer to each question under that heading. I have also, where appropriate, adopted the defined terms and acronyms used in the List of Questions.
- 5 Whilst for the purposes of this statement I have interpreted the various questions which refer to terms such as "you" and "your business" as being references to Sterling Pixxel or SSG, it is the company of which I am a director (Sterling Pixxel) that is the owner of the SSG business and the entity through which Sterling Pixxel has at all times conducted its business. I use the terms Sterling Pixxel and SSG interchangeably throughout this statement to refer to Sterling Pixxel.

Question 1 - What is your title and role within Sterling Services Group?

- 6 As stated above, I am both an employee and a director of Sterling Pixxel, which operates the SSG business. My day-to-day role as a director includes administrative work, invoicing and providing roster support.

Question 2 - What is your relevant professional background and work history?

- 7 I have been in the security industry for the last 12 years. I started working in the security industry as a security officer and worked my way up to the manager level. I registered Sterling Pixxel in April 2018 and I started SSG in 2019 after obtaining a security business license.

Sterling Services Group

Question 3 - When was your business first licensed as a private security business in Victoria?

- 8 Sterling Pixxel, trading as SSG, was first licensed as a private security business in Victoria in May 2019.¹

Question 4 - What are the usual services provided by your business?

- 9 SSG's usual business is as a labour hire provider that delivers labour to other security businesses that require security guards, crowd management, concierge services, mobile patrols and alarm response.

Question 5 - What is your business's usual client profile?

- 10 SSG provides labour hire services to other security businesses. The areas SSG employees work in include retail security, asset protection, static security, and mobile patrols. SSG offers services for clients in all industry areas.

Question 6 - To what extent, prior to the Hotel Quarantine Program, had your business provided security services to the Victorian government, whether directly or via subcontracting or labour hire arrangements?

- 11 Prior to the Hotel Quarantine Program, SSG had not provided any security services to the Victorian government directly or via subcontracting or labour hire arrangements.

Question 7 - On what basis (employee/contractor/other) do you engage staff to perform security services?

- 12 The staff that Sterling Pixxel engages to provide labour to other security businesses are employees of Sterling Pixxel.

Question 8 - How many permanent employees did you have as at 27 March 2020?

- 13 Sterling Pixxel had four permanent employees as at 27 March 2020, comprising myself, Harry Singh and two permanent security staff.

Question 9 - Which office holders within your business themselves hold private security licences?

- 14 Both Harry Singh and I hold private security licenses.

Question 10 - How do you ordinarily recruit staff?

- 15 Sterling Pixxel ordinarily recruits staff via face to face or phone interviews. A job ad was posted on Seek in 2019 when the business was started to get details of potential employees. A copy of this ad has been provided to the Inquiry.²

Question 11 - Are staff employed or engaged by your business under any restriction on accepting work from other security businesses?

- 16 Staff employed by Sterling Pixxel were not under any formal restrictions on accepting work from other security businesses. However, Sterling Pixxel verbally encouraged our security guards not to work at any other workplace while they were working in the quarantine hotels, in order to assist with the COVID-19 protection measures that were established.

¹ SSG.0002.0001.0708.

² SSG.0002.0001.0715.

Your company's involvement in the Hotel Quarantine Program

Question 12 - At which hotels, and for which government security contractor, did your business provide security staff? For each hotel please include details of the time period within which you provided security staff.

- 17 Sterling Pixxel provided security staff to the government security contractor Unified Security for the following hotels and time periods in the Hotel Quarantine Program:
- (a) **Novotel Collins:** 26 June 2020 - 10 July 2020;
 - (b) **Travel lodge Southbank:** 13 April 2020 - 14 May 2020;
 - (c) **Crown Metropol hotel:** 29 March 2020 - 5 April 2020 (covered partly); 6 April 2020 - 11 July 2020 (covered fully);
 - (d) **Holiday Inn Melbourne:** 21 May 2020 - 11 July 2020;
 - (e) **Crowne Plaza:** 19 April 2020 - 3 May 2020;
 - (f) **Pan Pacific South Wharf:** 26 April 2020 - 11 July 2020;
 - (g) **Rydges on Swanston:** 11 May 2020 to 30 May 2020; 14 June 2020 - 30 June 2020;
 - (h) **Novotel South Wharf:** 17 April 2020 - 1 May 2020; 9 May 2020 - 24 May 2020; 1 June 2020 - 17 June 2020;
 - (i) **Crown Promenade:** 3 April 2020 - 14 April 2020 (covered partly); 19 April 2020 - 11 July 2020 (covered fully);
 - (j) **Brady Hotel:** 17 June 2020 - 23 June 2020;
 - (k) **Comfort Inn Portland:** 19 May 2020 - 21 May 2020; 20 June - 27 June 2020;
 - (l) **Marriott Hotel:** 28 June 2020 - 11 July 2020; and
 - (m) **Hotel Grand Chancellor:** 26 June 2020 - 3 July 2020.

Question 13 - When and how did your business first become aware that there was to be a role for private security companies in the Hotel Quarantine System?

- 18 Sterling Pixxel was made aware of the role for private security companies in the Hotel Quarantine Program on 29 March 2020 when I was informed of the nature of the role through a phone call from Nigel Coppick, who is the National Operations Manager at Unified Security.

Question 14 - When and how did your business first reach an agreement to participate in the provision of security services in the Hotel Quarantine Program?

- 19 Sterling Pixxel had an existing subcontracting agreement with Unified Security, prior to the start of the Hotel Quarantine Program in March 2020. The subcontracting arrangement was agreed via email in March 2020 when we provided our rates for engaging staff to Unified Security in respect of security work generally.³
- 20 Sterling Pixxel subsequently also reached a further agreement with Unified Security on 28 March 2020 to provide additional security labour. This subsequent agreement was verbal and

³ SSG.0001.0001.0222, SSG.0001.0001.0224, SSG.0001.0001.0227, SSG.0001.0001.0264.

reached during a conversation between me and Nigel Coppick. At the time, I was not aware the security labour was for assisting with hotel quarantine. It was during a call with Nigel Coppick of Unified Security the following day that it became apparent that the additional security services (and the verbal agreement) were for the purpose of the Hotel Quarantine Program.

Question 15 - When was that agreement formalised in writing? If you had agreements with more than one of the government-contracted security companies, give details of all agreements.

- 21 Following the email agreement and further oral agreement that is referred to in response to question 14 above, a formal sub-contract agreement to provide services to Unified Security was signed in July 2020.⁴ There was no separate written contract for the Hotel Quarantine Program.

Question 16 - What precisely were the security services you agreed to provide under each agreement?

- 22 Sterling Pixxel only provided labour in the form of security guard services. In response to the request of Unified Security to provide security guards at the Hotel Quarantine Program, Sterling Pixxel hired and supplied security guards.

Question 17 - When and how [if at all] were you first provided with the terms of the head contract entered into by the government contractor with whom you had made an agreement to provide security services?

- 23 Sterling Pixxel has never been provided any details of any head contract that might have been entered into by the Victorian government with Unified Security.

Question 18 - Did you engage subcontractors or labour hire companies to provide any of the security services you had contracted with the government contractor to provide? If so, give details of

- (a) the firms engaged;
- (b) the hotels at which those firms provided services; and
- (c) the dates on which those firms provided services.

- 24 Sterling Pixxel did not engage any subcontractors.

The hotels at which your business provided security services

Question 19 - For each hotel at which your business provided security services, please state -

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

- 25 Security services were provided by SSG at the following hotels and with the following number of security staff (one 12 hour day shift and one 12 hour night shift):

- (a) **Novotel Collins**: 26 June 2020 - 10 July (35 day shift, 30 night shift);

⁴ SSG.0001.0001.0183, SSG.0002.0001.0720.

- (b) **Travel lodge Southbank:** 13 April 2020 - 14 May 2020 (29 day shift, 26 night shift);
- (c) **Holiday Inn Melbourne:**
- (i) 21 May to 21 June 2020 (31 day shift, 29 night shift);
 - (ii) 22 June 2020 - 11 July 2020 (26 day shift, 23 night shift);
- (d) **Crown Metropol hotel:**
- (i) 29 March 2020 - 31 March 2020 (27 day shift, 27 night shift);
 - (ii) 1 April 2020 - 3 April 2020 (34 day shift, 34 night shift);
 - (iii) 4 April 2020 - 5 April 2020 (36 day shift, 35 night shift);
 - (iv) 6 April 2020 - 9 April 2020 (34 day shift, 34 night shift);
 - (v) 10 April 2020 (37 day shift, 34 night shift);
 - (vi) 11 April 2020 (37 day shift, 36 night shift);
 - (vii) 12 Apr 2020 (39 day shift, 36 night shift);
 - (viii) 13 April 2020 - 19 April 2020 (48 day shift, 45 night shift);
 - (ix) 20 April 2020 - 24 April 2020 (41 day shift, 39 night shift);
 - (x) 25 April 2020 (47 day shift, 39 night shift);
 - (xi) 26 April 2020 (41 day shift, 38 night shift);
 - (xii) 27 April 2020 - 30 April 2020 (48 day shift, 45 night shift);
 - (xiii) 1 May 2020 (54 day shift, 46 night shift);
 - (xiv) 2 May 2020 (44 day shift, 44 night shift);
 - (xv) 3 May 2020 (45 day shift, 45 night shift);
 - (xvi) 4 May 2020 - 6 May 2020 (48 day shift, 46 night shift)
 - (xvii) 7 May 2020 - 9 May 2020 (54 day shift, 48 night shift)
 - (xviii) 10 May 2020 (48 day shift, 46 night shift);
 - (xix) 11 May 2020 - 17 May 2020 (49 day shift, 47 night shift);
 - (xx) 18 May 2020 - 21 May 2020 (49 day shift, 47 night shift);
 - (xxi) 22 May 2020 (54 day shift, 47 night shift);
 - (xxii) 23 May 2020 (42 day shift, 39 night shift);
 - (xxiii) 24 May 2020 (42 day shift, 42 night shift);
 - (xxiv) 25 May 2020 - 31 May 2020 (49 day shift, 46 night shift);

- (xxv) 1 June 2020 - 7 June 2020 (49 day shift, 46 night shift);
 - (xxvi) 8 June 2020 to 14 June 2020 (53 day shift, 45 night shift);
 - (xxvii) 15 June 2020 - 21 June 2020 (53 day shift, 45 night shift);
 - (xxviii) 22 June 2020 - 28 June 2020 (50 day shift, 42 night shift);
 - (xxix) 29 June 2020 - 5 July 2020 (46 day shift, 42 night shift);
 - (xxx) 6 July 2020 - 11 July 2020 (46 day shift, 42 night shift)
- (e) **Crowne Plaza:** 19 April 2020 - 3 May 2020 (50 day shift, 47 night shift);
- (f) **Pan Pacific South Wharf:**
- (i) 26 April 2020 - 21 June 2020 (42 day shift, 39 night shift);
 - (ii) 22 June 2020 - 11 July 2020 (27 day shift, 24 night shift);
- (g) **Comfort Inn Portland:**
- (i) 19 May 2020 (3 night shifts);
 - (ii) 20 May 2020 (6 shifts each for day and night);
 - (iii) 21 May 2020 (6 day shifts);
 - (iv) 20 June 2020 to 25 June 2020 (6 day shift, 6 night shift);
- (h) **Brady Hotel:** 17 June 2020 - 23 June 2020 (37 day shift, 34 night shift);
- (i) **Crown Promenade hotel:**
- (i) 3 April 2020 (31 night shift);
 - (ii) 4 April 2020 - 5 April 2020 (31 day shift, 31 night shift);
 - (iii) 6 April 2020 - 11 April 2020 (30 day shift, 30 night night);
 - (iv) 12 April 2020 (30 day shift, 50 night shift);
 - (v) 13 April 2020 - 14 April 2020 (52 day shift, 52 night shift)
 - (vi) 18 April 2020 (36 day shift, 35 night shift);
 - (vii) 19 April 2020 (42 day shift, 38 night shift);
 - (viii) 20 April 2020 - 21 June 2020 (61 day shift, 59 night shift);
 - (ix) 22 June 2020 - 11 July 2020 (49 day shift, 45 night shift)
- (j) **Rydges on Swanston:**
- (i) 11 May 2020 (18 night shift);
 - (ii) 12 May 2020 - 14 May 2020 (18 day shift, 18 night shift);

- (iii) 15 May 2020 (19 day shift, 18 night shift);
 - (iv) 16 May 2020 (20 day shift, 18 night shift);
 - (v) 17 May 2020 (20 day shift, 18 night shift);
 - (vi) 18 May 2020 - 29 May 2020 (18 day shift, 18 night shift);
 - (vii) 30 May 2020 (18 day shift, 16 night shift);
 - (viii) 14 June 2020 - 26 June 2020 (6 day shift, 6 night shift);
 - (ix) 27 June 2020 - 30 June 2020 (14 day shift, 11 night shift);
- (k) **Novotel South Wharf:**
- (i) 17 April 2020 - 19 April 2020 (54 day shift, 51 night shift);
 - (ii) 26 April 2020 - 26 April 2020 (54 day shift, 51 night shift);
 - (iii) 27 May 2020 - 1 May 2020 (54 day shift, 51 night shift);
 - (iv) 9 May 2020 (44 day shift, 44 night shift);
 - (v) 10 May 2020 (54 day shift, 51 night shift);
 - (vi) 11 May 2020 - 17 May 2020 (54 day shift, 51 night shift);
 - (vii) 18 May 2020 - 22 May 2020 (54 day shift, 51 night shift);
 - (viii) 23 May 2020 (54 day shift, 22 night shift);
 - (ix) 24 May 2020 (22 day shift & no night shift);
 - (x) 1 June 2020 (26 day shift, 23 night shift);
 - (xi) 2 June 2020 - 3 June 2020 (28 day shift, 25 night shift);
 - (xii) 4 June 2020 - 7 June 2020 (32 day shift, 29 night shift);
 - (xiii) 8 June 2020 - 14 June 2020 (34 day shift, 30 night shift);
 - (xiv) 15 June 2020 - 16 June 2020 (34 day shift, 31 night shift);
 - (xv) 17 June 2020 (34 day shift, no night shift);
- (l) **Grand Chancellor:** 26 June 2020 - 3 July 2020 (26 day shift. 23 night shift)
- (m) **Marriott hotel:** 28 June 2020 - 11 July 2020 (21 day shift; 18 night shift).

26 In relation to duties of staff rostered on for each shift, all the duties required to be completed by staff were verbally communicated by Unified Security. Sterling Pixxel understands from enquiries that it has made for the purpose of seeking to assist the inquiry in respect of this question that some of the duties were directly communicated by the Unified Security Operations Managers to the guards and some were communicated to the SSG Supervisor. The SSG Site Supervisor then further communicated to the other guards.

- 27 Based on enquiries, Sterling Pixxel understands that the duties required of the security staff were to:
- (a) patrol secured levels;
 - (b) monitor secured emergencies, exits and the hotel lift lobby;
 - (c) monitor and patrol secured ground floor areas;
 - (d) receive deliveries eg Uber, care packages;
 - (e) monitor fresh air-walks for hotel guests; and
 - (f) monitor entries and exits of the hotel guests.

Question 20 - Did the numbers of persons and shifts or the nature of the duties change over time? If so, please detail the nature of those changes.

- 28 The number of persons and shifts varied from time to time based on the arrival of people into quarantine and then when those people completed their 14 day mandatory quarantine period.
- 29 There was no change in the nature of the duties.

Question 21 - How were decisions made about the number of staff to be rostered on?

- 30 Sterling Pixxel was not responsible for making decisions about the number of staff that were to be rostered on.
- 31 Rather, Unified Security advised SSG of the number of staff it required for the purpose of being rostered on and SSG complied with the requests is by supplying the requested number of guards. This information was passed on to SSG via emails and verbally.

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?

- 32 All Sterling Pixxel employees are required to hold a security officer licence and Sterling Pixxel hold records of these security licences which have been provided to the Inquiry.⁵

Training and Supervision

Question 23 - What if any training was provided to your staff by DHHS, DJPR or any other government department regarding COVID-19 and how to work in a safe manner?

- 33 DHHS provided Personal Protective Equipment (PPE) training at the Crown Metropol hotel on 1 July 2020 and all rostered Sterling Pixxel employees attended this training.
- 34 Furthermore, Sterling Pixxel is aware from enquiries made for the purpose of preparing this document that guidelines for use of PPE were provided by DJPR to Unified Security, prior to the DHHS training that was provided on 1 July 2020.
- 35 Sterling Pixxel understands from information received from Mo Nagi, Unified Security - Operations Manager, that the guidelines that were provided to Unified Security by DJPR were then used by Unified Security to provide training to the security staff provided by SSG.

⁵ SSG.0002.0001.0714.

Question 24 - What if any training was provided to your staff by the government contractor that engaged you regarding COVID-19 and how to work in a safe manner?

- 36 Sterling Pixxel understands from enquiries made for the purpose of this document that Unified Security provided an Occupational Health Safety (OHS) induction, including in relation to use of PPE, to staff of Sterling Pixxel.

Question 25 - What if any training did your business require your own staff to undergo regarding COVID-19 and how to work in a safe manner? In your answer please make any necessary distinction between (a) staff directly engaged by your business; and (b) staff directly engaged by subcontractors and labour hire companies.

- 37 All staff engaged by Sterling Pixxel were required to complete online Infection Control training provided by the Australian Government Department of Health and the fact that this was a requirement was communicated by Nigel Coppick, National Operations Manager, Unified Security.
- 38 Staff completed this training from March through to July 2020. Records of this training have been produced to the Inquiry.⁶

Question 26 - What onsite supervision was in place for your business's security staff at each hotel? Was that supervision provided by you or by the government contractor that engaged you?

- 39 From 6 April 2020, Sterling Pixxel provided SSG Site Supervisors who reported to a Unified Security Operations Manager at each site. The overall management of each site was the responsibility of Unified Security Operations Managers.⁷
- 40 Unified Security had dedicated Operations Managers on the ground for each hotel at which Sterling Pixxel provided labour. Those Operations Managers were responsible for dealing with DHHS, DJPR, Global Victoria, Department of Justice and Community Safety and healthcare staff on a daily basis.

Question 27 - In cases where some of the staff on duty at a hotel quarantine site were engaged by your business, and some by the government contractor; (a) which business or person had responsibility for onsite supervision? (b) which business had responsibility for PPE?

- 41 SSG Site Supervisors were responsible for the:
- (a) daily roster management;
 - (b) uniform checks;
 - (c) making sure the guards arrived on time; and
 - (d) management of rest breaks.
- 42 Unified Security was responsible for the management and induction of all staff, including providing PPE (until DHHS took over this responsibility in June 2020) and PPE training.

Question 28 - In cases where all of the security staff on duty were engaged by your business, did your business provide onsite supervision?

- 43 Please refer to the answer to question 26.

⁶ SSG.0002.0001.0003.

⁷ SSG.0002.0001.0760.

Question 29 - If you engaged further subcontractors or labour hire companies, what role did they play in supervision of the staff provided by them?

44 SSG did not engage subcontractors.

Rosters and salary arrangements

Question 30 - Who in your business was responsible for the recruiting and rostering of staff?

45 Sterling Pixxel employee and director, Harry Singh.

Question 31 - How were the staff you provided for the quarantine program sourced and recruited?

46 Staff provided by SSG were primarily sourced from the company's guard database. This database was put together following applications being received in response to the Seek ad which SSG ran in 2019, referred to above, and also from various contacts SSG had in the security industry at the time that business commenced.

47 Before we start recruiting someone, we check if they have a security licence because if they do not have a licence it's not worth talking to them. As the hotel quarantine job was a big job, we first contacted staff from our database to fill the positions. Often staff would already be working, however given the impact of COVID-19 lots of people had lost jobs. This would mean that they would refer us on to other people who had lost their jobs and were looking for security work.

48 Sometimes potential staff contacted SSG directly and a phone interview was conducted. Whilst SSG ordinarily conducts face-to-face interviews, no face-to-face interviews were conducted during the work completed by SSG in the Hotel Quarantine Program.

Question 32 - What factors were relevant to how frequently staff were rostered on?

49 The primary factor for how frequently staff were rostered on was availability of staff members for shifts (which was dependent on the number of staff required for each hotel).

Question 33 - What records were kept of hours worked?

50 Roster records were kept by SSG.⁸

Question 34 - What were the applicable hourly rates of pay for the security staff you provided?

51 Staff employed by SSG were paid between \$26.65/hour and \$34.67/hour, depending on their roles.

Question 35 - How were security staff paid?

52 Electronic funds transfer in all cases.

Question 36 - To your knowledge were any security staff engaged by you at one hotel quarantine site also working at any other hotel quarantine site and/or for other security contractors?

⁸ SSG.0004.0001.0058; SSG.0004.0001.0010; SSG.0004.0001.0018; SSG.0004.0001.0285; SSG.0004.0001.0020; SSG.0004.0001.0220; SSG.0004.0001.0019; SSG.0004.0001.0154; SSG.0004.0001.0233; SSG.0004.0001.0139; SSG.0004.0001.0260; SSG.0004.0001.0207.

53 Sterling Pixxel is unaware of any instances of its staff also working for any other security company/sub-contractor.

54 Furthermore, as was noted in response to question 11 above, Sterling Pixxel encouraged security staff not to work at any other workplace due to their employment working at quarantine hotels. This was a general suggestion from SSG during the Hotel Quarantine Program to all staff working in quarantine hotels.

Question 37 - What if any fee or remuneration was paid to your company in addition to the actual salary costs of the staff you provided?

55 SSG has not received any remuneration from Unified Security for its role in the Hotel Quarantine Program.

Personal protective equipment

Question 38 - What PPE was provided by your business for staff use?

56 SSG did not provide any PPE. Unified Security or DHHS provided PPE to security staff supplied by SSG.

Question 39 - What PPE was provided by the government contractor to your business's security staff for use?

57 The PPE provided by Unified Security included hand sanitizer, gloves and face masks.

58 Furthermore, in April 2020 Sterling Pixxel was informed verbally by Mo Nagi, Operations Manager, that Unified Security were providing PPE due to a Government shortage.

59 Subsequently, during the month of June 2020 Sterling Pixxel was further advised by Unified Security that moving forward the Victorian government would be providing PPE for Sterling Pixxel staff to use.

Question 40 - What PPE was provided by DHHS or any other government department?

60 Sterling Pixxel understands that DHHS started providing hand sanitizer, gloves, face masks and full gown dressings for staff from approximately mid-June 2020 onwards.

Question 41 - Were your staff at any time required to provide their own PPE?

61 No, PPE was always available either from Unified Security or DHHS.

Question 42 - What training was given to your staff regarding the correct use of PPE? Who provided that training?

62 PPE training was provided by Unified Security on site on how to use gloves and masks. PPE guidelines prepared by the DJPR were used by Unified Security to provide training to the security staff. The completion of PPE training required an acknowledgement and signature from each security staff member. All the signed original acknowledgment documents are with Unified Security.

63 As set out above in the answer to question 23, DHHS provided PPE training on 1 July 2020 at the Crown Metropol hotel for all Sterling Pixxel security guard staff.

Question 43 - Did your business at any time experience a shortage of PPE? If so, how was that shortage managed?

64 No, there was never any shortage of PPE for use by SSG staff provided by either Unified Security or DHHS.

Question 44 - What if any arrangements were in place at the hotels for which you had responsibility for temperature checking of security staff? Who instituted and monitored any such arrangement?

65 Sterling Pixxel was informed by Mo Nagi, Operations Manager at Unified Security, that temperature checking of guards was the responsibility of the DHHS. Temperature checks were conducted by a nurse at each hotel at the entry point. This requirement was introduced on 23 June 2020.⁹

66 Sterling Pixxel understands that no temperature checks were done on security staff before 23 June 2020.

Complaints and concerns

Question 45 - Who was responsible for identifying and acting on instances of poor or unacceptable conduct by your security staff?

67 Unified Security was the decision maker in response to any issues of serious unacceptable conduct. SSG worked with Unified Security on all performance issues raised. Guards were performance managed if required.

68 In circumstances where the conduct was not as serious (turning up late, using mobile phones), SSG site supervisors working with Unified Security acted on such conduct.

69 Further details of these matters are set in response to question 47 below.

Question 46 - Who was responsible for identifying and acting on complaints or concerns regarding unsafe work conditions for your security staff?

70 Unified Security was responsible for providing the safe work environment for the staff and was responsible for dealing with any complaints.

71 SSG site supervisors were responsible to report to Unified Security Operations Managers. The Unified Security Operations Managers were responsible for dealing with any complaints.

Question 47 - Did your business identify or receive notice of poor or unacceptable conduct by any of your security staff? How were those issues dealt with?

72 SSG received the following notices in relation to poor or unacceptable conduct, and the following action was taken by SSG on the advice of Unified Security:

- (a) misuse of parking/tailgating - written complaint - seven guards were terminated;¹⁰
- (b) not arriving on time for a shift - verbal complaint - four guards were terminated;
- (c) not wearing a proper work uniform - verbal complaint - four guards were terminated;

⁹ SSG.0001.0001.0020.

¹⁰ SSG.0002.0001.0001; SSG.0003.0001.0114.

- (d) on 28 April 2020 Harry Singh received a call from Nigel Coppick of Unified Security where he was notified of several complaints received by Unified Security concerning SSG guards, namely:
- (i) an argument/scuffle between two guards - verbal complaint – the police were called in response and took statements from the guards involved. I understand no action was taken by Victoria Police against either guard. Both guards were removed from the sites immediately following the incident and were not given further shifts;¹¹
 - (ii) a complaint was made to the Victorian Health Authority by a guest, which alleged that a guard had been drinking a brown liquid from an alcohol tumbler – verbal complaint – the matter was investigated by Harry Singh, who spoke to the guards on duty at the time. No further action was taken as the complaint was not substantiated, and the DHHS team leader informed Harry that she would not escalate the matter further;¹²
 - (iii) an unspecified allegation by a female guard of sexual harassment by two supervisors – verbal complaint – Harry spoke with the supervisors in question, who denied the allegation, and he also spoke with other guards who supported the supervisors and said they didn't believe there had been any inappropriate conduct. I subsequently sent a report to Unified Security in connection with the investigation of this allegation, and no further action was taken;¹³
 - (iv) a complaint by a guard that guards had been given an alcoholic drink with a meal – verbal complaint – Harry Singh investigated and determined that the circumstances in which this occurred were inadvertent and did not warrant further action. Those circumstances were that the alcohol (bottles of 'sparkling ale') was delivered to the guards along with their meal by a guard who was Muslim and did not drink alcohol, and was unaware that the drinks he was delivering were alcoholic. I understand that no guards consumed the alcohol while on duty, and as soon the site supervisor became aware that alcoholic drinks had been delivered to guards he took all those drinks away from the guards and disposed of them. This was reported to Unified Security;¹⁴
- (e) a complaint was received from the Hotel Duty Manager at Pan Pacific Melbourne that a security team was having dinner at the entrance next to the valet desk - written complaint - Harry Singh attended the site to investigate and reminded the security guards this was not to occur. No further action was taken;¹⁵
- (f) a complaint was received from the General Manager at Crown Metropol that guards were accessing pantries and using towels to place in corridors and nap during the night. Harry Singh attended the site and the complaint could not be substantiated. No further action was taken;¹⁶
- (g) a complaint was received that guards at Crowne Plaza were disposing of gloves in the toilets at the site - written complaint. Harry Singh attended the site and reminded

¹¹ SSG.0002.0001.0711; SSG.0005.0001.0006.

¹² SSG.0005.0001.0066.

¹³ SSG.0005.0001.0006.

¹⁴ SSG.0005.0001.0006.

¹⁵ SSG.0003.0001.0003.

¹⁶ SSG.0003.0001.0069.

staff not to dispose of gloves in the toilet and to dispose of them in accordance with procedures for disposal of PPE;¹⁷

- (h) a complaint was received by Crown from a taxi driver that a security guard was rude to him¹⁸ - written complaint - an explanation was sought from, and provided by,¹⁹ the security guard and, based on that explanation, no further action was taken;
- (i) a complaint was received from the General Manager at Holiday Inn that security guards had not unplugged a security camera on Level 5 in accordance with management's requirements - written complaint. Harry Singh communicated with the guards to ensure the management requirements were completed;²⁰
- (j) nurses at Crowne Plaza raised an issue with DHHS that they had observed security guards not wearing appropriate PPE in the halls and not social distancing in the lifts – this was notified to me by Mo Nagi of Unified Security by email²¹ – in addition to the actions I understand were taken by DHHS (as set out in an email from ██████████ of DHHS on 24 April 2020)²², Harry Singh attended the site, spoke to the site supervisor about the issue and stressed the importance of guards wearing PPE and social distancing. I understand this message was then conveyed to the guards at the site by the supervisor;
- (k) a complaint was received from a taxi driver that security guards were rude to her - verbal complaint - the complaint was investigated by Karl Leitner at Unified Security and no further action was taken;²³ and
- (l) concerns raised by Rydges to Unified Security on 15 June 2020, after Hotel Quarantine had ended to allow a deep clean of the hotel, in relation to general (non-quarantine) security guards not following social distancing and hand sanitising protocols, and leaving rubbish around, while undertaking general asset protection duties - written complaint -²⁴ Harry Singh attended the site and spoke to the security guards to remind them that they should look after the building, stay away from each other, not shake hands, and use hand sanitiser, even though they were not performing quarantine duties.

73 Serious conduct such as the misuse of parking resulted in Unified Security directing SSG to terminate the staff. The lower order conduct was managed by SSG, with the staff set out above ultimately terminated.

Question 48 - 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 provide details of (a) who was so terminated, removed or acted against; and (b) the nature of the unsatisfactory behaviour concerned.

74 As set out above in response to question 47:

- (a) seven guards were terminated due to misuse of parking;
- (b) four guards were terminated for not arriving on time, despite being given a verbal warning by Unified Security; and

¹⁷ SSG.0004.0001.0334.

¹⁸ SSG.0002.0001.0857.

¹⁹ SSG.0002.0001.0865.

²⁰ SSG.0003.0001.0067.

²¹ SSG.0005.0001.0027.

²² SSG.0005.0001.0027.

²³ SSG.0003.0001.0097.

²⁴ SSG.0002.0001.0859; SSG.0003.0001.0112.

- (c) four guards were terminated for not wearing proper uniform, despite being given verbal warning by Unified Security.

75 In addition to this, three guards were retrained for using mobile phones while at work. After the retraining, there were no further issues with those guards.

Question 49 - Did your business identify or receive notice of unsafe work conditions for your security staff? How were those issues dealt with?

- 76 On 28 May 2020, Harry Singh received a call from an inspector from WorkSafe Victoria in relation to concerns that had been raised with WorkSafe regarding the health and safety of security workers at Crown and Rydges. He subsequently received an email from WorkSafe requesting further information and supporting documentation.²⁵
- 77 Later that day, Harry Singh and I also received from Mo Nagi of Unified Security a forwarded email that Unified Security had received from WorkSafe, in which Unified Security was asked to provide certain information to WorkSafe, including in relation to what I understand was the same complaint that had been separately raised with Sterling Pixxel.²⁶
- 78 On 29 May 2020, Harry Singh sent an email to WorkSafe which responded to WorkSafe's information request and enclosed certain documents.²⁷
- 79 On 2 June 2020, Harry Singh received an email from the WorkSafe investigator with respect to her Activity Report.²⁸ I understand, based on that correspondence, that the outcome of WorkSafe's investigation was that the allegations of unsafe work practices were unable to be substantiated and the investigation was concluded.

Question 50 - Did any security staff employed or engaged by your business contract COVID-19 in the course of their work in the Hotel Quarantine Program? If so, (a) what were the circumstances in which they came to contract it; (b) how did your business become aware of it; and (c) what steps were taken by your business in response?

- 80 Six security staff employed by SSG contracted COVID-19 while working at the Rydges on Swanston.
- 81 SSG initially took over security work on 11 May 2020 at the Rydges on Swanston after issues had arisen with the previous subcontractor. SSG commenced providing services for the night shift on 11 May 2020. SSG has provided documents in relation to this handover to the Inquiry.²⁹
- 82 On 26 May 2020, Harry Singh of SSG received a phone call from Mo Nagi, Operations Manager at Unified Security, in which Harry was informed that one of the hotel [REDACTED] at the Rydges on Swanston had tested positive to COVID-19, and that all security staff must get tested immediately. SSG understands that DJPR had requested Unified Security to get all the guards working at the Rydges Hotel tested immediately, in response to the [REDACTED] positive test.
- 83 SSG then contacted the relevant guards by phone to tell them that they must get tested. Staff were then tested on-site at the Rydges Hotel. Testing for COVID-19 for the staff was arranged by DHHS.³⁰ All the guards employed by Sterling Pixxel at the Rydges on Swanston site were tested immediately and then were put in 14-day mandatory self-isolation. The guards were then re-tested by DHHS on day 11 of self-isolation.

²⁵ SSG.0002.0001.0855.

²⁶ SSG.0002.0001.0768.

²⁷ SSG.0002.0001.0773.

²⁸ SSG.0002.0001.0771.

²⁹ SSG.0002.0001.0757; SSG.0002.0001.0767.

³⁰ SSG.0002.0001.0861; SSG.0002.0001.0864; SSG.0003.0001.0005.

- 84 A total of 6 SSG security guards returned positive tests.³¹ Two of those guards self-quarantined in hotels (one initially at Rydges and then Novotel South Wharf, one at Novotel South Wharf).
- 85 SSG kept in regular contact with these guards via phone to both ensure their wellbeing and also to offer assistance.³² SSG understands that DHHS was also in contact with these guards directly and helped them with any infection control questions/issues. Clearance letters were received from DHHS for all guards who completed quarantine before they returned to work.³³

Additional information

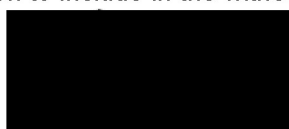
Question 51 - If you wish to include any additional information in your witness statement, please set it out below.

- 86 SSG has no further information to include in the witness statement.

Signed

Name

Date of signature



Sa'm Aggarwal

20 August 2020

³¹ SSG.0002.0001.0869; SSG.0002.0001.0867; SSG.0002.0001.0868; SSG.0003.0001.0001, SSG.0003.0001.0021; SSG.0003.0001.0058; SSG.0003.0001.0023; SSG.0003.0001.0060; SSG.0003.0001.0062; SSG.0003.0001.0072; SSG.0003.0001.0075; SSG.0003.0001.0085; SSG.0003.0001.0088; SSG.0003.0001.0091; SSG.0003.0001.0105

³² SSG.0002.0001.0761; SSG.0003.0001.0101.

³³ SSG.0003.0001.0007; SSG.0003.0001.0106.