

WITNESS STATEMENT OF Learning Consultant

Name: Learning Consultant

Address: 50 Lonsdale Street, Melbourne, Victoria

Occupation: Learning Consultant DHHS

Learning Consultant DHHS

Date: 18 September 2020

1. I make this statement to the Board of Inquiry in response to NTP-132, the Notice to Produce a statement in writing (**Notice**). This statement has been prepared with the assistance of lawyers and Departmental officers.
2. This statement is true and correct to the best of my knowledge and belief. I make this statement based on matters within my knowledge, and documents and records of the Department. I have also used and relied upon data and information produced or provided to me by officers within the Department.

QUESTIONS

Roles and Responsibilities

Question 1: Please describe your relevant professional experience and qualifications.

3. I hold the following qualifications:
 - (a) Bachelor of Social Work REDACTED;
 - (b) Master of Child and Adolescent Welfare REDACTED; and
 - (c) Certificate IV in Training and Assessment REDACTED.
4. In RED, just prior to graduating from my undergraduate degree, I obtained employment with the Department of Community Services NSW working in Statutory Child Protection Services. Since that time, save for a short period working at UNICEF and UNFPA, I have worked exclusively in the area of Child Protective Services and Family Violence.
5. In RED, I joined the Department of Health and Human Services (**Department**), Child Protection Program and worked in Child Protective Services. Initially, I was employed as an

REDACTED

Question 2: What is your usual role within the Department of Health and Human Services (the Department) and what are your usual responsibilities?

6. My current role is Learning Consultant DHHS

Learning Consultant DHHS

I have held in this position since REDACTED

7. REDACTED

Question 3: What role did you play in the Hotel Quarantine Program, what were you responsible for and at which locations did you work?

8. I was a DHHS Team Leader in the Hotel Quarantine Program (**HQ Program**). I worked in this capacity on a casual basis, typically in the evenings or weekends, as required. I continued to work in my normal full-time role throughout my time in the HQ Program.

9. As a Team Leader, I was one of the points of contact for all site staff (including nurses and hotel staff) and assisted with day to day problem solving, receiving and responding to staff and guests' complaints, implementing Department policies relevant to the HQ Program (such as the PPE policies) and supervising and coordinating entries and exits of guests. The Team Leader was also responsible for managing the personal protective equipment (**PPE**) inventory and ordering PPE as needed through the Emergency Operations Centre (**EOC**).

10. I worked in the following locations on the following dates:

(a) Travelodge Docklands – REDACTED

(b) Marriott – REDACTED

(c) Rydges on Swanston – REDACTED

(d) Mercure – REDACTED

- (e) Novotel on Collins – REDACTED
- (f) Crown Promenade – REDACTED
- (g) Park Royal (Airport) – REDACTED
- (h) Grand Chancellor – REDACTED
- (i) Holiday Inn (Flinders Lane) – REDACTED
- (j) Stamford Plaza – REDACTED
- (k) Novotel Southwharf – REDACTED
- (l) Pullman Hotel – REDACTED
- (m) Crown Metropol – REDACTED
- (n) Pan Pacific – REDACTED

11. On 19 July, I worked in the EOC main office and REDACTED
REDACTED

Different hotels

Question 4: Please describe any material differences, in terms of practices, procedures and outcomes, between the different quarantine hotels at which you worked and/or for which you were responsible.

12. There were some material differences between the practices, procedures and outcomes in different hotels relating to fresh air walks and the use of PPE amongst staff.
13. In relation to fresh air walks:
- (a) There were subtle differences between each of the hotels that I worked in. For instance, there was often a difference in the time that the walks were occurring, whether the walks were scheduled beforehand or on the day, whether all of the guests would be offered a fresh air walk or whether only certain groups of people were offered a walk (ie, those who had been identified by the nursing staff as needing a walk, families with children or smokers).
 - (b) Further, some hotels (such as the Novotel on Collins) did not have an outdoor area and as such guests were offered 'fresh air' walks inside an atrium, rather than going

on outdoor fresh airwalks. For this reason, I understood that some guests in these hotels were declining the offer of 'fresh air' walks.

- (c) I was informed by hotel staff at Travelodge Docklands that there had been instances where security guards had escorted guests outside for cigarette breaks. I was present when the DHHS Team Leader raised this issue with the Security Manager on the 18 April 2020 and explained it shouldn't be occurring. On the evening of 18 April 2020, as I was finishing my shift, I saw a security guard at Travelodge Docklands having a cigarette with a guest outside. I again raised this issue with the Security Manager the following day.

14. In relation to PPE:

- (a) In my experience, staff (including hotel and security staff) at some hotels were slow to implement the PPE policies as they were updated. For instance, I observed in around early to mid June 2020 that the security staff at the Stamford Plaza Hotel and several other hotels continued to use gloves, despite the Department's PPE policy at that time stating that gloves were not recommended for security staff and AOs.¹
- (b) I discuss this issue in greater detail in answer to question 5 and 10 below.

Question 5: As at early-mid June 2020, what were the procedures and practices at the Stamford Plaza Hotel for:

(a) removal of garbage or waste from guests' rooms;

15. I was not directly involved in the removal of garbage or waste from guests' rooms. Nor did I have cause to involve myself in the process beyond what I say below.
16. My understanding of the procedure in early to mid-June 2020 was that each morning guests were provided a garbage bag and were asked to bag their own rubbish and leave it outside their room. The garbage was then collected by housekeepers employed by the hotel who would take the garbage and dispose of it in a large garbage bin. The housekeepers performed this task using full PPE (gowns, masks and gloves). I did not pay specific attention to the location of the bin or the exact method of performing this task.
17. On about 13 June 2020, I spoke with the Hotel Manager of the Stamford Plaza Hotel and **RE** informed me that the General Manger of the hotel did not want the hotel staff removing

¹ PPE Advice for Hotel Security Staff and AOs in Contact with Quarantined Individuals dated 8 June 2020 [DHS.5000.0018.3660].

garbage and/or waste from COVID-19 positive guest's rooms until after the guests had left the hotel.

18. Following this discussion, I sent an email to the Operation Coordinator of Department of Jobs Precincts and Regions (**DJPR**) outlining the Hotel General Manager's concerns. The Operation Coordinator of DJPR replied to my email and advised that the process that had been adopted at the Crown Metropol for COVID-19 positive guests' rooms was for the guests to bag their garbage in a yellow bag and leave it outside their door. Nurses would then double bag the garbage in another yellow bag and dispose of it in a yellow bin. DJPR instructed me to confirm the process with the nursing staff on site [DHS.5000.0008.3944]. Prior to this it was my understanding that garbage for COVID-19 positive guests was to be removed in the manner outlined in paragraph 16 above.

(b) transport of luggage to/from guests' rooms; and

19. I was involved in one exit procedure for guests at the Stamford Plaza Hotel which I believe occurred on 14 June 2020. To the best of my recollection, I was not involved in any arrivals.
20. Generally, I understand that during departures guests were responsible for transporting their luggage from their room to the reception foyer to be processed and released. In the event that the guest was unable to manoeuvre their own luggage, for instance due to physical limitations, Dnata staff who were on site at the hotel were to provide assistance. In relation to arrivals, the guest's luggage was to be removed from the bus by Dnata staff and placed on a trolley or provided to the guest. Similarly, the guest was required to manoeuvre their luggage to their room. In the event that the guest was unable to manoeuvre their luggage, Dnata staff were to provide assistance.
21. I have detailed the practices of the security guards in my answer to subparagraph (c) below.

(c) use of PPE by security staff?

22. In early-mid June 2020, the Department Policy regarding PPE use for Security Staff did not recommend the use of gloves and instead reinforced effective hand hygiene practices.² As I

² The PPE policies for security guards were contained in the *Operation Soteria PPE Advice for Hotel-Based Security Staff and AOs in contact with Quarantined Clients* dated 5 May 2020 [DHS.5000.0026.3947] which was updated in *Operation Soteria – PPE Advice for Hotel-Based Security Staff & AOs in Contact with Quarantined Clients* [DHS.5000.0009.1930].

mentioned above, however, the Security Staff at the Stamford Plaza Hotel continued to use gloves, despite these policies.

23. I raised my concerns regarding the practices of the security guards on a number of occasions throughout early-mid June 2020. If I witnessed the behaviour, I would also raise my concerns directly with the security guards involved. I set out those concerns below:
- (a) On 6 June 2020, I was advised by one of the nurses that **RE** had been in the bathroom and witnessed a **REDA** security guard exit the toilet and leave the bathroom without having removed **RE** gloves or wash her hands. This conversation was overheard by the onsite general practitioner who informed me that **R** had witnessed a similar practice adopted by some of the **RED** security guards. I raised these concerns with the security manager that same day.
 - (b) Further, on or around 6 June 2020 (or perhaps the week after), I printed copies of the PPE policy and placed it on the doors of the rooms used by Department staff, nursing staff and security staff at the Stamford Plaza Hotel.
 - (c) On 13 June 2020, I observed a number of security guards not complying with the PPE recommendations or social distancing. I informed the security manager of my concerns and **RE** informed me that **RE** was not aware of the current PPE policy. Shortly after that discussion, I sent an email to the Stamford Plaza Hotel and the security manager enclosing the Department's current PPE policy and also a link to a YouTube video demonstrating cross contamination. I also asked the Stamford Plaza Hotel to print copies of the policy and place them in convenient locations for staff (including security staff) to access [DHS.5000.0151.2702].
 - (d) The following day, on 14 June 2020, as I entered the hotel in the morning to start my shift, I saw a large number of security guards (estimated to be around 70) standing shoulder to shoulder in a room not observing the social distancing guidelines. I wasn't able to speak to the security manager at the time because **RE** was inside the room and the meeting had already started. I spoke with the security manager after the meeting finished and advised **RE** of my concerns regarding conducting a large gathering, as well as the lack of social distancing. I suggested that **RE** break his team meeting into smaller numbers and use a larger area (which was available in one of the lower levels). The security manager advised me that the meeting was more important than the rules. I raised my concerns with the Stamford Plaza Hotel and EOC Operations via email that morning [DHS.5000.0161.6153].

- (e) Later on 14 June 2020, during a scheduled departure, I observed numerous security guards wearing gloves and assisting the guests to transport their luggage from their rooms to the hotel reception. This was in contravention of the Department PPE policy referred to above.
- (f) I had a number of conversations with the individual security guards and also the security manager regarding these practices during the departure. There was a DJPR representative onsite, but **RE** did not assist. In one of my conversations with the security manager **RE** said 'I won't be told what to do by you' or words to that effect. I advised the security manager that I could contact the Department head office and ask for a member of the public health team to attend and inspect the operation. In response, the security manager said 'I have seen the policy and my staff want to wear the gloves' or words to that effect. I explained that in the event the security staff wanted to continue wearing gloves that they would need doff gloves after each contact, and sanitise their hands, and don fresh gloves.
- (g) Ultimately, after some further discussion, I advised the security manager that **RE** staff were to either follow the correct PPE policy or finish their shift and leave the hotel. Shortly after this conversation, the security manager spoke with **RE** staff and their compliance improved.

Question 6: Did you consider that the above procedures and practices were adequate and appropriate? Why or why not?

Removal of garbage or waste from guests' rooms.

24. As I mentioned above, I was not directly involved in this process and had no real cause to involve myself. With that caveat and to the extent that I can make observations, I considered that the process was adequate and appropriate.

Transport of luggage to/from guests' rooms

25. As I mentioned above, I had limited involvement in this process and only supervised one exit from the Stamford Plaza Hotel. My observation was that the practice on 14 June 2020, which involved the security guards handling luggage instead of Dnata staff, was inappropriate because of the security guards' failure to use effective hand hygiene and their insistence on

wearing gloves. As I mentioned above, after several discussions with the security manager, the practices improved.

Use of PPE by security staff.

26. In my view, the policy and procedures relating to PPE use by security staff were adequate and appropriate. The policy as at early to mid-June 2020, required use of hand sanitiser after touching anything, rather than the use of gloves, and I believe this was a safer and more efficient method in the hotels. As mentioned above, I observed on 13 June 2020 that the implementation of the policy by the security staff was initially flawed.

Question 7. If, during the period from early-mid June, any of the above procedures or practices changed please describe when they changed, how they changed and why they changed.

27. I refer to my answer to question 5 above. I am not aware of any other changes to procedures or policies during the period from early-mid June 2020.

Question 8. If there was any difference between the procedures and practices identified in answer to the previous question insofar as they related to guests who were known to be COVID positive, what were those differences and what is your understanding for the reason(s) for those differences?

28. COVID-19 positive guests' luggage was double bagged during arrivals and departures. Further, COVID-19 positive guests were transported in ambulance and/or non-emergency patient transport vehicles and not taxis.
29. I was notified of a different garbage removal process for COVID-19 positive guests at the Stamford Plaza Hotel on or around 13 June 2020, as I have described above at paragraph 18.
30. Otherwise, I am not aware of any differences between PPE, garbage, and luggage policies and procedures for COVID-19 positive guests.

Complaints and Escalation

Question 9. At each quarantine hotel at which you worked, what was the process for people (including people working at the hotel and people in quarantine) to make complaints or escalate grievances? In your view, were those processes adequate?

31. Guests provided complaints and feedback in a range of different ways. For example, guests would speak directly to the hotel reception staff, nursing staff, DJPR staff, telephone reception

and ask to be put through to an AO or Team Leader or telephone the Department's feedback network.

32. In relation to guest complaints, I would always try and resolve the issue locally. That is, by using resources at my disposal within the hotel. For example, complaints relating to food could be directed to the hotel staff. In the event that a complaint could not be resolved locally, the complaint could be escalated to the EOC Operations Lead via email at dhhsopsoteriaEOC@dhhs.vic.gov.au and also directed to the Department's complaints process at <https://www.dhhs.vic.gov.au/making-complaint>.
33. Similarly, for staff working at the hotel, depending on the nature of the complaint, the process was to speak with their respective manager or the Team Leader. If the matter could not be resolved locally the complaint could be escalated to the EOC Operations Lead via the email mentioned above or through their respective manager. I am not specifically aware of matters that were raised with the DJPR Team Leader. The DJPR Team Leader was on site from time to time but not always.
34. During my time as a Team Leader, I do not recall any guest or person working at a hotel ever proceeding with a formal complaint. To the best of my recollection, I have never made a formal complaint or engaged in that process on behalf of a guest or person working at a hotel.

Question 10. Did you have concerns, or raise any issues, about any aspect of the Hotel Quarantine Program, or the way that the program was being delivered? If so, in relation to each, please:

- (a) provide the details of each concern or issue;
- (b) explain how the concern or issue was dealt with, including any persons to whom it was relayed; and
- (c) describe what outcome, if any, was achieved in relation to the concern or issue.

35. I set out below examples of general concerns as well as site specific concerns.

General concerns

36. On 21 April 2020, I raised concerns with the State Emergency Management Centre (SEMC) via email that there appeared to be a lack of understanding amongst security and nursing staff as to the potential for family violence. I also raised my concerns regarding the potential of leaving victim survivors isolated in rooms with perpetrators [DHS.5000.0023.7697]. I was not aware of the outcome at the time, however, I have since been informed that my concerns were forwarded by SEMC to EOC for their review. I understand that the Complex Assessment

and Response Team (CART) could assist with family violence matters and that the Welfare Team was required to ask questions to attempt to identify the risk of family violence. Later, towards the end of my time in the HQ Program, on 19 July 2020 [REDACTED]
[REDACTED]

37. On 24 April 2020, following one of my earlier shifts as a Team Leader, I felt that the Team Leaders should be provided with more information and details regarding the cohort of guests at the hotel, including what stage of quarantine the guests were in. I was also concerned that the Team Leader meetings were held by telephone, rather than via an online video platform, as there was a lot of background noise on the calls which made it difficult to hear. I sent my concerns in an email to the EOC Operations Lead [DHS.5000.0023.6368].
38. On 27 April 2020, I raised concerns with the EOC Operations Lead via email regarding specific instances of family violence in the Marriot Hotel [DHS.5000.0023.9267]. I understand that CART became involved, and worked with the nursing staff and Safe Steps Family Violence Response Centre to put a safety plan in place. When I finished my shift that evening, I completed detailed handover notes and I was satisfied there was enough information to progress the matter appropriately.
39. On 28 May 2020, I was working as a Team Leader at the Marriott Hotel, shortly after the outbreak at Rydges Carlton. In the evening, a mental health nurse attended the hotel for [REDACTED] shift (without PPE) and stated that [REDACTED] had been advised by his employer that [REDACTED] required COVID-19 testing as [REDACTED] had been in contact with COVID-19 positive staff, and that [REDACTED] should attend [REDACTED] shift and be tested at the Marriott Hotel. I was concerned that the nurse had worked at Rydges Carlton where staff had tested COVID-19 positive, and raised my concerns with the EOC Operations Lead via email [DHS.0001.0013.2912]. I received a call from EOC advising that the contract tracing team had confirmed that the nurse had not been in close contact with any COVID-19 positive cases, and that [REDACTED] would be able to return to work once [REDACTED] had completed a COVID-19 test.
40. On 6 June 2020, I was informed of an issue with one of the general practitioners being nonresponsive to a request for assistance from the nursing team [DHS.5000.0015.6614]. I escalated the issue to the EOC. I do not know the outcome.
41. On 16 June 2020, I raised a concern regarding PPE use by Dnata staff at hotels, as Dnata staff did not have a PPE policy specific to their role. I had previously observed Dnata staff not changing gloves in between handling guest luggage and not hand sanitising correctly. I provided local PPE guidance on correct/safe use of PPE and escalated my concern to the EOC. I was advised by the EOC that the PPE policy for security staff was currently being

reviewed and the use of PPE by Dnata staff would be considered as part of that review. [DHS.5000.0160.9664].

42. On 30 June 2020, a friend of mine who was isolating at Rydges Carlton advised me of their concerns with the vegan meals. I raised these concerns regarding the nutritional value of the meals with the EOC and also forwarded a photograph of the vegan meal which had been provided. I was advised that these issues would be raised with the kitchen staff [DHS.5000.0007.8635; DHS.5000.0161.2079]. My friend reported a general improvement in the food after the complaint.
43. On 4 July 2020, I sent an email to the EOC about the newly introduced Alfred Health *PPE Requirements for Staff at a Standard Quarantine Hotel* and raising the concern that the Alfred Health Team Leader had not trained any of the hotel staff in PPE, as **RE** had not been directed to do so by Alfred Health [DHS.5000.0087.8718]. I therefore asked the Alfred Health Team Leader to undertake a PPE briefing with the hotel staff (regardless of the company) at the Mercure the following day.

Novotel on Collins – 9 May 2020

44. On 9 May 2020, I was rostered to work at the Novotel on Collins. Unbeknownst to the hotel staff rostered on that morning (including myself), a group of 23 guests had received notification overnight that they were to depart the hotel that day at 12pm. We were first advised of these plans at 7:01am, when one of the guests contacted me to discuss the departure arrangements. Although there were some difficulties, thankfully, then whole team at the hotel pulled together and the departure was able to go ahead as planned.
45. I relayed my concerns about not having been properly notified of the departure to EOC the same day, by email [DHS.5000.0021.9705]. EOC replied to my email. In this response they indicated that there would be a follow up determine why the information had not been provided to the team in a timely manner [DHS.5000.0028.1655].

Park Royal – 24 May 2020

46. On 24 May 2020, I escalated an issue regarding a guest who was suffering from PTSD and had requested an exemption from the program to isolate at home. I indicated that, in my view, the guest could not be safely accommodated at the hotel [DHS.5000.0017.9310]. An AO had previously been involved with the matter, and when I finished my shift that day, I was satisfied that the AO was seeking to progress it. At the time I was not aware of the outcome, however,

I have since been informed that the guest exited hotel quarantine on the **REDACTED**, which was the date of **RE**scheduled departure.

Stamford Plaza

6 June 2020

47. On 6 June 2020, I raised concerns regarding the hairdressing salon located at the lobby of the Stamford Plaza Hotel. The salon was taking customers from the general public. That day, I saw one salon patron waiting for **RE** appointment in the lobby of the hotel whilst an exit of guests was being undertaken. I also observed that the hairdressers were using poor hygiene practices and did not use PPE. I spoke with the AO and a DJPR representative on shift in relation to my concerns. I raised these concerns with the EOC [DHS.5000.0017.6842].
48. Later that day, I had a discussion with a second AO who raised concerns that the security were not using PPE or following good hygiene practices. I raised these concerns with the EOC in a further email in the same email chain referred to above.

13 and 14 June 2020

49. I have set out my concerns regarding the security staffs' PPE and social distancing practices on these dates and prior in answer to question 5 (c) above. Further, on 14 June 2020, I called EOC to escalate my concerns. The following day, on 15 June 2020, a member of the EOC sent an email to the Stamford Plaza Department email mailbox (which is the email address I used when I was working as Team Leader at the Stamford) [DHS.5000.0008.4354] confirming:
- (a) The Department EOC had spoken with the DJPR Site Manager and asked DJPR to address issues relating to PPE use and social distancing practices immediately and advise of how they were to be managed;
 - (b) the DJPR Site Manager advised they would speak to the head of security and remind them of social distancing rules, and ensure security were trained to use PPE;
 - (c) the matter had been escalated to Merrin Bamert, Commander, Operation Soteria, who in turn provided a summary of the issues to senior executives in DJPR; and
 - (d) an infection control team had been asked to organise an urgent review of the Stamford Plaza Hotel.
50. On 14 June 2020, following the departure discussed above, I arranged for one of the nurses on duty (who had training experience) to provide instruction and training to the security staff

on appropriate PPE usage. I believe that social distancing measures would have also been discussed, however, I cannot recall precisely.

51. On the afternoon of 14 June 2020 or the morning of the 15 June 2020 (I can't recall which), I observed garbage on the floor and old food left in the Department/nurses staff room in the Stamford Plaza Hotel, as well as a kettle on the floor. Staff complained about the ongoing hygiene issues at the hotel. Others working at the hotel had also raised concerns with me on 14 June 2020, including regarding the toilets. I relayed my concerns by email to EOC on the morning of the 15 June 2020 and included photographs [DHS.0001.0023.0155].

Question 11. Did you or identify or receive notice of any poor or unacceptable conduct by any person in connection with the Hotel Quarantine Program? If so:

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

52. I consider the conduct of the security manager at Stamford Plaza Hotel, which I've outlined above at paragraph 23(c) to (e), was unacceptable. I also considered the conduct of the security guards which I have outlined at paragraph 13(c) was unacceptable. I wouldn't describe any other conduct I identified or became aware of as unacceptable.

Outbreak at the Stamford Plaza Hotel

Question 12. What actions were taken, and when, in relation to the outbreak at the Stamford Plaza Hotel? Do you think the response(s) was/were adequate and appropriate? Please provide details and any relevant documents.

53. I did not work at the Stamford Plaza Hotel after the outbreak and I was quarantined for two weeks until 29 June 2020. I therefore do not know what actions were taken and I cannot comment further.

Further Information

Question 13. If you wish to include any additional information in your witness statement, please set it out below.

54. I have nothing further to add.

Signed at Melbourne

in the State of Victoria

on **18 September 2020**

REDACTED

Learning Consultant
DHHS