
STATE OF VICTORIA

Inquiries Act 2014

BOARD OF INQUIRY INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

Response to a request for a statement pursuant to NTP-041

Wilson Security Pty Ltd

Statement of: Gregory Robert Watson

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

Occupation: General Manager

Date: 2 September 2020

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A. INTRODUCTION

On 2 September 2020, I, Gregory Robert Watson, of Level 3/6 English St, Essendon Fields VIC 3041, say:

1. This statement is made in response to and in compliance with a Notice to Produce from the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**the Inquiry**) issued on 10 August 2020 pursuant to section 64 of the *Inquiries Act 2014* (Vic) (**NTP-041**). It is produced to the Inquiry on the basis that it will be tendered and received in evidence by the Inquiry pursuant to that Notice to Produce and on the basis that the statement will be treated as evidence pursuant to section 80 of the *Inquiries Act*.
2. Exhibited to me at the time of making this statement is a bundle of documents marked "**Exhibit GRW-1**".
3. Where in this statement I refer to documents, I refer to them by reference to their tab number within **Exhibit GRW-1** and their unique document number beginning with "**WILS**".
4. The matters set out in this statement are based on my knowledge and experience and information provided to me.
5. Where I have been provided with information, I believe that information to be true and correct.
6. As requested, this statement is arranged by reference to the questions I have been asked to address (as set out in the letter to me from the Hon Jennifer Coate AO of 10 August 2020).

B. MY ROLE AND BACKGROUND

Question 1

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

7. I am the General Manager Regional Operations (Victoria and Tasmania) at Wilson Security Pty Ltd (**Wilson Security**). I report to the Chief Executive Officer of Wilson Security, Mr Nick Frangoulis.
8. I am responsible for overseeing Wilson Security's operations in Victoria and Tasmania. In practice, this means that I am responsible for service delivery, client management, compliance and contract deliverables. I have oversight over Wilson Security's Victorian and Tasmanian operations. Wilson Security employs over 7,000 persons. Of that number, 2,358 are located in Victoria and Tasmania..
9. I have four individuals that report directly to me. Their roles include:

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- a) [REDACTED] (Commercial Manager, Wilson Security);
 - b) [REDACTED] (State Manager – Victoria, Wilson Security); and
 - c) [REDACTED] (State Manager – Tasmania, Wilson Security).
10. I was appointed by the Chief Executive Officer of Wilson Security to be ultimately responsible for an 'operating cell' that managed Wilson Security's provision of security services to the Hotel Quarantine Program. This meant that I was responsible for:
- a) liaising with Victorian government department representatives; and
 - b) overseeing the delivery of security services which included understanding the Victorian government's requirements, working with my team to implement those requirements, managing the security services that were being delivered and to act as a liaison with the Victorian government.
11. The 'operational cell' was comprised of individuals from Wilson Security's Corporate Risk team, and comprised:
- a) [REDACTED] (General Manager Specialist Services);
 - b) Mr Shaun Hogan (National Corporate Risk Manager);
 - c) [REDACTED] (Security Risk Specialist); and
 - d) [REDACTED] (National Protection Manager);
12. Mr Hogan, [REDACTED] and [REDACTED] were dedicated to managing the Hotel Quarantine Program on a full-time basis. The Wilson Security management team comprised of people with risk expertise. This was considered necessary to ensure we had persons able to appropriately identify and evaluate risks and develop and implement mitigation strategies, particularly infection control measures.
13. I worked in conjunction with Mr Hogan who was the Project Manager of the Hotel Quarantine Program. He and I worked collaboratively together such that he escalated issues to me where they required higher level intervention. I subsequently gave him my advice on how a situation could be resolved and where necessary, raised the matter with the relevant Victorian government contact to work out a resolution.
14. In order to appraise myself of operational matters in relation to each hotel at which Wilson Security was providing security services, I held daily telephone conferences with [REDACTED] and Mr Hogan. At that call, we discussed matters such as variations to services, communication with key stakeholders (departments and hotel management), PPE supplies and availability, personnel and contractor performance, service issues arising from the Formstack Incident Reports (Formstack was an online

reporting system that was configured to permit delivery of the Hotel Quarantine Program), future projections of incoming passenger numbers and duration of service requirements at each hotel.

15. In addition to this senior management overlay, security guards were supervised by site supervisors. For peak hotel times (6:30am to 6:30pm, 7 days a week) Wilson Security also added additional management personnel (**Site Managers**) at each Wilson Security hotel site. Site Managers were all Wilson Security employees and reported to the National Manager – Corporate Risk.

Question 2

What is your relevant professional background and work history

16. I have been in my current role since December 2016.
17. Prior to this, I have held various roles, including:
- a) **from 2011 to 2016:** the Chief Operating Officer and Executive Director of SECUREcorp;
 - b) **from 2006 to 2010:** the National Business Development Manager, Director of Strategic and Corporate Services and Director of Operations at SECUREcorp;
 - c) **from 1997 to 2004:** performing various management roles within Chubb Security Pty Ltd; and
 - d) **from 1990 to 1996:** various training and management roles within MSS Security Pty Ltd.
18. A substantial part of the roles that I describe above is in having the expertise to run major events. Over the last 20 years or so, I have been involved in organising security at events such as the opening of Crown Casino in 1997, the MotoGP and the Grand Prix. I was also responsible for organising security at the Melbourne Cricket Ground for AFL events for many years. In addition, I have substantial experience in understanding requirements for planning and overseeing large-scale deployments of major customers in a varied range of segments.
19. Coordinating security for large events requires substantial planning and preparation of contingencies. Providing security for large events also requires you to be flexible and be prepared to adapt during the implementation phase.
20. In my current role at Wilson Security, I also oversee the delivery of services to vulnerable individuals or those that have been detained. For example, I currently oversee the provision of security services to mental health facilities and oversee a youth detention transport service in Tasmania.
21. Prior to working in the security industry, I was a secondary school teacher and also held various project roles focused on community development with the Victorian Department of Education.

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22. I hold a Bachelor of Education, Diploma of Management and a Certificate IV in Workplace Training and Assessment.
23. My statement covers the following subject matters:
- a) a background into Wilson Security and its experience in providing security services; and
 - b) Wilson Security's involvement in the Hotel Quarantine Program.

C. BACKGROUND INTO WILSON SECURITY

Question 3

When was your company first licensed as a private security business in Victoria?

24. The Wilson Security business has been licensed as a private security business in Victoria since 2000.
25. Wilson Security Pty Ltd has been licensed as a private security business in Victoria since 2007. Prior to this, another company within the Wilson Group trading as Wilson Security was licensed as a private security business in Victoria. That company was first licensed as a private security business in 2000.

Question 4

What are the usual services provided by your company? Do they extend beyond services which require private security licences?

26. Wilson Security's usual services are:
- a) **Static Guarding:** the provision of personnel to provide on-site security services;
 - b) **Major Events:** major event management to allow us to provide protection to high-profile event participants as well as delivering overall threat mitigation strategies for high-risk events;
 - c) **Mobile Patrols:** the provision of mobile patrols who monitor theft, damage and safety at the premises of Wilson Security's clients;
 - d) **Technology Solutions:** the design, implementation and maintenance of security technology services (such as Thermal Body Cameras and CCTV); and
 - e) **Corporate Risk:** the provision to corporate clients of expert advice and guidance on security risk, business continuity and emergency management, Risk Assessments and audits.

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27. In addition to the above, Wilson Security has a long history of providing security to the health sector in Victoria and provides services to most major public hospitals in Victoria and Tasmania. This requires Wilson Security to provide services in sensitive high-pressure environments such as in Emergency Departments.
28. Wilson Security also provides security services to the Australian Defence Force at major defence installations in Victoria.
29. Each of these services are provided under Wilson Security's Private Security Business Licence with the authority to provide the services of: Bodyguard, Crowd Controller, Investigator, Private Security Trainer, Security Guard, Armed/Unarmed Guard, Cash-In-Transit, Control Room Operator, Guard with A Dog, Monitoring Centre Operator. Wilson Security is also the holder of a Private Security Business Registration which allows it to provide Security Advisor and Security Equipment Installer Services.

Question 5

What is your company's usual client profile

30. Wilson Security provides security services for customers in a range of industries, including in the private sector (banking, retail, mining, ports, landside airport services and secondary and tertiary education institutions) and public sector (federal and state/territory departments and agencies).
31. Wilson Security is engaged by clients to provide long and short-term engagements, contracts for short-term needs as well as fixed-term projects. Predominantly our work is permanent engagements, with minor ad-hoc work from existing customers. We generally manage large scale customers with fixed and long term arrangements – for example Retail Distribution Centres, Commercial Real Estate premises and the Department of Treasury and Finance (**DTF**) since 2008.
32. Wilson Security has experience in sensitive, high-profile and large-scale projects. For example, Wilson Security has been engaged to provide security services for:
- a) the 2014 G20 summit held in Brisbane;
 - b) the Gold Coast Commonwealth Games held in 2018; and
 - c) the Avalon Air Show held in 2019
33. In approaching large scale projects such as these, I (and Wilson Security) work through a series of phases:
- a) **phase 1**: understanding requirements and objectives – which involves discussions with stakeholders to understand the type of security services they are expecting and assessing

potential risks in the delivery of those services;

- b) **phase 2:** undertaking procurement, logistical and mobilising activities (for example, recruiting personnel, organising those individuals to be at the correct venue at the correct time), developing contingencies and risk management strategies;
- c) **phase 3:** the operations phase, which involves managing the deployment at the event, being aware of and dealing with issues as and when they arise, communications with stakeholders during the delivery of services and ensuring that the services delivered meet their expectations; and
- d) **phase 4:** back-office functions including contract administration, invoicing and other functions.

Question 6

To what extent, prior to the Hotel Quarantine Program, had your company provided private security services to the Victorian government?

- 34. Wilson Security (since 2007, and previously another entity within the Wilson Group) has been on the Victorian state government panel of security providers since 2004. Wilson Security's inclusion on the panel means that it is approved to participate in State government security requests for tenders and be engaged as a security provider by Victorian government departments and agencies if it is the successful tender applicant.
- 35. The most recent tender process was conducted by the Department of Treasury and Finance (**DTF**) in 2018. As part of that process, Wilson Security was required to prepare a tender document and presentation to representatives of the Victorian government, following which it was permitted to enter into Purchase Order Contracts (**POCs**) with government departments that were seeking the provision of security services. As a result of being successful during the tender process, Wilson Security entered in to a State Purchase Contract (**SPC**) with the DTF on behalf of the State of Victoria. I exhibit the SPC behind **Tab 1 to Exhibit GRW-1 [WILS.0001.0005.0905]**. The 2018 tender process enabled Wilson Security to tender for providing security services to Victorian government departments, including DTF, the Department of Health and Human Services (**DHHS**), the Department of Environment, Land, Water and Planning (**DELWP**), the Department of Economic Development, Jobs, Transport and Resources, the Office of Public Prosecutions (**DEDJTR**), VicRoads and the Department of Justice (**DOJ**).
- 36. Since its inclusion on the panel, Wilson Security (and from 2004-2007, an associated company in the Wilson Group) has provided private security services to the Victorian government in contexts such as:

- a) **Securing Government Department premises:** providing security at the premises of various government departments, including the Department of Human Services, the Department of Primary Industries, the DTF, the Department of Innovation, Industry and Regional Development, WorkSafe, VicRoads and Court Services Victoria;
 - b) **Victoria Police:** to various Victoria Police sites (including the Victoria Police Centre, the Victorian Policy Academy, the Victoria Police Forensics' Centre, the Victoria Police Archives and the Victoria Police Vehicle Impoundment Support Unit and the Mail Screening and Delivery Service);
 - c) **Providing security at high-risk venues:** Parliament House, then Spencer Street Station (now Southern Cross Station, the Independent Broad-based Anti-Corruption Commission (**IBAC**), the Royal Commission into the Management of Police Informants and the National Gallery of Victoria; and
 - d) **High-risk engagements:** such as in connection with the 2007 Equine Influenza outbreak.
37. Wilson Security drew on the experience I have detailed above in preparing for and acting in the Hotel Quarantine Program.
38. We knew that medical opinion and input was an important part of preparing procedures to manage risk posed by the virus, as well as implantation of that from Health, Safety and Environment expertise. Wilson Security had previous experience in dealing with infectious outbreaks, albeit not on the scale of Hotel Quarantine Program. As I set out below:
- a) alive to the risks of the COVID-19 pandemic and consistent with Wilson Security's pandemic response plan, we engaged an external medical expert. That expert advice informed our policies on infection prevention with a view to managing the risks of any spread of COVID-19. We also appointed the national manager of corporate risk (who was the operations director for the Gold Coast G20 summit) to have operational control of the project, reporting to me;
 - b) notwithstanding there being no requirement to do so, Wilson Security prepared and implemented policies from the outset to manage the risks we identified. This included practical things like: where possible, catering meals to guards, at our cost, to avoid them having to congregate at outside restaurants during breaks; providing a clear PPE and infection control policy and sourcing PPE for all our guards through supply channels; requiring temperature checking at the beginning of each shift; and ensuring a strong presence of highly experienced Wilson Security employees as Site Managers as a second layer of oversight to the site supervisors.
39. The following contracting arrangements relate to Wilson Security's inclusion on the Victorian government panel:

- a) Wilson Security has entered into the SPC with the DTF (on behalf of the State of Victoria) which establishes an overarching agreement between Wilson Security and the DTF under which Wilson Security is able to contract with particular State government departments and agencies for the provision of security services;
- b) if a Victorian government department or agency requires security services, it will request proposals from security firms on the Victorian government's panel for each engagement;
- c) the proposals that security firms provide must include break downs of the rates or fees payable by the purchasing government department for the security services; and
- d) if the proposal is accepted, the government department or agency issues a POC to the security firm, based on the requirements that are contained within the overarching SPC. The POC includes details such as the commencement date of the services, the applicable fees and rates and the specific services that are required.

Question 7

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

- 40. Wilson Security predominantly engages direct employees (either as full time, part time or casual). We rely on our employee workforce to provide day-to-day security services for engagements where it is required to provide guards with regularity over an extended period of time. Wilson Security uses contractors to provide guards were required to fulfil an immediate short-term engagement, such as the Hotel Quarantine Program.
- 41. I explain in my response to question 10 below the steps that Wilson Security took when engaging contractors in respect of the Hotel Quarantine Program.

Question 8

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

- 42. Nationally, Wilson Security had 5,642 permanent employees as at the end of March 2020. Additionally, Wilson Security had 1,532 casual employees nationally at the end of March 2020.
- 43. I note that in Victoria, Wilson Security has 1,492 permanent employees and 537 casual employees.

Question 9

Which office holders within your company themselves hold private security licences?

44. No office holders of Wilson Security currently hold private security licences. A number of senior Wilson Security employees who oversee frontline operations do hold private security licenses.

Question 10

How do you recruit staff?

45. Wilson Security's recruitment and selection process is governed by its Wilson Group Recruitment and Selection Policy and Procedural Guidelines, which outlines the process followed for Wilson Security recruiting its team members, involving:
- a) obtaining approval to recruit from the state manager;
 - b) advertising the position on mediums such as Wilson's intranet page and seek.com;
 - c) shortlisting job applicants;
 - d) the interview process involving operational and HR representatives;
 - e) background and reference checks; and
 - f) making the formal offer of employment.
46. Once an applicant has been offered and has accepted their contract of employment, they are required to complete an on-boarding and induction process specific to the role and the site at which they will be deployed to.
47. I exhibit a copy of the Wilson Group Recruitment and Selection Policy and Procedural Guidelines behind **Tab 2 of Exhibit GRW-1 [WILS.0001.0006.1919]**.
48. Wilson Security recruits security staff through its in-house recruitment team through its online HR information system.
49. Wilson Security has a team of 16 HR personnel, of which four are dedicated recruitment coordinators. The coordinators are supported by the broader HR team, when required.
50. The in-house recruitment team advertises roles through authorised online recruitment and professional websites such as seek.com and LinkedIn. Roles are also advertised internally on Wilson

Security's intranet page. I am aware of allegations that other security providers used social media to recruit. For clarity, Wilson Security does not use social media portals such as Facebook or WhatsApp to recruit employees or contract labour.

51. Wilson Security also engages third-party recruitment agencies to source candidates for more specialised, management or executive roles.
52. Wilson Security's engagement of contractors is governed by its Wilson Security Contractor Management Procedure, which outlines the process followed for Wilson Security sourcing and engaging contractors.
53. The Wilson Security Contractor Management Procedure sets out the criteria in accordance with which third party contractors are selected. Selection criteria include:
 - a) that the security contractor has the ability, experience and geographic coverage necessary to support Wilson Security's requirements;
 - b) that Wilson Security will conduct checks to ensure that the security contractor does not have adverse findings that may affect Wilson Security or its customers' reputation;
 - c) the security contractor provide documentation demonstrating insurances, professional indemnity, workers' compensation insurance and a verification of their safety systems;
 - d) a review of the contractor's labour hire licence, including 6-monthly reviews of the contractor's performance; and
 - e) ensuring that the contractors have appropriate training and qualification requirements in place.
54. The Procedure also require Wilson Security to periodically conduct a review of contractors and their practices.
55. I exhibit the Wilson Security's Contractor Management Procedure behind **Tab 3 to Exhibit GRW-1 [WILS.0001.0006.1723]**.

Question 11

Are staff employed or engaged by your company under any restriction on accepting work from other security businesses?

56. Wilson Security's permanent employees are required to obtain Wilson Security's consent before undertaking any other employment or activities that may be in conflict (actual or perceived) or in competition with Wilson Security. Given the nature of casual work, Wilson Security does not restrict

the ability of casual employees to accept work from another employer.

57. I have extracted the relevant clause from the pro forma employment contract issued to permanent employees below:

"Without our prior written consent, you must not undertake any activities or other employment, including directorships, personal business undertakings, or act in any capacity in competition with the Company and/or which could result in an actual, potential or perceived conflict of interest between you and the Company, or impairs or could potentially impair your ability to act in the best interest of the Company. Without our prior written consent, you must not engage in paid work when on any form of leave."

58. As described in further detail as part of my response to question 30 below, Wilson Security required its contractors to ensure that their staff were not working on a site other than the hotel quarantine site to which they were assigned by Wilson Security. Wilson Security does not generally restrict contractors that it engages from accepting work from other security providers. That said, for the Hotel Quarantine Program, Wilson Security identified the infection control risks associated with guards working for contractors working for multiple hotel sites. As a result, Wilson Security implemented a bespoke requirement that guards working on the program were not permitted to work for other contractors on the program.

D. WILSON SECURITY'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?

59. Wilson Security staff were first informed about a potential role for Wilson Security in the Hotel Quarantine Program on Friday, 27 March 2020 at 11:45pm.
60. Ms Katrina Currie, an Executive Director in the Employment and Inclusion team at the Department of Jobs, Precincts and Regions (DJPR) contacted two Wilson Security staff – [REDACTED] (National Event and Brand Manager at Wilson Security) and [REDACTED] (the former Group Managing Director). In her email, Ms Currie stated:
- "I am seeking urgent advice from Wilson's Security on their capacity to support a security response to quarantine measures associated with COVID-19 being implemented from tomorrow night 28 March 2020 for travellers returning to Australia through Melbourne Airport. Please contact me URGENTLY on...tomorrow to discuss options/support."*
61. Ms Currie's email was forwarded by [REDACTED] to the Chief Executive Officer of Wilson Security,

Mr Nick Frangoulis, on 27 March 2020 at 11:51pm.

62. Mr Frangoulis forwarded that email to me with comments to 'reach out' on Saturday, 28 March 2020 at 7:00am.
63. I responded to Ms Currie's email at 7:58am. In my response to Ms Currie, I advised:
- "I am available at any time on...to discuss. In particular we would like to understand the scope of work and duties required so we can make an informed assessment about staff selection, specialist requirements and a thorough risk assessment and provision of PPE."*
64. As a current provider to government we would be willing to assist in any way we can at this challenging time.
65. At 8:03am, Ms Currie acknowledged receipt of my response and noted that she "was awaiting advice this morning" and that she would "get back to [me] once I know more."
66. I exhibit my correspondence with Ms Currie behind **Tab 4 to Exhibit GRW-1 [WILS.0001.0005.3894]**.

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?

67. My responses to questions 13 and 14 involve a common chronology of events. I have first answered the Inquiry's questions and then provided a common chronology (set out in the answer to question 14) to assist the Inquiry understand the events that led up to Wilson Security reaching its agreement with the Victorian government and the security services that Wilson Security provided.
68. I received an email confirmation from Ms Currie at around 9:59am on 30 March 2020 that Wilson Security would need to commence providing security services for the Hotel Quarantine Program with effect from later that afternoon. That confirmation was only in relation to the Crowne Plaza Hotel. I exhibit that email behind **Tab 5 to Exhibit GRW-1 [WILS.0001.0005.3896]**.
69. In relation to the other hotels sites at which Wilson Security provided security services:
- a) I received email confirmation from Personal Information (a Principal Policy Officer in the Inclusion and Employment team at the DJPR) at around **11:51am on Thursday, 2 April 2020** that Wilson Security would need to commence providing security services at the Pan Pacific Hotel with effect from 7am on **Friday, 3 April 2020**. I exhibit the email chain, and my forwarding of it to the team behind **Tab 6 to Exhibit GRW-1 [WILS.0001.0001.4027]**;

- b) I received email confirmation from Ms Gönül Serbest (the Chief Executive Officer of Global Victoria in the DJPR) at around 8:48pm on **Saturday, 4 April 2020** that Wilson Security would need to commence providing security services at the Mercure Welcome Hotel with effect from 12 midday on **Sunday, 5 April 2020**. I exhibit that email behind **Tab 7 to Exhibit GRW-1 [WILS.0001.0005.0505]**;
- c) I received a telephone call from **Personal Inform** at around **4:30pm on Monday, 25 May 2020** that Wilson Security would again need to provide security services at the Mercure Welcome (Wilson Security had previously ceased providing services at the Mercure Welcome on 16 May 2020) and Pullman Hotels with effect from the mornings of **Wednesday, 27 May 2020** and **Thursday, 28 May 2020**, respectively.

Question 14

What precisely were the security services you agreed to provide under the agreement?

70. As I explain below, when Wilson Security first deployed guards as part of the Hotel Quarantine Program, the scope of the services provided were to *"observe and report"*. This meant that there would be very limited physical interactions with guests (primarily at the time guests arrived at the hotels) and there would be no physical contact between guards and guests.
71. By early April 2020, the scope of services that Wilson Security was requested to provide by the Victorian government changed in some key respects, such as:
- a) **bag searches:** from around 4 April 2020, Wilson Security guards were conducting a voluntary visual inspection of guests' bags;
 - b) **food delivery and care packages:** from around 9 April 2020, Wilson Security guards were receiving care packages and food delivery at the front of hotels and delivering these to guests' rooms; and
 - c) **exercise breaks:** from around 10 April 2020, Wilson Security guards were supervising guests on daily exercise breaks.

Chronology of events

72. The chronology of events that led to the agreement that I refer to in paragraph 68 above were:
- a) **Saturday, 28 March 2020 at 4:49pm:** email correspondence from Ms Currie confirming that the deployment of security guards would be *"a staggered start"*. I exhibit my email to Ms Currie behind **Tab 8 to Exhibit GRW-1 [WILS.0001.0005.3893]**;

- b) **Sunday, 29 March 2020 at 8:16am:** email correspondence from myself to Ms Currie noting that Wilson Security had conducted a *“high level review of risk control issues, logistics and operational delivery matters...”* and had identified *“a number of questions that have arisen which affect our capacity to deliver the services”*. I noted that clarification was required on:
- i) *“Scope of work required to determine licencing requirements and what other roles fulfilled by non security staff could be delivered to supplement licenced guards to ensure capability of resourcing”;*
 - ii) whether there was *“going to be an onsite medical advisor if not what is the escalation”;*
 - iii) what the *“medical regime for those isolated and what if any is the expectation on security”;* and
 - iv) the *“protocols for liaison and communication with the police presence on site and expectations around escalation to Vicpol”*.

I exhibit my email to Ms Currie behind **Tab 9 to Exhibit GRW-1 [WILS.0001.0006.1495]**.

- c) **Sunday, 29 March 2020 at 10:30am:** teleconference between Mr Cameron Nolan (an Executive Director in the Priority Projects Unit of the DJPR) and Ms Currie and Mr Hogan , [REDACTED] and myself. On that teleconference, we discussed the following:
- i) Ms Currie and Mr Nolan provided Wilson Security with an overview of the Hotel Quarantine Program and answered some of my (and the team’s) questions, which I explain in further detail below;
 - ii) Ms Currie and Mr Nolan advised that Victoria Police were expected to be on site, and that they would be managing the chain of custody for the arrival of guests at hotels, and that the Victorian government was seeking 24/7 security and medical support;
 - iii) that a DHHS employee would be the authorised officer onsite, and that there would be an additional governmental representative at each site;
 - iv) that a decision on the next hotels for inclusion in the Hotel Quarantine Program was expected at 11:30am that day, but that it was expected the Crowne Plaza, the Pan Pacific and Park Royal would be next to mobilise and that they were proposed to be allocated to Wilson Security;
 - v) I also recall that Ms Currie and Mr Nolan mentioned that it was important to take precautions against cross-contamination within each hotel and that the government was having some difficulty in obtaining sufficient PPE for the exercise;
 - vi) that guests would not be permitted services such as UberEats; and

- vii) that Ms Currie and Mr Nolan would organise a time for Wilson Security personnel to attend these locations either later that day or on Monday in order to assess the resourcing needs and commence logistical planning, and that they would send through calendar invitations after they had received confirmation of the hotels for inclusion at 11:30am.
- d) **Sunday, 29 March 2020 at around 12:30pm:** I had a conversation with Ms Currie who advised that there had been changes to the times for site visits, Unified Security had been appointed to provide services at the two Crown Hotels, and another provider had been awarded regional sites and other metropolitan hotels. Ms Currie indicated that Wilson Security would be offered work at three hotels. I also recall that Ms Currie requested that I provide her with an estimate of Wilson Security's PPE needs for the next four weeks, in addition to Wilson Security's own stocks, and that DJPR would supply PPE required by guards at hotels;
- e) **Sunday, 29 March 2020 at 3:29pm:** I received a calendar invitation from Mr Nolan (an Executive Director in the Priority Projects Unit of the **DJPR**) to attend a meeting at Crowne Plaza at 4pm that day *"to start preparing Crowne Plaza for the arrival of quarantined guests...on the assumption that guests will arrive from Monday onwards."* I exhibit that calendar invitation behind **Tab 10 to Exhibit GRW-1 [WILS.0001.0006.1485]**
- f) **Sunday, 29 March 2020 at 4:00pm:** I attended the Crowne Plaza Hotel:
- i) I attended with Shaun Hogan (National Manager, Corporate Risk) and [REDACTED] (HSE Advisor) from Wilson Security. Also present were government representatives from DJPR and DHHS, Victoria Police, Dnata (who I understood was to be assisting with transportation of hotel guests from the airport) and the General Manager from the Crowne Plaza;
- ii) The purpose of the site visit was to:
- A) Meet department representatives, hotel management, VicPol members, other contractors such as Dnata (luggage handling);
- B) Gain an overview of the service; and
- C) Conduct an inspection of the site to view:
- Access routes from entry from the driveway to reception to each room
 - Floor plates for lay out of access points such as stairwells, fire escapes, lifts
 - Potential escape routes via service corridors, fire escapes and loading docks

- Discuss methodology for processing incoming guests
 - Discuss and confirm numbers of security personnel, role and placement
 - Inspect facilities for the security team such as break out areas, wash room and amenities
 - Make arrangements with hotel management for staff meals on site.
- iii) We undertook a tour of the hotel and discussed the scope of the assignment on the assumption of 340 people being transferred to the hotel the following afternoon. As I discuss below, this number of expected guests was later revised to 137;
- iv) At this meeting, I recall that Mr David Clements (a Deputy Secretary from the Inclusion team of the DJPR) provided me with a hard copy of a draft document that explained the role that Wilson Security was to play in the Hotel Quarantine Program. Mr Clements also sent a soft copy of that document to Mr Hogan. I discuss that document in further detail in my response to question 14 below and exhibit this behind **Tab 11 to Exhibit GRW-1 [WILS.0001.0001.8552]**.
- g) **Sunday, 29 March 2020 at 5:32pm:** email correspondence from Mr Nolan that he was *“arranging more reconnaissance meetings to be held tomorrow for the next two hotels that need to come online...to start taking guests from Tuesday or Wednesday (TBA)”* and that the hotels and timings were *“Pan Pacific Melbourne: 10am”* and *“Parkroyal Melbourne Airport: 1pm”*. I exhibit this behind **Tab 12 to Exhibit GRW-1 [WILS.0001.0006.1493]**;
- h) **Sunday, 29 March 2020 at 9:34pm:** I sent an email to Ms Currie (copying Mr Nolan) about our understanding of the services required on the basis that *“[w]e have been advised that we start at 3 pm tomorrow ahead of an expected 340 people being transferred to [the Crowne Plaza Hotel]”* and noted that *“in consultation with the various government representatives present, we estimated that the scope is closer to 27 people required 24/7 for the duration of the assignment. This is based on the following:*
- *Supervisor / site manager (1)*
 - *6 floors requiring 3 security officers each as there are 3 fire exits on each floor and no line of sight between them (18)*
 - *Security offices at main entry and staff entry point (2)*
 - *Escorts of people to their rooms (2)*
 - *Relievers to ensure 23 staff receive breaks as per SSIA and NES (4)”*

...

We seek your formal confirmation of our appointment to the 3 nominated hotels and approval

for the rates for service as submitted.”

I include a version of this email correspondence (which includes comments that I provided to other individuals at Wilson Security) behind **Tab 13 to Exhibit GRW-1 [WILS.0001.0001.8558]**.

73. Although I did not receive an immediate response from Ms Currie, we prepared on the assumption that Wilson Security would be required to provide services from 3pm on Monday, 30 March 2020. I had not received a response from Ms Currie on Monday morning, so I sent a further email to Ms Currie at 9:10am requesting authorisation to proceed.
74. Ms Currie responded shortly afterwards advising that authorisation was provided in relation to one hotel only and that the fewer than anticipated incoming passenger numbers meant a reduced security presence would be required. I exhibit that email behind **Tab 5 to Exhibit GRW-1 [WILS.0001.0005.3896]**.
75. I also received calendar invitations on **Sunday, 30 March 2020** to attend site walkthroughs on **Monday, 31 March 2020** at the Pan Pacific and Park Royal Hotels at 10am and 1pm, respectively. I attended these site visits on the understanding that Wilson Security would be required to provide security services to these hotels. After attending the site visit at the Park Royal Hotel, I was informed by Ms Serbest on the evening of 4 April 2020 (the evening prior to our intended deployment) that Wilson Security would not be providing security services in relation to that hotel, but would instead be requested to provide services at the Mercure Welcome Hotel.
76. I recall that a senior representative of Victoria Police was present at the Pan Pacific Hotel (Acting Inspector Andy McKee) gave all present (including representatives from DJPR and hotel management) directions as to what he wanted on each floor, in terms of a security presence and the hotel access points that needed to be secured, particularly those external to the Hotel in the South Wharf precinct and the roadway entering South Wharf.
77. From my initial phone call with Ms Currie on the morning of Saturday, 28 March 2020, I understood that the role of security guards would essentially be to observe and report, to de-escalate any potential situations and ensure that guests did not leave the room specified in their Direction and Detention Notice. If the matter could not be resolved, the guards were to advise onsite police officers of the situation. It was subsequently stated by police members present at the meeting at Crowne Plaza on Sunday afternoon that there would not be a permanent Victoria Police presence on site. However the next day at the Pan Pacific site visit, Acting Inspector Andy McKee assumed control of the placement of security and indicated that police would be present in the precinct and controlling the public road entrance to South Wharf.
78. As I explain above, on **Sunday, 30 March 2020** Mr Clements provided myself and my colleague Mr Hogan with a draft document titled 'Security consultants – Roles and responsibilities for hotel quarantine'. That document stated that security personnel "*had been engaged to support authorised*

officers from the Victorian Department of Health and Human Services (DHHS) and Victoria Police to uphold mandatory quarantine directions from Chief Health Officer.” That document also listed duties of security personnel:

“Support the Chief Health Officer, authorised officers and Victoria Police in the enforcement of the Isolation (International Arrivals) Directions (Attachment A) on the premises of the hotel.

Ensure quarantined guests do not leave the hotel for the period of their quarantine without the permission of an authorised officer.

Ensure that any disputes involving quarantined guests in the hotel are de-escalated without physical contact. If unable to de-escalate, Victoria Police should be contacted immediately.

Provide advice to quarantined guests on which areas they can go to in the hotel (Attachment B) and ensure that this is upheld.”

79. As I note above, Mr Clements provided hard copies of this document at a meeting that I had with him, but also circulated a soft copy to Mr Hogan. I exhibit the version of the document that was received in soft copy behind **Tab 14 to Exhibit GRW-1 [WILS.0001.0001.8556]**.
80. On **Wednesday, 1 April 2020 at 4:40pm**, I received an email from **Personal Inform** who identified that he worked with Ms Currie and would be assisting her in managing the security arrangements as part of the Hotel Quarantine Program. He identified that he would be the point of contact in relation to the Crowne Plaza Hotel, the Pan Pacific and the third hotel that would be allocated to Wilson Security.
81. I responded to **Personal Informa** email on **Wednesday, 1 April 2020 at 6:24pm** and confirmed that Wilson Security “*was underway at Crowne Plaza and we are mobilising to start at Pan Pacific when we are notified*”. I also advised **Personal Inform** that it was my understanding that the third hotel that Wilson Security was to provide services at was the Park Royal.
82. I exhibit **Personal Informa** email and my response behind **Tab 15 to Exhibit GRW-1 [WILS.0001.0006.1499]**.
83. Wilson Security commenced providing security services at the Pan Pacific Hotel from Friday, 3 April 2020 from approximately 10:00am.
84. On **3 April 2020 at 10:05am**, I received an email from **Personal Inform** confirming that “*all is on track for mobilisation at [our] third site*” for 4 April 2020.
85. **Personal Inform** advised in his 3 April email that the responsibilities of security staff were:

“Before check in:

- In position on floors where guests are staying.*

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During check in:

- *Accompanying guests in the lift up to their floor. No more than 4 per lift (including the security officer).*
- *Assisting with arriving busses (such as getting luggage off bus if people need help).*
- *Being present to manage any on site issues.*

Once checked in:

- *Maintaining presence on-floors, lobby and front door.*
- *Receiving parcels and logging details.*
- *Delivering parcels to rooms (once checked and approved by the DHHS authorised officer).*
- *Maintain security: Only allowing authorised persons to enter premise.*

Escalation of issues:

- *Guest health related requests or concerns must be communicated to the DHHS Authorised Officer or Nurse on site as soon as possible.*
- *Dinner / food complaints to be communicated to the hotel.*
- *Any other onsite queries to be communicated to the DJPR Site Manager.*

In any emergency – dial 000.”

86. Personal Inform sent a further email to me on Friday, 3 April 2020 at 2:10pm, Personal Infor clarified that “no gifts or deliveries for guests be accepted by security staff directly from family or friends”.
87. I exhibit this email chain behind **Tab 16 to Exhibit GRW-1 [WILS.0001.0005.3906]**.
88. Wilson Security had initially been allocated to the Park Royal hotel at Melbourne Airport, but I was told on the evening of **Saturday, 4 April 2020** that we had been reallocated to the Mercure Welcome hotel in the Melbourne CBD, where we commenced at 12 midday the following day (5 April), Employees had already been rostered to commence at 6am the next morning at the Park Royal hotel. Wilson Security had selected its employees who already worked at Melbourne Airport to attend the Park Royal because it was close to their normal place of work. This last-minute change meant Wilson Security's Roster Coordinators were required to go into the office that evening to call and notify all employees of the change and organise revised logistical parking arrangements (since they were required in the CBD, rather than Melbourne Airport). The changes were implemented by

approximately 11.30 pm on **Saturday, 4 April 2020**. I exhibit my email correspondence behind **Tab 7 to Exhibit GRW-1 [WILS.0001.0005.0505]**

89. In addition to meal provision, Wilson Security also arranged free or subsidised parking for our guards to reduce cross-contamination risk.

90. I also noted the following to Ms Currie regarding the amount security officers would be paid:

All Security officers will be paid minimum Level 2 under the SSIA 2010 or Wilson Security EA (higher than SSIA) and will receive all required rest and meal breaks. We have also allowed for one meal per person prepared by the Hotel in a 12 hour shift as they will not be able to leave the site and it is undesirable for food to be brought in by security staff due to the risk of contamination.

91. I exhibit this email correspondence behind **Tab 4 to Exhibit GRW-1 [WILS.0001.0005.3894]**.

92. I also noted that Wilson Security advised that it would provide other individuals at no extra charge – namely a Contract Manager, a Health, Safety and Environment Advisor and support, Corporate Risk management support and HR and rostering support. We also provided Site Managers at each hotel as an additional layer of supervision at our cost. The Site Managers were all permanent Wilson employees.

93. The DJPR executed a POC with Wilson Security for security services in relation to the Hotel Quarantine Program on 6 May 2020, covering the period 30 March 2020 to 30 June 2020. I exhibit that POC behind **Tab 17 to Exhibit GRW-1 [WILS.0001.0001.8812]** Wilson Security did not have a prior POC under which it was providing services during the period 30 March 2020 to 5 May 2020.

94. The POC also included details of security services that Wilson Security was to provide, although it was only executed on 6 May 2020. Schedule 3 to that POC listed the duties to be performed by Wilson Security and in my view, reflected the expectations as at that time (rather than the commencement of the Hotel Quarantine Program). I have extracted the duties listed in Schedule 3 below, and bolded those duties that I considered to be additions after the date on which Wilson Security initially commenced providing services (30 March 2020):

- ***“Accompanying guests in the lift up to their floor and to their room. No more than 4 per lift (including the security officer).***
- ***Assisting with arriving busses (such as getting luggage off bus if people need help).***
- *Being present to manage any on site issues.*
- *Maintaining presence on-floors, lobby and front door of each Designated Location.*
- ***Receiving and checking parcels and logging details from courier services approved by***

the Purchaser only. All deliveries from family and friends to be refused.

- *Delivering parcels to rooms (once checked and approved by the DHHS authorised officer).*
- *Accepting and delivering food deliveries to rooms for DHHS approved guests only.*
- *Supporting outdoor breaks for guests in accordance with arrangements agreed at each Designated Location.*
- *Maintain security: Only allowing persons authorised by the Purchaser to enter each Designated Location.*
- *Assist with the checking out of guests by escorting guests from their rooms to the lobby when directed and assisting with luggage where required.*
- *The Service Provider will escalate issues as outlined below or as directed by the Purchaser:*
- *Guest health related requests or concerns must be communicated to the DHHS Authorised Officer or Nurse on site as soon as possible.*
- *Dinner / food complaints to be communicated to the Hotel staff.*
- *Any other onsite queries to be communicated to the Purchaser's Designated Location Manager.*

At all times:

- *respond to routine and emergency incidents;*
- *In the case of any emergency at any time during the provision of the Services, the*
- ***Service Provider must call 000.***

The Purchaser may at any time revise these Services by adding or subtracting parts of the services or how they are delivered, at its sole discretion."

95. Wilson Security then liaised with the DHHS in respect of the same services from the period 1 July 2020 to 31 July 2020, with one month options thereafter. On 3 July 2020, I was contacted by a representative of the Department of Corrections, who advised that they would be taking control of the Hotel Quarantine Program and Wilson Security would cease providing services with effect from 5 July 2020.

Question 15

When were such security services first provided?

96. Wilson Security commenced providing security services on 30 March 2020 at Crowne Plaza at around 3.00pm.

Question 16

When was that agreement formalised in writing?

97. I refer to my response to questions 13 and 14 above.

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 those discussions?

98. As I note in my response to question 14 above, Wilson Security was provided with a draft document that set out our roles and responsibilities for the Hotel Quarantine Program. That document did not set out any requirements regarding infection control, PPE and specialised training for security staff. As I explain in further detail below, Wilson Security implemented its own infection control, PPE and specialised training practices. Wilson Security was able to do so because it had previously considered the potential impact of COVID-19 on its people more generally and as a result, already had stocks of, and was in the process of sourcing additional, PPE. Wilson Security had an internal team who was responsible for procuring PPE supplies. Those details were not discussed with government representatives before Wilson Security's guards commenced providing security services on 30 March 2020. We at all times had adequate PPE for our people as well as providing it for others.
99. I set out the circumstances in which I recall infection control, PPE and specialised training being discussed between Wilson Security and representatives of the Victorian government below:
- a) **28 March 2020:** in my correspondence (behind **Tab 4 of Exhibit GRW-1**) to Ms Currie requesting whether Wilson Security had capacity to provide the security services for the Hotel Quarantine Program, I noted that Wilson Security would *"like to understand the scope of work and duties required so we can make an informed assessment about staff selection, specialist requirements and a thorough risk assessment and provision of PPE."*

- b) **28-29 March 2020:** as I explain in my response to question 13 above, I had some discussions with Ms Currie and Mr Nolan regarding the need for PPE as well as infection control practices to ensure that there was no cross-contamination within a hotel. I recall that I advised Ms Currie and Mr Nolan that Wilson Security only had limited supplies of PPE, so asked if the Victorian government was able to provide some. I recall that Ms Currie and Mr Nolan advised me that the Victorian government was having difficulty obtaining PPE and that they would provide what they were able, but asked Wilson Security to provide the PPE that it was able to in the interim. As a result, Wilson Security provided PPE from its own supplies to all guards that were deployed on 30 March 2020.
- c) **3 April 2020:** [Personal Inform] noted that *“Security teams will need to be responsible for the provision of their staff’s personal protection equipment (PPE)”* and that *“No Security officer is to refuse wearing PPE”*, although he noted that in light of my earlier discussions on 28-29 March, that I had said Wilson Security only had limited supplies of PPE, that *“[Wilson Security] issue [its] staff with what PPE [it has] and we will work through the Department [of] Health and Human Services to supply additional PPE where possible.”* I exhibit my correspondence with [Personal Inform] behind **Tab 16 of Exhibit GRW-1 [WILS.0001.0005.3906]**.
- d) **29 May 2020:** Wilson Security was issued a document titled **‘Operation Soteria – PPE Advice for Hotel-Based Security Staff & AOs in Contact with Quarantined Clients’** that set out details of when PPE ought to be used. Although that document is dated **5 May 2020**, the first record that I have of receiving that document is on **Friday, 29 May 2020** via email from [Personal Inform]. I exhibit the email correspondence where [Personal Inform] sends me this document, and my subsequent forwarding of that email behind **Tab 18 of Exhibit GRW-1 [WILS.0001.0005.7959] [WILS.0001.0005.7961]**. A revised version of that document was provided to me by [Personal Inform] on 11 June 2020. I exhibit the email correspondence where [Personal Inform] sends me this document, and my subsequent forwarding of that email behind **Tab 19 of Exhibit GRW-1 [WILS.0001.0001.4902] [WILS.0001.0001.4904]**.
100. As I explain below, Wilson Security had already implemented PPE standards prior to 29 May 2020 and on reviewing those standards, the Health, Safety and Environment and Risk teams at Wilson Security determined that our policies on PPE use were most stringent than those recommended for implementation by the Victorian government. I recall that this was because Wilson Security’s policy required the wearing of gloves and masks at all times, and eye protection to be always accessible, but not necessary to be worn. The government’s guidance did not require the wearing of masks in a hotel unless 1.5m physical distancing was not feasible. In addition, Wilson Security’s guidance provided for guards to change their PPE between different zones (for example between different floors, lifts, lobbies and break rooms) to avoid cross-contamination between zones.
101. Wilson Security separately sourced its own PPE for all of its people, implemented a PPE policy and provided infection control and other relevant training to security guards. I have explained these

matters in my response to question 26 below.

Question 18

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

102. As I explain above and in my response to question 19 below, the nature of security services that Wilson Security was required to provide to the Hotel Quarantine Program did vary. Those changes were communicated in person by authorised officers on site at the hotels and to me via representatives of DJPR and DHHS.
103. That said, those changes predominantly occurred in the first month of the program and the nature of services (as they were set out in the POC that Wilson Security entered into with the Victorian government) did not vary from the time that POC was executed on 6 May 2020 to the time Wilson Security ceased providing services in connection with the Hotel Quarantine Program on 5 July 2020.

Question 19

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

104. I have set out below my understanding of Wilson Security's duties and how they were varied over time: These were primarily communicated to me by **Personal Infor** and Mr Hogan. The issues generally arose based on what Mr Hogan and Wilson managers were being told by authorised officers on the ground at the hotels.
- a) **28-29 March 2020:** as I explain in my response to question 14 above, I understood that Wilson Security's initial responsibility was to "*observe and report*" and that its responsibility was to "*support authorised officers from the Victorian Department of Health and Human Services and Victoria Police...*";
- b) **29 March 2020:** at the Crowne Plaza site visit I became aware that no police officers were to be present at hotels save for when guests were arriving and checking in, although I had a different impression the next day when I attended the Pan Pacific Hotel based on the comments of Acting Inspector McKee;
- c) **3 April 2020:** as I explain in my response to question 14 above, **Personal Informa** email provided further detail on the role that security guards were to provide in the context of the Hotel Quarantine Program;

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- d) **4 April 2020:** I became aware from discussions with Mr Hogan that authorised officers at some hotels were requesting that Wilson Security guards conduct searches of guests' parcels and bags. When I became aware of this, I advised [Personal Info] and Mr Clements that I was concerned that Wilson Security's guards did not have the legal authority to conduct such searches. Following this, arrangements were put in place whereby security guards were to undertake a "footy bag check" – a visual inspection of the bag with the guest present and voluntarily opening the bag;
- e) **4 April 2020:** I became aware from discussions with Mr Hogan that Wilson Security guards were being asked to handle guests' luggage. I raised some infection control concerns with this arrangement, but I agreed with [Personal Info] and Mr Clements that this issue would be best addressed on a case-by-case basis in exceptional circumstances;
- f) **6 April 2020:** I became aware that the Victorian government was commencing a trial under which quarantine guests were permitted to be escorted outside the hotel for 15 minutes at a time. When I became aware of the program, I raised a number of operational concerns with [Personal Info], which I explain further in my response to question 25 below. I note that arrangements were put in place to address some of those concerns with effect from 10 April 2020. I also discuss those arrangements at question 25 below;
- g) **9 April 2020:** [Personal Info] informed me that in accordance with a direction issued by DHHS, guests that were deemed a "high risk" were to be granted access to food deliveries to meet their dietary requirements, which meant that security guards were required to collect these deliveries and provide them to guests; and
- h) **23 June 2020:** Following a request from the manager of the Mercure Welcome, Wilson Security agreed that its guards would wipe down lift buttons as they entered and exited lifts.
105. The scope of the duties that Wilson Security was required to perform did change as the program progressed. This was particularly so between 30 March 2020 (when we first deployed to the Crowne Plaza) and mid-April 2020. The changes to the scope of work and duties that Wilson Security was required to perform were, from my perspective, a function of being asked to adapt our practices to some of the practical challenges that became apparent during that period and changes that were made to the operation of the program – for example, to allow some hotel guests an exercise break.
106. in summary, when Wilson Security was first engaged, based on the discussion and written instructions provided to me by Mr Clements on 30 March 2020, I understood that our role was to provide a presence to dissuade guests from leaving their rooms (known in the security industry as an 'observe and report' brief). That practically involved stationing guards at various points on the floors within line of sight of, in particular, key exit routes. Based on those written instructions and my discussions with Acting Inspector McKee (who attended the Pan Pacific Hotel with me on 31 March 2020, any issues in that respect were to be escalated to Victoria Police. However, as I describe above, over time, Victorian

government staff required our guests to conduct things like bag searches, package inspections, outdoor visits and some guest welfare services (such as handling luggage and delivering food).

Question 20

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

107. Wilson Security provided security services for the following periods at the following hotel sites:
- a) **Crowne Plaza Hotel:** 30 March – 17 April
 - b) **Pan Pacific Hotel:** 2 April – 24 April
 - c) **Mercure Hotel:** 5 April – 16 May, and 27 May – 5 July
 - d) **Pullman Hotel:** 28 May – 5 July.
108. Except for some short periods, Wilson Security was generally only servicing two hotel sites at any point in time.

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?

109. Wilson Security engaged a total of approximately 650 guards under subcontracting arrangements, with the total 'peak' numbers as follows:
- a) **Crowne Plaza:** 168 guards;
 - b) **Pan Pacific Hotel:** 180 guards;
 - c) **Mercure Hotel:** 160 guards; and
 - d) **Pullman Hotel:** 145 guards.
110. Overall guard numbers at each hotel was dependant on a number of factors, including:
- a) the specific hotel site. All hotel layouts were different and the staffing numbers varied depending on layout (especially lines of sight) and the number of floors activated for the incoming flights;

- b) the volume of flight passengers arriving at any point in time and being placed at hotels being secured by Wilson Security; and
- c) overall guest numbers as informed by guest departures from the hotel (for example, after the 14-day quarantine period had been served or where guests were transferred out of the hotel which I explain in further detail in question 23 below).

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 guards that Wilson Security engaged (both its own employees and those of its contractors) were required to hold a Victorian security licence in order to be engaged.
112. Wilson Security required that contractors provide it with a spreadsheet containing each security guard's name, mobile phone number, security licence number and expiry date. Wilson Security maintained those records in its online rostering system "Workbuddy".
113. On 26 April 2020, Personal Inform emailed me to request that Wilson Security implement a procedure under which only employees that had a satisfactory Working With Children Check accompany children on outdoor breaks. From that date, Wilson Security also required that its employees confirm whether they held a Working With Children Check. This confirmation was requested at the time guards signed on, so that the site supervisor could allocate relevant security guards to duties.

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.*

114. Wilson Security did engage subcontractors to perform part of the security services that it had

contracted to provide for the Hotel Quarantine Program. This was a factor of it being an immediate short-term engagement, with 48 hours' notice and uncertainty around which hotels Wilson Security would be allocated to and for how long (with only a tight 14-day commitment at any given time, reflective of the period of hotel quarantine that people had to serve). In providing security services under the Hotel Quarantine Program, Wilson Security first contacted contractors with whom it had pre-existing relationships (and specifically, contractors that Wilson Security had worked with previously). It then considered the availability of contractors from firms that had serviced the aviation industry, because guards working in that industry were known to be well-trained and had generally performed to high service standards. It then contacted contractors responsible for providing services to the hospitality industry because Wilson Security considered that customer service skills of those guards would be well-suited for the Hotel Quarantine Program. Wilson Security also understood that guards from both of those industries had been affected by the then recently-imposed COVID-19 restrictions.

115. The firms that Wilson Security subcontracted were:

- a) ICorp Security;
- b) Black Tie Security;
- c) Nu Force Security Group;
- d) AMG Security Services;
- e) Signal 88 Security Australia;
- f) Nexar Group;
- g) Austec Security Services;
- h) The Security Hub;
- i) GMS Staffing; and
- j) CPS.

116. The contractors performed security services on the following dates at the following hotel sites for Wilson Security:

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| | Wilson Security | Icorp | Blacktie | Nuforce | AMG | Signal88 | Nexar | Austec Services | Security Hub | GMS | CPS |
|-------------------|---------------------------------------|---------------------|-----------------|---------------------|---------------------------------------|--------------------|-----------------|-------------------|--------------------|---------------------|---------------------|
| Pan Pacific Hotel | 3 April - 24 April | 16 April - 18 April | | | 11 April - 18 April | 3 April - 19 April | | | 3 April - 24 April | | 11 April - 17 April |
| Crowne Plaza | 30 March - 17 April | | | 30 March - 17 April | | 2 April - 7 April | | 1 April - 6 April | | 30 March - 10 April | |
| Mercure Hotel | 5 April - 16 May & 27 May - 5 July | | | | 5 April - 16 May & 27 May - 5 July | | | | | | |
| Pullman Hotel | 28 May - 5 July | 28 May - 11 June | 28 May - 5 July | 28 May - 5 July | 16 June - 5 July | | 28 May - 5 July | | | | |

117. Under the terms of its contract with each of these contractors, Wilson Security prohibited them to themselves engage in labour hire.

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.

118. Wilson Security provided the same training to all guards working on the Hotel Quarantine Program without delineation between those that it employed and those engaged by contractors, other than in respect of on-boarding training.
119. For security staff working on the Hotel Quarantine Program, Wilson Security provided the same training and supervision between staff it directly engaged and those that were engaged by contractors, other than in respect of on-boarding training. I provide further details on those modules below.
120. All security guards that Wilson Security deployed under the Hotel Quarantine Program also held a valid security licence, which requires the successful completion of a [three] week training course that is conducted in English.

Induction Program

121. Wilson Security requires its employees to undergo The Wilson Security Employee Induction. That induction has the following modules:
- a) Wilson Security's systems;
 - b) The need for compliance with:
 - i) Security standards;
 - ii) Competition and Consumer Law;
 - iii) Health and Safety;
 - iv) Policies and Procedures; and
 - v) The Comcare Scheme.
122. In respect of the staff of contractors , the induction process for the Hotel Quarantine Program was as follows:
- a) **Provision of details:** the contractor was required to provided Wilson Security with each guard's name, mobile phone number, security licence number and expiry date;
 - b) **Recording of details:** Wilson Security allocated each guard a staff identification number in its "Workbuddy" personnel management system;
 - c) **Learning Management System:** Wilson Security's training team used the staff identification number to create a login and profile for each security guard in Wilson Security's Learning Management System (**LMS**);
 - d) **Contractor Induction:** Wilson Security's training team provided each security guard with a link to the Wilson Contractor Induction module (**Contractor Induction**) on the LMS. I exhibit the Contractor Induction behind **Tab 20 to Exhibit GRW-1 [WILS.0001.0008.0001]**. The online induction, which took approximately 20 minutes, covering the following topics:
 - i) A background to Wilson Security's business;
 - ii) Anti-discrimination;
 - iii) Harassment and bullying;
 - iv) Inappropriate conduct;

- v) Sign on / off protocols;
- vi) Presentation expectations;
- vii) Health and safety;
- viii) Duty of care; and
- ix) Customer service.

I note that in light of the limited amount of time that we had to deploy guards, not all contractors completed this induction prior to being deployed. The key training regarding the Hotel Quarantine Program is below.

123. The Induction includes a link to the Wilson Group Code of Conduct. I exhibit the Wilson Group Code of Conduct behind **Tab 21** to **Exhibit GRW-1 [WILS.0001.0009.0001]**.

Hotel Quarantine Program Training

124. In addition to the matters set out above, Wilson Security considered that it was appropriate to provide all security guards (staff and contractors) with training in relation to their specific duties as part of the Hotel Quarantine Program. This included safety-related precautions.
125. Wilson Security prepared and provided all guards providing security services at its hotels a document titled 'Duties / Actions On' which set out the Core Duties and expectations Wilson Security had of the guards. I refer to this document as the **Core Duties Document** and exhibit behind **Tab 22** to **Exhibit GRW-1 [WILS.0001.0003.0096]**. The Core Duties Document was first prepared on or around 7 April 2020. At around that time, Wilson Security also prepared (and provided to guards), an Assignment Instruction explaining various aspects of their role. I exhibit those documents behind **Tab 23** to **Exhibit GRW-1 [WILS.0001.0005.8872] [WILS.0001.0005.8880]**. Until those documents were ready for circulation, the information within them were conveyed by a verbal briefing.
126. The Core Duties Document explained:
- a) the main objective of security guards to observe and report and ensure that quarantined guests remained inside their rooms;
 - b) the requirements to:
 - i) remain at a designated post at all times (when not on a break);
 - ii) note down and record the site supervisor's mobile number at the start of each shift;
 - iii) ensure that guests comply with the quarantine order they have signed;

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- iv) escalate all issues and people exiting their rooms to the site supervisor;
- v) advise guests of the requirement to comply with their quarantine order;
- vi) not physically stop, restrain or touch any person in quarantine;
- vii) maintain social distancing, hand hygiene, and report feeling unwell to the site supervisor.

127. In addition to being provided to all guards, the document was also generally stuck on walls in the hotel in a highly visible location and posted in the security room where briefings were held at the start of each shift. Guards were also made aware of the document as part of a verbal briefing at the beginning of each shift.

128. All security guards were also provided:

- a) **The Wilson COVID-19 Pack:** the Pack, which was created by Wilson Security's Health, Safety and Environment specialist and Risk and Operations specialist with input from Wilson Security's Chief Medical Advisor, Dr Promodh Nathaniel. The Pack set out:
 - i) key information such as:
 - A) Wilson Security's role in the Hotel Quarantine Program;
 - B) Wilson Security's legal obligations under the Hotel Quarantine Program;
 - C) the level of risk associated with the Hotel Quarantine Program;
 - D) PPE that was required;
 - E) incident reporting guidance; and
 - F) Employee Assistance Support details.
 - ii) four 'cheat sheets' on important practical areas:
 - A) Use of PPE;
 - B) Hand Hygiene;
 - C) Social Distancing; and
 - D) Cough Etiquette.

I exhibit versions of the COVID Pack, as at March 2020 behind **Tab 24 to Exhibit GRW-1 [WILS.0001.0003.2137]** and an updated version of the COVID Pack, as at June 2020 behind **Tab 25 to Exhibit GRW-1 [WILS.0001.0005.6913]**.

- b) **Commonwealth Government's Training:** Security guards were also required to complete the Commonwealth Government's infection control training module, together with evidence of completion.

129. During the course of the Hotel Quarantine Program, the Victorian Department of Health and Human Services issued further guidance materials from time to time. Wilson Security trained all personnel on those materials and procedures as they were received. The guidance included:

- a) **Operation Soteria – PPE advice for hotel-based security staff and authorised officers in contact with quarantined clients** (provided to Wilson Security by the Department of Jobs, Precincts and Regions on or around 29 May 2020): Wilson Security understood that this guidance was a minimum standard, and I understood from Wilson Security's National Manager – Corporate Risk that on review, he had identified that Wilson Security's standards were more stringent than those released by the Victorian government. I explain the differences between the policies in my response to question 17 above; and
- b) **Operation Soteria – Exercise and fresh air implementation plan** (a final version of which was provided by the DJPR to Wilson Security on 18 April 2020, although it is dated 15 April 2020).

On-Site Procedures

130. During the first few days of Wilson Security's deployment of guards, the information contained below was conveyed verbally during initial briefings. From about 1 April 2020, Wilson Security provided training to security guards by:

- a) **Site Supervisor and Site Manager training:** Wilson Security required that all site supervisors and Site Managers be trained in procedures relevant to the Hotel Quarantine Program. Site supervisors and Site Managers were appointed to oversee the provision of security services at quarantine hotel sites. The training provided included the matters to emphasise in Toolbox Talks (described below), the circumstances in which PPE should be worn and important techniques for guards to keep in mind when dealing with guests;
- b) **Site Supervisors and/or Site Managers training of security guards:** each site supervisor was then responsible for disseminating the information to and ensuring all security personnel understood it. This was typically done in three ways:
- i) **Toolbox Talk:** personnel would be taken through the content in detail by the site supervisor at the beginning of their shift. Each toolbox talk was typically completed approximately 4 or 5 times to ensure all security personnel at a particular site had completed it. New starters were required to complete the toolbox talk individually (or with other new starters);

- ii) **Daily briefings:** briefings were conducted at the start of each shift in a dedicated security room. In these briefings, staff were reminded of their core duties, including those set out in the Core Duties SOP. Daily briefings and toolbox talks were conducted in a security room, where the Core Duties SOP and Wilson Security COVID-19 Pack were displayed prominently (including by being stuck to the walls);
 - iii) **Ensuring information was readily available:** Wilson Security did not keep many physical copies of the documents on hand because it was aware that those copies could be sources for the spread of COVID-19. However, Wilson Security ensured that the materials were stuck on walls, including in the security room, designated guards' posts and highly visible locations.
 - iv) **Follow up with the team whilst on post:** Wilson Security also checked with guards that they understood their duties and the COVID guidelines. This was often necessary because it was sometimes not possible to conduct a briefing of all guards at the start of a shift (for example, because of briefing rooms not being large enough in which to conduct briefings whilst maintaining social distancing and the need to deploy guards quickly to relieve an outgoing shift).
131. Site supervisors also recorded attendance at each toolbox talk in a spreadsheet containing all personnel names. This allowed the Site supervisors at each hotel to track who had and who had not completed the respective training modules.
132. The "Toolbox Talk Confirmation" spreadsheet for the Pullman Hotel (which was typical of documents kept in respect of the other sites) included information as to whether staff (whether Wilson employees or contractors' employees) had:
- a) Completed a toolbox talk on the Wilson COVID-19 Pack;
 - b) Completed the Federal Government COVID-19 training; and
 - c) Obtained a Working With Children Check.
133. If any Wilson Security employee or contractor worker attended for duty and had not completed any of the above requirements, they would be required to complete the relevant training.
134. [After approximately early May at the Mercure Welcome Hotel], Wilson Security engaged nurses to provide the toolbox talk to security guards. We considered that this would be an effective method through which security guards would be able to get medical and infection control information.
135. In addition, Wilson Security commenced developing a web page in June 2020 through which the information contained in the toolbox talk was available. This was intended to enable guards to review this information on their personal mobile phones while working on a shift. However, this process was

not completed before Wilson Security ceased providing services under the Hotel Quarantine Program.

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?

Parts (a) and (b): Formal lines of communication and who those communications were with

136. Initially my communications were with Ms Currie. On **1 April 2020**, [Personal Inform] emailed me to say that he would be taking over as my main contact. The majority of my communication with the Victorian government after this date was with [Personal Inform]

137. That said, in practice I had regular contact with individuals from DJPR and the DTF.

138. I principally communicated directly with:

- a) Ms Serbest, Mr Clements and [Personal Inform], in respect of some of the matters set out above;
- b) Mr Nolan, in respect of the matters that I describe in my responses to questions [12, 13 14 and 15 above];
- c) Ms Currie, in respect of the matters that I describe in my responses to questions [12, 13, 14 and 15 above]
- d) [REDACTED] (from the DTF) who was responsible for the overarching SPC agreement and therefore matters such as the approval of Wilson Security's rates and the registration of contractors.

139. Other Wilson Security employees (Mr Hogan and [REDACTED]) had regular contact with authorised officers at hotel sites. Those authorised officers were, to our knowledge, the person 'in charge' on site and gave Wilson Security employees directions on matters such as incoming flights and guard numbers, new specific duties, implementation of existing duties (e.g. boundaries for daily exercise walks) and updates to government requirements (such as with regards to PPE). I am not aware of the names of individual authorised officers as I understood that they rotated through various hotel sites,

and I understood that hotels did not have a 'regular' authorised officer. The authorised officer that was onsite generally liaised with Wilson Security's Site Manager or site supervisor. I did not have contact with the authorised officers, but received regular updates from Shaun Hogan about discussions between the authorised officers with Mr Hogan and the Wilson team on site.

140. In practice, the authorised officer (a representative of DHHS) at each hotel site was in charge of a particular site. In the Core Duties Document that I describe above (that I instructed Mr Hogan and [REDACTED] to prepare), Wilson Security made it clear to our security staff (including site supervisors and Site Managers) that the authorised officer "*controls the building*".
141. It was my understanding that authorised officers were from both DHHS and other government departments. Over the course of our involvement in the Hotel Quarantine Program, Wilson Security dealt with a large number of different authorised officers. Particularly in the first few weeks of the Hotel Quarantine Program, there was a wide degree of variation in how different authorised officers implemented arrangements or requested that Wilson Security undertake duties that differed from our understanding of our original engagement, as changes were made to the program. At times, authorised officers made requests of Wilson Security guards that Wilson Security considered were beyond those guards' legal authority, or had the potential to put the guards at additional risk.
142. Generally, when such matters arose, in practice the process that Wilson Security followed was that:
- a) **Escalation to National Manager – Corporate Risk:** a Wilson Site supervisor and/or Site Manager would raise the matter with the National Manager – Corporate Risk (Mr Hogan), who would advise the Site supervisor on how to respond;
 - b) **Escalation to me:** in circumstances where the National Manager – Corporate Risk considered that a matter could not be satisfactorily resolved or may have broader implications, he raised the matter with me and Wilson Security's General Manager of Specialist Security ([REDACTED]). I initially tried to work with the National Manager – Corporate Risk and the General Manager of Specialist Security to determine whether a workaround solution could be reached. If such a solution could not be reached, I then liaised with representatives of the DJPR; and
 - c) **Discussion with DJPR:** I generally communicated with [REDACTED] Personal Infor, Mr Clements or Ms Serbest at the DJPR and raised matters that I felt needed a resolution. At times they conveyed that they needed to escalate the matter at their end, but then reverted and we agreed on the approach.

Parts (c) and (d): Issues and when/how often I made contact with DJPR

143. The type of matters that I contacted the DJPR about generally involved issues where we considered that Wilson Security guards were being asked to do something that was beyond their legal authorities, where security guards' safety was at risk or where there was an underlying 'relationship' issue that I felt needed to be resolved.

144. By way of example, two of the matters that I discussed with [Personal Infor] and Mr Clements were:

- a) **Bag checks and packages:** I became aware that on around 4 April an authorised officer at the Pan Pacific Hotel requested that Wilson Security conduct a search of guests' bags and incoming packages. I emailed [Personal Infor] and Mr Clements to say that it was my understanding that security guards did not have the legal authority to open and inspect peoples' bags. I was also concerned about the infection control risk of security guards inspecting bags and packages of guests that were potentially infectious with COVID-19. In discussion with [Personal Inform] and Mr Clements, we agreed that security guards would conduct searches of bags where guests voluntarily opened their own bags for security guards to inspect, and guests moved around items in those bags. This check is known colloquially in the security industry as a 'footy bag check'. I also noted that security guards would wear PPE while conducting such checks. I exhibit my correspondence and [Personal Informa] response to my email behind **Tab 26 to Exhibit GRW-1 [WILS.0001.0005.3926]**. I also relayed the outcome of my discussions to the National Manager – Corporate Risk via email and I include this behind **Tab 27 to Exhibit GRW-1 [WILS.0001.0005.7734]**.
- b) **Exercise breaks:** I became aware that on around 6 April 2020, DHHS had requested one of its authorised officers at the Pan Pacific Hotel to implement a trial program under which guests would be allowed a 15-minute exercise break, under the supervision of security guards. I explained to Ms Serbest (and copied to [Personal Infor]) on **Monday, 6 April 2020 at 1:05pm** that I had concerns regarding *"enforcing the quarantine conditions and the risk of cross-contamination in the hotel; legal powers around custody of persons if entrusted to security officers; contingency plans if someone was to abscond when outdoors, opportunities to collect contraband from friends, interaction with families and friends etc."*

I did not immediately receive a response to my email.

On **Wednesday, 8 April 2020 at 1:05pm**, I again emailed Ms Serbest and [Personal Infor] about this issue because an authorised officer had directed Wilson Security's onsite manager to accompany guests on an exercise break and noted that guards would receive a \$20,000 fine for non-compliance, despite Wilson Security's manager advising that they had *"sought advice and hadn't been cleared for this duty yet"*. As a result, the onsite manager complied with the authorised officer's direction. [Personal Infor] responded to me shortly after that Wilson Security's concerns had been escalated, and that [Personal Infor] would *"keep [me] posted"*.

My email exchange with Ms Serbest and [Personal Infor] is at **Tab 28 of Exhibit GRW-1 [WILS.0001.0005.3930]**.

Following this, [Personal Infor] advised me on **Saturday, 18 April 2020 at 9:49am** that the DJPR had developed an implementation plan for the delivery of exercise to guests. I exhibit that email and its attachment behind **Tab 29 of Exhibit GRW-1 [WILS.0001.0005.3939]**

[WILS.0001.0005.3940] For completeness, I note that the policy was later changed in June 2020 to only permit exercise breaks in circumstances where guests had been identified by medical professionals as requiring it for mental health reasons.

Question 26

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

Engagement of an independent medical expert

145. At the start of the COVID-19 pandemic on around 21 February 2020, Wilson Security had appointed an independent medical professional, Dr Pramodh Nathaniel as its Chief Medical Advisor. Dr Pramodh was appointed as the Chief Medical Advisor in accordance with a Pandemic Response Plan that the Wilson Group had implemented in around 2009. Dr Pramodh also provided advice to Wilson Security's Crisis Management Team on infection control measures relevant to COVID-19. As part of that role, Dr Pramodh provided advice to Wilson Security on how its existing policies could be adopted for the COVID-19 pandemic.
146. Dr Pramodh has expertise in epidemiology and had been involved in assisting a number of organisations develop protocols for COVID-19 screening and readiness.
147. Between 21 February and 28 March 2020, Dr Pramodh provided advice on matters such as the implications and containment strategies of COVID-19 in light of it being spread by aerosol, reviewing existing health-related response plans to identify on potential 'gaps' and how they might be addressed, briefing Wilson stakeholders and executives and acting as a 'sounding board' to ensure that the Wilson Group's policies and procedures remained 'best practice' and at a high standard.
148. Dr Pramodh was involved in specific planning around the Hotel Quarantine Program, the development and implementation of policies and procedures, and discrete advice on particular issues (for example, the health impacts of COVID-19 on individuals with particular health conditions and temperature testing for security workers).
149. Dr Pramodh provided advice and was involved in preparing policies and risk assessments about the following:
- a) PPE, including about the appropriate PPE to be worn, the importance of PPE relative to other control measures, cross-contamination minimisation and effectiveness;
 - b) Temperature testing of security personnel and the requirement for security personnel to

complete daily health declarations to ensure their fitness for duty;

- c) The specific management of a quarantine guest who was prone to sleepwalking;
- d) Exercise / fresh air walks; and
- e) Incoming deliveries (parcel and food deliveries such as Uber Eats).

150. Wilson Security's Health, Safety and Environment team were responsible for raising matters with Dr Pramodh, receiving Dr Pramodh's advice and ensuring that Wilson Security's policies and procedures (including for the Hotel Quarantine Program) reflected that advice. Dr Pramodh also provided advice on matters such as hygiene, infection control and any individual circumstances that arose as part of the Hotel Quarantine Program. One example of the latter was a female guest advising an authorised officer that she had a tendency to sleepwalk and if she were to, that she should be guided back to her room. Wilson Security sought advice on the infection control risks regarding this from Dr Pramodh.

The Provision of PPE

151. Wilson Security adopted policies for the deployment of PPE in light of the expert medical advice that it obtained. I set out Wilson Security's policies on PPE below:

- a) **31 March 2020:** as I explain above, when Wilson Security was engaged to provide security services as part of the Hotel Quarantine Program, it sought advice from Dr Pramodh as to the need for security guards to wear PPE. Dr Pramodh advised that while Wilson Security should have access to PPE, *"the recommendation for the presence of PPE is more so for a standby need rather than a mandatory requirement during the shift. I presume the use of disposable gloves is a requirement regardless."* Dr Pramodh's advice was on the basis that symptomatic travellers and travellers diagnosed with COVID-19 would not be staying at hotels secured by Wilson Security. I include an email chain containing Dr Pramodh's advice and my clarification of the position regarding PPE behind **Tab 30 of Exhibit GRW-1 [WILS.0001.0001.4257]**.

Wilson Security implemented a policy in accordance with which all guards would be supplied with gloves, facemasks and protective eyewear. Guards were required to wear gloves and facemasks at all times, other than in certain designated 'green zones'. In addition, security guards were provided with protective eyewear which they could choose to wear at their discretion, but may be required to wear this when coming into contact with guests.

In light of Dr Pramodh's advice, Wilson Security ordered additional stocks of facemasks, eye goggles and gloves to provide to all security guards. Wilson Security also tried to source further stocks of masks to have on hand, if required. I also recall that on a call with Ms Currie on 30 March 2020 and [REDACTED] (General Manager – Specialist Security), I noted that Wilson Security was relying on the Victorian government to support Wilson Security's potential PPE needs, but that in the interim, Wilson Security would source and provide PPE to its guards;

-
- b) **10 April 2020:** as a result of feedback received from Personal Inform that management at the Pan Pacific hotel had noted that *"I am not sure if [the security guards] were supposed to wear PPE at all times, if yes then that is not being followed"*, I noted *"If the instruction is to wear masks all the time we can enforce that if that is the direction."* Personal Infor responded that he would *"get back to [me] with advice on masks and breaks."* I exhibit that email chain behind **Tab 31 to Exhibit GRW-1 [WILS.0001.0005.3934]**.

Supply of PPE

152. Wilson Security maintained a supply of PPE for all of its guards and personnel on site, including :
- a) face masks;
 - b) hand sanitiser;
 - c) nitrile gloves;
 - d) safety goggles; and
 - e) surgical gowns.
153. Wilson Security provided more than 30,000 masks, 81,000 pairs of gloves and 150 litres of hand sanitiser to security guards.
154. Notwithstanding my initial concerns that Wilson Security may not have sufficient PPE, staff in my team were able to find supply lines to ensure that levels of PPE were sustained throughout the period Wilson Security provided the security services.
155. In respect of the face masks, hand sanitiser and nitrile gloves, Wilson obtained an Australian Register of Therapeutic Goods Certificate from the Commonwealth Department of Health authorising the supply of that PPE.
156. Wilson separately submitted the hand sanitiser for "time kill analysis" by an independent medical laboratory. The results of that analysis showed that the hand sanitiser "achieved 5 log reduction as per reference standard EN1276" and was efficient in killing 99.99% of the bacteria tested.
157. Wilson Security sourced the above PPE from:
- a) Frontline Innovations (an Australian hospital-grade medical supplies provider and a subsidiary of Wilson Medic One who is a health services provider within the Wilson Group); and
 - b) for the safety goggles only, RSEA (an Australian PPE, workwear, safety equipment and safety gear provider).

158. Medical gowns were provided by DHHS. These were provided in the event that security personnel had reason to enter a hotel quarantine guest's room. This did not eventuate, so the gowns were not used.
159. I (and Wilson Security) considered these arrangements to be satisfactory. To our knowledge, there were no cases of COVID-19 for any of our people working on the program (employees or contractors).

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?*

160. Given the nature of the assignment and that guests who were to be placed in hotel quarantine posed the "highest risks of infection" and were the "biggest contributors to the spread of COVID-19 throughout Victoria", Wilson Security was concerned to ensure the safety of our security staff at the hotels. I explain the measures we took to manage those concerns below.
161. On learning about the proposed engagement on 29 March 2020, I was aware that unless precautions were taken, our security guards may be at risk of contracting COVID-19 because of their proximity to returned travellers.
162. When I first corresponded with Ms Currie, I noted to her that Wilson Security would *"like to understand the scope of work and duties required so we can make an informed assessment about staff selection, specialist requirements and a thorough risk assessment and provision of PPE."*
163. These issues were also raised by other members of the Wilson Security management team in our initial discussions.
164. I initially satisfied myself that these concerns could be managed because:
- a) **Wilson Security role:** Wilson Security staff were initially to have very limited contact with hotel quarantine guests and had a 'hands off' role – with contact limited to directing guests to their rooms. As I note in my response to question 19 above, that position changed and Wilson Security was required to take further steps to ensure the safety of security guards;
 - b) **PPE and medical advice:** as I explain in my response to question 26 and 29 below, Wilson

Security sought and obtained medical advice on how best to manage the safety of its guards (including those, for example that had asthma or other respiratory conditions) and what PPE was required;

- c) **Policies:** Wilson Security developed policies and procedures to ensure that the transmission of COVID-19 was minimised, including through:
- i) **Guidance on PPE:** providing advice on social distancing, the use of hand sanitiser, nitrile gloves and when goggles and masks should be used. Wilson Security maintained a more stringent policy than that implemented by the Victorian government, as indicated in the email chain that I exhibit behind **Tab 32 of Exhibit GRW-1 [WILS.0001.0005.1582].;**
 - ii) **Cross-contamination risks:** early in our engagement in the Hotel Quarantine Program, Wilson Security became aware that some security guards were working across a number of hotels and that this increased the risk of transmission of COVID-19. In order to manage that risk, Wilson Security did not roster guards to more than one hotel quarantine site. In addition, all guards were required to complete a declaration at the start of each shift where they advised of a number of matters, including whether they had worked in other hotels. Guards that had done so were not permitted to commence their shifts, and were replaced immediately;
 - iii) **Food policy:** Wilson Security identified that there was a potential risk for community transmission of COVID-19 if large groups of security guards visited restaurants during their food breaks. As a result, Wilson Security arranged for meals to be provided for security guards, through the food and beverage departments of hotels, where possible; and
 - iv) **Temperature checking policy:** as I discuss in my response to question 30 below, in light of the increased transmission risk of COVID-19 among security guards, on around 5 April 2020 Wilson Security adopted a policy of checking the temperature of all security guards to ensure that they did not have a fever (which Wilson Security's medical advice indicated was a symptom of COVID-19).
- d) **Site supervisors:** Wilson Security deployed site supervisors to oversee compliance with its policies and procedures.

165. As I explain in my response to question 19 above, there were points in time when Wilson Security's role changed as a consequence of which I re-assessed the above, and in particular:

- a) **Exercise breaks:** as I explain in my response to question 25 above, security guards were requested to accompany quarantine guests on exercise breaks. I raised my concerns with representatives of the Victorian government, who prepared a policy for Wilson Security to

follow. Wilson Security also implemented guidelines on physical distancing and the use of PPE in respect of guards accompanying guests on exercise breaks; and

- b) **Handling of luggage and packages:** in early April, Wilson Security guards were also asked to assist with the handling of guests' luggage, as well as searching bags. After discussion with DJPR, it was agreed that Wilson Security would only conduct a visual inspection of guests' bags (and not touch them) and in addition, would only assist with loading and unloading when required and on those occasions with adequate PPE.

166. At each point, I (and other employees of Wilson Security) ensured that policies were implemented, or guidance received, to ensure that the risk of COVID-19 transmission was minimised.

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 provide details of –

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

(b) the nature of the unsatisfactory behaviour concerned.

167. Wilson Security did take action against certain security personnel that were engaged at its hotel sites.
168. I have included the details that Wilson Security has been able to compile in the time available at **Confidential Annexure A**. I relied on Wilson Security staff to compile the information contained in Confidential Annexure A. This information has been compiled from Wilson Security's Formstack database that amongst other matters, was used to record incidents that occurred at hotel sites involving Wilson Security guards. I have also reviewed the annexure to ensure that it records incidents that I recall being advised during the Hotel Quarantine Project.

Question 29

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

169. I have included my response to this question as part of my response to question 24 above.

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?

Requirement for temperature testing arrangements

170. On or around 26 March 2020 (prior to the DJPR's request for Wilson Security's services), [REDACTED] had contacted Dr Pramodh in relation to requests from a number of Wilson Security's clients that its employees conduct temperature testing of visitors to client sites. Dr Pramodh gave Wilson Security advice on the merits of temperature testing. I exhibit this advice behind **Tab 33 to Exhibit GRW-1 [WILS.0001.0001.4245]**.
171. By late March 2020, Wilson Security had developed draft procedures for temperature checking at clients' sites. I exhibit these at **Tab 34 to Exhibit GRW-1 [WILS.0001.0001.1308] [WILS.0001.0001.1316]**.
172. On or around 31 March 2020, [REDACTED] again contacted Dr Pramodh to discuss the particular requirements of the Hotel Quarantine Program, with particular reference to the draft guidelines that Wilson Security had developed. Dr Pramodh advised that the draft guidelines were acceptable, provided Wilson Security was not making any medical judgments of its own, and clients had a process to support Wilson Security with onsite medical professionals. I exhibit that correspondence behind **Tab 35 to Exhibit GRW-1 [WILS.0001.0001.1846]**.
173. From 5 April 2020, Wilson Security implemented the requirement that each of its employees and contractors' employees had their temperature tested prior to entering a hotel site to commence each shift.
174. Wilson Security was asked to share (and did share) information with the Victorian government about its temperature testing arrangements including information about the instruments used and training provided to staff.
175. From 24 June 2020, the Victorian government confirmed that it was mandating temperature checks at all hotel sites.

Temperature testing arrangements

176. Each hotel site had a designated temperature testing area.
177. Wilson Security implemented and maintained Temperature Screening Guidelines to manage the

temperature testing process. The Temperature Screening Guidelines are exhibited behind **Tab 36 to Exhibit GRW-1 [WILS.0001.0006.1300] [WILS.0001.0006.1308]** In summary, these guidelines required:

178. Any worker who returned a temperature reading of 37.4 degrees Celsius or below was permitted to enter the site. This threshold was determined on the basis of medical advice provided by Wilson's Chief Medical Advisor, having regard to Government guidelines.
- a) Any worker who returned a temperature reading greater than 37.4 degrees Celsius was not permitted to enter the site. I understand that no worker returned a reading greater than 37.4 degrees while these arrangements were in place.
 - b) If workers had returned a temperature of greater than 37.4 degrees, Wilson's Temperature Checking Policy provided that the worker would be issued a face mask and directed to a designated self-isolation area where they would be required to answer further questions contained in the Wilson Group COVID-19 Declaration Form. Those questions were:
 - i) If the worker answered "yes" to any of the three questions, they were immediately sent home. Such a worker was required to seek further medical advice clearing them as safe to return to work before re-attending.
 - ii) If the worker answered "no" to all three questions, they would be given a secondary temperature test 15 minutes later to determine whether their temperature was 37.4 degrees Celsius or below.
 - iii) If the worker returned a secondary reading of 37.4 degrees Celsius or below, they were permitted to enter the site.
 - iv) If the worker returned a secondary reading above 37.4 degrees Celsius, they were prohibited from entering the site and were required seek further medical advice clearing them as safe to return to work before re-attending.
179. Temperature testing was initially conducted by the site supervisor using devices Wilson Security had sourced for this purpose. From 24 June 2020, the checks were conducted by DHHS nurses.

Declaration of Fitness

180. From around 7 April 2020, Wilson Security required each worker to complete a Declaration of Fitness Form prior to commencing any shift. This form is exhibited behind **Tab 37 to Exhibit GRW-1 [WILS.00001.0005.2203]**. This was implemented to improve the rigour around the on the ground process after our learnings from the first week of the program and formed part of our prevention strategy for preventing cross-contamination. When concerns were raised about the outbreak amongst security officers at Rydges and Stamford, we introduced into the form a question around whether

workers had been at another hotel in the prior 14 days.

181. This was an electronic form created by Wilson Security using our "Formstack" software. Through Formstack, Wilson Security was able to modify the form and include questions / response fields as it so desired. I exhibit an example of such a change at **Tab 38 to Exhibit GRW-1 [WILS.0001.0001.8914]**.

182. Initially, those questions / response fields were:

- a) Security company;
- b) Security Guard Licence number;
- c) Security Guard's name;
- d) Site;
- e) Do you have an existing respiratory condition (such as asthma?);
- f) Do you have a fever?;
- g) Do you have a cough?;
- h) Are you lethargic?;
- i) Do you have any difficulty breathing or shortness of breath?;
- j) Do you declare you are fit to work?;
- k) Name of person completing form?; and
- l) Date/Time.

183. On or around 24 June 2020, the following further question was added:

"Have you worked at any other quarantine hotel in the last 14 days?"

184. I exhibit this form behind **Tab 39 to Exhibit GRW-1 [WILS.0001.0005.8483]**.

185. Site supervisors accessed the template forms on an iPad. The site supervisor asked each worker the questions on the form and recorded them. This process was implemented to eliminate the need to share the iPad and minimise any risk of transmission.

186. Any worker who answered "yes" to any of the questions at (e) to (i) above, or "no" to (j), was required to leave the site and seek further medical advice clearing them as safe to return to work before re-attending.

187. Wilson Security configured the Formstack software in such a way that Supervisors and other Managers of the Hotel Quarantine Program (such as the National Manager – Corporate Risk) would automatically receive an email containing the completed form, if the worker had answered those questions as described in the previous paragraph. This ensured that no worker who had answered in this way would be rostered for a further shift unless and until they obtained medical clearance.
188. The National Manager – Corporate Risk and the on-site management team monitored any flags that were raised for the duration of Wilson Security's involvement in the Hotel Quarantine Program.
189. The Declaration of Fitness process commenced from around 7 April to include rigour around the informal processes that Wilson Security had employed, to ensure that guards arriving at work did not have symptoms of COVID-19. When concerns were raised about COVID-19 infections at other hotels, Wilson Security added additional questions to ensure that Wilson Security's guards had not worked at other 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?

190. No. Wilson Security is not aware of any of its employees or contractors having contracted COVID-19 in the course of the Hotel Quarantine Program.
191. Additionally, Wilson Security is not aware of any of its employees or contractors on the Hotel Quarantine Program having otherwise contracted COVID-19 during the time of the program and requiring them to not attend for work.

Board of Inquiry into the COVID-19 Hotel Quarantine Program
Witness Statement of Gregory Robert Watson

Question 32

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

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

Signed:




Date:

2 September 2020

CONFIDENTIAL ANNEXURE A

| Name | Approximate Date | Nature of behaviour | Action taken |
|------------|------------------|---|--|
| [REDACTED] | 5 April 2020 | Guard left his post and was argumentative. Wilson Security considered that he did not meet the criteria or standards that Wilson Security considered was required. | Individual ceased work across all Wilson Security operations, effective as of 5 April 2020. |
| [REDACTED] | 5 April 2020 | Guard left his post and was argumentative. Wilson Security considered that he did not meet the criteria or standards that Wilson Security considered was required. | Individual ceased work across all Wilson Security operations, effective as of 5 April 2020. |
| [REDACTED] | 6 April 2020 | Wilson Security considered that this contractor's guards were generally of poor quality, had poor presentation and were not punctual. | Wilson Security ceased subcontracting to [REDACTED] at Crowne Plaza Hotel. |
| [REDACTED] | 8 April 2020 | Security guard did not intervene when a hotel guest was verbally abusive towards a nurse. Security guard did not report this occurrence. | Individual removed from site. Individual ceased work across all Wilson Security operations, effective as of 9 April 2020. |
| [REDACTED] | 8 April 2020 | Security guard did not intervene when a hotel guest was verbally abusive towards a nurse. Security guard did not report this occurrence. | Individual removed from site. Individual ceased work across all Wilson Security operations, effective as of 9 April 2020. |
| [REDACTED] | 10 April 2020 | Security guard was found sleeping at his post. | Individual removed from site. |
| [REDACTED] | 11 April 2020 | Security guard made inappropriate advances towards a hotel guest. | Initially, the individual was moved to a different level during the shift. |

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| Name | Approximate Date | Nature of behaviour | Action taken |
|---|------------------|--|--|
| | | | The individual was later questioned by management and ceased work across all Wilson Security operations, with effect from effective 12 April 2020. |
|  | 13 April 2020 | Wilson Security considered this supervisor's attention to detail was lacking. | Individual removed from supervisory role at the Pan Pacific, effective as of 13 April 2020. Individual completed their deployment as a security officer at the Pan Pacific. |
|  | 13 April 2020 | Security guard was found sleeping, refused to wear PPE and was constantly on his phone. | Individual removed from site. Individual ceased work across all Wilson Security operations, effective as of 13 April 2020. |
|  | 13 April 2020 | Complaints received that supervisor was rude, abrupt and aggressive towards other guards. | Individual spoken to by management. Individual not rostered in a supervisory role effective as of 14 April 2020. |
|  | 14 April 2020 | Security Guard made inappropriate advances towards a hotel guest. | Individual removed from site. Individual ceased work across all Wilson Security operations, effective as of 14 April 2020. |
|  | 14 April 2020 | Repeated mobile phone use, sleeping and inattention during shift and failure to follow instructions. | Individual warned by supervisor repeatedly throughout the shift. Individual ceased work across all Wilson Security operations, effective as of 14 April 2020. |
|  | 14 April 2020 | Repeated mobile phone use, inattention during shift and failure to follow instructions. | Individual warned by supervisor repeatedly throughout the shift. Individual ceased work across all Wilson Security operations, effective as of 14 April 2020. |

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| Name | Approximate Date | Nature of behaviour | Action taken |
|------------|------------------|---|---|
| [REDACTED] | 15 April 2020 | Late to shift, argumentative, abandoned his post and would not answer his phone | Individual ceased work at the Pan Pacific effective as of 16 April 2020. |
| [REDACTED] | 22 June 2020 | Security guard was found sleeping. | Individual ceased work across all Wilson Security operations, effective as of 22 June 2020. |
| [REDACTED] | 4 April 2020 | Security guard was found sleeping at his post. | Individual removed from site. Individual ceased work across all Wilson Security operations, effective as of 5 April 2020. |
| [REDACTED] | 5 April 2020 | Security guard was listening to music from his phone with headphones, and was singing along. This was reported as loud. | Individual spoken to by supervisor and reprimanded on 5 April 2020. |
| [REDACTED] | 30 June 2020 | Security guard wearing sneakers that were not appropriate footwear under the uniform instructions. | Individual removed from site. |
| Unknown | 8 April 2020 | Security guard argumentative and unwell. | Individual ceased work across all Wilson Security operations |
| [REDACTED] | 13 April 2020 | Wilson Security became aware that a security guard had been stood down by a previous provider for failing to fulfil his duties and returned to the site under a different provider. | Individual removed from site. Individual ceased work at Pan Pacific, effective as of 13 April 2020. |
| [REDACTED] | 14 April 2020 | Security guard had earphones on and was watching YouTube videos. | Individual spoken to by supervisor. |
| [REDACTED] | 14 April 2020 | Security guard was using two chairs: one to sit on and the other to rest his legs. | Individual spoken to by supervisor and required to remove the second chair. |
| [REDACTED] | 18 April 2020 | Security guard was found sleeping at his post with mobile in hand. | Individual removed from site. |