

Appendices

Appendix A

List of Abbreviations

| Acronym | Meaning |
|-----------------------|-----------------------------------------------------------------------------------------------|
| ABF | Australia Border Force |
| AC | Assistant Commissioner |
| Action Plan | Victorian Action Plan for Influenza Pandemic 2015 |
| ADF | Australian Defence Force |
| AFP | Australian Federal Police |
| AHMPPPI | The Commonwealth Government's Australian Health Management Plan for Pandemic Influenza |
| AHPPC | Australian Health Protection Principal Committee |
| AHS | AHS Hospitality Pty Ltd |
| AMC | AMC Commercial Cleaning |
| AO | Authorised Officer |
| ARTG | Australian Register of Therapeutic Goods |
| AV | Ambulance Victoria |
| CBD | Central Business District |
| CCC | Crisis Council of Cabinet |
| CCOM Guidelines | COVID-19 Case and Contact Management Guidelines for Health Services and General Practitioners |
| CCOMT | Case, Contact and Outbreak Management Team |
| CCP | Chief Commissioner of Police, State of Victoria |
| CDNA | Communicable Diseases Network Australia |
| CEA program | COVID-19 Emergency Accommodation program |
| CHO | Chief Health Officer, State of Victoria |
| Cleaning Protocol | Cleaning and disinfecting to reduce COVID-19 transmission, Tips for non-healthcare settings |
| COAG | Council of Australian Governments |
| COMDISPLAN | Australian Government Disaster Response Plan |
| COVID-19 PHC Division | COVID-19 Public Health Command Division |
| CPSU | CPSU (Community & Public Sector Union) |
| DCHO | Deputy Chief Health Officer, State of Victoria |
| DELWP | Department of Environment, Land, Water and Planning |
| DFAT | Department of Foreign Affairs and Trade |
| DHHS | Department of Health and Human Services |
| DJCS | Department of Justice and Community Safety |

| Acronym | Meaning |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| DJPR | Department of Jobs, Precincts and Regions |
| DoT | Department of Transport |
| DPC | Department of Premier and Cabinet |
| DPHC | Deputy Public Health Commander |
| DPHC CCOM | Deputy Public Health Commander — Case, Contact and Outbreak Management |
| DPHC — Planning | Also known as DPHC, Strategy and Implementation |
| DPHC, Strategy and Implementation | Also known as DPHC — Planning |
| DSC — H | Deputy State Controller — Health |
| DTF | Department of Treasury and Finance |
| EM | Emergency Management |
| EM Act | <i>Emergency Management Act 2013 (Vic)</i> |
| EMC | Emergency Management Commissioner |
| EMLO | Emergency Management Liaison Officer |
| EMMV | Emergency Management Manual Victoria |
| EOC | Emergency Operations Centre |
| ERC | Expenditure Review Committee |
| GP | General Practitioner |
| Head Contracts | Contracts with security service providers Wilson, MSS and Unified |
| HCW | Healthcare worker |
| HPB | Health Protection Branch |
| HQP | Hotel Quarantine Program |
| IKON | IKON Services Australia Pty Ltd |
| IMT | Incident Management Team |
| IPA | Infection Prevention Australia |
| IPC | Infection Prevention and Control |
| IPC Consultant | Infection Prevention and Control Consultant |
| IPC Cell | Infection Prevention and Control Cell |
| MCC | Mission Coordination Committee |
| MDU PHL | Microbiological Diagnostic Unit Public Health Laboratory |
| MERS/MERS COV | Middle East respiratory syndrome caused by COVID-19 |
| MSS | MSS Security Pty Ltd |
| MSS Contract | Purchase Order Contract between the Department of Jobs, Precincts and Regions and MSS Security Pty Ltd entered into on 23 April 2020 |
| NCM | National Coordination Mechanism |
| OMP | Outbreak Management Plan |
| OMT | Outbreak Management Team |
| PH | Public Health |
| PHC | Public Health Commander |

| Acronym | Meaning |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| PH — IMT | Public Health — Incident Management Team |
| PHT | Public Health Team |
| PHW Act | <i>Public Health and Wellbeing Act 2008 (Vic)</i> |
| POC | Purchase Order Contract |
| PPE | Personal Protective Equipment |
| RFT | Request for Tender |
| RSO | Residential Support Officer |
| SARS-CoV-2 | Severe Acute Respiratory Syndrome Coronavirus 2 |
| SCC | State Control Centre |
| SC — H | State Controller — Health |
| SCM | State Consequence Manager |
| SCV | Safer Care Victoria |
| Self-isolation Directions | Self-Quarantine following Overseas Travel Direction/Airport Arrivals Direction |
| SEMC | State Emergency Management Centre |
| SERP | State Emergency Response Plan |
| SH — IMT | State Health Incident Management Team |
| SHEMC | State Health Emergency Management Coordinator |
| SHERP | State Health Emergency Response Plan |
| Sterling | Sterling Security Group |
| TGA | Therapeutic Goods Administration |
| The Charter / Charter | <i>Charter of Human Rights and Responsibilities 2006 (Vic)</i> |
| Trades Hall | Victorian Trades Hall Council |
| Unified | Unified Security Group (Australia) Pty Ltd |
| Unified Contract | Purchase Order Contract between the Department of Jobs, Precincts and Regions and Unified Security Group (Australia) Pty Ltd entered into on 9 April 2020 |
| URM | United Risk Management |
| VicPol | Victoria Police |
| Victoria Pandemic Plan | Victorian Health Management Plan for Pandemic Influenza 2014 |
| VSB | Victorian Secretaries Board |
| WHO | World Health Organization |
| Wilson | Wilson Security Pty Ltd |
| Wilson Contract | Purchase Order Contract between the Department of Jobs, Precincts and Regions and Wilson Security Pty Ltd entered into on 6 May 2020 |

Appendix B

Glossary

| Term | Meaning |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Action Plan | Victorian Action Plan for Influenza Pandemic 2015 |
| Airport Arrivals Direction | Direction issued 18 March 2020 outlining that all international travellers arriving at an airport in Victoria between 5.00pm on 18 March 2020 and midnight on 13 April 2020 must travel from the airport to a premises that is suitable for the person to reside in for a period of 14 days |
| Antigens | Molecules capable of stimulating an immune response |
| Asymptomatic | Someone who does not develop symptoms throughout the course of their disease |
| Authorised Officer | A person appointed under the <i>Public Health and Wellbeing Act 2008</i> (Vic) with power to enforce compliance with Detention Directions |
| Cases | Individuals who test positive to COVID-19 |
| Charter | <i>Charter of Human Rights and Responsibilities Act 2006</i> (Vic) |
| Commonwealth Pandemic Plan | The Commonwealth Government's Australian Health Management Plan for Pandemic Influenza |
| Community transmission | Where a person is infected by the virus but they have not been overseas recently or been in recent contact with other confirmed cases |
| Contacts | Individuals who may have been exposed to COVID-19 |
| Contact tracing | The identification, assessment and management of people who potentially have been exposed to disease (and so at higher risk of developing and spreading it) and working with them to interrupt the spread of the disease |
| Control agency | Agency with overall responsibility for all activities undertaken in response to an emergency |
| COVID-19 | The coronavirus disease 2019 caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) strain of coronavirus |
| Crisis Council of Cabinet | The core decision making forum for the Victorian Government on all matters related to the coronavirus emergency, including implementing the outcomes of the National Cabinet. |
| Direction and Direction Notice | A direction issued by the Chief Health Officer or their delegate under the <i>Public Health and Wellbeing Act 2008</i> (Vic) mandating an individual into quarantine |
| Epidemiology | The study of the patterns and determinants of disease in specific populations |
| Facility-based model | A quarantine model for returning international arrivals that primarily takes place in a managed facility, such as a hotel or similar facility |
| Fogging | The use of chlorine-based chemical (that is, bleach) to fog the rooms |
| Fomites | Surfaces or objects (including hands) that may become contaminated and serve as an intermediary vehicle for transmission |
| Genome | An organism's complete set of genes or genetic material, comprising DNA or RNA |
| Genomic sequencing | A process by which the whole genetic signature of a pathogen is recovered |
| Genomic cluster | A group of samples with a condition or disease that have some similarity, suggesting that the condition or disease was acquired from one another or has a common source or common cause |
| Global Victoria | An agency within DJPR which focuses on trade facilitation. The CEO of Global Victoria is Ms Gönül Serbest |
| Green zone | A designated 'clean' area in a quarantine facility where no PPE is to be worn |

| Term | Meaning |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Head Contracts | Contracts with security service providers (Wilson, MSS and Unified) |
| Home-based model | A quarantine model for returning international arrivals that primarily takes place in the home |
| Home Quarantine Direction | Direction to be made under the proposed Home Quarantine Model as outlined in Section 2 of the Interim Report |
| Home Quarantine Model | The proposed home-based model as outlined in Section 2 of the Interim Report. |
| Hot hotel | Certain premises that were used exclusively to accommodate returned travellers who had tested positive to COVID-19 |
| Hotel Quarantine Program | The original Victorian Hotel Quarantine Program which ran from 29 March to 30 June 2020 and is the subject of this Inquiry |
| Incubation period | The time between being exposed to a disease and the onset of symptoms |
| Infection prevention and control | A scientific and risk management approach designed to prevent harm caused by infection to patients and health workers |
| Infectious period | The length of time an individual can transmit COVID-19 |
| International arrivals | People who may visit Victoria and be required to quarantine under the new Quarantine Program |
| Interim Report | COVID-19 Hotel Quarantine Inquiry Interim Report and Recommendations (6 November 2020) |
| Isolate / quarantine | <p>The terms 'isolate' and 'quarantine' are given distinct and separate meanings on DHHS' website: https://www.dhhs.vic.gov.au/self-quarantine-coronavirus-covid-19#when-do-i-isolate</p> <p>The term 'isolate' is used to describe the process of separating people with COVID-19 from people who do not have the virus.</p> <p>The term 'quarantine' is used describe the process of separating and restricting the movement of people who have been or may have been exposed to COVID-19.</p> <p>Notwithstanding this distinction, the terms 'isolate' and 'quarantine' were often used interchangeably throughout the evidence to this Inquiry. In this report, where witness evidence containing the terms 'isolate' or 'quarantine' is quoted or otherwise referred to, the terminology adopted by that witness is used. In all other contexts, the report adopts the distinction outlined above, and uses the terms 'isolate' and 'quarantine' accordingly</p> |
| Issues Paper | Victoria's Private Security Industry — Issues Paper for Consultation |
| June Cleaning Advice | Hotel Quarantine Response — Advice for cleaning requirements for hotels who are accommodating quarantined, close contacts and confirmed COVID-19 Guests — Updated |
| March Cleaning Advice | Cleaning and disinfecting to reduce COVID-19 transmission: Tips for non-healthcare settings |
| National Cabinet | The Australian intergovernmental decision-making forum composed of the Prime Minister and state and territory Premiers and Chief Ministers |
| Operation Soteria | The alternative name for the Hotel Quarantine Program. |
| Pandemic | The worldwide spread of a new disease |
| Personal protective equipment (PPE) | <p>PPE refers to anything used or worn to minimise risk to workers' health and safety. PPE for COVID-19 includes surgical masks, particulate filter respirators (such as P2 or N95), gloves, goggles, glasses, face shields, gowns and aprons.</p> <p>See Department of Health website for further information: https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/coronavirus-covid-19-advice-for-the-healthand-disability-sector/personal-protective-equipment-ppe-for-the-health-workforceduring-covid-19</p> |
| Procurement | The process of finding and agreeing to terms, and acquiring goods, services or works from an external source, often via a tendering or competitive bidding process |

| Term | Meaning |
|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Purchase order contract | A commercial contract between a supplier and purchaser, which outlines the terms and obligations of each party in relation to the purchase of goods or services |
| Quarantine Governing Body | A body that consists of appropriate senior members of the governance structure, which meets regularly, is chaired by the Secretary to the responsible Minister, maintains records of its meetings including records of all decisions reached, and provides reports to the Minister from those meetings and in respect of decisions reached as proposed in Section 1 of the Interim Report |
| R ₀ | The average number of people who are likely to contract a contagious disease, from one other person with that disease, within a sample population |
| Red zone | A designated area in a quarantine facility where PPE must be worn |
| Returned travellers | People who returned to Victoria and quarantined in the initial Hotel Quarantine Program |
| Safer Care Victoria | A Victorian State authority that leads quality and safety improvements in healthcare settings |
| SARS-CoV-2 | Severe Acute Respiratory Syndrome Coronavirus 2 |
| SCOVID | People who are suspected, but not yet proven to have COVID-19 |
| Second wave | The increase in COVID-19 cases in Victoria in the wake of two outbreaks at the Rydges Carlton and Stamford Plaza hotels |
| Self-isolation Directions | Collective term to refer to both the Self-Quarantine following Overseas Travel Direction (issued 16 March 2020) and the Airport Arrivals Direction (issued 18 March 2020) |
| Self-Quarantine following Overseas Travel Direction | Direction issued 16 March 2020 requiring international travellers arriving at an airport in Victoria to travel from the airport to a premises that is suitable for the person to reside in for a period of 14 days |
| Specialised cleaning | Commercial cleaning services for rooms that have accommodated guests positive for COVID-19 |
| State Controller — Health | The individual appointed in a Class 2 emergency to provide support to the State Control Centre and lead the emergency response in a public health emergency |
| State Control Centre | The Victorian operations centre for emergencies |
| State of Disaster | Declared if the Premier is satisfied an emergency “constitutes or is likely to constitute a significant and widespread danger to life or property in Victoria” |
| State of Emergency | Declared when there is a serious risk to public health |
| State Purchase Contract | Centralised contracts used by the Victorian Government to buy common goods and services |
| Super spreader | Individuals who infect a disproportionately large number of contacts |
| Support agency | An agency working under the direction of the department in control of the program |
| Swab testing | Swabbing of areas after they have undergone an infectious clean to verify the area is actually clean |
| Terms of Reference | The Terms of Reference of the Inquiry into the COVID-19 Hotel Quarantine Program established by the Order in Council dated 2 July 2020 |
| Victorian Pandemic Plan | Victorian Health Management Plan for Pandemic Influenza 2014 |
| Victorian Secretaries Board | A forum of all Department Secretaries, the Police Commissioner and the Victorian Public Sector Commissioner |
| Viral load | A measure of the number of virus particles in a given sample. For example, it may refer to the amount of virus present in a person’s tissues or bodily fluids (such as respiratory droplets), or the amount of virus to which a person is exposed |
| Viral shedding | Occurs when a person who has the virus present in their body expels infectious fluid from their body; for example, by sneezing or coughing |

Appendix C

Order in Council dated 2 July 2020

Inquiries Act 2014

APPOINTMENT OF A BOARD OF INQUIRY INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

ORDER IN COUNCIL

The Governor in Council, on the recommendation of the Premier under section 53(1) of the **Inquiries Act 2014**, appoints the Honourable Jennifer Coate AO to constitute a Board of Inquiry to inquire into, report on and make any recommendations considered appropriate in relation to the terms of reference specified in paragraphs 1 to 6 of this Order.

This Order comes into effect on the date it is published in the Government Gazette.

BACKGROUND

Having regard to the global COVID-19 pandemic and the following:

- a. Previous and current Directions on Detention, issued under section 200 of the **Public Health and Wellbeing Act 2008**, requiring returned overseas travellers to be quarantined for at least 14 days in certain hotels following their arrival in Australia as part of the Victorian government's COVID-19 hotel quarantine program (Quarantine Program);
- b. The dynamic environment under which the Quarantine Program was established, including the concern at the time for the immediate safe return of Victorians from overseas areas impacted by the pandemic;
- c. The use of certain hotels to facilitate the Quarantine Program;
- d. The use of private sector providers, including security, transport, medical and food service providers (Private Service Providers) to administer the Quarantine Program;
- e. Recent epidemiological material collected up to 15 July 2020 in relation to travellers quarantined as part of the Quarantine Program, potentially linking subsequent increases in the spreading of the COVID-19 virus from such quarantined travellers through to the broader Victorian community;
- f. The Government's objective of effectively identifying, managing and containing the

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spread of COVID-19 from returned overseas travellers in the Quarantine Program into the community (COVID-19 Quarantine Containment); and

- g. Subsequent efforts to diagnose and treat, and to contain case numbers and the community transmission of COVID-19, as a result of the Quarantine Program.

TERMS OF REFERENCE

You are required to inquire into, report and make any recommendations considered appropriate in relation to the following terms of reference:

1. The decisions and actions of Victorian government agencies, hotel operators and Private Service Providers, including their staff/contractors and any other relevant personnel involved in the Quarantine Program (each Relevant Personnel), relating to COVID-19 Quarantine Containment;
2. Communications between Victorian government agencies, hotel operators and Private Service Providers relating to COVID-19 Quarantine Containment;
3. The contractual arrangements in place across Victorian government agencies, hotel operators and Private Service Providers to the extent they relate to COVID-19 Quarantine Containment;
4. The information, guidance, training and equipment provided to Relevant Personnel for COVID-19 Quarantine Containment and whether such guidance or training was followed, and such equipment was properly used;
5. The policies, protocols and procedures applied by Relevant Personnel for COVID-19 Quarantine Containment; and
6. Any other matters necessary to satisfactorily resolve the matters set out in paragraphs 1 to 5.

REPORTING DATES

You must report your findings and any recommendations to the Governor as soon as possible, and not later than 25 September 2020.

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CONDUCTING THE INQUIRY

1. You may:
 - (a) conduct your inquiry as you consider appropriate, subject to the requirements of procedural fairness;
 - (b) have regard to any research relevant to your inquiry;
 - (c) consult with and engage experts as necessary to provide relevant advice and assistance;
 - (d) engage Australian legal practitioners to assist you as counsel.
2. You must conduct your inquiry in accordance with this Order, the **Inquiries Act 2014**, and all other relevant laws.
3. It is anticipated that in conducting your inquiry, you will:
 - (a) to the extent you think it appropriate, work co-operatively with, and seek not to prejudice, any ongoing response or recovery activities or investigations;
 - (b) adopt informal and flexible procedures to ascertain the relevant facts as directly and effectively as possible;
 - (c) avoid unnecessary duplication; and
 - (d) avoid unnecessary cost or delay.

BUDGET

4. You may incur expenses and financial obligations to be met from the Consolidated Fund up to \$3 million in conducting this Inquiry.

Dated: - 2 JUL 2020

Responsible Minister:

The Hon Daniel Andrews MP
Premier


Clerk of the Executive Council

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Amended Order in Council dated 5 August 2020

Inquiries Act 2014

AMENDED TERMS OF REFERENCE FOR THE BOARD OF INQUIRY INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

ORDER IN COUNCIL

The Governor in Council, on the recommendation of the Premier under section 53 of the **Inquiries Act 2014**, amends the Order in Council dated 2 July 2020 establishing the Board of Inquiry into the COVID-19 Hotel Quarantine Program by:

1. For the words "25 September 2020" under the heading "Reporting Dates" substituting "6 November 2020".

This Order comes into effect on the date it is published in the Government Gazette.

Dated: 05 AUG 2020

Responsible Minister:

The Hon Daniel Andrews MP
Premier


Clerk of the Executive Council

Amended Order in Council dated 29 October 2020

Inquiries Act 2014

AMENDED TERMS OF REFERENCE FOR THE BOARD OF INQUIRY INTO THE COVID-19 HOTEL QUARANTINE PROGRAM

ORDER IN COUNCIL

The Governor in Council, on the recommendation of the Premier under section 53 of the **Inquiries Act 2014**, amends the Order in Council dated 2 July 2020 (as amended by a further Order in Council dated 5 August 2020) establishing the Board of Inquiry into the COVID-19 Hotel Quarantine Program by:

1. For the words "You must report your findings and any recommendations to the Governor as soon as possible, and not later than 6 November 2020" under the heading "Reporting Dates" **substituting** "You must report your interim findings and any recommendations to the Governor as soon as possible, and not later than 6 November 2020, and you must report your final findings and any recommendations to the Governor as soon as possible, and not later than 21 December 2020".

This Order comes into effect on the date it is published in the Government Gazette.

Dated: 29 OCT 2020

Responsible Minister:

The Hon Daniel Andrews MP
Premier


Clerk of the Executive Council

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Appendix D

Practice Direction 1



COVID-19 Hotel Quarantine Inquiry

PRACTICE DIRECTION NO. 1

SECTION 64 NOTICES AND DOCUMENT MANAGEMENT

RELEASED 15 JULY 2020

INTRODUCTION

- 1 This Practice Direction (**PD-1**) relates to notices issued pursuant to s 64 of the *Inquiries Act* 2014 (Vic) (**Act**) by the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Inquiry**) and provides the Protocol for the Electronic Management of Documents.
- 2 This Practice Direction is issued under s 63(1) of the Act. It should be read in conjunction with the Act and with the terms of reference contained in the Order establishing the Inquiry.
- 3 This Practice Direction sets out the way in which the Inquiry will:
 - (a) deal with claims of reasonable excuse in response to a Notice to Attend, Notice to Produce or Notice to Attend and Produce (as provided for by s 64 of the Act (**Notice**)); and
 - (b) receive materials in response to a Notice to Produce or an informal request for information.
- 4 In this Practice Direction, and for the purposes of PD-1 and the attached Protocol only, reference to a **Party** (or **Parties**) means:
 - (a) any entity, organisation or individual that has been served with, or is the subject of a Notice; and
 - (b) anyone who intends to provide documents, evidence or other material to the Inquiry, including in response to a request for information.
- 5 The intended audience of this Practice Direction includes a Party, as well as the legal representatives and IT professionals engaged to assist Parties in responding to Notices.
- 6 This Practice Direction may be varied, changed or amended by the Inquiry from time to time. The Inquiry may, at any time, depart from this Practice Direction if it considers it appropriate to do so.

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CLAIMS OF 'REASONABLE EXCUSE' IN RESPONSE TO NOTICES

- 7 Any Party who asserts that they have a reasonable excuse for failing to comply with a Notice, in whole or in part, must have regard to sections 65 and 74(3) of the Act and any notes which accompany the Notice.
- 8 The Inquiry will set out in each Notice the date by which a claim of reasonable excuse must be made (**Objection Date**).
- 9 If a Party considers that any part of a Notice concerns evidence, material or document/s that are the subject of a claim of 'reasonable excuse' by that Party, it must, by the Objection Date:
- (a) notify the Inquiry in accordance with the requirements of the Notice;
 - (b) provide the following information to assist the Inquiry to determine whether a reasonable excuse exists:
 - (1) a brief general description of the subject matter of the evidence, material or document(s) to which the reasonable excuse is claimed to apply;
 - (2) the basis on which the claim of reasonable excuse is made;
 - (3) brief reasons in support of the claim of reasonable excuse; and
 additionally, for documents or materials:
 - (4) the nature of the document (date, type etc); and
 - (5) the author(s) and, where applicable, the addressee(s) of the document; and
 - (c) inform the Inquiry whether:
 - (1) it claims that the reasonable excuse applies to all of the evidence, material or document(s);
 - (2) it claims the evidence, material or document(s) should not be adduced and/or produced at all on the grounds of the identified reasonable excuse, or
 - (3) whether it consents to production of the evidence, material or document(s) on appropriate terms, and if so, what those proposed terms ought to be.
- 10 Where a claim of reasonable excuse is made over documents or material, the Party making that claim must also comply with the requirements of the Protocol in respect of the production and coding of documents.

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PROTOCOL FOR PRODUCING MATERIAL TO THE INQUIRY

- 11 Any material to be filed with the Inquiry should be in accessible electronic format consistent with the requirements of this Practice Direction and the Document Management Protocol (**Protocol**) attached to this Practice Direction. However, this does not preclude the Inquiry from accepting material, at its discretion, in a hard copy format or as objects.
- 12 All electronic material to be produced to the Inquiry must be prepared and provided in accordance with the Protocol.

PROTOCOL FOR DOCUMENTS WHERE AN ORDER IS SOUGHT FOR PROHIBITION OR RESTRICTION OF PUBLICATION

- 13 Any party who seeks an order prohibiting or restricting the publication of (or part of) a document must:
- (a) have regard to section 73 of the Act and any notes which accompany the Notice; and
 - (b) comply with the requirements of the Protocol in respect of the production and coding of documents where an order is sought to prohibit or restrict publication of documents is made.
- 14 The Protocol provides a process for Parties to identify information as being personal identifying information. However, the existence of personal information is not, on its own, a basis on which the Inquiry will make an order prohibiting or restricting publication.

INQUIRY'S DOCUMENT MANAGEMENT SYSTEM

- 15 The Inquiry will maintain an electronic database using Lexel that will contain, among other things, copies of all material produced to the Inquiry including material produced in response to a Notice, informal request for information or otherwise.

QUESTIONS REGARDING THIS PRACTICE DIRECTION OR DOCUMENT MANAGEMENT PROTOCOL

- 16 The Inquiry accepts that some Parties producing documents to it may not be able to comply with the Protocol. These Parties should contact the person named on the Notice as the contact to discuss alternative arrangements for production.

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- 17 Any person who has a technical question about producing material electronically to the Inquiry should also contact Solicitors Assisting at lawyers@quarantineinquiry.vic.gov.au or (03) 7017 3459.

Issue date: 15 July 2020



THE HONOURABLE JENNIFER COATE AO

Board of Inquiry into the COVID-19 Hotel Quarantine Program

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**COVID-19
Hotel Quarantine Inquiry**

DOCUMENT MANAGEMENT PROTOCOL

RELEASED 15 JULY 2020

INTRODUCTION

- 1 This Document Management Protocol (Protocol) outlines the method by which documents are to be provided to the Inquiry, whether in response to a Notice to Produce (Notice) or otherwise.
- 2 The intended audience of this Protocol is the legal representatives and IT professionals engaged to assist Parties produce materials to the Inquiry.
- 3 All documents to be produced to the Inquiry must be prepared and provided in accordance with this Protocol.
- 4 This Protocol may be varied, changed or amended by the Inquiry from time to time. The Inquiry may, at any time, depart from this Protocol if it considers it appropriate to do so, including but not limited to circumstances where it is unreasonable or too onerous upon a party to comply with the technical specifications of this Protocol.

PRINCIPLES

1 Acceptable formats

- 1.1 The Inquiry will accept electronic documents in both Concordance/Relativity (.dat/.opt) and Ringtail (.mdb) formats, as outlined in Schedules 1A & 1B respectively.
- 1.2 Each electronic file must be produced in its native format or, alternatively, produced as a rendered PDF together with a (.txt) file containing the OCR contents of the PDF file.

2 Identification of documents

- 2.1 Each document must be identified with a Document ID and page numbers which are unique to each page and will be the primary means of identification of documents.
- 2.2 All Document IDs and page numbers are to be stamped in the top right hand corner of each page.

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2.3 A Document ID must be in the following format:

PPP(P).BBBB.FFFF.NNNN_XXXX

- (1) **PPP(P)** is a three (or four) letter party code that identifies a Party. A Party producing Documents should contact the Inquiry prior to production to confirm the Party codes available for use.

| Party Code | Party |
|------------|-------------------------------------------|
| EHSP | Example Hotel Quarantine Services Pty Ltd |
| ABC | AB Corporation Pty Ltd |
| XYZ | XY Holdings Pty Ltd |

- (2) **BBBB** is a 4-digit 'box' number identifying separate collections of documents (for example in relation to a particular Notice to Produce or Summons), the number to be between 0001-9999.
- (3) **FFFF** is a 4-digit 'container' number identifying further separate collections of documents, the number to be between 0001-9999.
- (4) **NNNN** is a 4-digit number used to differentiate individual documents and/or individual pages. In some cases, NNNN operates as a document number rather than a page number because individual pages are not numbered (ie non-standard Native files not produced as searchable PDFs). This number is padded with zeros to consistently result in a 4 digit structure.
- (5) **XXXX** is an optional 4-digit number used to identify suffix rendered PDF pages. It is only required where Parties may choose to review documents in native format in their document review platforms and render documents to PDF for the purpose of production. The suffix must be preceded by an underscore, padded with zeros to consistently result in a 4-digit number structure.

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An example of the Document ID structure is set out below:

XYZ.0001.0001.0001

Where:

| XYZ | Party code |
|------------|-----------------------------------------------|
| 0001 | Unique 'box' number allocated by Party. |
| 0001 | Unique 'container' number allocated by Party. |
| 0001 | Sequential page number. |

- 2.4 Document IDs assigned must be unique to each document and must not be re- assigned to subsequent documents produced.
- 2.5 If alternate numbering is required please contact the Inquiry to discuss.
- 2.6 It is understood and accepted that Document IDs may not be consecutive as a result of the removal of irrelevant documents during review. A Party must however identify host and attachment documents with consecutive Document IDs.
- 2.7 Upon production of a document, the document filename must be its Document ID.
- 2.8 If Parties wish to render a document at the time of production following a native file review and:
 - (a) the first Document ID is XYZ.0001.0001.0001; then
 - (b) the first page of that Document rendered PDF must be stamped with: XYZ.0001.0001.0001 or XYZ.0001.0001.0001_0001;
 - (c) the second page of that Document must be stamped with: XYZ.0001.0001.0001_0002;
 - (d) the third page of that Document must be stamped with: XYZ.0001.0001.0001_0003; and
 - (e) the next consecutive Document must be Document ID XYZ.0001.0001.0002.

3 Document Hosts and Attachments

- 3.1 Every document that is attached to or embedded within another document will be treated as an Attached Document. A document that contains at least one

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Attached Document will be called a Host Document. A document that is neither a Host or Attached Document will be called a Standalone Document.

- 3.2 Examples of Host Documents and Attached Documents include:
- (a) An email, letter or fax (Host Document) and its attachments (Attached Documents).
 - (b) An electronic file (Host Document) that has other files embedded within it (Attached Documents)
- 3.3 If an Attached Document also contains attachments, those attachments will be treated as attachments to the Host Document.
- 3.4 A Party must ensure that false or unnecessary relationships between Host Documents and Attached Documents are not created by:
- (a) taking reasonable steps to ensure that email footers, logos, and other repeated content are not separated as Attached Documents; and
 - (b) ensuring that physical or digital document containers, such as hard copy folders or electronic ZIP container files, are not identified as Host Documents, unless the identification of the container as a Host Document is necessary to the understanding of the documents within that container.
- 3.5 Unless required to provide documents in their native structure for technical reasons, documents should be extracted from their containers and the container itself should not be produced.

4 Indexes and Load Files of documents produced to the Inquiry

- 4.1 All documents to be produced to the Inquiry must be:
- (a) included in an itemised electronic index of documents in Microsoft Excel format (**Index**) that is provided to the Inquiry; and
 - (b) provided in an electronic format that is in accordance with the applicable Production Load File Specification at Schedule 1A or 1B (**Load File**).
- 4.2 Both the Index and the Load File must contain the following information for each document, where available:

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- (a) Document ID
- (b) Host Document ID
- (c) Document Type
- (d) Document Date
- (e) Document Title
- (f) Author (From)
- (g) Recipient (To)
- (h) Recipient (CC)
- (i) Recipient (BCC)
- (j) Notice to Produce or Summons No.
- (k) Notice to Produce Tranche No.
- (l) Notice to Produce Schedule Item
- (m) Withheld
- (n) Withheld Reason
- (o) Restriction requested
- (p) Reason for restriction request
- (q) LPP
- (r) Personal-identifying-information

5 Document metadata

5.1 Wherever possible, a Party is to rely on the automatically identified metadata of electronic documents. Automatically identified metadata should be used when:

- (a) searching for documents;
- (b) itemising documents in a list; and
- (c) preparing a production of documents in accordance with the Production Specification at Schedules 1A or 1B.

5.2 A Party should take reasonable steps to ensure that all appropriate document metadata is not modified or corrupted during collection and preparation of electronic documents for review and production.

5.3 Document metadata is to be automatically extracted using UTC + 10 (Sydney, Melbourne, Canberra) as the time zone in the processing application.

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- 5.4 The Inquiry accepts that complete document metadata may not be available for all electronic documents. A Party should attempt to provide complete metadata where practicable.
- 5.5 Hard copy documents must be produced as PDFs, together with extracted text files together with a load file as per Schedules 1A or 1B where possible.
- 5.6 A Party must provide information regarding the software and procedure used to automatically identify the metadata of their electronic documents if requested by the Inquiry.
- 5.7 Original versions of all documents must be retained by the Party producing them.

6 De-duplication of documents

- 6.1 A party must take reasonable steps to ensure that duplicate documents are removed from the produced material (**de-duplication**).
- 6.2 The Inquiry acknowledges that there may be circumstances where duplicates need to be identified and produced for evidentiary purposes.
- 6.3 Duplication must be considered at a document group level. That is, all documents within a group comprising a Host Document and its attachments, will be treated as duplicates only if the entire group of documents is duplicated elsewhere. An Attached Document must not be treated as a duplicate if it is merely duplicated elsewhere as an individual standalone document that is not associated with another group of documents.
- 6.4 A Party must apply electronic de-duplication using a MD5 algorithm.
- 6.5 A Party may also determine duplicate documents by way of manual review where appropriate

7 Exclusion of unusable file types

- 7.1 A NIST filter is to be applied to a Party's electronic documents to remove files with no user-generated content, such as system files and executable files, so that these are excluded from searches and disclosure (to the extent possible).
- 7.2 Temporary internet files and cookies are to be excluded from the disclosure process.

8 Treatment of email chain correspondence

- 8.1 Where an email is identified as relevant and it forms part of an email chain, the Party must disclose the entire email chain.

9 Use of advanced analytics technology

- 9.1 Parties may use advanced analytics technologies at their own discretion, but they must maintain the integrity and context of the documents, and provide entire document groups including all attachments.
- 9.2 Parties may use 'Email threading' technology to minimise document review. Where this technology has been used, Parties may provide only the relevant end point email with its attachments.
- 9.3 Parties may use technology commonly referred to as 'TAR / Assisted Review / Predictive coding' for document review at their discretion. Parties do not need to seek agreement to use such technology, but must disclose to the Inquiry that it has been used and implement processes to ensure that they are meeting their obligations under a Notice or otherwise by providing only material identified as relevant to the Notices issued, along with their document group.

10 Data security

- 10.1 A Party producing data must take all reasonable steps to ensure that the data is useable and is not infected by malicious software.

11 Errors in provided documents

- 11.1 If errors are found in any produced documents, the Party producing must provide a corrected version of the document to the Inquiry as soon as reasonably possible once that error is identified.
- 11.2 If errors are found in more than 25% of the produced documents in any one tranche, the Party who produced those documents must, if requested by the Inquiry, provide a correct version of all documents within the tranche.
- 11.3 A written explanation setting out the reasons for the errors in the documents and describing the data affected must be provided by the Party producing if errors are found in any produced documents.

12 Electronic provision of data for productions

12.1 Unless otherwise agreed or ordered by the Inquiry, the information provided and delivered to the Inquiry must be contained on agreed electronic media, being either:

- (a) SFTP services of the Party providing the documents; or
- (b) USB media.

In all cases Parties must apply encryption to the zip file uploaded to the SFTP or the USB media provided and the password must be shared with the Inquiry via a separate email, at the time of confirming the delivery.

13 Claims of a reasonable excuse for not complying with a Notice

13.1 Where a Party asserts that it has a reasonable excuse for failing to produce a **whole** document, the Party must:

- (a) ensure that the document is identified in the Index and Load File;
- (b) code the field 'Withheld=Yes' in the Index and Load File; and
- (c) select the basis for the claim in the field 'Withheld Reason' in the Index and Load File.

13.2 Where a Party asserts that a reasonable excuse exists for failing to produce **part(s)** of a document, the Party must:

- (a) redact the part(s) of the document that the Party asserts it has a reasonable excuse to withhold;
- (b) ensure that the document is identified in the Index and Load File;
- (c) code the field 'Withheld=Part' in the Index and Load File; and
- (d) select the basis for the claim in the field 'Withheld Reason' in the Index and Load File.

14 Production of documents where an order is sought for restriction on publication of information

14.1 Where a Party seeks an order to prohibit or restrict publication of a **whole**

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document, the Party must:

- (a) produce the document;
- (b) code the field 'Restricted=Yes' in the Index and Load File; and
- (c) select the basis for the claim in the field 'Restricted Reason' in the Index and Load File.

14.2 Where a Party seeks an order to prohibit or restrict publication of **part(s)** of a document, the Party must:

- (a) produce the document;
- (b) highlight the part(s) of the document that are the subject of the claim as set out in paragraph 14.5 below;
- (c) code the field 'Restricted=Part' in the Index and Load File; and
- (d) select the basis for the claim in the field 'Restricted Reason' in the Index and Load File.

14.3 Where a Party seeks an order to prohibit or restrict publication over information that is personal identifying information, the Party may:

- (a) highlight any personal identifying information as set out in paragraph 14.5;
- (b) code the field 'Personal identifying information=Yes' in the Index and Load File; and
- (c) code the fields 'Restricted' and 'Restricted Reason' in the Index and Load File as is appropriate.

14.4 The highlight colours to be applied are set out below:

| Colour | Reason for highlighting |
|------------|--------------------------------------------------------------------------------------|
| Light Blue | Personal identifying information. |
| Green | Claim for prohibition or restriction on publication provided for in s 73 of the Act. |

14.5 If part of any document provided to the Inquiry is highlighted in accordance with this section 14, the Party producing that document must retain a non-highlighted version of the document which must be produced to the Inquiry on request.

**Schedule 1A – Production Specification for .DAT/.OPT Load File
(Concordance/Relativity Compliant)**

1 Production format

- 1.1 Documents must be provided electronically, using a .DAT/.OPT data file format and in Microsoft Excel format.
- (a) The first line of the .DAT file must be a header row identifying the field names.
- (b) The .DAT file must use the following Concordance® default de-limiters:
- (1) Pilcrow ¶ ASCII character
- (2) Quote ¢ ASCII character
- 1.2 Date fields should be provided in the format: DD-MMM-YYYY or DD/mm/YYYY
- 1.3 If the production includes emails and attachments, the attachment fields must be included to preserve the parent/child relationship between an email and its attachments.
- 1.4 Productions must include an extracted text file for each document. An OCR PATH field must be included to provide the file path and name of the extracted text file on the produced storage media. The text file must be named after the Document ID. Do not include the text in the .DAT file.
- 1.5 For productions that contain PDF or Native documents, a LINK field must be included to provide the file path and name of the native file on the produced storage media. The native file must be named after the Document ID.

2 Preparation of documents

- 2.1 A Party should avoid converting native electronic documents to paper for production to the Inquiry and must instead produce them as searchable multi-page PDF documents. For non-standard documents, such as Microsoft Excel and Audio/Video files, native document production is required.
- 2.2 Documents produced as searchable multi-page PDFs must be stamped with sequential page numbers in the top right hand corner of each page. The number on the first page will be the Document ID. The format must be PPP.BBBB.FFFF.NNNN, eg XYZ.0000.0000.0001
- 2.3 Searchable electronic documents should be rendered directly to PDF to create searchable images. Documents should not be printed to paper and scanned or

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rendered to Tagged Image File Format (**TIFF**) format and then converted to PDF, unless required for the purposes of highlighting within a document review platform.

- 2.4 Non-searchable or image only native files should be converted to searchable PDFs, and not image only or non-searchable PDFs.
- 2.5 Non-standard electronic documents that do not lend themselves to conversion to PDF (for example, complex spread-sheets, databases, etc.) must be produced to the Inquiry as native electronic documents or in another format agreed with the Inquiry.
- 2.6 Hard copy documents should be produced as searchable, stamped, multi-page PDF documents. The minimum requirement for scanned images is 300dpi text searchable multi-page PDF.
- 2.7 Colour versions of documents must be created if the presence of colour is necessary to the understanding of the document. Documents which have coloured annotations or highlighting, photos, graphs or images are to be captured in colour.
- 2.8 If documents are highlighted or redacted for the purposes identified in sections 13 and 14 of this Protocol, Parties must provide the Inquiry with an image set (as PDF files) with documents containing redactions or highlights burnt in, accompanied by a load file complying to this Schedule.
- 2.9 A Party may apply Document IDs to the following paper documents where they contain relevant content:
 - (a) folder covers, spines, separator sheets dividers;
 - (b) hanging file labels; and
 - (c) the reverse pages of any document.

3 Document folder structure

- 3.1 The file name of each document must include the relevant file extension, e.g. 'DocumentID.xxx' where '.xxx' is the file extension.
- 3.2 The top level folder containing every document must be named '\Documents\'.
- 3.3 The documents folder must be structured in accordance with the Document ID hierarchy, e.g. 'Documents\ABC\."

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4 Overview of metadata provided within the data (.DAT) load file

4.1 Required fields/metadata in a flat file format:

| Field | Explanation – Document Types and Coding Method and possible values | |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Document_ID | Document ID | |
| Host_Reference | If the document is an attachment, this field contains the Document ID of its host document. If a document does not have a host, this field is to be left blank\NULL. | |
| Document_Type | Paper Documents | Refer Document Types in Schedule 2. |
| | Electronic Documents (including email, email attachments, loose files etc) | Either native file type or Document Type in Schedule 2 as determined on the basis of the face of the document. |
| Document_Date | DD-MMM-YYYY or DD/mm/YYYY | |
| | Paper Documents | Determined on the basis of the date appearing on the face of the document. |
| | Undated Documents | Leave field blank\NULL. |
| | Incomplete Date (Year Only) | For example, 01-JAN-YYYY |
| | Incomplete Date (Month and Year Only, or Day and Month Only) | For example, 01-MMM-YYYY, DD-MMM-1900 |
| | Emails | Email Sent Date |
| | Unsent Emails | Last Modified Date |
| | Other Electronic Documents | Last Modified Date; or Date appearing on the face of the document. |
| Document Date and Time | DD-MMM-YYYY HH:MM:SS (where HH is a 24 hour format) | |
| | Paper Documents | Determined on the basis of the date appearing on the face of the document |
| | Undated Documents | Leave field blank\NULL. |
| | Incomplete Date (Year Only) | For example, 01-JAN-YYYY 00:00:00 |
| | Incomplete Date (Month and Year Only, or Day and Month Only) | For example, 01-MMM-YYYY 00:00:00, DD-MMM-1900 00:00:00 |
| | Emails | Email Sent Date and Time |
| | Unsent Emails | Last Modified Date and Time |
| | Other Electronic Documents | Last Modified Date and Time; or Date and time appearing on the face of the document. |
| Estimated | Yes OR No OR NULL | |
| | Default | No OR NULL |
| | Undated Documents | No OR NULL |
| | Incomplete Date | Yes |
| Title | Paper Documents | Determined on the basis of the title appearing on the face of the document |
| | Email | Subject field from email metadata. |
| | Other Electronic Documents | Metadata file name or determined on the basis of the title appearing on the face of the document. |

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| | | |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| People and Organisations | Format 1: Person [Organisation] Format 2: Organisation Format 3: Person name or email address | |
| | Paper Documents | Name of person to be determined on the basis of the face of the document [Name of organisation that produced the document as determined on the basis of the face of the document] |
| | Emails | Electronic metadata – email addresses or email alias names. |
| | Other Electronic Documents | To be determined from the automatically identified metadata. |
| Organisations | Paper Documents | Name of organisation that produced the document as determined on the basis of the face of the document. |
| | Emails | Blank\NULL |
| | Other Electronic Documents | To be determined from the automatically identified metadata. |
| Persons | Paper Documents | To be determined on the basis of the face of the document. |
| | Emails | Electronic metadata – email addresses or email alias names. |
| | Other Electronic Documents | Author value to be determined from the automatically identified metadata. |
| Withheld | Yes OR Part OR No | |
| Withheld Reason | Legal professional privilege (65(2)(c)) Privilege against self-incrimination (offence) - (65(2)(a)); Privilege against self-incrimination (penalty) - (65(2)(a)); Parliamentary privilege (65(2)(b)); Public interest immunity (65(2)(d)); Prohibited by court order (65(2)(e)); Prohibited by enactment (65(2)(f)); Prohibited by enactment prescribed by regulations (65(2)(g)); or Other reason(65(1)(a)) | |
| Restricted | Yes OR Part OR No | |
| Restricted Reason | Prejudice or hardship (73(2)(a)); Sensitive nature and subject matter (73(2)(b)); Possible prejudice to legal proceedings (73(2)(c)); Conduct of proceeding would be more efficient and effective (73(2)(d)); or Member should otherwise consider appropriate (73(2)(e)) | |
| Personal-identifying information | Yes OR No | |
| Notice to Produce or Summons No. | Eg: NP002 | Inquiry request number as identified on the Notice or Summons |
| Notice to Produce Tranche No | NP002_TR01 | Notice to Produce Tranche No in which the document is produced under |
| Notice to Produce Schedule Item | NP002-sch01 | Notice to Produce Schedule item the document is relevant to |

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| | | |
|----------------------------|----------------------------------------------|--------------------------------------------------------------------------------------|
| File Path | e.g. \\server\custodianname\ | Source path of the original file, if available. |
| File Name | e.g. draft report.pdf | Source name of the original file, if available. |
| Date Created | DD-MMM-YYYY HH:MM:SS | Electronic metadata – created date, if available. |
| Date Last Modified | DD-MMM-YYYY HH:MM:SS | Electronic metadata – last modified date, if available. |
| MD5 Hash Value | | MD5 hash value used for deduplication, if available. |
| File Extension | Eg: XLSX PDF | The file extension or original native file type is to be provided for all documents. |
| OCR TEXT file path | Documents\Text\Document_ID.TXT | Extracted text path. |
| NativePDF file Path | Documents\Native\Document_ID.EXT | Native path for documents produced in native format. |

4.2 Parties' information (To/From/CC/BCC) technical requirements:

- (a) These fields hold the names of Parties associated with a particular document and their relationship to the document. It may also hold organisation information for these people.
 - (1) Describing people:
 - (i) A person's name may be referenced using:
 - A. email addresses (for example, jcitizen@xyz.com.au); or
 - B. Surname [space] first name initial (for example, Citizen J) where email addresses are not available; or
 - C. by reference to a position (for example, Private Service Provider) where email addresses or surname and first name initial are not available; or
 - D. by reference to an organisation associated with the person where email address, surname and first name initial and position are not available.
 - (2) Multiple recipients must be separated by a semicolon.
 - (3) Organisations must be placed into square brackets.

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Schedule 1B – Production Specification for Four-Table Microsoft Access Load File (Ringtail Compliant)

1 Production format

- 1.1 Documents must be produced electronically, in a cascading Windows folder structure, with the corresponding document metadata structured in a four-table Microsoft Access database format.
- 1.2 A Party should also include the index of documents in Microsoft Excel format.

2 Preparation of documents

- 2.1 A Party should avoid converting native electronic documents to paper for production to the Inquiry and must instead produce them as searchable multi-page PDF documents. For non-standard documents, such as Microsoft Excel and Audio/Video files, native document production is required.
- 2.2 Documents produced as searchable multi-page PDFs must be stamped with sequential page numbers in the top right hand corner of each page. The number on the first page must be the Document ID. The format must be PPP.BBBB.FFFF.NNNN, e.g. XYZ.0001.0001.0001.
- 2.3 Searchable electronic documents should be rendered directly to PDF to create searchable images. Documents should not be printed to paper and scanned or rendered to Tagged Image File Format (**TIFF**) format and then converted to PDF, unless required for the purposes of highlighting within a document review platform.
- 2.4 Non-searchable or image only native files should be converted to searchable PDFs, and not image only or non-searchable PDFs.
- 2.5 Non-standard electronic documents that do not lend themselves to conversion to PDF (for example, complex spread-sheets, databases, etc.) must be delivered to the Inquiry as native electronic documents or in another format agreed with the Inquiry.
- 2.6 Hard copy documents should be provided as searchable, stamped, multi-page PDF documents. The minimum requirement for scanned images is 300dpi text

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searchable multi-page PDF.

- 2.7 Colour versions of documents must be created if the presence of colour is necessary to the understanding of the document. Documents which have coloured annotations or highlighting, photos, graphs or images are to be captured in colour.
- 2.8 If documents are highlighted for the purposes identified in section 18, 19 and 20 of this Protocol, Parties must provide the Inquiry with an image set (as PDF files) with documents containing highlights burnt in accompanied by a load file, complying to this Schedule.
- 2.9 A Party may apply Document IDs to the following paper documents where they contain relevant content:
 - (a) folder covers, spines, separator sheets dividers;
 - (b) hanging file labels; and
 - (c) the reverse pages of any document

3 Document folder structure

- 3.1 The file name of each document must include the relevant file extension, e.g. 'DocumentID.xxx' where '.xxx' is the file extension.
- 3.2 The top level folder containing every document must be named 'Documents'
- 3.3 The documents folder must be structured in accordance with the Document ID hierarchy, ie "Documents\ABC\[subfolders if required]"

4 Overview of structure of four-tabled Microsoft Access database

- 4.1 The document metadata is to be structured into the following four Microsoft Access database tables:

| Table Name | Table Description |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| Export | Main document information. |
| Parties | People and organisation information for each document. |
| Pages | Listing of electronic image filenames for each document. The Pages table must correspond to the files within the cascading document folder structure. |
| Export_Extras | Additional data fields for each document, including subjective fields populated by the Parties during review. |

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4.2 Export Table

| Field | Data Type | Explanation – Document Types and Coding Method and possible values | |
|----------------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Document_ID | Text, 255 | Document ID | |
| Host_Reference | Text, 255 | If the document is an attachment, this field contains the Document ID of its host document. If a document does not have a host, this field is to be left blank\NULL. | |
| Document_Type | Text, 255 | Paper Documents | Refer Document Types in Schedule 2. |
| | | Electronic Documents (including email, email attachments, loose files etc) | Either native file type or Document Type in Schedule 2 as determined on the basis of the face of the document. |
| Document_Date | Date, 11 | DD-MMM-YYYY or DD/mm/YYYY | |
| | | Paper Documents | Determined on the basis of the date appearing on the face of the document. |
| | | Undated Documents | Leave field blank\NULL. |
| | | Incomplete Date (Year Only) | For example, 01-JAN-YYYY |
| | | Incomplete Date (Month and Year Only; or Day and Month Only) | For example, 01-MMM-YYYY, DD-MMM-1900 |
| | | Emails | Email Sent Date |
| | | Unsent Emails | Last Modified Date |
| Estimated | Text, 3 | Yes OR No OR NULL | |
| | | Default | No OR NULL |
| | | Undated Documents | No OR NULL |
| | | Incomplete Date | Yes |
| Title | Text, 255 | Paper Documents | Determined on the basis of the title appearing on the face of the document. |
| | | Email | Subject field from email metadata. |
| | | Other Electronic Documents | Metadata file name or determined on the basis of the title appearing on the face of the document. |
| Level_1 | | First subfolder level of where the document file is. | |
| Level_2 | | Second subfolder (if required) of where the document file is. | |

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4.3 Parties Table:

- (a) This Table holds the names of people associated with a particular document and their relationship to the document. It may also hold organisation information for these people. There is a one-to-many relationship between the Export Table containing the primary document information and the Parties Table because multiple people could be associated with a single document.

| Field | Data Type | Explanation | |
|----------------------------|-----------|----------------------------|---------------------------------------------------------------------------------------------------------|
| Document_ID | Text, 255 | Document ID | |
| Correspondence_Type | Text, 100 | Paper Documents | AUTHOR, RECIPIENT BETWEEN, ATTENDEES, CC To be determined on the basis of the face of the document. |
| | | Emails | FROM, TO, CC, BCC |
| | | Other Electronic Documents | AUTHOR, RECIPIENT, CC To be determined from the automatically identified metadata. |
| Organisations | Text, 255 | Paper Documents | Name of organisation that produced the document as determined on the basis of the face of the document. |
| | | Emails | BlankNULL |
| | | Other Electronic Documents | To be determined from the automatically identified metadata. |
| Persons | Text, 255 | Paper Documents | To be determined on the basis of the face of the document. |
| | | Emails | Electronic metadata – email addresses or email alias names. |
| | | Other Electronic Documents | Author value to be determined from the automatically identified metadata. |

- (b) Describing people in the Parties Table:
 - (1) A person's name may be referenced using:
 - (A) email addresses (for example, jcitizen@xyz.com.au); or
 - (B) Surname [space] first name initial (for example, Citizen J) where email addresses are not available; or
 - (C) by reference to a position (for example, Private Service Provider Manager) where email addresses or surname and first name initial are not available; or
 - (D) by reference to an organisation associated with the person where email address, surname, surname and first name initial and position are not available.
 - (2) Multiple recipients must be entered as separate rows in the Parties Table.

4.4 Pages Table

- (a) There must be at least one entry in the Pages Table that relates to a single document in the Export Table. Concurrently, there must be an entry in the Pages Table for every file provided in the cascading document folder structure.

| Field | Data Type | Explanation |
|--------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Document_ID | Text, 255 | Document ID |
| File_Name | Text, 128 | Filename, including extension of each indexed document. |
| Page_Label | Text, 32 | "PDF" for files produced as searchable multipage PDF documents. "Native" for documents produced as native electronic files. "Text" for the extracted text (OCR) contents of the file. |
| Page_Num | Number, Double | "1" for files produced as searchable multipage PDF documents. "2" for documents produced as native electronic files. "3" for the OCR text file. |
| Num_Pages | Number, Double | A number that represents the total number of pages of the document for files produced as searchable multipage PDF documents. "1" for documents produced as native electronic files. |

4.5 Export Extras Table

- (a) The Export Extras Table holds any additional metadata the Parties wish to produce that is not held in the other three Tables mentioned above. In addition to automatically identified document metadata, the Export Extras Table must also hold subjective coding information about documents that has been determined by the Parties.

| Field | Data Type | Explanation |
|--------------------|-----------|------------------------------------------------------------------------------------------------|
| Document_ID | Text, 255 | Unique Document Identifier (Document ID) |
| theCategory | Text, 50 | Text OR Date OR Numb OR Bool OR Pick OR Memo |
| theLabel | Text, 255 | Custom Field Name, from the List of Extras Fields below |
| theValue | Text, 255 | Custom Field Contents from the List of Extras Fields below |
| MemoValue | MEMO | Custom Field Contents from the List of Extras Fields below for values more than 255 characters |

(b) Required Extras Fields

| Field | Data Type | Acceptable Values | Explanation |
|-------------------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Document Date and Time | TEXT | DD-MMM-YYYY HH:MM:SS (where HH is a 24 hour format) | Document Date and Time electronically extracted using the respective processing tool (ie. Email Sent Date and Time OR Last Modified Date and Time). Where no time is electronically available the format value will be DD-MMM-YYYY 00:00:00 |
| Withheld | PICK | Yes, Part | Only required for Documents being withheld in full or part. Single choice only |
| Withheld Reason | PICK | Legal professional privilege (65(2)(c)) Privilege against self-incrimination (offence) - (65(2)(a)); Privilege against self-incrimination (penalty) - (65(2)(a)); Parliamentary privilege (65(2)(b)); Public interest immunity (65(2)(d)); Prohibited by court order (65(2)(e)); Prohibited by enactment (65(2)(f)); Prohibited by enactment prescribed by regulations (65(2)(g)); or Other reason(65(1)(a)) | Basis on which document is withheld. Only required for Documents marked as Withheld = Yes or Part |
| | | (18(2)(d)); Prohibited by enactment (18(2)(e)); Prohibited by enactment prescribed by regulations (18(2)(f) and (34(4)); or Other reason(18)(1)(a) | |
| Restricted | PICK | Yes, Part | Only required for documents with restrictions in full or part. Single choice only |

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| | | | |
|-----------------------------------------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| Restriction Reason | PICK | Prejudice or hardship (73(2)(a)); Sensitive nature and subject matter (73(2)(b)); Possible prejudice to legal proceedings (73(2)(c)); Conduct of proceeding would be more efficient and effective (73(2)(d)); or Member should otherwise consider appropriate (26(2)(e)) | Basis on which document is restricted. Only required for documents marked as Restricted = Yes or Part |
| Personal identifying information | PICK | Yes | Only required where information is highlighted as personal identifying information. Single choice only |
| Notice to Produce or Summons No. | PICK | Eg: N006/16 | Inquiry request number as identified on the Notice or Summons. |
| Notice to Produce Tranche No | PICK | NP002_TR01 | Notice to Produce Tranche No in which the document is produced under |
| Notice to Produce Schedule Item | PICK | NP002-sch01 | Notice to Produce schedule item the document is relevant to |
| File Path | MEMO | | Source path of the original file, if available. |
| File Name | TEXT | | Source name of the original file, if available. |
| Date Created | TEXT | DD-MMM-YYYY HH:MM:SS | Electronic metadata – created date, if available. |
| Date Last Modified | TEXT | DD-MMM-YYYY HH:MM:SS | Electronic metadata – last modified date, if available. |
| MD5 Hash Value | TEXT | | MD5 hash value used for deduplication, if available. |
| File Extension | TEXT | Eg: XLSX PDF | The file extension or original native file type is to be provided for all documents. |

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**COVID-19
Hotel Quarantine Inquiry**

Schedule 2 – Document Types

1 Document Types for electronic documents

| Document Type | Description |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| Email | An email – usually contained within an email store (e.g. an email box) but may be extracted to reside within a directory or folder on a file system. |
| Email Attachment | An electronic document attached to an email. |
| Electronic File | An electronic file that is not attached to an email but rather resided in its original state in a directory on a file system. |

2 Document Types for hard copy documents

2.1 Standard document types:

| Document Type | | | |
|---------------------------------|-------------------------|------------------------|------------|
| Agenda | Email | Minutes of Meeting | Transcript |
| Agreement/Contract/Deed | Facsimile | Notice | Web Page |
| Affidavit/Statement | Fax Transmission Report | Permit | |
| Annual Report | File Note | Photograph | |
| Article | Financial Document | Physical Media | |
| Authority | Form | Presentation | |
| Board Papers | Handwritten Note/Note | Receipt | |
| Brochure | Invoice/Statement | Report | |
| Certificate | Legislation/Act | RFI – RFO | |
| Cheque Remittance | Letter | Search/Company Search | |
| Court Document | List | Social Media/Messaging | |
| Curriculum Vitae/Identification | Manual/Guidelines | Specification | |
| Diary Entry | Map | Table/Spreadsheet | |
| Divider/File Cover | Media Article/Release | Submissions | |
| Diagram/Plan | Memorandum | Timesheet | |

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Practice Direction 2



COVID-19 Hotel Quarantine Inquiry

PRACTICE DIRECTION NO. 2 LEAVE TO APPEAR AT THE INQUIRY

15 JULY 2020

INTRODUCTION

1. This Practice Direction (**PD-2**) relates to participation in the evidentiary public hearings that will be held as part of the work of the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Inquiry**).
2. This Practice Direction is issued under s 63(1) of the *Inquiries Act 2014 (Vic)* (**Act**). It should be read in conjunction with the Act and with the terms of reference contained in the Order establishing the Inquiry.
3. This Practice Direction sets out general guidance about applications for leave to appear at the evidentiary public hearings of the Inquiry. Other information relevant to the work of the Inquiry can be found in Practice Direction 3 which relates to the taking of evidence at those public hearings.

WHEN LEAVE TO APPEAR MAY BE GRANTED

4. The Inquiry's power to grant leave to appear is contained in section 62 of the Act.
5. Having regard to the matters in that section and to the nature, purposes and timeframe of the Inquiry, it is anticipated that leave to appear may be granted to a person (including a body corporate or body politic) who has a direct or special interest in one or more of the subjects of the Inquiry. It will generally be granted where a person -
 - (a) is a subject of consideration at the evidentiary public hearing;
 - (b) is likely to be the subject of an adverse allegation; or
 - (c) is able to demonstrate that their participation in the hearing will assist the Inquiry.

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THE SCOPE OF ANY LEAVE GRANTED

6. It is unlikely that the Inquiry will grant any person unconditional leave to appear. Unless the Inquiry is otherwise persuaded in a particular case, any grant of leave will be -
 - (a) limited to the particular issue or issues in which the person has the special or direct interest; and
 - (b) subject to conditions.
7. A person granted leave to appear will be entitled to -
 - (a) appear at and participate in the public hearing subject to the Inquiry's control and to any limitations and conditions imposed on the grant of leave;
 - (b) be legally represented without the need for further or separate authorisation; and
 - (c) seek leave to examine or cross examine witnesses in accordance with Practice Direction 3.
8. The Inquiry may at any time withdraw leave to appear or make a grant of leave subject to amended or additional limitations and conditions.

PROCESS FOR APPLICATIONS

9. The evidentiary public hearings will commence in August 2020 on dates to be fixed. The matters to be considered at the public hearings will be determined by the Inquiry and published on its website in advance of the hearing dates.
10. All applications for leave to appear at the evidentiary public hearings must be made -
 - (a) as soon as the person becomes aware that they have a relevant interest in the matters to be considered at the public hearings;
 - (b) wherever possible, no later than 3 days prior to the date of the evidentiary public hearing for which leave to appear is sought; and
 - (c) on the form **attached** to this Practice Direction entitled "Application for Leave to Appear at the Public Hearings of the Inquiry".
11. The completed form must be accompanied by a short submission of no more than one page addressing the reasons why the applicant should be granted leave to appear at the evidentiary public hearing. Submissions should address:

- (a) the matters referred to in section 62(2) of the Act; and
 - (b) the matters set out in this Practice Direction.
12. Applications for leave should be sent to Solicitors Assisting by email to: lawyers@quarantineinquiry.vic.gov.au or by post to: PO Box 24012, Melbourne VIC 3001.
13. The Inquiry will generally determine applications for leave to appear without any oral hearing and on the basis of the application and submissions provided.
14. The Inquiry will notify the applicant in writing of its determination.

CONTACTING THE INQUIRY

15. Any questions about any matters dealt with in this Practice Direction or other matters concerning the public hearings should be directed to Solicitors Assisting at: lawyers@quarantineinquiry.vic.gov.au.

Issue date: 15 July 2020



THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

Application for Leave to Appear at the Public Hearings of the Inquiry

| | |
|-------------------------------------------------------------------|------------------------------------------------|
| Name of person or organisation seeking leave to appear | |
| Lawyer(s) representing the person or organisation (if any) | |
| Contact person(s) | |
| Contact address | (State) (Postcode) |
| Contact telephone number | (Business) (Mobile) |
| Contact email address(es) | |

Please attach a short submission as to the reasons why the applicant should be granted leave to appear at the public hearings.

The submission must be no longer than one page and should address:

- the matters referred to in section 62(2) of the *Inquiries Act 2014* (Vic); and
- how granting leave to appear at the public hearings would assist the Inquiry in the conduct of the public hearings over and above any written submissions that the applicant may make

Please lodge this form with the attached submission by sending it via:

- email to: lawyers@quarantineinquiry.vic.gov.au; or
- post to: PO Box 24012, Melbourne VIC 3001.

Practice Direction 3



COVID-19 Hotel Quarantine Inquiry

PRACTICE DIRECTION NO. 3

CONDUCT OF PUBLIC HEARINGS

15 JULY 2020

As Amended on 20 August 2020

INTRODUCTION

1. This Practice Direction (**PD-3**) relates to the conduct of the public hearings that will be held as part of the work of the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Inquiry**).
2. This Practice Direction is issued under section 63(1) of the *Inquiries Act 2014 (Vic)* (**Act**). It should be read in conjunction with the Act and with the terms of reference contained in the Order establishing the Inquiry.
3. This Practice Direction sets out the way in which the evidentiary public hearings of the Inquiry will be conducted. Persons seeking to participate in the public hearings should consult Practice Direction 2 which relates to applications for leave to appear.

GENERAL MATTERS

4. The Inquiry will conduct evidentiary public hearings from August 2020 on dates to be fixed.
5. The Inquiry will endeavour to publish a list of the topics to be examined in the public hearings in advance. That list may be amended as the Inquiry proceeds. The Inquiry will also, from time to time, publish a list of the witnesses who will attend and give evidence at the hearings.
6. Subject to any contrary direction of the Inquiry pursuant to the Act, the public hearings will be open to the public via live streaming.
7. Subject to any changes in public health directions made under the *Public Health and Wellbeing Act 2008*, or by leave granted by exception, only designated officers of the Inquiry, including Counsel Assisting the Inquiry (**Counsel Assisting**), will be physically

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present during the public hearings. Persons granted leave to appear and their legal representatives will attend via online video platform.

WITNESSES

8. Subject to the control of the Inquiry, Counsel Assisting will determine -
 - (a) who is to be called as a witness at the public hearings;
 - (b) the order in which those witnesses are called; and
 - (c) which documents are to be tendered.
9. The Inquiry will require witnesses to give evidence on oath or affirmation.
10. The Inquiry may require witnesses to give evidence concurrently with other witnesses.
11. All persons required to give evidence will be served with a notice under section 64 of the Act requiring their attendance to give evidence.

IDENTIFICATION AND PREPARATION OF WITNESSES

12. Counsel Assisting, with the assistance of the Solicitors Assisting the Inquiry, will:
 - (a) identify and contact each individual they wish to give evidence as a witness before the Inquiry;
 - (b) determine whether an individual in respect of whom a witness statement has been prepared or received will be called to give evidence at a hearing; and
 - (c) obtain witness statements in accordance with this Practice Direction.
13. Unless the Inquiry otherwise determines, any witness called in the public hearings will give evidence by way of both written witness statement and oral evidence.
14. Where a proposed witness is not legally represented, Counsel Assisting and Solicitors Assisting the Inquiry will meet with the proposed witness for the purpose of preparing their witness statement.
15. Where a proposed witness is legally represented -
 - (a) Counsel Assisting will prepare, and Solicitors Assisting will provide, an outline of the topics that should be addressed in a proposed witness statement;
 - (b) the proposed witness will be assisted by their legal representative in the preparation of their witness statement;
 - (c) the witness statement must follow, and address each topic in, the outline; and

- (d) Solicitors Assisting will communicate with the witness's legal representatives about the time by which the statement will be required, and where relevant and appropriate, about conferring with the witness prior to the date on which the witness gives evidence.

EXAMINATION OF WITNESSES AT THE PUBLIC HEARING

Evidence in chief

16. All witnesses called to give evidence will be examined by Counsel Assisting who will -
- (a) invite the witness to adopt their witness statement as their evidence in chief; and
 - (b) examine the witness on topics that are -
 - (A) not covered in their witness statement;
 - (B) the subject of different or contradictory information available to the Inquiry; or
 - (C) otherwise matters which the Inquiry will be assisted by being canvassed in oral evidence.
17. Where practicable, Counsel Assisting will notify witnesses in advance of the hearing of any topics on which questions will be asked of the witness that are not covered by their witness statement. Counsel Assisting may, however, ask questions of the witness irrespective of whether notice is given.

Cross examination

18. Examination or cross-examination of witnesses by any other party will be by leave only and no open-ended leave will be given.
19. Any person who has leave to appear and who wishes to examine or cross examine a witness should consult with Counsel Assisting, via email in the first instance, regarding topics to be canvassed and whether those matters are matters that can be dealt with by Counsel Assisting. Counsel Assisting can be contacted at:

Tony Neal QC – tony.neal@quarantineinquiry.vic.gov.au

Rachel Ellyard – rachel.ellyard@quarantineinquiry.vic.gov.au

Ben Ihle – ben.ihle@quarantineinquiry.vic.gov.au

Steven Brnovic - steven.brnovic@quarantineinquiry.vic.gov.au

Jess Moir - jess.moir@quarantineinquiry.vic.gov.au

20. A person who has leave to appear and who wishes to seek leave to examine or cross-examine a witness must notify Counsel Assisting in accordance with paragraph 19 at least 2 working days before the day on which the witness is scheduled to give evidence, in accordance with the timetable to be published by the Inquiry from time to time, and inform Counsel Assisting of the matters set out in paragraph 22 below.
21. If a person who has leave to appear wishes to seek leave to examine or cross examine a witness and has not given notice as required by paragraph 20, that person may nevertheless seek leave, and may be called upon to specify, in addition to the matters set out in paragraph 22, why notice was unable to be given in advance.
22. In determining whether a person has a sufficient interest to examine or cross-examine a witness, the Inquiry may call upon the party making the application to set out in writing or in oral submissions:
 - (a) the purpose of the cross-examination;
 - (b) the issues to be canvassed;
 - (c) the proposed duration of the examination; and
 - (d) details (with copies provided) of any documents to which they propose to take the witness.
23. Wherever possible the Inquiry will determine applications for leave in chambers and in advance of the date on which the witness is to be called.
24. Leave to cross examine will only be granted to the extent it will assist the Inquiry.
25. Where leave is granted -
 - (a) that leave may specify the issue or issues about which questions may be asked;
 - (b) questioning must be limited to matters within the scope of the Inquiry;
 - (c) questioning which is repetitive of matters already raised by Counsel Assisting will not be permitted;
 - (d) questions going only to credit will not be permitted;
 - (e) parties with a common interest in the evidence of a witness will be expected to agree amongst themselves on the division of topics amongst them;
 - (f) revisiting areas or subjects covered by earlier questioning by parties with a common interest will not be permitted; and

- (g) in default of agreement the Inquiry will direct the order of questioning; and
 - (h) any leave granted to the legal representative of a witness to examine their client will be confined to matters not already in evidence.
26. After any questioning by other parties, Counsel Assisting may re-examine the witness.

DOCUMENTS

27. Counsel Assisting will determine, subject to the Inquiry's control, which and when documents are to be tendered.
28. Before the commencement of the public hearing, each person granted leave to appear at the hearing may at the discretion of Counsel Assisting or Solicitors Assisting be given confidential access to documents that are likely to be tendered as exhibits and which could affect that person's interests. The time at which such access will be granted is in the discretion of the Inquiry and may be granted in tranches subject to the order in which issues are to be addressed in the public hearing.
29. One purpose for which confidential access may be granted is to enable the identification of any application for a restricted publication order in relation to a document or part of a document.
30. Additional documents may be tendered by Counsel Assisting during the course of a public hearing. Copies of any such documents will be provided to persons granted leave to appear.
31. A copy of any document proposed to be put to a witness must be provided to the Solicitors Assisting the Inquiry as soon as the decision is made to use the document and in all cases prior to the date on which it is intended to be used.
32. If a person who has been granted leave to appear seeks to have a document tendered at a public hearing:
- (a) that person must provide a copy of it to Solicitors Assisting the Inquiry as soon as the decision is made to place the document before the public hearing;
 - (b) the Inquiry may require the production of other documents to assist in determining whether the document in question should be received; and
 - (c) Counsel Assisting will decide whether or not the documents are to be tendered.

RESTRICTED PUBLICATION ORDERS

33. The Inquiry may restrict publication of information relating to the public hearings in accordance with section 73 of the Act.
34. Subject to section 73 and any other direction made by the Inquiry:
- (a) transcripts of the evidence at the public hearings will be uploaded onto the Inquiry's website as soon as they are available;
 - (b) witness statements of witnesses called to give evidence at the public hearings will be available on the Inquiry's website as soon as practicable after the witness has given their evidence; and
 - (c) documents tendered at the public hearings will be available on the Inquiry's website as soon as practicable after the document has been tendered.
35. A person who has been granted leave to appear at the public hearing and who wishes to apply for a restricted publication order in respect of any witness or any evidence to be given during a public hearing must -
- (a) give notice of the application to Solicitors Assisting as soon as the basis for the application is identified and in all cases prior to the date on which the witness or evidence is to be before the public hearing; and
 - (b) in that notice set out the basis of the application in writing by reference to the matters in section 73.
36. Unless the Inquiry otherwise directs in a particular case, restricted publication order applications will be determined on the papers.
37. The Inquiry will give notice to media organisations of any application for a restricted publication order.

CONTACTING THE INQUIRY

38. Any questions about any matters dealt with in this Practice Direction or other matters concerning the public hearings should be directed to Solicitors Assisting at: lawyers@quarantineinquiry.vic.gov.au.

Issue date: 15 July 2020



THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

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**COVID-19
Hotel Quarantine Inquiry**

**PRACTICE DIRECTION NO. 4
CONDUCT OF EVIDENTIARY PUBLIC
HEARINGS IN A VIRTUAL
ENVIRONMENT**

6 August 2020

INTRODUCTION

1. This Practice Direction (**PD-4**) relates to the conduct of the evidentiary public hearings that will be held as part of the work of the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Inquiry**) in a virtual environment.
2. This Practice Direction is issued under s 63(1) of the *Inquiries Act 2014 (Vic)* (**Act**). It should be read in conjunction with the Act, the terms of reference contained in the Order establishing the Inquiry, and the other Practice Directions available on the Inquiry's website (<https://www.quarantineinquiry.vic.gov.au/lawyers>).
3. This Practice Direction may be varied, changed or amended from time to time. The Inquiry may, at any time, depart from this Practice Direction if it considers it appropriate to do so.

VIRTUAL HEARING ROOM

4. The evidentiary public hearings will be conducted via a virtual hearing room (**Virtual Hearing Room**).
5. The software used to host the Virtual Hearing Room will be Zoom.

PARTICIPANTS

6. To maintain orderly proceedings, access to the Virtual Hearing Room will be limited to the following, subject to any contrary directions the Inquiry may make in exceptional circumstances:
 - (a) Witnesses called to give evidence before the Inquiry;
 - (b) The legal representatives of such witnesses, including their Counsel and/or

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solicitors;

- (c) The legal representatives of other parties with leave to appear, but only at such times as evidence is being given or submissions are being made to the Inquiry in respect of matters where that party has a direct or special interest in that evidence or those submissions; and
- (d) If applicable, one other person representing witnesses and/or each party with leave to appear (e.g. 'clients').

(together, **Participants**).

- 7. All other parties or persons wishing to observe the evidentiary public hearings may do so via the livestream available on the Inquiry's website (www.quarantineinquiry.vic.gov.au).

TECHNOLOGICAL SPECIFICATIONS FOR VIRTUAL HEARING ROOM

- 8. Zoom is a video conferencing application that can be used on any device, including a computer, tablet or a smartphone. Zoom may be accessed through the dedicated application or through a web browser.
- 9. The Inquiry recommends that Participants:
 - (a) download the Zoom application (available free at <https://zoom.us/download> or in the app store for your device);
 - (b) familiarise themselves with Zoom using the videos and guides on the Zoom website;
 - (c) have their own device with Zoom installed;
 - (d) use a computer or tablet no smaller than an iPad (9.7"). Smartphones should not be used by Participants who will be addressing the Inquiry during the evidentiary public hearings;
 - (e) ensure that they access the Virtual Hearing Room from a location that has a reasonable internet speed, whether via Wi-Fi or a cellular network such as 4G;
 - (f) wear a headset when attending the Virtual Hearing Room to improve audio quality and reduce any audio feedback (noting that mobile phone in-ear headphones do not generally provide reliable audio).

ACCESSING THE VIRTUAL HEARING ROOM

- 10. In order to access the Virtual Hearing Room, Participants are required to:

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- (a) Prepare a list containing the names, email addresses and mobile phone numbers of each person requiring access to the Virtual Hearing Room; and
 - (b) Email the list at least 24 hours prior to the hearings they propose to attend to Solicitors Assisting at lawyers@quarantineinquiry.vic.gov.au using 'Proposed Participants for Virtual Hearings' as the subject line of the email.
11. Participants will then be provided with log-in details enabling them to access the Virtual Hearing Room.

DEVICE CHECKS

12. Device checks will be arranged with witnesses called to give evidence before the Inquiry, in the days before they are scheduled to give evidence, to confirm that their technology is operating effectively. Legal representatives for witnesses called to give evidence before the Inquiry are permitted to attend such device checks.
13. A final device check will be conducted immediately prior to the hearing. Witnesses and their Nominated Legal Representative (see paragraph 18, below) must log-in to Zoom using the details provided 30 minutes prior to their scheduled appearance time to complete the final device check.

ATTENDING THE VIRTUAL HEARING ROOM

14. In order to replicate the conditions of a physical hearing room, when attending the Virtual Hearing Room:
 - (a) all Participants must ensure that they are situated in a quiet physical location that complies with social distancing requirements in place at the time, and where they will avoid interruption; and
 - (b) save as may be necessary for the limited purpose of receiving technological support, and subject to any directions the Board may make from time to time, witnesses must ensure that there are no other persons present in that physical location while giving evidence before the Inquiry.
15. When logging-in to Zoom, Participants must enter '(LTA)' then their full name and the organisation they are representing (if applicable). E.g. '(LTA) John Smith – Sample Co Pty Ltd'.
16. Participants other than witnesses and their Nominated Legal Representative (see paragraph 18, below) must mute their microphones and ensure that their camera is turned off.

17. Witnesses and their Nominated Legal Representative must log-in 30 minutes prior to the scheduled commencement of the witness' evidence, with their microphone on mute and their camera turned on. Witnesses will be invited to unmute their microphone immediately prior to giving evidence, and their Nominated Legal Representative will be requested to switch off their cameras and leave their microphone on mute unless addressing the Inquiry as outlined below.

ADDRESSING THE INQUIRY

18. Only one legal representative for each witness and party who has been granted leave to appear (**the Nominated Legal Representative**) will be able to turn on their camera, unmute their microphone, and address the Inquiry during the public evidentiary hearings, subject to the following:
- (a) In accordance with standard Court etiquette, the Nominated Legal Representative must refrain from turning on their camera and unmuting their microphone while Counsel Assisting is examining a witness unless it is necessary to make an objection;
 - (b) When considering the need to address the Inquiry, the Nominated Legal Representative should have regard to the following:
 - (A) The need for the Inquiry to maintain orderly proceedings, and the added difficulty of maintaining orderly proceedings in a virtual environment;
 - (B) Once the Nominated Legal Representative turns on their camera and unmutes their microphone, their image and voice will be broadcast within the Virtual Hearing Room and, unless the Inquiry otherwise directs, the public via the Inquiry's live-stream;
 - (c) Applications for leave to re-examine or cross-examine a witness must be made in accordance with Practice Direction 3; and
 - (d) The Inquiry maintains the right to conduct the evidentiary public hearings in any manner it considers appropriate in accordance with s 59 of the *Inquiries Act 2014*.
19. Witnesses will be permitted to address the Inquiry in the usual manner when responding to questions put to them.
20. Those persons who have been given access to the Virtual Hearing Room, other than the Nominated Legal representative and witnesses, will not be permitted to address the Inquiry, unless exceptional circumstances apply, and will have their camera and microphone settings disabled throughout the evidentiary public hearings accordingly.

GIVING EVIDENCE

21. Witnesses will be sworn in or affirmed by the Associate. Witnesses can choose to take an oath or affirmation via Zoom. Witnesses choosing to take an oath are not required to hold a religious text. In circumstances where a witness would like to swear an oath upon a religious text, it will be the responsibility of the witness and/or their legal representative(s) to ensure that text is available.
22. Where a witness wishes to show a document or video during the virtual hearing, the witness and/or their legal representative(s) must contact the Inquiry at least two days prior to the commencement of the hearing so that the Inquiry may make suitable arrangements for the document or video to be shown during the hearing.

ETIQUETTE

23. The Board of Inquiry is constituted by the Honourable Jennifer Coate AO. When addressing the Board of Inquiry, the appropriate terminology is 'the Board' (e.g. 'if the Board pleases').
24. Participants should remain seated when the Honourable Jennifer Coate AO enters and exits the hearings, and when addressing the Inquiry.
25. When attending the hearings, Participants are expected to be attired and behave in a manner appropriate for attendance at a Court.
26. For the avoidance of doubt, Counsel are not to be robed.

LIVE STREAM AND RECORDING

27. The evidentiary public hearings will be live streamed to the public on the Inquiry's website (www.quarantineinquiry.vic.gov.au), which will be closed-captioned and subject to a delay of five minutes.
28. All aspects of the public hearings will be audio and visually recorded.

CONTACTING THE INQUIRY

29. For any issues, including technological difficulties, that may arise during the course of the Board's hearings, please contact Solicitors Assisting, who will be monitoring emails in real-time to enable a timely response, at lawyers@quarantineinquiry.vic.gov.au.
30. Questions about any matters dealt with in this Practice Direction or other matters concerning the evidentiary public hearings should be directed to Solicitors Assisting at: lawyers@quarantineinquiry.vic.gov.au.

Issue date: 6 August 2020



THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

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**COVID-19
Hotel Quarantine Inquiry**

PRACTICE DIRECTION NO. 5

DOCUMENTARY EVIDENCE

31 August 2020

INTRODUCTION

1. This Practice Direction (**PD-5**) relates to the handling of documentary evidence produced to the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Inquiry**).
2. This Practice Direction is issued under s 63(1) of the *Inquiries Act 2014 (Vic)* (**Act**). It should be read in conjunction with the Act, the terms of reference contained in the Order establishing the Inquiry, and the other Practice Directions available on the Inquiry's website (<https://www.quarantineinquiry.vic.gov.au/lawyers>).
3. This Practice Direction may be varied, changed or amended from time to time. The Inquiry may, at any time, depart from this Practice Direction if it considers it appropriate to do so.

ONLINE HEARING BOOK

4. The Inquiry's online Hearing Book (**Hearing Book**) is accessible to parties with Leave to Appear. Access is expressly subject to an undertaking given by the accessing party that information contained on the Hearing Book will not be published or otherwise disclosed unless and until it has been tendered at a public hearing of the Inquiry or otherwise made publicly available by the Inquiry.
5. The Inquiry's staff, including Solicitors Assisting and Counsel Assisting the Inquiry, will determine which materials provided to the Inquiry will be uploaded to the Hearing Book.
6. As a general guide, the Hearing Book will contain:
 - (a) statements of witnesses;
 - (b) any exhibits or attachments to the statements of witnesses;
 - (c) other documents identified as being relevant to the evidence of witnesses; and

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(d) transcripts of public hearings.

7. The Hearing Book folders are structured as follows:

[Hearing dates to which evidence relates]

01. Leave to Appear folder

[Name of witness to whom evidence relates]

- a. Statement
- b. Exhibits
- c. Documents Relevant to Witness

Other relevant documents

02. Produced for Tendering folder

[Name of witness to whom evidence relates]

- a. Statement
- b. Exhibits
- c. Documents Relevant to Witness

Other relevant documents.

03. Tendered Exhibits folder

04. Finalised Transcripts folder

HEARING BOOK PROCESS

- 8. Documents subject to a 'reasonable excuse' claim pursuant to s 65 of the Act will not be uploaded to the Hearing Book until such claims have been determined.
- 9. Documents will be uploaded by the Inquiry's staff to the Hearing Book as follows:
 - (a) As soon as practicable upon receipt of statements and their exhibits/attachments that are proposed to be tendered, and upon identification of any other documents relevant to witnesses, but following the resolution of any claims of 'reasonable excuse' over the documents, or parts of documents;
 - (b) Documents subject to an extant claim for an order pursuant to s 73 of the Act (**s 73 Order**) will be uploaded to the Leave to Appear folder along with documents that are not subject to claims;
 - (c) Where redacted copies of documents subject to a claim for a s 73 Order are not provided at the time the documents are produced, unredacted copies of

those documents will be uploaded to the Leave to Appear folder;

- (d) Where redacted copies of documents subject to a claim for a s 73 Order are provided to the Inquiry, those documents will be uploaded in redacted and unredacted form while such claims are resolved;
- (e) Where a party seeks any redaction to documents contained on the Inquiry's Hearing Book prior to them being tendered, that party is required to provide highlighted and redacted copies of the documents to Solicitors Assisting as soon as possible but at least three days prior to the hearing at which the documents are proposed to be tendered;
- (f) The Inquiry's staff will endeavour to transfer documents from the Leave to Appear folder to the 'Produced for Tendering' folder at least two days prior to the hearing to which those documents relate;
- (g) Once witness statements are tendered, they will be published on the Inquiry's website, generally the same day they are tendered;
- (h) Once documents other than witness statements are tendered, they will be placed in the Tendered Exhibits folder. Should any further redactions to the documents be sought, the seeking party must provide the Inquiry with highlighted and redacted copies of the documents as soon as possible, but no more than two calendar days after their being uploaded to the 'Tendered Exhibits' folder;
- (i) Documents contained in the 'Tendered Exhibits' folder will be published on the Inquiry's website in due course;
- (j) Documents contained in the 'Produced for Tendering' folder may be publicly displayed during the Inquiry's hearings.

REDACTING DOCUMENTS

- 10. The Inquiry's staff are generally not in a position to make redactions on behalf of parties.
- 11. If a party seeks that a redaction be made, it is that party's responsibility to provide copies of:
 - (a) the document(s) with highlighting over those parts sought to be redacted; and
 - (b) the document(s) with the relevant parts redacted as sought, and
 - (c) an explanation in writing which justifies the redaction.

12. Failure to provide any one of (a) – (c) above will result in the application for redaction being considered void and the document may be tendered, referred to in public hearings and published on the Inquiry's website in accordance with the remaining paragraphs of this Practice Direction.

DOCUMENTS AVAILABLE TO WITNESSES

13. When giving evidence before the Inquiry, witnesses are required to have immediate access (whether in electronic or hard-copy format) to all documents contained in the 'Produced for Tendering' folder assigned to their name.

IDENTITIES OF NON-EXECUTIVE PERSONNEL

14. The Inquiry has determined that information tending to identify any non-executive personnel of a government or private agency is not generally relevant to its Terms of Reference.
15. Accordingly, unless otherwise directed by the Inquiry, parties producing documents in response to a Notice to Produce (including statements) may produce documents to the Inquiry in two forms:
 - (a) an unredacted copy of the document which contains personal identifying information of non-executive personnel of government and/or private agencies; and
 - (b) a form of the document where the personal identifying information is redacted from documents, and in which the redacted information may be replaced with text reflecting that person's job title or role.
16. In the instance that a party seeks to avail itself/themselves of the process afforded by paragraph 15 above, then:
 - (a) only the redacted version of the statement will be placed in the 'Produced for Tendering' folder, tendered at any public hearing and placed on the Inquiry's website for public access; and
 - (b) any person to whom such personal identifying information relates will be given a pseudonym by the Inquiry, and if referred to or called to give evidence at a public hearing, will give evidence under that pseudonym.

Issue date: 31 August 2020



THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

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Appendix E

List of Parties with Leave to Appear

| |
|-----------------------------------------------------------------------------------------------------------------------------------------|
| Alfred Health |
| Australian Nursing Agency |
| Crown Melbourne Ltd |
| Mr Christopher Eagle |
| Department of Environment, Land, Water and Planning (DELWP) |
| Department of Health and Human Services (DHHS) |
| Department of Jobs, Precincts and Regions (DJPR) |
| Department of Justice and Community Safety (DJCS) |
| Department of Premier and Cabinet (DPC) |
| Department of Treasury and Finance (DTF) |
| The Hon. Daniel Andrews MP |
| The Hon. Jenny Mikakos |
| The Hon. Lisa Neville MP |
| The Hon. Martin Pakula MP |
| Meteorite Land (Pearl River) Pty Ltd as trustee for the Meteorite Land (Pearl River) Unit Trust, trading as the Four Points by Sheraton |
| Melbourne Hotel Group Pty Ltd trading as Holiday Inn Melbourne Airport |
| Mr Michael Girgis, IKON Cleaning Services |
| MSS Security Pty Ltd |
| Onsite Doctors Pty Ltd |
| Professor Benjamin Howden |
| Rydges Hotels Ltd |
| Salter Brothers (Spencer Street) Hotel Pty Ltd |
| Chief Commissioner Shane Patton, Victoria Police |
| Stamford Plaza Melbourne Pty Ltd |
| Sterling Pixxel Pty Ltd trading as Sterling Security Group |
| Travelodge Hotel Docklands |
| Unified Security Group (Australia) Pty Ltd |
| United Risk Management Pty Ltd |
| Wilson Security Pty Ltd |
| Your Nursing Agency (Victoria) Pty Ltd (YNA) |

Appendix F

Example letter and notice to produce documents



**COVID-19
Hotel Quarantine Inquiry**

[Date]

[Name of addressee]
[Position of addressee]
[Organisation]
[Organisation's address]

By email: [email address of addressee or their legal representative]

Dear [Name of addressee]

Board of Inquiry into the COVID-19 Hotel Quarantine Program – NTP-[number]

The COVID-19 Hotel Quarantine Program Inquiry was established on 2 July 2020 by Order in Council made under s 53(1) of the *Inquiries Act 2014* (Vic).

The Board of Inquiry's Terms of Reference (**Terms of Reference**) are enclosed at **Attachment 1**.

The purpose of this letter is to notify you that your organisation has been identified as an organisation of interest to the work of the Inquiry.

The Inquiry is conscious that many who will be asked to contribute to the work of the Inquiry are concurrently assisting with the ongoing efforts to respond to the COVID-19 pandemic. Whilst mindful of this, we are also conscious of the timeframes in which the Inquiry is required to undertake its task, and to furnish its report.

We now write to issue your organisation with a Notice to Produce requiring the production of documents.

Notice to Produce

Please find **enclosed** a Notice to Produce (**Notice**) issued pursuant to s 64 of the *Inquiries Act 2014* (Vic). A copy of s 64 is attached to this letter (**Attachment 2**).

The Notice is to be known as NTP-[number]. It contains important information about how the documents specified in the Schedule to the Notice are to be produced to the Inquiry and when.

The documents responsive to the Notice should be produced in accordance with Practice Direction 1: Production of Materials and Document Management Protocol, a copy of which is attached to this letter (**Attachment 3**).

When producing the documents responsive to the Notice, please include a covering letter that identifies whether the documents produced constitute complete or partial production in response to the Notice.

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Timeline

The Notice requires that you produce relevant documents to the Inquiry by **[time and date of deadline]**.

We appreciate your organisation may face difficulty in meeting this timeframe. We have factored that difficulty into the period in which production of documents is required pursuant to the Notice.

You will also note that the Inquiry is required to provide its final report to the Governor in approximately 13 weeks from now, on 6 November 2020. Accordingly, your compliance with the timeframe is required.

If you would like to discuss this, or any other matter regarding the Inquiry, please contact Solicitors Assisting at lawyers@quarantineinquiry.vic.gov.au or (03) 7017 3459.

Yours sincerely,

THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

NOTICE TO PRODUCE
DOCUMENTS TO A BOARD OF INQUIRY

Regulation 15

TO: [Name of addressee]
[Position title of addressee]
[Organisation]

AT: [Organisation address]

A Board of Inquiry is being held into the COVID-19 Hotel Quarantine Program, established by an Order in Council made under s 53(1) of the *Inquiries Act 2014* (Vic) (Act).

What you must do

You must produce the documents specified in the Schedule attached to this Notice (the **Schedule**). This Notice is identified as 'NTP-[number]'.

You should include with the documents a numbered index which includes:

- the document title and date; and
- any relevant commentary necessary to provide context to the document.

Where you must produce documents

The documents specified in the Schedule must be produced electronically in accordance with Practice Direction 1: Production of Materials and Document Management Protocol on or before [time and date of deadline].

Objecting to this notice

You may object to this notice if you have (or will have) a reasonable excuse for failing to comply with the notice. For example, it is a reasonable excuse to fail to comply with the notice if you are prohibited from disclosing the document(s) by a court order. See section 65 of the *Inquiries Act 2014* (the **Act**) for further examples of what constitutes a reasonable excuse.

You may also object to the notice by claiming that the document(s) specified in the notice are not relevant to the subject matter of the inquiry.

If you wish to object to this notice, you must do so in writing:

To: lawyers@quarantineinquiry.vic.gov.au

By: [time and date of deadline].

Your written objection must outline your reasons for objecting and include a relevant contact person with which to liaise. If the Board of Inquiry is satisfied that your claim is made out, the Board of Inquiry may vary or revoke this notice.

Failure to comply with this notice without a reasonable excuse may constitute a criminal offence. The maximum penalty for this offence is 240 penalty units or imprisonment for two years. See section 86 of the Act.

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Failure to comply with this notice without a reasonable excuse may also result in the Board of Inquiry making an application to the Supreme Court of Victoria. The Court may then order you to comply with the notice within a specified period. See section 70 of the Act.

THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

Date: [Date]

SCHEDULE TO NOTICE TO PRODUCE

DOCUMENTS TO A BOARD OF INQUIRY (NTP-[number])

The documents described below are required to be produced to the Board of Inquiry pursuant to s 64 of the *Inquiries Act* (Vic):


[Insert numbered list of types or categories of documents to be provided]

DEFINITIONS

For the purposes of this Notice to Produce:

[Insert definitions relevant to this notice]

Example letter and notice to produce witness statement



**COVID-19
Hotel Quarantine Inquiry**

[Date]

**[Name of addressee]
[Position of addressee]
[Organisation]
[Organisation's address]**

By email: **[email address of addressee or their legal representative]**

Dear **[Name of addressee]**,

Board of Inquiry into the COVID-19 Hotel Quarantine Program

The Board of Inquiry (**Inquiry**) is inquiring into certain matters relating to the Hotel Quarantine Program and has identified you as a person with relevant evidence to give regarding one or more of those matters.

This letter is a request for a witness statement from you to assist the Inquiry with its work.

Attached to this letter are:

- A list of questions to be answered in your witness statement; and
- A Notice to Produce the statement by **[time and date of deadline]**. (NTP-**[number]**).

Powers of the Inquiry

Under the *Inquiries Act 2014 (Vic)* (**Inquiries Act**) the Inquiry has the power to compel a person to attend to give evidence before a sitting of the Inquiry and to produce any document or thing. Persons who give evidence to the Inquiry enjoy certain protections under the Inquiries Act. In certain circumstances, a person may offer a reasonable excuse why they ought not be compelled to give evidence. More information can be found on the Inquiry's website and in the Inquiries Act.

Your witness statement will be your evidence in chief

The nature of the matters being inquired into and the timeframe within which the Inquiry must complete its work means that the Inquiry has determined to receive evidence in chief from all witnesses by means of a written witness statement. We are seeking your assistance in the preparation of a statement in advance of the hearings so as to enable the timely and effective receipt of relevant evidence. If you are not willing to prepare a written statement you should advise us as soon as possible so that arrangements can be made for your attendance before the Inquiry to have your evidence taken in another way.

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Not all witnesses who provide statements will also be called to give oral evidence at the public hearings. You will receive notice in advance of the public hearings if your oral evidence is required

You can get help with writing your witness statement

If you have a legal representative, you may seek their assistance in preparing your witness statement.

If you are not legally represented, you may choose to -

- seek legal representation for the purposes of preparing your witness statement; or
- prepare the statement yourself in accordance with the questions and guidance contained in this letter and attachment; or
- meet with someone from the team of Counsel Assisting the Inquiry who will assist you in the preparation of your statement. If you wish to take up this option, you should contact us immediately.

Approach to witness statement

The Inquiry requests that you take the following approach when preparing your witness statement:

1. Answer the Inquiry's questions in the order in which they are listed in the attached document;
2. List each question as a heading and answer the relevant question under that heading;
3. Draft the statement in your own words and in plain English without the use of acronyms or jargon;
4. Only include additional evidence which you consider necessary, *having regard to the terms of reference of this Inquiry*, to give context or completeness to the questions you have been asked after you have answered the Inquiry's questions;
5. Where it is necessary to refer in your statement to a document which you or your organisation have already produced to the Inquiry under a Notice to Produce, refer to the document both by its title or description and by the number assigned to it when it was produced to the Inquiry;
6. Where it is necessary to refer in your statement to a document which you have not yet produced to the Inquiry, assign it a number in accordance with Practice Direction 1, refer to the document both by its title or description and by the number it has been assigned, and produce the document or documents to the Inquiry at the same time that you produce your statement; and
7. Once completed, assign your statement its own number in accordance with Practice Direction 1.

You can find Practice Directions relating to documents and your witness statement at the Inquiry's website, www.quarantineinquiry.vic.gov.au.

Timeline for production

The Notice requests that you produce all relevant documents to the Inquiry by **[time and date of deadline]**. However, we would gratefully receive any material produced prior to that date, if it is practicable for you to do so.

If you have any questions, please contact Solicitors Assisting at lawyers@quarantineinquiry.vic.gov.au or (03) 7017 3459.

Yours sincerely,

THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program



**COVID-19
Hotel Quarantine Inquiry**

IN THE MATTER OF the *Inquiries Act 2014*

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

LIST OF QUESTIONS FOR [NAME OF WITNESS]

[Please include these questions in your witness statement as headings, with your answer to each question immediately beneath the relevant heading]

[Insert sample questions for Witness]

**NOTICE TO PRODUCE
DOCUMENTS TO A BOARD OF INQUIRY**

Regulation 15

TO: [Name of addressee]
[Position title of addressee]
[Organisation]

AT: [Organisation address]

A Board of Inquiry is being held into the COVID-19 Hotel Quarantine Program, established by an Order in Council made under s 53(1) of the *Inquiries Act 2014* (Vic) (**Act**).

What you must do

You must produce the documents specified in the Schedule attached to this Notice (the **Schedule**). This Notice is identified as 'NTP-[number]'.

You should include with the documents a numbered index which includes:

- the document title and date;
- whether the document is subject to a claim for reasonable excuse; and
- any relevant commentary necessary to provide context to the document.

Where you must produce documents

The documents specified in the Schedule must be produced electronically on or before [time and date of deadline] in accordance with Practice Direction 1: Production of Materials and Document Management Protocol.

Objecting to this notice

You may object to this notice if you have (or will have) a reasonable excuse for failing to comply with the notice. For example, it is a reasonable excuse to fail to comply with the notice if you are prohibited from disclosing the document(s) by a court order. See section 65 of the *Inquiries Act 2014* (the **Act**) for further examples of what constitutes a reasonable excuse.

You may also object to the notice by claiming that the document(s) specified in the notice are not relevant to the subject matter of the inquiry.

If you wish to object to this notice, you must do so in writing:

To: lawyers@quarantineinquiry.vic.gov.au

By: [time and date of deadline]

Your written objection must outline your reasons for objecting and include a relevant contact person with whom to liaise. If the Board of Inquiry is satisfied that your claim is made out, the Board of Inquiry may vary or revoke this notice.

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Failure to comply with this notice without a reasonable excuse may constitute a criminal offence. The maximum penalty for this offence is 240 penalty units or imprisonment for two years. See section 86 of the Act.

Failure to comply with this notice without a reasonable excuse may also result in the Board of Inquiry making an application to the Supreme Court of Victoria. The Court may then order you to comply with the notice within a specified period. See section 70 of the Act.

THE HONOURABLE JENNIFER COATE AO

Board of Inquiry into the COVID-19 Hotel Quarantine Program

Date: [Date]

[E lawyers@quarantineinquiry.vic.gov.au](mailto:lawyers@quarantineinquiry.vic.gov.au)

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SCHEDULE TO NOTICE TO PRODUCE**DOCUMENTS TO A BOARD OF INQUIRY (NTP-[number])**

The documents described below are required to be produced to the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Board**) pursuant to s 64 of the *Inquiries Act 2014* (Vic):

1. The statement, along with any supporting documents annexed thereto and an index of the supporting documents, prepared or gathered in response to the list of questions in the Board's letter addressed to [name of witness] dated [day / month] 2020.

Example letter and notice to attend



**COVID-19
Hotel Quarantine Inquiry**

[Date]

**[Name of addressee]
[Title of addressee]
[Organisation]
[Organisation's address]**

By email: [email address of addressee or their legal representative]

Dear **[Name of addressee]**,

Board of Inquiry into the COVID-19 Hotel Quarantine Program: Notice to Attend

We write further to our recent correspondence, in which you were requested to provide a written statement to the Board of Inquiry into the COVID-19 Hotel Quarantine Program (**Board**).

Notice to Attend

As foreshadowed in that letter, please find **attached** a Notice to Attend the evidentiary hearings being conducted by the Board on **[date of hearing]**.

[Include the following two sentences only if date of hearing is not yet decided:] We expect that you will be called in the period between **[first possible hearing date]** and **[last possible hearing date]**. We will contact to you in the coming week providing further details in this regard.

Conduct of hearings

The evidentiary hearings will be conducted via video-link. You will not be required to physically attend the hearings, but rather, will be able to attend remotely using Zoom using log-in details that will be provided to you in advance of the hearing at which you will be called to give evidence.

In you have legal representatives, they will also be permitted to attend the hearings remotely via Zoom. Further information regarding the conduct of the evidentiary hearings is available on the Board's website in Practice Direction 4.

Publication of your statement

Consistent with its usual procedures, the Board intends to make your statement and any documents annexed thereto available on the Board's Hearing Book in advance of the hearing at which you will be called to give evidence. The Board will also make any other documents likely to be raised during your evidence available on the Hearing Book.

The Board's Hearing Book is available to parties with leave to appear before the Board, and is regularly updated with relevant documents, such as your statement and any documents annexed thereto, to ensure that parties with leave to appear have notice of the matters likely to be raised at the Board's hearings.

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Subject to any contrary orders you may seek from the Board, once your statement and any other relevant documents relating to your evidence are tendered during the Board's hearings, those documents will be published on the Board's website. Again, this is consistent with the Board's usual procedures, and ensures that the public has access to relevant evidence forming part of the Board's Inquiry.

Application for Leave to Appear

If you have not done so already, and would like access to the Board's Hearing Book or to have legal representatives attend the hearings, we ask that you apply for leave to appear in accordance with Practice Direction No.2, which is contained on the Board's website by **[time and date of deadline]** (<https://www.quarantineinquiry.vic.gov.au/lawyers>).

If you have any questions, please contact Solicitors Assisting at lawyers@quarantineinquiry.vic.gov.au or (03) 7017 3459.

Yours sincerely,

THE HONOURABLE JENNIFER COATE AO

Board of Inquiry into the COVID-19 Hotel Quarantine Program

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**COVID-19
Hotel Quarantine Inquiry**

NOTICE TO ATTEND TO A BOARD OF INQUIRY

Regulation 15

TO: [Name of addressee]
[Title of addressee]

AT: [Organisation of addressee]
[Address]

A Board of Inquiry is being held into the COVID-19 Hotel Quarantine Program, established by an Order in Council made under s 53(1) of the *Inquiries Act 2014* (Vic) (**Act**).

What you must do

You must attend the Board of Inquiry to give evidence until excused.

Where you must attend

Where: The Board of Inquiry's hearings will be conducted by video-link using Zoom. You will be provided with login details and required to attend the hearing remotely using those details.

When: [date of hearing] at [time of hearing].

Note: You should bring this notice with you when attending the Board of Inquiry.

Objecting to this notice

You may object to this notice if you have (or will have) a reasonable excuse for failing to comply with the notice. For example, it is a reasonable excuse to fail to comply with the notice if you are prohibited from disclosing the document(s) by a court order. See section 65 of the Act for further examples of what constitutes a reasonable excuse.

You may also object to the notice by claiming that the document(s) specified in the notice are not relevant to the subject matter of the inquiry.

If you wish to object to this notice, you must do so in writing:

To: lawyers@quarantineinquiry.vic.gov.au

By: [time and date of deadline].

Your written objection must outline your reasons for objecting and include a relevant contact person with whom to liaise. If the Board of Inquiry is satisfied that your claim is made out, the Board of Inquiry may vary or revoke this notice.

Failure to comply with this notice without a reasonable excuse may constitute a criminal offence. The maximum penalty for this offence is 240 penalty units or imprisonment for two years. See section 86 of the Act.

Failure to comply with this notice without a reasonable excuse may also result in the Board of Inquiry making an application to the Supreme Court of Victoria. The Court may then order you to comply with the notice within a specified period. See section 70 of the Act.

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THE HONOURABLE JENNIFER COATE AO
Board of Inquiry into the COVID-19 Hotel Quarantine Program

Date: [date]

Appendix G

List of witnesses and statements received

| Last name, first name | Title | Role | Date of Appearance(s) |
|------------------------------------------------------|----------|--------------------------------------------------------------------------------------------------|---------------------------------|
| Adams, Jamie | Mr | General Manager (Victoria and Tasmania), MSS Security Pty Ltd | 3 September 2020 |
| Aggarwal, Sorav 'Sam' | Mr | Chief Executive Officer, Sterling Services Group | 2 September 2020 |
| Alexander, Simone | Ms | Chief Operating Officer, Alfred Health | 8 September 2020 |
| Alpren, Charles | Dr | Epidemiologist | 18 August 2020 |
| Andrews, Daniel | The Hon. | Premier of Victoria | 25 September 2020 |
| Arundel, Craig | Mr | Security guard | 24 August 2020 |
| Ashford, Luke | Mr | Authorised officer | 21 August 2020 |
| Ashton, Graham | Mr | Former Chief Commissioner of Victoria Police | 17 September 2020 |
| Attalah, Mina | Mr | Managing Director, United Risk Management | 2 September 2020 |
| Bamert, Merrin | Ms | Director, Emergency Management and Health Protection, Department of Health and Human Services | 11 September 2020 |
| Banks, Dan | Mr | Director, Signal88 Security Australasia | Statement tendered ¹ |
| Baxter, Hayley | Ms | Acting Executive Director of Strategic Sourcing, Department of Treasury and Finance | Statement tendered |
| Bedford, Rebecca | Ms | Partner, MinterEllison | Statement tendered |
| Chakik, Eddie | Mr | Business/Operations Manager, Ultimate Protective Services | Statement tendered |
| Chekaik, Samir | Mr | Director, Australian Protection Services Pty Ltd | Statement received ² |
| Cleaves, Noel | Mr | Manager, Environmental Health Regulation and Compliance, Department of Health and Human Services | 4 September 2020 |
| Coppick, Nigel | Mr | National Operations Manager, Unified Security Group | 3 September 2020 |
| Crisp, Andrew | Comm'r | Emergency Management Commissioner, Emergency Management Victoria | 15 September 2020 |
| Crouch, Simon | Dr | Senior Medical Advisor, Department of Health and Human Services | 8 September 2020 |
| 'Crowne Plaza Melbourne Executive Assistant Manager' | | Executive Assistant Manager, Crowne Plaza Melbourne | Statement received |

1. 'Statement tendered' denotes that a statement was formally tendered in evidence before the Board. The makers of such statements, and those who appeared before the Board's hearings, are defined as 'witnesses' throughout this Report.

2. 'Statement received' denotes that a statement was produced to the Inquiry and not tendered in evidence. As indicated in 'About this Report', the fact that a statement was not tendered does not mean that regard was not had to it by the Board for the purposes of its Inquiry.

| Last name, first name | Title | Role | Date of Appearance(s) |
|-------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Currie, Katrina | Ms | Executive Director, Employment Delivery, Working for Victoria; Executive Director, Department of Jobs, Precincts and Regions | 27 August 2020 |
| Curtain, Janette | Ms | Manager, Your Nursing Agency (Victoria) Pty Ltd | Statement tendered |
| D'Cruz, Shaun | Mr | Executive General Manager, Crown Melbourne Hotels | 28 August 2020 |
| de Kretser, Hugh | Mr | Returned traveller and Executive Director of the Human Rights Law Centre | 20 August 2020 |
| de Witts, Jacinda | Ms | Deputy Secretary, Legal and Executive Services, Department of Health and Human Services | Statement tendered |
| 'DHHS Infection Control Consultant' | | Infection Control Consultant, Department of Health and Human Services | Statement tendered |
| 'DHHS Learning Consultant' | | Learning Consultant, Department of Health and Human Services | Statement tendered |
| 'DHHS Manager' | | Manager, Department of Health and Human Services | Statement tendered |
| 'DHHS senior project officer' | | Senior project officer, Department of Health and Human Services | Statement tendered |
| 'DJPR Administrative Officer' | | Administrative Officer, Department of Jobs, Precincts and Regions | Statement received |
| 'DJPR Operational Safety Advisor' | | Operational Safety Advisor, Department of Jobs, Precincts and Regions | Statement received |
| 'DJPR Program Manager' | | Program Manager, Department of Jobs, Precincts and Regions | Statement received |
| Eagle, Christopher | Mr | Deputy State Controller, Health | 15 September 2020 |
| Eccles, Christopher | Mr | Former Secretary, Department of Premier and Cabinet | 21 September 2020 |
| Erasmus, Ron | Mr | Returned traveller | 21 August 2020 |
| Erasmus, Sue | Ms | Returned traveller | 21 August 2020 |
| Febey, Claire | Ms | Executive Director of the Priority Projects Unit, Department of Jobs, Precincts and Regions | 27 August 2020 |
| Ferrigno, Stephen | Mr | General Manager, Four Points by Sheraton Melbourne | 28 August 2020 |
| Garrow, Stuart | Mr | Clinical Lead Medical Practitioner, Onsite Doctor Pty Ltd | Statement tendered |
| Gavens, Kate | Ms | Chief Conservation Regulator, Department of Environment, Land, Water and Planning | Statement tendered |
| Girgis, Michael | Mr | General Manager, IKON Services Australia Pty Ltd | 11 September 2020 |
| Gordon, Rob | Dr | Psychologist | 18 September 2020 |
| Grayson, Lindsay | Prof. | Infectious diseases expert | 17 August 2020 |
| Gupta, Ishu | Mr | Managing Director, The Security Hub | 2 September 2020 |

| Last name, first name | Title | Role | Date of Appearance(s) |
|---------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Helps, Jason | Mr | State Controller; Deputy Director of Emergency Operations and Capability Health, Department of Health and Human Services | 17 September 2020 |
| Henderson, Nick | Mr | General Manager, Holiday Inn Melbourne Airport | Statement tendered |
| 'Hi8 Security Duty Manager' | | Duty Manager, Hi8 Security | Statement received |
| Hogan, Braeden | Mr | Deputy Director, Strategy and Policy, Emergency Management Branch, Department of Health and Human Services | Statement tendered |
| Hogan, Shaun | Mr | National Manager, Corporate Risk, Wilson Security Pty Ltd | Statement tendered |
| Howden, Ben | Prof. | Medical microbiologist | 17 August 2020 |
| Hyslop, Kate | Ms | Returned traveller | 20 August 2020 |
| Krikelis, Sam | Mr | Business Manager, Event Services, MSS Security Pty Ltd | 3 September 2020 |
| Lapsley, Craig | Mr | Former Emergency Management Commissioner, Emergency Management Victoria | Statement tendered |
| Looker, Clare | Dr | Senior Medical Advisor, Department of Health and Human Services | Statement tendered |
| Loughnan, Matthew | Mr | Airport Services Manager, Melbourne, Dnata Airport Services Pty Ltd | Statement tendered |
| Lombardo, Matthew | Mr | Director, ACOST Security Services | Statement received |
| Mandyam, Ram | Mr | Hotel General Manager, Travelodge Hotel Melbourne Docklands | 28 August 2020 |
| May, Rachaele | Ms | Executive Director, Emergency Coordination and Resilience, Department of Jobs, Precincts and Regions | 4 September 2020 |
| McGuinness, Sarah | Dr | Outbreaks Lead, Outbreak Management Team, Department of Health and Human Services | 8 September 2020 |
| McLean, Andrew | Mr | Director, Elite Protection Services (Australia) Pty Ltd | Statement received |
| Mead, Cameron | Mr | Hotel Manager, Park Royal Hotel | Statement tendered |
| Menezes, Rosswyn | Mr | General Manager, Rydges on Swaston | 28 August 2020 |
| Menon, Unni | Mr | Executive Director, Aviation Strategy and Services, Department of Jobs, Precincts and Regions | 31 August 2020 |
| 'Mercure Welcome Melbourne CEO' | | Chief Executive Officer, Mercure Welcome Melbourne | Statement received |
| Mikakos, Jenny | The Hon. | Former Minister for the Coordination of Health and Human Services: COVID-19, Former Minister for Health, Former Minister for Ambulance Services | 24 September |
| Millward, David | Mr | Director of National Operations, Unified Security Pty Ltd | Statement tendered |

| Last name, first name | Title | Role | Date of Appearance(s) |
|-------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Murphy, Richard | Mr | Partner, MinterEllison | Statement tendered |
| Nagi, Mo | Mr | Victorian Operations Manager, Unified Security Pty Ltd | 3 September 2020 |
| Neville, Lisa | The Hon. | Minister for Police and Emergency Services Minister for Water Former Minister for the Coordination of Environment, Land, Water and Planning | 23 September 2020 |
| 'Nurse Jen' | | Nurse, Your Nursing Agency | 20 August 2020 |
| 'Nurse Manager' | | Nurse Manager, Alfred Health | Statement tendered |
| Ofli, Kaan | Mr | Returned traveller | 24 August 2020 |
| 'DJPR Operations Coordinator' | | Operations Coordinator, Department of Jobs, Precincts and Regions | Statement tendered |
| Paccioco, Rob | Mr | Director, BlackTie Security Pty Ltd | 2 September 2020 |
| Pakula, Martin | The Hon. | Minister for Racing Minister for Tourism, Sports and Major Events Minister for Industry Support and Recovery Minister for Trade Minister for Business Precincts Former Minister for the Coordination of Jobs, Precincts and Regions: COVID-19 | 23 September 2020 |
| Patton, Shane | Chief Commissioner | Chief Commissioner, Victoria Police | 17 September 2020 |
| Peake, Kym | Ms | Former Secretary of Department of Health and Human Services | 22, 23 September 2020 |
| Phemister, Simon | Mr | Secretary of Department of Jobs, Precincts and Regions | 22 September 2020 |
| Pinskier, Nathan | Dr | Director, On Site Doctor Pty Ltd | Statement tendered |
| 'Principal Policy Officer' | | Principal Policy Officer, Employment, Inclusion, Department of Jobs, Precincts and Regions | Statement tendered |
| Rait, Julian | Dr | Associate Professor, AMA Victoria President | Statement tendered |
| Ratcliff, Liliana | Ms | Returned traveller | 21 August 2020 |
| 'Returned traveller 1' | | Returned traveller | 20 August 2020 |
| Romanes, Finn | Dr | Deputy Public Health Commander – Planning, Department of Health and Human Services. On various occasions, Dr Romanes also performed the role of Public Health Commander | Statement tendered |
| 'Security 1' | | Security guard | 21 August 2020 |
| 'Security 16' | | Security guard | 24 August 2020 |
| 'DHHS Senior authorised officer' | | Senior authorised officer, Department of Health and Human Services | Statement tendered |

| Last name, first name | Title | Role | Date of Appearance(s) |
|------------------------------------|-------|-------------------------------------------------------------------------------------------------------------------|-----------------------|
| Serbest, Gönül | Ms | Chief Executive Officer of Global Victoria, Department of Jobs, Precincts and Regions | 27 August 2020 |
| Sinadinov, Darko | Mr | Director, Hospitality Performance Leaders Pty Ltd (T/A Nu Force Security Group) | Statement tendered |
| Singh, Ricky | Mr | Returned traveller | 20 August 2020 |
| Skilbeck, Melissa | Ms | Deputy Secretary, Regulation, Health Protection and Emergency Management, Department of Health and Human Services | 10 September 2020 |
| Smith, Eric | Mr | Managing Director, SwingShift Nurses | Statement tendered |
| Smith, Murray | Mr | Commander, COVID-19 Enforcement and Compliance, Department of Health and Human Services | 10 September 2020 |
| Spiteri, Andrea | Ms | State Controller; Health; Executive Director of Emergency Management, Department of Health and Human Services | 17 September 2020 |
| Sutton, Brett | Prof. | Chief Health Officer, Department of Health and Human Services | 16 September 2020 |
| Symonds, Terry | Mr | Deputy Secretary, Health and Wellbeing, Department of Health and Human Services | Statement tendered |
| Tait, Michael | Mr | Nurse, Your Nursing Agency | 20 August 2020 |
| Tully, Timothy | Cdr | Commander, Victoria Police | 4 September 2020 |
| Unterfrauner, Karl | Mr | General Manager, Stamford Plaza Melbourne | 28 August 2020 |
| van Diemen, Annaliese | Dr | Deputy Chief Health Officer, Department of Health and Human Services | 16 September 2020 |
| Verosaari, Mika | Mr | General Manager, Victoria and Tasmania, AHS Hospitality Pty Ltd | Statement tendered |
| 'Victoria Police Superintendent' | | Superintendent, Victoria Police | Statement tendered |
| 'Victoria Police Superintendent 2' | | Superintendent, Victoria Police | Statement received |
| 'Victoria Police Inspector' | | Inspector, Victoria Police | Statement received |
| 'QSS Security Executive Manager' | | Executive Manager, QSS Security | Statement received |
| Wallace, Euan | Prof. | Former Chief Executive Officer, Safer Care Victoria; Secretary, Department of Health and Human Services | 10 September 2020 |
| Watson, Greg | Mr | General Manager, Regional Operations (Victoria and Tasmania), Wilson Security Pty Ltd | 2 September 2020 |
| Williams, Pam | Ms | Commander, Operation Soteria, Department of Health and Human Services | 11 September 2020 |

Appendix H

Exhibit list

| Exhibit | Document Title |
|---------|-----------------------------------------------------------------------------------------------------------------------------------|
| 1 | Exhibit HQI0001_P Witness statement of Prof. Lindsay Grayson |
| 2 | Exhibit HQI0002_RP Curriculum vitae of Prof. Michael Lindsay Grayson |
| 3 | Exhibit HQI0003_P Dept Health training on how to protect yourself and others from COVID-19 |
| 4 | Exhibit HQI0004_P Operation Soteria PPE advice for hotel security staff and AOs in contact with quarantined individuals (Grayson) |
| 5 | Exhibit HQI0005_P Witness statement of Prof. Benjamin Howden |
| 6 | Exhibit HQI0006_P Curriculum vitae of Prof. Benjamin Howden |
| 7 | Exhibit HQI0007_P Genomic clustering graph |
| 8 | Exhibit HQI0008_RP Witness statement of Dr Charles Alpren |
| 9 | Exhibit HQI0009_RP Witness statement of 'Nurse Jen' |
| 10 | Exhibit HQI0010_RP Induction and learning modules completed by 'Nurse Jen' |
| 11 | Exhibit HQI0011_P YNA COVID-19 Staff Update re infection control training module ('Nurse Jen') |
| 12 | Exhibit HQI0012_RP Email to 'Nurse Jen' re Dept of Health infection control training |
| 13 | Exhibit HQI0013_RP Witness statement of 'Returned Traveller 1' |
| 14 | Exhibit HQI0014_RP Witness statement of Mr Michael Tait |
| 15 | Exhibit HQI0015_RP Email from Mr Michael Tait asking for assistance |
| 16 | Exhibit HQI0016_P Witness statement of Mr Hugh de Kretser |
| 17 | Exhibit HQI0017_P Hotel room photos taken by Mr Hugh de Kretser |
| 18 | Exhibit HQI0018_P Joint witness statement of Ms Kate Hyslop and Mr Ricky Singh |
| 19 | Exhibit HQI0019_P Joint witness statement of Ms Sue and Mr Ron Erasmus |
| 20 | Exhibit HQI0020_P Witness statement of Ms Liliana Ratcliff |
| 21 | Exhibit HQI0021_RP Annexures to witness statement of Ms Liliana Ratcliff |
| 22 | Exhibit HQI0022_RP Annexure to witness statement of Ms Liliana Ratcliff |
| 23 | Exhibit HQI0023_RP Witness statement of Mr Luke Ashford |
| 24 | Exhibit HQI0024_RP Witness statement of 'Security 1' |
| 25 | Exhibit HQI0025_P Wilson Security Duties and Action On ('Security 1') |
| 26 | Exhibit HQI0026_P Wilson Security Toolbox Talk re hotel quarantine work ('Security 1') |
| 27 | Exhibit HQI0027_P Witness statement of Mr Kaan Ofli |
| 28 | Exhibit HQI0028_RP Meal order information for people with food allergies (Ofli) |
| 29 | Exhibit HQI0029_P Witness statement of Mr Craig Arundel |
| 30 | Exhibit HQI0030_P Wilson Security Core duties at the hotel (Arundel) |
| 31 | Exhibit HQI0031_RP Witness statement of 'Security 16' |
| 32 | Exhibit HQI0032_P Witness statement of Ms Claire Febey |

| Exhibit | Document Title |
|---------|----------------------------------------------------------------------------------------------------|
| 33 | Exhibit HQI0033(1)_RP Annexures to witness statement of Ms Claire Febey |
| | Exhibit HQI0033(2)_RP Audio recording of SCC Operation Soteria meeting 27 March 2020 |
| | Exhibit HQI0033(3)_RP Audio recording of SCC Operation Soteria meeting 10.00am 28 March 2020 |
| | Exhibit HQI0033(4)_RP Audio recording of Operation Soteria meeting 6.00pm 28 March 2020 |
| 34 | Exhibit HQI0034_RP Victoria enforced quarantine planning process (Febey) |
| 35 | Exhibit HQI0035_RP Operation Soteria Operations Plan (Febey) |
| 36 | Exhibit HQI0036_RP Witness statement of Ms Katrina Currie |
| 37 | Exhibit HQI0037_RP Annexures to witness statement of Ms Katrina Currie |
| 38 | Exhibit HQI0038_RP Witness statement of Ms Gönül Serbest |
| 39 | Exhibit HQI0039_RP Annexures to witness statement of Ms Gönül Serbest |
| 40 | Exhibit HQI0040_RP Witness statement of Mr Ram Mandyam |
| 41 | Exhibit HQI0041_RP Witness statement of Mr Shaun D'Cruz |
| 42 | Exhibit HQI0042_RP Witness statement of Mr Stephen Ferrigno |
| 43 | Exhibit HQI0043_RP Witness statement of Mr Nick Henderson |
| 44 | Exhibit HQI0044_RP Witness statement of Mr Cameron Mead |
| 45 | Exhibit HQI0045_RP Witness Statement of Mr Rosswyn Menezes |
| 46 | Exhibit HQI0046_RP Annexures to witness statement of Mr Rosswyn Menezes |
| 47 | Exhibit HQI0047_RP Witness statement of Mr Karl Unterfrauner |
| 48 | Exhibit HQI0048_RP Annexures to witness statement of Mr Karl Unterfrauner |
| 49 | Exhibit HQI0049_RP Witness statement of Mr Unni Menon |
| 50 | Exhibit HQI0050_RP Annexures to witness statement of Mr Unni Menon |
| 51 | Exhibit HQI0051_RP Witness statement of Mr Sorav 'Sam' Aggarwal |
| 52 | Exhibit HQI0052_RP Witness Statement of Mr Mina Attalah |
| 53 | Exhibit HQI0053_RP Witness Statement of Mr Ishu Gupta |
| 54 | Exhibit HQI0054_RP Witness Statement of Mr Rob Paciocco |
| 55 | Exhibit HQI0055_RP Subcontract agreement between Wilson Security and Black Tie Security (Paciocco) |
| 56 | Exhibit HQI0056_RP Witness statement of Mr Darko Sinadinov |
| 57 | Exhibit HQI0057_RP Witness statement of Mr Dan Banks |
| 58 | Exhibit HQI0058_P Witness statement of Mr Eddie Chakik |
| 59 | Exhibit HQI0059_RP Witness statement of 'Principal Policy Officer' |
| 60 | Exhibit HQI0060(1)_RP Annexures to witness statement of 'Principal Policy Officer' |
| 61 | Exhibit HQI0061_RP Witness statement of Mr Gregory Watson |
| 62 | Exhibit HQI0062_RP Annexures to witness statement of Mr Gregory Watson |
| 63 | Exhibit HQI0063_RP Witness statement of Mr Shaun Hogan |
| 64 | Exhibit HQI0064_RP Annexures to witness statement of Mr Shaun Hogan |
| 65 | Exhibit HQI0065_RP Witness statement of Mr Jamie Adams |
| 66 | Exhibit HQI0066_RP Annexures to witness statement of Mr Jamie Adams |
| 67 | Exhibit HQI0067_RP Witness statement of Mr Sam Krikelis |

| Exhibit | Document Title |
|---------|-------------------------------------------------------------------------------------------|
| 68 | Exhibit HQI0068_RP Annexures to witness statement of Mr Sam Krikelis |
| 69 | Exhibit HQI0069_RP Witness statement of Mr David Millward adopted by Mr Nigel Coppick |
| 70 | Exhibit HQI0070_RP Annexures to witness statement of Mr David Millward |
| 71 | Exhibit HQI0071_RP Witness statement of Mr Mo Nagi |
| 72 | Exhibit HQI0072_RP Annexures to witness statement of Mr Mo Nagi |
| 73 | Exhibit HQI0073_P Witness statement of Ms Hayley Baxter |
| 74 | Exhibit HQI0074_RP Witness statement of Mr Matthew Loughnan |
| 75 | Exhibit HQI0075_P Witness statement of Mr Noel Cleaves |
| 76 | Exhibit HQI0076_RP Annexures to witness statement of Mr Noel Cleaves |
| 77 | Exhibit HQI0077_RP Witness statement of 'Senior AO 1' |
| | Exhibit HQI0077(1)_RP Annexures to witness statement of 'Senior AO 1' |
| 78 | Exhibit HQI0078_RP Witness statement of Commander Timothy Tully |
| 79 | Exhibit HQI0079_RP Annexures to witness statement of Commander Timothy Tully |
| 80 | Exhibit HQI0080_RP First witness statement of Ms Rachaele May |
| 81 | Exhibit HQI0081_RP Annexures to first witness statement of Ms Rachaele May |
| 82 | Exhibit HQI0082_RP Second witness statement of Ms Rachaele May |
| 83 | Exhibit HQI0083_RP Annexures to second witness statement of Ms Rachaele May |
| 84 | Exhibit HQI0084_RP Witness statement of 'Operations Coordinator' |
| 85 | Exhibit HQI0085_RP Witness statement of Ms Janette Curtain |
| 86 | Exhibit HQI0086_RP Annexures to witness statement of Ms Janette Curtain |
| 87 | Exhibit HQI0087_RP Annexures to witness statement of Ms Janette Curtain |
| 88 | Exhibit HQI0088_RP Witness statement of Dr Stuart Garrow |
| 89 | Exhibit HQI0089_RP Annexures to witness statement of Dr Stuart Garrow |
| 90 | Exhibit HQI0090_RP Witness statement of Mr Eric Smith |
| 91 | Exhibit HQI0091_RP Annexures to witness statement of Mr Eric Smith |
| 92 | Exhibit HQI0092_RP Witness Statement of Dr Julian Rait |
| 93 | Exhibit HQI0093_RP Annexures to the witness statement of Dr Julian Rait |
| 94 | Exhibit HQI0094_RP Witness statement of 'Nurse Manager' |
| 95 | Exhibit HQI0095_RP Witness statement of Dr Nathan Pinskiar |
| 96 | Exhibit HQI0096_RP Annexures to witness statement of Dr Nathan Pinskiar |
| 97 | Exhibit HQI0097_RP Witness statement of Dr Clare Looker |
| 98 | Exhibit HQI0098_RP Annexures to witness statement of Dr Clare Looker |
| 99 | Exhibit HQI0099_RP Witness statement of Ms Simone Alexander |
| 100 | Exhibit HQI0100_RP Annexures to the witness statement of Ms Simone Alexander |
| 101 | Exhibit HQI0101_P Alfred Health Model of Care COVID-19 Hotel Support Services (Alexander) |
| 102 | Exhibit HQI0102_RP MOU between DHHS and Alfred Health (Alexander) |
| 103 | Exhibit HQI0103_RP Witness statement of Dr Simon Crouch |
| 104 | Exhibit HQI0104_RP Outbreak Management Plan Rydges Swanston (Crouch) |

| Exhibit | Document Title |
|---------|--------------------------------------------------------------------------------------------|
| 105 | Exhibit HQI0105_RP Annexures to witness statement of Dr Simon Crouch |
| 106 | Exhibit HQI0106_RP Witness statement of Dr Sarah McGuinness |
| 107 | Exhibit HQI0107_RP Annexures to witness statement of Dr Sarah McGuinness |
| 108 | Exhibit HQI0108_RP Annexures to witness statement of Ms Jannette Curtain |
| 109 | Exhibit HQI0109_RP Witness statement of 'DHHS Manager' |
| 110 | Exhibit HQI0110_RP Annexures to witness statement of 'DHHS Manager' |
| 111 | Exhibit HQI0111_RP Witness statement of Ms Kate Gavens |
| 112 | Exhibit HQI0112_RP Annexures to witness statement of Ms Kate Gavens |
| 113 | Exhibit HQI0113_P Witness statement of Dr Finn Romanes |
| 114 | Exhibit HQI0114_RP Annexures to witness statement of Dr Finn Romanes |
| 115 | Exhibit HQI0115_RP Annexures to witness statement of Dr Finn Romanes |
| 116 | Exhibit HQI0116_RP First witness statement of Prof. Euan Wallace AM |
| 117 | Exhibit HQI0117_RP Annexures to first witness statement of Prof. Euan Wallace AM |
| 118 | Exhibit HQI0118_RP Second witness statement of Prof. Euan Wallace AM |
| 119 | Exhibit HQI0119_RP Annexures to second witness statement of Dr Euan Wallace AM |
| 120 | Exhibit HQI0120_RP Email from Prof. Euan Wallace AM to Ms Melissa Skilbeck |
| 121 | Exhibit HQI0121_RP PPE advice for hotel based healthcare worker |
| 122 | Exhibit HQI0122_RP Witness statement of Mr Murray Smith |
| 123 | Exhibit HQI0123_RP Annexures to witness statement of Mr Murray Smith |
| 124 | Exhibit HQI0124(1)_RP Annexures to witness statement of Mr Murray Smith |
| 125 | Exhibit HQI0125_RP Witness statement of Ms Melissa Skilbeck |
| 126 | Exhibit HQI0126(1)_RP Annexures to witness statement of Ms Melissa Skilbeck |
| 127 | Exhibit HQI0127_RP Witness statement of Mr Mika Verosaari |
| 128 | Exhibit HQI0128_RP Witness statement of Mr Michael Girgis |
| 129 | Exhibit HQI0129_RP Annexures to witness statement of Mr Michael Girgis |
| 130 | Exhibit HQI0130_RP Witness statement of Ms Pam Williams |
| 131 | Exhibit HQI0131(1)_RP Annexures to witness statement of Ms Pam Williams |
| 132 | Exhibit HQI0132_RP Email from Ms Rachaele May to Ms Pam Williams |
| 133 | Exhibit HQI0133_RP Minutes of Operation Soteria meeting 10 April 2020 |
| 134 | Exhibit HQI0134_RP Operation Soteria Positive diagnosis guidance |
| 135 | Exhibit HQI0135_RP Witness statement of Ms Merrin Bamert |
| 136 | Exhibit HQI0136_RP Annexures to witness statement of Ms Merrin Bamert |
| 137 | Exhibit HQI0137_RP Email from Ms Merrin Bamert to DHHS and Safer Care Victoria |
| 138 | Exhibit HQI0138_RP DHHS emails re hotel accommodation for COVID positive passengers |
| 139 | Exhibit HQI0139_RP Email from DHHS Team Leader at Stamford Hotel to DHHS Operation Soteria |
| 140 | Exhibit HQI0140_P Witness statement of Mr Craig Lapsley |
| 141 | Exhibit HQI0141_RP Letter from the Commonwealth of Australia to the Board of Inquiry |
| 142 | Exhibit HQI0142_RP Voluntary submission from the Commonwealth of Australia |

| Exhibit | Document Title |
|---------|------------------------------------------------------------------------------------------------------------|
| 143 | Exhibit HQI0143(1)_RP Audio recording of SCC Operation Soteria meeting 27 March 2020 |
| | Exhibit HQI0143(1)_RP Transcript of audio recording of SCC Operation Soteria meeting 27 March 2020 |
| | Exhibit HQI0143(2)_RP Audio recording of SCC Operation Soteria meeting 10.00am 28 March 2020 |
| | Exhibit HQI0143(2)_RP Transcript of audio recording of SCC Operation Soteria meeting 10.00am 28 March 2020 |
| | Exhibit HQI0143(3)_RP Audio recording of Operation Soteria meeting 6.00pm 28 March 2020 |
| | Exhibit HQI0143(3)_RP Transcript of audio recording of Operation Soteria meeting 6.00pm 28 March 2020 |
| 144 | Exhibit HQI0144_P First witness statement of Commissioner Andrew Crisp |
| 145 | Exhibit HQI0145(1)_RP Annexures to first witness statement of Commissioner Andrew Crisp |
| 146 | Exhibit HQI0146_RP Second witness statement of Commissioner Andrew Crisp |
| 147 | Exhibit HQI0147_P Third witness statement of Commissioner Andrew Crisp |
| 148 | Exhibit HQI148(1)_RP Annexures to third witness statement of Commissioner Andrew Crisp |
| | Exhibit HQI0148(2)_RP Audio recording of SCC Operation Soteria Meeting 27 March 2020 |
| 149 | Exhibit HQI0149_RP Witness statement of Mr Christopher Eagle |
| 150 | Exhibit HQI0150_RP Annexures to witness statement of Mr Christopher Eagle |
| 151 | Exhibit HQI0151_P Witness statement of Ms Jacinda de Witts |
| 152 | Exhibit HQI0152(1)_RP Annexures to witness statement of Ms Jacinda de Witts |
| 153 | Exhibit HQI0153_RP Witness statement of Prof. Brett Sutton |
| 154 | Exhibit HQI0154_P Annexures to witness statement of Prof. Brett Sutton |
| 155 | Exhibit HQI0155_RP Annexures to witness statement of Prof. Brett Sutton |
| 156 | Exhibit HQI0156_P Review of Australia's Health Sector Response to Pandemic (H1N1) 2009 |
| 157 | Exhibit HQI0157_P Transcript of Prime Minister's Press Conference 27 March 2020 |
| 158 | Exhibit HQI0158_RP Email from Dr Finn Romanes to Ms Andrea Spiteri and Mr Christopher Eagle |
| 159 | Exhibit HQI0159_RP Emails between DHHS Commanders and Prof. Brett Sutton |
| 160 | Exhibit HQI0160_P Witness statement of Dr Annaliese van Diemen |
| 161 | Exhibit HQI0161(1)_RP Annexures to witness statement of Dr Annaliese van Diemen |
| 162 | Exhibit HQI0162_P Witness statement of Ms Andrea Spiteri |
| 163 | Exhibit HQI0163(1)_RP Annexures to witness statement of Ms Andrea Spiteri |
| 164 | Exhibit HQI0164_RP Witness statement of Mr Jason Helps |
| 165 | Exhibit HQI0165(1)_RP Annexures to witness statement of Mr Jason Helps |
| 166 | Exhibit HQI0166_P Class 2 State Controller responsibilities |
| 167 | Exhibit HQI0167_RP EMV State Operational Arrangements COVID-19 |
| 168 | Exhibit HQI0168_RP Emails between Ms Claire Febey and Mr Christopher Eagle |
| 169 | Exhibit HQI0169_RP Witness statement of Chief Commissioner Shane Patton APM |
| 170 | Exhibit HQI0170_RP Annexures to witness statement of Chief Commissioner Shane Patton APM |
| 171 | Exhibit HQI0171_RP Victoria Police safety officer instructions |
| 172 | Exhibit HQI0172_RP Witness statement of 'Victoria Police Superintendent' |
| 173 | Exhibit HQI0173_RP First witness statement of former Chief Commissioner Graham Ashton AM APM |

| Exhibit | Document Title |
|---------|-----------------------------------------------------------------------------------------------------------|
| 174 | Exhibit HQI0174_RP Annexures to first witness statement of former Chief Commissioner Graham Ashton AM APM |
| 175 | Exhibit HQI0175_RP Second witness statement of former Chief Commissioner Graham Ashton AM APM |
| 176 | Exhibit HQI0176_P Witness statement of Dr Rob Gordon |
| 177 | Exhibit HQI0177_RP First witness statement of Mr Christopher Eccles |
| 178 | Exhibit HQI0178_RP Annexures to first witness statement of Mr Christopher Eccles |
| 179 | Exhibit HQI0179_RP Second witness statement of Mr Christopher Eccles |
| 180 | Exhibit HQI0180_RP Annexures to second witness statement of Mr Christopher Eccles |
| 181 | Exhibit HQI0181_RP Texts between Commissioner Andrew Crisp and Kate Houghton |
| 182 | Exhibit HQI0182_RP Working with Vic messages re good security companies |
| 183 | Exhibit HQI0183_RP Buying for Victoria webpage re security services |
| 184 | Exhibit HQI0184_RP Witness statement of Mr Simon Phemister |
| 185 | Exhibit HQI0185(1)_RP Annexures to witness statement of Mr Simon Phemister |
| 186 | Exhibit HQI0186_RP First witness statement of Ms Kym Peake |
| 187 | Exhibit HQI0187_RP Annexures to first witness statement of Ms Kym Peake |
| 188 | Exhibit HQI0188_RP Second witness statement of Ms Kym Peake |
| 189 | Exhibit HQI0189_RP Annexures to second witness statement of Ms Kym Peake |
| 190 | Exhibit HQI0190_RP Annexures to second witness statement of Ms Kym Peake |
| 191 | Exhibit HQI0191_RP Initial response to the Board of Inquiry from DHHS |
| 192 | Exhibit HQI0192_RP DHHS draft advice to National Cabinet |
| 192 | Exhibit HQI0192_RP DHHS draft advice to National Cabinet |
| 193 | Exhibit HQI0193_P Letter from the Hon. Daniel Andrews MP to Ms Kym Peake |
| 194 | Exhibit HQI0194_RP Mission Implementation Plan |
| 195 | Exhibit HQI0195_RP Witness statement of the Hon. Martin Pakula MP |
| 196 | Exhibit HQI0196_P Witness statement of the Hon. Lisa Neville MP |
| 197 | Exhibit HQI0197_RP Appointment of Ms Andrea Spiteri as a Class 2 State Controller |
| 198 | Exhibit HQI0198_RP Appointment of DHHS Class 2 Controllers |
| 199 | Exhibit HQI0199_RP DHHS emails re returning passengers from Greg Mortimer cruise |
| 200 | Exhibit HQI0200_P Protecting our Healthcare Workers |
| 201 | Exhibit HQI0201_RP Witness statement of 'DHHS Learning Consultant' |
| 202 | Exhibit HQI0202_RP Annexures to witness statement of 'DHHS Learning Consultant' |
| 203 | Exhibit HQI0203_RP Witness statement of 'DHHS Infection Control Consultant' |
| 204 | Exhibit HQI0204_RP Annexures to witness statement of 'DHHS Infection Control Consultant' |
| 205 | Exhibit HQI0205_RP Witness statement of 'DHHS Senior Project Officer' |
| 206 | Exhibit HQI0206_RP Annexures to witness statement of 'DHHS Senior Project Officer' |
| 207 | Exhibit HQI0207_P Witness statement of Mr Terry Symonds |
| 208 | Exhibit HQI0208_RP Annexures to witness statement of Mr Terry Symonds |
| 209 | Exhibit HQI0209_RP Texts between Assistant Commissioner Mick Grainger and Ms Claire Febey |

| Exhibit | Document Title |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 210 | Exhibit HQI0210_P Video of press conference by the Hon. Daniel Andrews MP 27 March 2020 |
| | Exhibit HQI0210_P Transcript of press conference by the Hon. Daniel Andrews MP on 27 March 2020 |
| 211 | Exhibit HQI0211_P First witness statement of the Hon. Jenny Mikakos, former MP |
| 212 | Exhibit HQI0212_RP Annexures to the first witness statement of the Hon. Jenny Mikakos, former MP |
| 213 | Exhibit HQI0213_RP Bundle of government emails across departments |
| 214 | Exhibit HQI0214_RP Texts between Assistant Commissioner Mick Grainger and Commissioner Andrew Crisp |
| 215 | Exhibit HQI0215_RP Initial responses from parties |
| 216 | Exhibit HQI0216_P Index of initial responses |
| 217 | Exhibit HQI0217_RP Request for assistance register |
| 218 | Exhibit HQI0218_P Witness statement of the Hon. Daniel Andrews MP |
| 219 | Exhibit HQI0219_RP Annexures to witness statement of the Hon. Daniel Andrews MP |
| 220 | Exhibit HQI0220_P Video of press conference by the Hon. Daniel Andrews MP |
| | Exhibit HQI0220_P Transcript of press conference by the Hon. Daniel Andrews MP |
| 221 | Exhibit HQI0221_P Video of press conference by former Chief Commissioner Graham Ashton |
| | Exhibit HQI0221_P Transcript of press conference by former Chief Commissioner Graham Ashton |
| 222 | Exhibit HQI0222_P Second witness statement of the Hon. Jenny Mikakos, former MP |
| 223 | Exhibit HQI0223_RP Bundle of documents tendered by DHHS |
| 224 | Exhibit HQI0224_RP Annexures to witness statement of 'Operations Coordinator' |
| 225 | Exhibit HQI0225_RP Annexures to witness statement of Mr Shaun D'Cruz |
| 226 | Exhibit HQI0226_RP Bundle of notices and advices tendered by DHHS |
| 227 | Exhibit HQI0227_RP Bundle of documents tendered by DJPR |
| 228 | Exhibit HQI0228_RP Letter from MinterEllison dated 25 September 2020, responsive to questions posed to Ms Kym Peake |
| 229 | Exhibit HQI0229_RP DHHS email chain re 'Information — Chain of Command — people in detention' and 'Smoking policy — Operation Soteria' ending 2 July 2020 |
| 230 | Exhibit HQI0230_RP DHHS emails re VIC Hotel Quarantine arrangements |
| 231 | Exhibit HQI0231_P Letter from Solicitors Assisting to Solicitors for DHHS dated 16 October 2020 |
| 232 | Exhibit HQI0232_P Letter from Solicitors for DHHS to Solicitors Assisting dated 19 October 2020 |
| 233 | Exhibit HQI0233_RP DHHS email chain re 'Information — Chain of Command — people in detention' and 'Smoking policy' — Operation Soteria' ending 1 April 2020 |
| 234 | Exhibit HQI0234_RP DHHS email chain re 'Smoking policy — Operation Soteria' |
| 235 | Exhibit HQI0235_RP DHHS email chain re 'Governance of mandatory detention implementation' |
| 236 | Exhibit HQI0236_RP DHHS email chain re 'Passengers under detention having Covi swabs at hospitals' |
| 237 | Exhibit HQI0237_P Affidavit of Mr Christopher Eccles |
| 238 | Exhibit HQI0238_RP Further DPC document |
| 239 | Exhibit HQI0239_RP Affidavit of the Hon. Daniel Andrews MP |
| 240 | Exhibit HQI0240_RP Exhibit to Affidavit of the Hon. Daniel Andrews MP |
| 241 | Exhibit HQI0241_RP Text exchange between the Hon. Daniel Andrews MP and Lissie Ratcliff dated 27 March 2020 |

| Exhibit | Document Title |
|---------|--------------------------------------------------------------------------------------------------|
| 242 | Exhibit HQI0242_RP Premier's Private Office (PPO) Document |
| 243 | Exhibit HQI0243_P Affidavit of Mr Simon Phemister |
| 244 | Exhibit HQI0244_P Affidavit of former Chief Commissioner Graham Ashton AM APM |
| 245 | Exhibit HQI0245_RP Further Victoria Police document |
| 246 | Exhibit HQI0246_P Affidavit of the Hon. Lisa Neville MP |
| 247 | Exhibit HQI0247_RP Bundle of documents produced by DHHS in response to Notice to Produce 163 |
| 248 | Exhibit HQI0248_RP Bundle of documents produced by DHHS in response to Notice to Produce 165 |
| 249 | Exhibit HQI0249_RP First affidavit of Prof. Brett Sutton |
| 250 | Exhibit HQI0250_RP Exhibit to First affidavit of Prof. Brett Sutton |
| 251 | Exhibit HQI0251_RP Document referred to in the first affidavit of Prof. Brett Sutton |
| 252 | Exhibit HQI0252_P Second affidavit of Prof. Brett Sutton |
| 253 | Exhibit HQI0253_RP Exhibit to second affidavit of Prof. Brett Sutton |
| 254 | Exhibit HQI0254_RP Further document pertaining to Prof. Brett Sutton |
| 255 | Exhibit HQI0255_RP Affidavit of Mr Jason Helps |
| 256 | Exhibit HQI0256_RP Document referred to in affidavit of Mr Jason Helps |
| 257 | Exhibit HQI0257_RP Affidavit of Mr Braedan Hogan |
| 258 | Exhibit HQI0258_RP Document referred to in affidavit of Mr Braedan Hogan |
| 259 | Exhibit HQI0259_RP Affidavit of Dr Finn Romanes |
| 260 | Exhibit HQI0260_RP Document referred to in affidavit of Dr Finn Romanes |
| 261 | Exhibit HQI0261_P Letter from Solicitors for DHHS to Solicitors Assisting dated 11 November 2020 |
| 262 | Exhibit HQI0262_P Affidavit of Mr Richard Murphy |
| 263 | Exhibit HQI0263_P Affidavit of Ms Rebecca Bedford |