

In the matter of the *Commissions of Inquiry Act 1950*
Commissions of Inquiry Order (No.4) 2015
Barrett Adolescent Centre Commission of Inquiry

AFFIDAVIT

James Robert Watterston c/- Floor 22, Education House, 30 Mary Street, Brisbane, Director-General of Department of Education and Training states on oath:

Receipt of Notice

1. I am aware that the department received the first Requirement to Produce Documents ("**the notice**") at 6:18PM on Tuesday, 15 September 2015. The notice was emailed directly to Tom Jumpertz (Executive Director of the Legal and Administrative Law Branch) and Christine Ashton (Director of the Legal and Administrative Law Branch) by Louise Syme of Crown Law.
2. I am aware that relevant documents were required to be produced to the Commission within a very short timeframe, namely, by 4pm on Monday, 28 September 2015.
3. The Legal and Administrative Law Branch of my department is authorised to accept service of Notices to produce documents on my behalf and to manage the response that is required by the Notice.
4. I am aware that an extensive report summarising the department's disclosure to the Commission up to Friday, 13 November 2015 was provided to the Commission as an

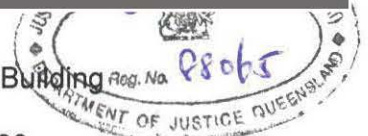
Deponent

AFFIDAVIT OF JAMES ROBERT WATTERSTON

On behalf of the State of Queensland

ge 1

Crown Solicitor
11th Floor, State Law Building
50 Ann Street
BRISBANE QLD 4000
TEL [REDACTED]
Email: [REDACTED]



attachment to the Affidavit of Louise Syme dated 11 November 2015. A copy of that report (without the attachments) is Exhibit JRW1 to this Affidavit.

Provision of documents to Crown Law

5. Excluding the de-archived emails (which are discussed in more detail below), I am advised that the department delivered all the material it was able to locate in response to the notice, to Crown Law on Thursday, 24 September 2015. I am also advised that given the short timeframes, the department's legal branch did not have time to review or index the material before providing it to Crown Law. This would have taken some time. It was agreed that the department would provide its material to Crown Law and that Crown Law would review and then ensure that relevant material was provided to the Commission in the required format.
6. The documents provided to Crown Law in response to the initial notice comprised 11 boxes of material, along with large amounts of electronic documents (i.e. provided on USBs and hard drives).
7. I am advised that although the department did not have time to index the material in detail, a high level index was provided to Crown Law and a copy of this index is Exhibit JRW2 to this Affidavit.
8. I am advised that following the department's compliance with the notice, there was some further material that was identified by areas of the department. This included:

No.	Document/Material	Date delivered to Crown Law.
1.	School mobile phone	Copies of the text messages were extracted from the phone and provided to Crown Law on Monday, 12 October 2015.
2.	A small bundle of further documents from Human Resources Branch.	Documents provided to Crown Law on Tuesday, 6 October 2015.

No.	Document/Material	Date delivered to Crown Law.
3.	A small bundle of further documents from a Senior Nurse Manager.	Documents provided to Crown Law on Thursday, 22 October 2015.
4.	A small bundle of further documents from the Deputy Director-General, State Schools.	Documents provided to Crown Law on Thursday, 22 October 2015.
5.	Material extracted from the de-archived emails and calendar of Mr Peter Blatch.	Arrangements were made directly between Crown Law and Mr Blatch in relation to this material so the department does not know the specific date that the documents were provided.
6.	A small bundle of additional documents identified during the witness meeting with Mr Blatch and Crown Law.	Documents provided to Crown Law on Tuesday, 13 October 2015.
7.	Two additional diary notes from the Deputy Director-General, State Schools.	Documents provided to Crown Law on Tuesday, 13 October 2015.
8.	Further student files requested by Crown Law on Monday, 9 November 2015.	Student files provided to Crown Law on Friday, 13 November 2015.
9.	A small bundle of emails from the Director, Office of the Deputy Director-General, State Schools	Emails provided to Crown Law on Monday, 16 November 2015.
10.	A small bundle of emails from the Executive Director, Office of the Director-General (Mr Nick Seeley)	Emails provided to Crown Law on Tuesday, 17 November 2015.
11.	Two emails from the Acting Director-General during 2012 (Ms Annette Whitehead)	Emails provided to Crown Law on Tuesday, 17 November 2015

9. To the extent that the documents provided are the subject of privilege (being legal professional privilege, cabinet privilege or parliamentary privilege), the provision of those documents to the Commission is not within my control. I am advised that any such privilege issue is being addressed by Crown Law.

Prioritised Barrett Adolescent Centre Special School (BACSS) staff member emails

10. An email was received from Crown Law on Wednesday, 30 September 2015 advising that the email inboxes of 19 Barrett Adolescent Centre Special School (BACSS) staff members should be prioritised. A copy of this email is Exhibit JRW3 to this Affidavit.
11. A further email was received from Crown Law on Friday, 13 November 2015 providing a complete staff list of BACSS staff members that had been identified by the Commission. This list contained 27 names. Therefore, an additional 8 BACSS staff members were prioritised. A copy of this email is Exhibit JRW4 to this Affidavit.
12. The retrieval of these emails has been completed as follows:

1.	The de-archived and filtered emails of 19 prioritized Barrett Adolescent Centre Special School (BACSS) staff members	Emails provided to Crown Law on Tuesday, 17 November 2015.
2.	The de-archived (but unfiltered) emails of a further 8 BACSS staff members.	Emails provided to Crown Law on Tuesday, 17 November 2015.

Outstanding material

13. I am advised that the only outstanding material to be provided to Crown Law is the further staff email inboxes that are yet to be de-archived.
14. As outlined above, the email inboxes of all the 27 BACSS staff members identified by the Commission have been completed and provided to Crown Law. These staff members include:
- (a) Adam Wilson
 - (b) Annette Finlay
 - (c) Benn Watkins

- (d) Daniel Goodall
- (e) Darren Bate
- (f) Deborah Rankin
- (g) Diane Wallace
- (h) Elayne Raisin
- (i) Elizabeth Kirk
- (j) Elizabeth Marlay
- (k) Janine Armitage
- (l) Jill Medew
- (m) John Morahan
- (n) Justine Oxenham
- (o) Kevin Rodgers
- (p) Kory Foster
- (q) Liam Huxler
- (r) Louise Dornan
- (s) Margaret Nightingale
- (t) Megan Vizzard
- (u) Michelle Fidler
- (v) Ruth Brown

- (w) Serena Marriot
- (x) Stephan Marriot
- (y) Susan Cassidy
- (z) Timothy Hills
- (aa) Tracey Egan

15. At present, the department has identified 45 non-BACSS staff members (Central and Regional Office staff) who may have email material relevant to the Inquiry. To assist Crown Law and the Commission, the department has attributed each staff member a priority (i.e. high, medium or low) depending on the relevance of the material that they are likely to have. A copy of this table is Exhibit JRW5 to this Affidavit.

16. I am advised that the department received correspondence from the Commission on Tuesday, 17 November 2015 which highlighted seven staff members that the Commission requested that the department prioritise above any other staff members. These staff members included:

- (a) Jim Watterston
- (b) Paul Hobbs
- (c) Kym Amor
- (d) Chris Rider
- (e) Garry Innes
- (f) Stephan Marriot
- (g) Liam Huxler

17. It should be noted that Stephan Marriot and Liam Huxley are BACSS staff members and therefore the task of retrieving their emails has been completed and these emails were provided to Crown Law on Tuesday, 17 November 2015.
18. The remaining five staff members above have been marked as 'very high' priority in the table annexed (and highlighted in yellow) and have been actioned by the department's Information Technology Branch.

Estimated timeframes for the five prioritised staff members

19. I am advised by the department's Information Technology Branch that the estimated timeframes for the retrieval of these email inboxes are:
- (a) For material post July 2012 (i.e. the current technology) – emails can be provided to Crown Law by the end of this week (i.e. by Friday, 20 November 2015).
 - (b) For the remainder of the material (i.e. pre July 2012) – emails can be provided to Crown Law by Friday, 27 November 2015.

Estimated timeframes for the remaining 40 staff members

20. I am advised by the department's Information Technology (IT) Branch that the estimated timeframes for the retrieval of the remaining 40 email inboxes will take more time. Specifically:
- (a) For material post July 2012 (i.e. the current technology) – emails can be provided to Crown Law by Friday, 11 December 2015.
 - (b) For the remainder of the material (i.e. pre July 2012) – emails can be provided to Crown Law by 11 December 2015.

21. I am advised that this is due to the following:

- (a) The department's mail backup system does not have the capability for the purposes of mail archival and retrieval. The intended use is for Disaster Recovery purposes only to maintain business continuity.
- (b) The department currently has its managed service provider (Intalock) performing the retrieval of mail items post July 2012. To date, the expected additional costs for Intalock to restore the emails post July 2012 is [REDACTED]
- (c) Due to limitations in the legacy software and hardware, if the department was to undertake the task of retrieving the emails dated prior to July 2012 it would have required significant funding and resources to purchase infrastructure and build out multiple Microsoft Exchange environments to facilitate concurrent restores.
- (d) In order to avoid this and to expedite the mail retrieval process, the department has now also engaged the services of Kroll ON Track to perform the tape recovery services and to deliver the extracted mail items. An optimistic assessment of the restoration process could see the mail items delivered in 3-4 weeks (as outlined above). Over 1,500 tapes will need to be scanned and indexed before the identification of the required mailboxes can take place. The estimated cost of this engagement is [REDACTED]

22. The department will provide de-archived, unfiltered email inboxes of the staff members as prioritised to Crown Law as they are received and the department's managed service providers have been advised that individual email inboxes should be fed through as they are completed. Therefore, I am advised that it is expected that emails will be fed through to Crown Law in batches.

All the facts sworn to in this affidavit are true to my knowledge and belief except as stated otherwise.

Sworn by James Robert Watterson on 18
November 2015 at Brisbane in the
presence of:

A Justice of the Peace, C. Dec., Solicitor

[who certifies that the affidavit was read in the presence of the deponent who seemed to understand it, and signified that that person made the affidavit. (If required: see UCPR rule 433(1)).]

In the matter of the *Commissions of Inquiry Act 1950***Commissions of Inquiry Order (No.4) 2015****Barrett Adolescent Centre Commission of Inquiry****INDEX TO EXHIBITS**

Exhibit No	Exhibit description	Page numbers
JRW1	Copy of DET Summary of Disclosure report attached to the Affidavit of Louise Syme dated 11 November 2015.	5
JRW2	Index of material provided by DET to Crown Law on Thursday, 24 September 2015	3
JRW3	Email from Crown Law to DET received Wednesday, 30 September 2015	2
JRW4	Email from Crown Law to DET received Friday, 13 November 2015	2
JRW5	Table of DET staff member emails to be de-archived (as at 18.11.2015)	4

In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit JRW1 to the Affidavit of James Robert Watterson sworn on 18 November 2015.



A J.P., G. Dec., Solicitor



The department received the first Notice to Produce Documents on Tuesday, 15 September 2015. The information was required to be produced by 4pm on Monday, 28 September 2015.

In response, Tom Jumpertz, Executive Director, Legal and Administrative Law Branch (Legal Branch) initially sent an email to Sharon Mullins, Executive Director, State Schools (and others) to advise that the notice had been received and to also advise that a formal search request would also be circulated to relevant areas of the department (refer **Email 1**).

On Thursday, 17 September 2015 a formal search request was circulated by Tom Jumpertz to:

- Hayley Stevenson, A/Executive Director, Office of the Director-General
- Jeff Hunt, Deputy Director-General, Corporate Services
- Patrea Walton, Deputy Director-General, State Schools
- Annette Whitehead, Deputy Director-General, Policy Performance and Planning
- Mark Hind, Assistant Director-General, Information and Technologies
- Mark Campling, Regional Director, Metropolitan Region
- Deborah Rankin, Principal, Barrett Adolescent Centre Special School
- Susan Fleming, Principal, Tennyson Special School
- Cathy Heffernan, Assistant Director-General, Human Resources
- Kevin Mara, Assistant Director-General, Infrastructure Services
- Sharon Mullins, A/Assistant Director-General, State Schools Operations
- Leanne Nixon, Assistant Director-General, State Schools Performance
- Neil McCarthy, Director, ICY Governance Strategy Policy

(refer to **Email 2**).

Sharon Mullins provided an update to her supervisor, Bevan Brennan, ADG, State Schools - Operations on Friday, 18 September 2015 (refer to **Email 3**).

TRIM Searches and Iron Mountain

In relation to **TRIM searches** (the department's document management system), search terms were decided on early (refer to **Email 4**).

All resulting documents that were located by Kate Lavery were placed on a USB which was delivered to Crown Law with the rest of the department's material (refer to **Email 5**).

Some archive boxes were also retrieved from the department's offsite storage facility (Iron Mountain) (refer to **Email 6**).

Response to first Notice to Produce – provided to Crown Law on Thursday, 24 September 2015

Excluding the archived emails, the department delivered the material it was able to locate in response to the first notice to produce to Crown Law on Thursday, 24 September 2015 (refer to **Email 7**). Given the short timeframes, the department's legal branch did not have time to review the material before providing it to Crown Law or to index all of the material. This would have taken some time. The department provided the material on the understanding

that Crown Law would review and then ensure that relevant material was provided to the Commission in the required format.

De-archiving of emails

The issue in relation to the need to de-archive a number of email inboxes was identified early on 18 September 2015 (refer to **Email chain 8**).

Information Technology Branch (IT) identified on that same day (i.e. 18 September) that the de-archiving of emails was going to be a big task and requested further information for the purpose of providing an estimate of resources and timeframes (refer to **Email chain 8**).

Given that IT had indicated that it might take some months to retrieve the emails, further clarification was sought by the legal branch on Monday, 21 September 2015 (refer to **Email chain 8**).

Given the likely delay in providing emails, Rachel Plant Senior Lawyer Legal Branch spoke with Crown Law (Louise Syme) on Monday, 21 September 2015 and flagged the issue (refer to **Email 9**).

The first estimate was provided by IT on Tuesday, 22 September 2015 (refer to **Email 10**).

This estimate was provided to Crown Law on the same day (refer to **Email 11**).

A further updated estimate was sent to Crown Law on Tuesday, 22 September 2015 at 3.31pm (refer to **Email 12**).

A further updated estimate was provided to Crown Law on Thursday, 24 September 2015 (refer to **Email 13**).

In response, Crown Law queried whether an external service provider would be engaged to restore the emails on behalf of the department and who would be responsible for the cost (refer to **Email 14**).

A response was provided to Crown Law that same day and as part of that response the department advised that, *"We have told IT to hold off on doing anything until we receive a response from the Commission"* (refer to **Email 15**).

On Monday, 28 September 2015, Crown Law sought permission to provide the department's estimate directly to the Commission (refer to **Email 16**). This was consented to by the department and the department advised Crown Law that the external services had not yet been engaged. Crown Law responded and advised that this should be done and that it would seek an extension from the Commission in relation to the emails (refer to **Email 17**).

The department then advised its' IT department to engage the external contractor (Intalock) and begin the task of de-archiving the emails (refer to **Email 18**).

An email was sent to DPC on Monday, 28 September 2015 enquiring as to whether they would cover the cost of retrieving the emails (refer to **Email 19**).

Crown Law further indicated on Tuesday, 29 September 2015 that they were liaising with the Commission and trying to reduce scope and or identify the priority of the search order (i.e. emails of the employees at the centre first, then senior management) (refer to **Email 20**).

An email was received from Crown Law on Wednesday, 30 September 2015 advising that the email inboxes of 19 staff members at the BAC should be prioritised (refer to **Email 21**).

On Wednesday, 14 October 2015, DPC confirmed that it would fund the costs associated with engaging the contractor (Intalock) to de-archive the necessary inboxes (refer to **Email 22**).

The 19 prioritised email inboxes

The legal branch was advised on Wednesday, 21 October 2015 that this had been completed. The retrieved material was referred to the Regional Office to undertake relevant searches and to extract relevant material. The latest update that we have received from the Region is that they have had some 39,500 emails to review and this task should be completed by the end of this week (i.e Friday, 13 November 2015).

Also on 21 October 2015, the department emailed Crown Law (Mark Zamek) to advise that the task of de-archiving the 19 prioritised email inboxes had been completed and sought guidance as to what further email inboxes should be prioritised (refer to **Email 23**). Despite several follow up emails, the department is still waiting on this advice and received an email Crown Law on Monday, 9 November 2015 requesting a further list of the remaining inboxes and advising that once reviewed, we would discuss further (refer to **Email 24**).

Information identified following compliance with the first notice to produce

School mobile phone

The department's legal branch was advised late on the afternoon of Thursday, 24 September 2015 that the Region had also located a school mobile phone that contained relevant text messages.

The department advised Crown Law of the existence of the mobile phone on Monday, 28 September 2015 (refer to **Email 25**) and advised that the department would take steps to retrieve the text messages.

On Thursday, 1 October 2015 the department provided an update to Crown Law in relation to delays it was experiencing in retrieving the text messages (refer to **Email 26**).

Copies of the text messages were provided by IT on Monday, 12 October 2015 and were forwarded to Crown Law the same day (refer to **Email chain 27**).

Further documents from HR – refer to Email 28.

Documents from Kim Bennett (Senior Nurse Manager) – Kim advised the legal branch on Tuesday, 20 October 2015 that she may have documents relevant to the first Notice to Produce. These were delivered to central office in hard copy and the hard copy was delivered to Crown Law on Thursday, 22 October 2015 (refer to **Email 29**).

1 bundle of further material from Patrea Walton – this material was delivered to Crown Law with Kim Bennett's material referred to above (refer to **Email 29**).

Further Notices to Produce documents – Patrea Walton, Peter Blatch and Debbie Rankin

The department was advised by Crown Law on Wednesday, 7 October 2015 that further notices to produce and requests for statements had been received for Debbie Rankin, Peter Blatch and Patrea Walton (refer to **Email 30**).

The department was provided with copies of these notices on Thursday, 8 October 2015 (refer to **Email 31**).

The relevant staff members were notified of these notices on Friday, 9 October 2015 (refer to **Emails 32**).

Also in response to these requests, a formal request was made to IT to add Peter Blatch's name to the list of priority email inboxes to be de-archived (refer to **Email 33**). Crown Law was advised of this the same day (refer to **Email 34**).

The emails and calendar of Peter Blatch were de-archived and made available on Wednesday, 14 October 2015 and these were reviewed by the Regional Office (and Peter himself) and relevant material extracted. It is the department's understanding that Peter Blatch copied any relevant material onto a disk/USB and arrangements were made between Peter Blatch and Crown Law for Crown Law to obtain this material directly from the Regional Office following his witness meeting. The department does not have a copy of this additional material that was provided directly to Crown Law. This was confirmed with Crown Law on Wednesday, 21 October 2015 (refer to **Email 35**).

Excluding any email or calendar material that was provided directly to Crown Law, in relation to Peter Blatch and further documents, the legal branch was advised by the Regional Office (Kym Amor) on Tuesday, 13 October 2015 (refer to **Email 36**) that:

I understand that all of the documents relating to Peter Blatch and the Barrett Adolescent Centre Special School from our G Drive have been copied on to the external hard drive that we provided during the RTI process. It should be labelled Peter Blatch files on this drive.

During the witness meeting with Peter Blatch on Tuesday, 13 October 2015, he referred to a couple of additional documents which were located and provided to Crown Law on Tuesday, 13 October 2015 (refer to **Email 37**).

Following a discussion with Debbie Rankin on Monday, 12 October 2015, the department advised Crown Law that Debbie had advised that she had no further documents to produce in addition to those that had already been provided by the department (refer to **Email 38**). Debbie is now separately represented and the department does not know if she has disclosed further documentation to Crown Law directly.

In relation to Patrea Walton, 2 additional diary notes were identified and they were provided to Crown Law on Tuesday, 13 October 2015 (refer to **Email 39**). Further, during her witness meeting, Crown Law requested a copy of the folder of material that Patrea was referring to and this was provided to Crown Law (in hard copy) on Thursday, 15 October 2015.

Further Notices to Produce documents – Darren Bate and Margaret Nightingale

The department was advised by Crown Law on Thursday, 29 October 2015 that a further notice to produce had been received for Margaret Nightingale (refer to **Email 40**). Margaret Nightingale was advised by Crown Law that one of its officers, Mark Zemek, would contact her directly regarding the request. The department is unaware of what documents, if any, Margaret Nightingale provided to Crown Law in relation to this notice to produce.

The department was advised by Crown Law on Monday, 2 November 2015 that a further notice to produce and request for statement had been received for Darren Bate (refer to **Email 41**). During the witness meeting with Darren Bate on 3 November 2015, Darren Bate provided a number of documents directly to Crown Law. The department does not have a copy or list of the documents that were provided to Crown Law by Darren Bate.

Recent Crown Law request for further student files

An email was received by Crown Law on Monday, 9 November 2015 requesting further student files (refer **Email 42**).

The department provided an initial response on Tuesday, 10 November 2015 and additional student files will be delivered to Crown Law on Wednesday, 11 November 2015 (refer to **Email 43**).

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Commissions of Inquiry Order (No.4) 2015

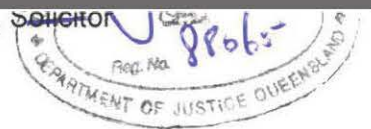
Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit JRW2 to the Affidavit of James Robert Watterson sworn on 18 November 2015.



A J.P., C.DEC., SOUTHERN



**DEPARTMENT OF EDUCATION AND TRAINING
BARRETT INQUIRY
Index of Material provided to Crown Law**

	AREA OF THE DEPARTMENT	DEPARTMENTAL CONTACT/S	NO. OF BOXES OR OTHER MATERIAL	ORIGINALS/COPIES	DATE DELIVERED TO CROWN LAW
1.	Metropolitan Region (including Tennyson Special School & BAC at Tennyson)	Yolanda Foley [REDACTED] Sophia Woods [REDACTED]	9 boxes + 1 hard drive: <ul style="list-style-type: none"> • Planning documents – 1982 onwards (this box includes a hard drive of material) • Student Files (x 2 boxes) • Principal and Administrative documents • Various school and Regional documents • Various student related documents • Guidance Officer documents/files • Staff files • Staff Wellness and PD documents <p>Please note: the Region/school have advised that they have been unable to locate the student file of [REDACTED]. The school is going to continue to look. In the meantime, OneSchool student profiles for this student have been included with the material.</p>	Originals + a hard drive	24.09.2015
2.	Document Management Services (DMS)	Clint Thornton [REDACTED]	1 box	Originals	24.09.2015
3.	Human Resources (Material from HR, Infrastructure Services and State Schools are in the 1 box)	Kristy Springer [REDACTED]	2 x bundles of documents.	Copies	24.09.2015

**DEPARTMENT OF EDUCATION AND TRAINING
BARRETT INQUIRY
Index of Material provided to Crown Law**

	AREA OF THE DEPARTMENT	DEPARTMENTAL CONTACT/S	NO. OF BOXES OR OTHER MATERIAL	ORIGINALS/COPIES	DATE DELIVERED TO CROWN LAW
4.	Infrastructure Services (Material from HR, Infrastructure Services and State Schools are in the 1 box)	Kristv Sprinaer	2 x bundles of documents 1 USB 7 x DET files (Originals): <ul style="list-style-type: none"> • Financial Management – Payments – 34-126284 (Barrott Adolescent Centre Special School Replace Classroom furniture in 3 Classrooms) • Financial Management – Capital Works – 34-126284 (Barrott Adolescent Centre Special School Replace Classroom furniture in 3 Classrooms) • Financial Management – Payments – 34-125965 (Barrott Adolescent Centre Special School Shade Sail Over Existing Seats and Garden) • Financial Management – Capital Works – 34-126285 (Barrott Adolescent Centre Special School Refurbishment of Existing Kitchen) • Financial Management – Payments – 34-126285 (Barrott Adolescent Centre Special School Refurbishment of Existing Kitchen) • Facility Management – Capital Works – 34-129134 – Barrett Adolescent Centre Spec – Resource Centre – SSS • Financial Management – Payments – 34-129134 – Barrett Adolescent Centre Spec 	Copies & Originals	24.09.2015

**DEPARTMENT OF EDUCATION AND TRAINING
BARRETT INQUIRY
Index of Material provided to Crown Law**

	AREA OF THE DEPARTMENT	DEPARTMENTAL CONTACT/S	NO. OF BOXES OR OTHER MATERIAL	ORIGINALS/COPIES	DATE DELIVERED TO CROWN LAW
5.	State Schools (Material from HR, Infrastructure Services and State Schools are in the 1 box)	Brendan Keane [REDACTED]	USB x 2: <ul style="list-style-type: none"> • results of search of department's document management system (TRIM) • results of search of State Schools email & G Drive search 2 x bundles of documents <u>Please note:</u> this material also contains: <ul style="list-style-type: none"> • 1 x cabinet briefing note • a document marked with a yellow tag in relation to sensitive student information 	Copies	24.09.2015
6.	Portfolio Services and External Relations	Amanda Dulvarie [REDACTED]	Have indicated may have 1 document. Will forward on once received.		

TOTAL OF 11 BOXES

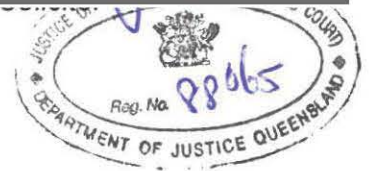
In the matter of the *Commissions of Inquiry Act 1950*

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Barrett Adolescent Centre Commission of Inquiry

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From: [REDACTED]
Sent: Wednesday, 30 September 2015 1:34 PM
To: JUMPERTZ, Tom
Cc: ASHTON, Christine; PLANT, Rachel
Subject: De-archiving emails

Importance: High

Hi Tom,

Further to our discussion yesterday I have confirmed with Counsel Assisting that I would ask DET to prioritise the de-archiving of the emails for the relevant staff at BAC (listed below) and then any ADG or DG level or similar departmental decision makers (as we identify from the material) should be prioritised.

1. Adam Wilson
2. Daniel Goodall.
3. Darren Mark Bate
4. Deborah Clair Rankin.
5. Dianne Wallace
6. Elayne May Raisin.
7. Elizabeth Marlay
8. Janine Armitage
9. Jill Medew
10. John Morahan
11. Justine Oxenham
12. Kevin Rodgers
13. Kory Foster – None. Not an employee at the relevant time.
14. Margaret Nightingale
15. Megan Louise Vizzard
16. Ruth Brown
17. Serena Marriott.
18. Susan Cassidy
19. Timothy Scott Hills

Based on this list of 19 could you please let me know of the likely expenditure for the DET email de-archiving process?

Similarly, assuming that we only end up identifying another 6 inboxes, could you also give me an indication of the likely expenditure for DET?

Alex has asked me to provide this information to her by **COB today**.

With thanks

Louise

Louise Syme

A/Assistant Crown Solicitor

Advocacy - Galligan Chambers

Ph: [REDACTED]

Crown Law, State Law Building, 50 Ann Street, Brisbane Qld 4000

[REDACTED] www.crownlaw.qld.gov.au



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A.S.P., C.Dee., Solicitor



From: [REDACTED]
Sent: Friday, 13 November 2015 11:59 AM
To: PLANT, Rachel; ASHTON, Christine
Subject: Full Staff List

Importance: High

Hi Rachel,

As discussed today- here is the full staff list

Adam Wilson
Annette Finlay
Benn Watkins
Daniel Goodall
Darren Bate
Deborah Rankin
Diane Wallace
Elayne Raisin
Elizabeth Kirk
Elizabeth Marlay
Janine Armitage
Jill Medew
John Morahan
Justine Oxenham
Kevin Rodgers
Kory Foster
Liam Huxler
Louise Dornan
Margaret Nightingale
Megan Vizzard
Michelle Fidler
Ruth Brown
Serena Marriot
Stephan Marriot
Susan Cassidy
Timothy Hills
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In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit JRW5 to the Affidavit of James Robert Watterson sworn on 18 November 2015.



A J.P., ~~G. Dec.~~, Solicitor



No.	Name of Staff Member	PRIORITY – in terms of potential relevant information for the Inquiry	Position Description	Further background information in relation to relevance to the Barrett Inquiry
Relevant Director-Generals				
1.	Jim Watterston	Very High	April 2013 - Current DG, DET	May have high level information about engagement across agencies from April 2013
2.	Julie Grantham	High	DG from Mar 2009 – Nov 2012	May have relevant information regarding any early discussions about current or future operation of the centre.
3.	Rachel Hunter	Medium	DG from 2006 - 2009	May have relevant information regarding any early discussions about current or future operation of the centre.
4.	Ken Smith	Medium	DG from 2003 - 2006	
5.	Jim Varghese	Low	DG from 2000 - 2003	
6.	Terry Moran	Low	DG from 1998 - 2000	
7.	Frank Peach	Low	DG from 1994 - 1998	
Central Office Staff				
8.	Lyn McKenzie	High	Former employee – former DDG, Education Queensland (DDG from May 2009 - June 2013)	Former employee - may have relevant information related to any proposed closure or relocation
9.	Marg Pethiyagoda	High	Former employee – former ADG, State Schools (ADG from June 2012 – Jan 2014)	Former employee – as ADG Operations may have information related to requirements for closure or relocation
10.	Jenny Cranston	High	Former employee – former DDG Education Queensland (2003 – April 2009)	Former employee - may have information related to any early discussion around future operations of the centre.
11.	Paul Hobbs	Very High	Former employee – former ADG, Infrastructure	Former employee - may have information related to any facility requirements, changes or future plans
12.	Jenny Haddrell	High	Former employee – former ADG Education Queensland	Former employee - may have information related to former operations of the centre.
13.	Angela	Medium	Current employee – State Schools (SS)	Current employee - supported former ADG

No.	Name of Staff Member	PRIORITY – in terms of potential relevant information for the Inquiry	Position Description	Further background information in relation to relevance to the Barrett Inquiry
	Kitzelman		Planning and reporting and manager of team that deals with correspondence	(Marg Pethiyagoda) may information related to requirements for closure or relocation
14.	Terry Kearney	Low	Former employee – former ADG Indigenous Education and Strategic Implementation	Former employee - may have information related to strategic direction on the support of students
15.	Ken Rogers	Low	Former employee – former ADG, Student Services	Former employee - may have information related to the support of young people with mental health concerns
16.	Anne Schafer	Low	Current employee – Former Principal Advisor, OADG	Current employee – formerly supported Marg Pethiyagoda and Yvana Jones, so may have copies of or sourced information regarding operation of the centre
17.	Yvana Jones	Low	Former employee – former ADG Curriculum (Position title changed with structural changes.)	Former employee - may have information on the provision of education program to students at the centre.
18.	Peter Mulcahy	Low	Director, Performance	Former employee - may have information related to the data/performance or staff of the centre
Regional Office Staff				
19.	Mark Campling	High	Regional Director	Current employee - may have relevant information relating to BACSS from March 2014 onwards.
20.	Jennifer Hart	High	Principals' Supervisor	Current supervisor of the BACSS Principal. May have relevant information relating to BACSS.
21.	Kym Amor	Very High	Director Regional Services	Current employee - may have relevant information relating to BACSS from October 2014 onwards.
22.	Christine Marsh	High	Principal Policy Officer (Correspondence)	Current employee - may have relevant information relating to BACSS.
23.	Glyn Davis	High	Former Senior Guidance Officer	May have relevant information relating to

No.	Name of Staff Member	PRIORITY – in terms of potential relevant information for the Inquiry	Position Description	Further background information in relation to relevance to the Barrett Inquiry
				BACCS during transition period
24.	Carmel Davies	High	Former Principal Advisor Education Services	May have relevant information relating to BACCS during transition period
25.	Rob Seiler	High	Former Director Regional Services	May have relevant information relating to BACCS during transition period
26.	Chris Rider	Very High	Former Regional Director	May have relevant information relating to BACCS from 2009 – 2014
27.	Wendy Dewis	High	Former Director Regional Services	May have relevant information relating to BACCS during from 2010 – 2013.
28.	Jo Diessel	High	Former Regional Executive Director	May have relevant information regarding BACSS prior to 2009.
29.	Keith Hynes	High	Former Regional Executive Director	May have relevant information regarding BACSS prior to 2009.
30.	Garry Innes	Very High	Former Director Human Resources	May have relevant information relating to BACCS during transition period
31.	Desley Brassington	High	Former Executive Director Schools	Was responsible for supervising Principals in the former Moreton Region dating back to 2002
32.	Cynthia Kyla	High	Former Principal Advisor	May have relevant information regarding BACSS.
33.	Rachel Thornley	High	Former Senior Facilities Officer	May have relevant information regarding Infrastructure projects during relocation of BACSS.
34.	Jan Boys	High	Former Regional Executive Director	May have relevant information regarding BACSS prior to 2005.
35.	Cliff Kuskopf	High	Former Director Facilities	Current employee - may have relevant information regarding Infrastructure projects or other involvement regarding BACSS.
36.	Leanne Zischke	Medium	Former Senior Facilities Officer	May have relevant information regarding Infrastructure projects during the relocation of BACSS.
37.	Janice Yarrow	Medium	Executive Services Officer	Current employee - may have relevant

No.	Name of Staff Member	PRIORITY – in terms of potential relevant information for the Inquiry	Position Description	Further background information in relation to relevance to the Barrett Inquiry
				information regarding BACSS.
38.	Scott Rodgers	Medium	Former Director Human Resources	Current employee - may have relevant information regarding BACSS from 2014 onwards.
39.	Eugene O'Donnell	Medium	Principal Advisor (Regulation)	Current employee - may have relevant information regarding BACSS.
40.	Benjamin John Green	Low	Former Principal Advisor Education Services	May have relevant information regarding BACSS
41.	Peta Turnbull	Low	Former Principal Policy Officer (Correspondence)	May have relevant information relating to BACSS during transition period
42.	Anthony Smith	Low	Former Senior Guidance Officer	May have relevant information regarding BACSS prior to 2013
43.	Barb Kropp	Low	Infrastructure Manager	Current employee - may have relevant information regarding Infrastructure projects during the relocation of BACSS
44.	Ian Liddell	Low	Former Manager Facilities	May have relevant information regarding Infrastructure projects or other involvement regarding BACSS.
45.	Karen Sweedman	Low	Principal Advisor Education Services	Current employee – may have relevant information relating to BACSS