

Oaths Act 1867

Statutory Declaration

I, **Ashleigh Trinder** of c/- Corrs Chambers Westgarth, 111 Eagle Street, Brisbane, Queensland, in the state of Queensland, do solemnly and sincerely declare that:

Background and experience

1 What are your current professional role/s, experience, qualifications and memberships? Provide a copy of your most recent curriculum vitae.

1.1 Attached and marked **AT-1** is a copy of my most recent and current curriculum vitae.

1.2 My current professional roles, experience, qualifications and memberships are outlined in my curriculum vitae.

2 The Commission understands that you have held the position of Psychologist at the Barrett Adolescent Centre (BAC). State whether that is correct and, if so, specify the period in which you held that position.

2.1 I held the position of locum Clinical Psychologist at the Barrett Adolescent Centre (**BAC**) on successive 12 month contracts between 2009 and the beginning of 2013, and thereafter on three and six month contracts until 30 December 2013, working five days per fortnight.

3 If you held that position of Psychologist:

(a) outline and explain your key responsibilities in that role; and

(b) provide a copy of your job description.

3.1 My key responsibilities in the role of Clinical Psychologist at BAC are set out in the Position Description for that role.

3.2 Attached and marked **AT-2** is a copy of the Position Description.

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4 Were you aware of the circumstances surrounding Dr Sadler's departure, removal or suspension from the BAC on or about September 2013? If so, when did you first become aware and by what means? Give details of those circumstances including the reasons for his departure, removal or suspension.

- 4.1 I am aware in only general terms of the circumstances surrounding Dr Sadler's departure from BAC.
- 4.2 I was first made aware of Dr Sadler's departure, removal or suspension from BAC in September 2013 when I returned to work following one of my rostered days off. I do not recall the specific date, and I do not recall who advised me of this information.
- 4.3 I do not recall being provided with specific details on the circumstances or reasons for his departure. [REDACTED]
- [REDACTED]

Closure of the BAC

5 On what date did you first become aware of the decision to close the BAC and by what means?

- 5.1 I undertook my clinical doctorate at BAC in 2008 and commenced employment at BAC in 2009. From that time I was aware of talk that BAC would be relocated to a site at Redlands. I was involved in meetings about what the design of the facility would look like although I was never a member of any formal project team. We were looking also at different models of care that could be offered.
- 5.2 By around 2011, I believed that the Redlands project would occur. I was aware of a staff member who bought a house near Redlands specifically in anticipation of the facility moving, and other staff who left BAC because of the logistics of working at Redlands.
- 5.3 I recall that the proposal to move the BAC's services to the Redlands site encountered difficulties because of the presence of a koala habitat on the site and that subsequently,

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a decision was made that the Redlands facility would not be built and the development funding would be reabsorbed into Queensland Health. This was in about mid 2012.

5.4 I recall that after this there was uncertainty about the future of BAC and whether BAC would continue or be closed. Dr Sadler was a strong advocate for keeping BAC open and he advised staff that he was pursuing other options such as looking at a site at Springfield.

5.5 Although I was not involved in the process, I was aware that in the early part of 2013 an Expert Clinical Reference Group and a Planning Group started the process of evaluating the service needs for BAC. I recall some discussions surrounding this in group meetings.

5.6 At that time, I was employed on a contract, initially March, and then with an end date in June 2013. I requested information from the Team Leader Non Secure Services, Lorraine Dowell by email in March 2013 about the status of my contract renewal. This was because of both uncertainty about BAC's future and also general reviews within West Moreton Mental Health Services about staffing and funding. All health services were being examined at that time for cost savings and greater service efficiencies.

5.7 Lorraine advised that she was unable to confirm if my contract would or would not be extended however guessed that BAC would most likely not continue at The Park and that a decision would happen before the end of the financial year. Attached and marked **AT-3** is a copy of the email exchange between myself and Lorraine Dowell.

5.8 I was on holidays overseas in June/July 2013.

5.9 Formally, I became aware that a definite decision had been made to close BAC on 6 August 2013 when I received an email from Dr Leanne Geppert, who was then Acting Director of Strategy, Mental Health Services informing staff of the decision to close BAC. Attached and marked **AT-4** is a copy of that email and the attachments to that email.

6 In relation to the circumstances surrounding the decision to close the BAC:

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(a) Were you made aware of the basis for the closure decision? If so, explain how you were made aware of the closure decision and any reasons for that decision;

- 6.1 The attachment to the email from Dr Geppert dated 6 August 2013 provided me with some information as to the basis for the closure decision and the reasons for the decision. The reasons stated in that material were:
- (a) An information sheet attached to the email stated that the redevelopment at The Park meant that it was no longer a suitable place for adolescents and that West Moreton Hospital and Health Service (WMHHS) would be working with the community to ensure that the needs of the patients at BAC would be met.
 - (b) A copy of the Expert Clinical Reference Group Recommendations for the BAC Strategy dated July 2013 attached to the email outlined considerations for alternative care models.
 - (c) A copy of a media statement by then Health Service Chief Executive, Lesley Dwyer on 6 August 2013 attached to the email stated that the BAC model of care had been determined as no longer being appropriate for adolescents.
- 6.2 I also recall that there were a number of factors being generally discussed within BAC around that time which related to the closure, in particular, the age of the BAC buildings and a new facility at The Park.

(b) What information, material, advice, processes, considerations and recommendations related to or informed the closure decision; and

- 6.3 As I was not involved in the closure decision or any of the considerations leading to the closure decision, I am unable to comment on what information, material, processes, considerations and recommendations related to or informed the closure decision.

(c) What was the decision making process related to the closure decision?

- 6.4 As I was not involved in the closure decision or any of the considerations leading to the closure decision I am unable to comment on the decision making process related to the

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closure decision.

Transition arrangements

7 From late 2013 until early 2014, a number of BAC patients were transitioned to alternative care arrangements in association with the closure or anticipated closure (transition clients). Did you have any involvement in developing, managing and implementing the transition plans for the BAC patients (including, but not limited to identifying, assessing and planning for care, support, service quality and safety risks)? If so:

- 7.1 I had minimal direct involvement with developing, managing and implementing the transition plans for the BAC patients (including identifying, assessing and planning for care, support, service quality and safety risks).
- 7.2 During the relevant period, my role was primarily to continue to provide individual therapy and support to a number of patients in BAC and provide psychological summaries.
- 7.3 I was not part of the transition panel which I believe was comprised of at least the following key BAC representatives: Acting Clinical Director, Dr Anne Brennan; Occupational Therapist Megan Haynes; A/Clinical Nurse Consultant Vanessa Clayworth; and Social Worker Carol Hughes.
- 7.4 I understand that the transition panel mostly met on Tuesdays. During the relevant period I worked at BAC on Mondays, Wednesdays and alternative Fridays.

(a) identify the transition clients with whom you were involved; and

- 7.5 The transition clients with whom I was involved were Patient ■, Patient ■, Patient ■, Patient ■, Patient ■, Patient ■ and Patient ■.

(b) explain the transition arrangements put in place and how those transition arrangements were developed in the period from August 2013 to January 2014.

- 7.6 I am unable to provide complete details of the transition arrangements put in place for

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specific patients or how they were developed as I was not a member of the transition team and transition arrangements were not within my area of responsibility. In relation to those BAC patients whose clinical care I was involved in, my involvement in the patient's care and my understanding of their transition arrangement is as follows.

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Patient ■

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Patient [Redacted]

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8 Explain any information, material, advice, processes, considerations and recommendations that related to or informed the transition arrangements.

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Patient ■

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Patient ■

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EXHIBIT 129

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Patient [REDACTED]

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Patient [REDACTED]

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9 For each of those transition plans:

(a) state who was responsible for overseeing the transition plans; and

9.1 I believe that for all the patients mentioned above, there were dedicated care coordinators and associated care coordinators who would have been partly responsible for overseeing the transition plans. I believe that the transition panel held responsibility for overseeing the transition plans.

(b) were there any arrangements to review, follow up and monitor the outcome of the

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transition arrangements? If so, what were those arrangements?

9.2 I finished at BAC on 30 December 2013 so I am not aware of specific arrangements to review, follow up and monitor the outcome of the transition arrangements as I was not involved after that time.

9.3 Up until my departure from BAC on 30 December 2013, [REDACTED]

9.4 [REDACTED]

10 Did you have any discussions with the medical or other staff at receiving alternative services regarding the transition clients' transitional arrangements, treatment plans, clinical and educational needs or other matters? If so, explain the nature of these discussions, including the date on which they occurred, with whom and for what purpose.

10.1 I was involved in initial discussions within BAC about transition to the PAH Mood Team being a possible option for BAC patients. I have a professional relationship with psychologist [REDACTED] and recall that I may have spoken to her not long after the closure decision was announced with a view to explore possible referral options for transition clients generally, [REDACTED]

10.2 As mentioned, I also had limited contact with [REDACTED]

11 In relation to the transition arrangements did you have any consultation(s) with transition clients and or their families, friends or carers? If so, explain the date and details of such consultation(s).

11.1 [REDACTED]

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11.2



12 Were you aware of any concerns regarding the transition of any transition clients from the BAC to an alternative service provider? If so:

(a) Explain such concerns.

12.1



12.2

12.3 (b) If there were concerns, who were these concerns expressed by and to whom?

12.4



(c) On what date and by what means did you become aware of these concerns?

12.5 To the best of my recollection, I became aware of these concerns about a month prior to my departure from BAC which was on 30 December 2013.

(d) What steps, if any, did you cause to be undertaken as a result of those concerns?

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12.6



13 If there were transitional plans in place for the transition clients, what progress did each client make in respect of the plans? If progress was unsatisfactory, what arrangements, if any, were made for alternative management?

13.1 I was not involved in specific transition planning or transition arrangements for BAC patients and therefore I am not aware of specific aspects of the progressing of those arrangements. For the patients I was involved with, my involvement is outlined above and I did not have specific concerns that the referral options presented to those patients and their families were not adequate or appropriate.

13.2



14 Explain any other information or knowledge (and the source of that knowledge) that you have relevant to the Commission's Term of Reference.

14.1 One of the key issues that concerned me in relation to BAC and its closure was in relation to staffing. Historically there had been one psychology student placement at BAC on a six month rolling basis to assist with clinical load. From my recollection, this was discontinued after the student who completed [REDACTED] placement in December 2012.

14.2 On 9 May 2013 I received an email from Sarah Brown, asking BAC Psychology Services if we would be willing to supervise a student placement. I replied on 13 May 2013 advising that in view of the uncertainty as to the future of BAC it would not be ethical to offer a placement. Attached and marked **AT-49** is a copy of that email exchange.

14.3 Also, the occupational therapy locum was not continued after 30 June 2013, although the incumbent for the position returned to BAC to support the transition.

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- 14.4 On 18 September 2013, Danielle Corbett advised that Michelle Giles (AH Director) and Lorraine Dowell suggested to have brief weekly meetings to touch base and to provide a two way flow of information and support during this time of flux. Attached and marked **AT-50** is a copy of this email.
- 14.5 On 30 September 2013 I attended part of a meeting attended by Lorraine Dowell who discussed organisational change helpful strategies. Attached and marked **AT-51** is a copy of an email from Lorraine Dowell attaching the list of strategies.
- 14.6 There were regular meetings from that time at which there was a general discussion about staff issues and in particular employment movements and the options for staff in terms of redeployment or redundancy. I recall in one of those meetings I raised that I felt there was a split between the Queensland Health staff and the Education Queensland staff which affected communication between the staff.
- 14.7 Also there was uncertainty and speculation as to why Dr Sadler had been stood down and therefore concerns about Dr Brennan being appointed as Acting Director, although she came to be better accepted as time progressed.
- 14.8 I also wrote a number of emails to senior staff which demonstrate frustration with my own contract uncertainty and lack of certainty generally re future of BAC. Copies of these emails are attached in the bundle marked **AT-52**. For example:
- (a) In October 2012 all departments were asked to provide a summary of the role and services they provided. In relation to psychology services at BAC, Georgia Watkins-Allen and I provided a joint response. This occurred within the environment of all units across the service being asked to justify their position and this added to the feeling of uncertainty about the future.
 - (b) On 6 February 2013, Scott Natho (Senior Psychologist), advised that it would be likely that there would be a decision to delay the position of clinical supervisor so that my locum position could be extended.
 - (c) On 6 February 2013 in an email to Scott Natho (Senior Psychologist), I raised an ethical battle as to whether there would be sufficient time to terminate therapy

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effectively and appropriately as my contract was ending in 2 weeks.

- (d) On 13 February 2013 in a further email to Scott Natho, I indicated that I would extend my contract if it was possible. I also noted that this was important for continuity of care and stability of the BAC unit.
- (e) On 1 March 2013 I received an email from Dr Sadler in which he on-forwarded email exchanges between himself and the Director of Allied Health, Tawanda Machingura regarding allied health staffing in BAC.
- (f) On 11 October 2013, I sent an email to Lorraine Dowell noting that that I had received the latest Staff Communique indicating that BAC would be open until the end of January 2013. I therefore asked if we should discuss organising another temporary contract post my current December, 2013 contract. Lorraine Dowell responded by email that day noting that she would check with Michelle.

15 Identify and exhibit all documents in your custody or control that are referred to in your witness statement.

- 15.1 All documents referred to in my witness statement are exhibited.

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 Ashleigh Hunter

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And I make this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the *Oaths Act 1867*.

Taken and declared before me by)
Ashleigh Trinder at Brisbane in the)
 State of Queensland this)
 day of *30th October 2015*)
 Before me:)



Signature of authorised witness

Solicitor
 A Justice of the Peace/
 Commissioner for Declarations



Signature of declarant

STATUTORY DECLARATION OF ASHLEIGH TRINDER
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AT-4	Email from Leanne Geppert to Ashleigh Trinder, copied to Michelle Giles and Lorraine Dowell, dated 6 August 2013 attaching: <ul style="list-style-type: none"> • West Moreton Hospital and Health Service and Children's Health Queensland Hospital and Health Service document entitled 'What is the Barrett Adolescent Centre (BAC)?', undated • West Moreton Hospital and Health Service – Expert Clinical Reference Group Recommendations Barrett Adolescent Strategy dated July 2013 • West Moreton Hospital and Health Service and Children's Health Queensland Hospital and Health Service Media Statement dated 6 August 2013 	WMS.0016.0001.18215 WMS.0016.0001.18180 WMS.0016.0001.18207 WMS.0016.0001.18247	15 - 26
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	Progress Summary dated 27 January 2012 West Moreton Hospital and Health Service The Park – Centre for Mental Health Barrett Adolescent Centre, Case Review Progress Summary dated 18 April 2012 West Moreton Hospital and Health Service The Park – Centre for Mental Health Barrett Adolescent Centre, Case Review Progress Summary dated 5 October 2012	WMS.0024.0001.00413	
AT-7	Letter from Tom Pettet to [REDACTED] dated 9 October 2013	WMS.1000.0048.00015	51-52
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