

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

**Commissions of Inquiry Order (No.4) 2015**

**Barrett Adolescent Centre Commission of Inquiry**

**AFFIDAVIT**

Ronald Martin Simpson of Disability and Community Services, Department of Communities, Child Safety and Disability Services ('DCCSDS') at Brisbane in the State of Queensland, Case Manager solemnly and sincerely affirms and declares:

1. I have been provided with a request for additional information in an email from Ms Catherine Muir, Counsel Assisting for the Barrett Adolescent Centre Commission of Inquiry dated 3 May 2016. **Exhibit A** to this affidavit is a copy of that email.
2. Attached to this Affidavit and marked "**Exhibit B**" is a letter I received from the Commission of Inquiry which is dated 9 May 2016 requesting further information which is responded to in this Affidavit.
3. Attached to this Affidavit and marked "**Exhibit C**" is a letter I received from the Commission of Inquiry which is dated 12 May 2016 requesting further information which is responded to in this Affidavit.

4. [REDACTED]

Page 1

Deponent

A.J.P., C. Dec., Solicitor

**AFFIDAVIT**

On behalf of the State of Queensland

Crown Solicitor  
11<sup>th</sup> Floor, State Law Building  
50 Ann Street  
BRISBANE QLD 4000

**Documentation from Dr Anne Brennan**

5. To the best of my knowledge, Dr Brennan provided the following documentation in the lead up to, and following the transfer of [REDACTED]
- (a) An updated Mental Health Services, Risk Screening Tool on 14 January 2014, as stated in paragraph 15 of my affidavit to the Commission dated 7 January 2016; and
  - (b) A Mental Health Services Crisis Intervention Plan as stated in paragraph 24 of my affidavit to the Commission dated 7 January 2016.
6. I do not recall receiving a discharge summary from the Barrett Adolescent Centre or Dr Brennan on or after 28 January 2014; and I have been unable to locate a record of receiving such a document.

**Documentation from other sources**

7. On 24 January 2014, I received a list of Community Contacts for [REDACTED] via email from Barrett Adolescent Centre Occupational Therapist Megan Hayes. Attached to this affidavit and marked "**Exhibit D**" is a copy of that list.

**Mental Health Services**

8. I recall having a conversation with an employee of [REDACTED]
- [REDACTED]

9. [REDACTED]

10. [REDACTED]

11.

12.

13.

14.

**Medication**

15.

16.

17.

**Specialist Appointments**

18.

19.

20.

21.

### Funding

22. Within DCCSDS, block funding refers to supports being provided by an organisation which has a "pre-purchased" set of supports available to a person with a disability. For example, DCCSDS may purchase 500 hours of community access support, for use among 100 people with a disability, prior to that service being delivered.

23. DCCSDS service users would then be offered that type of funded support from the organisation where "capacity" is identified.

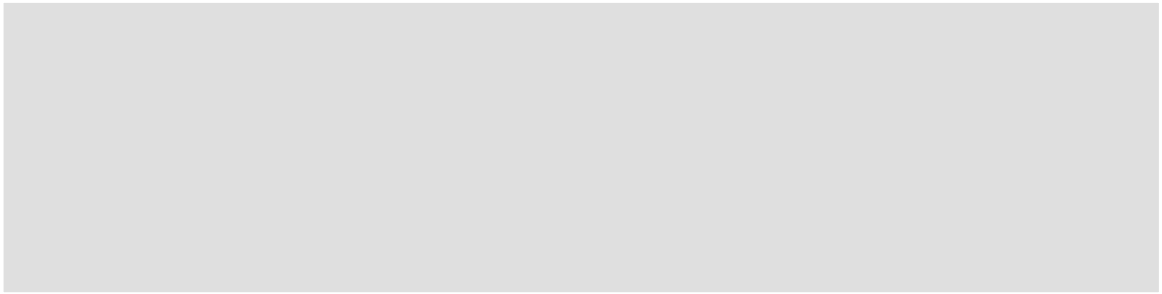
24. This type of funding has also historically been applied to accommodation support within the community. For instance, a household supported by an organisation, may have funding to support 2 people with a disability.

25.

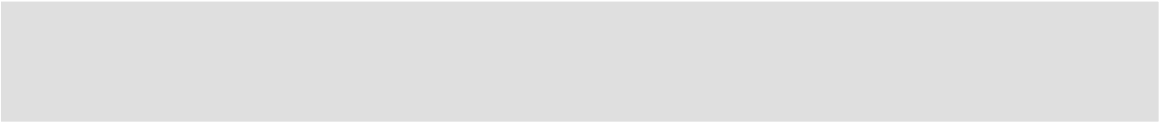
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27.

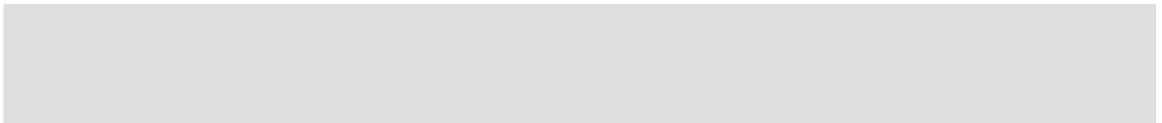
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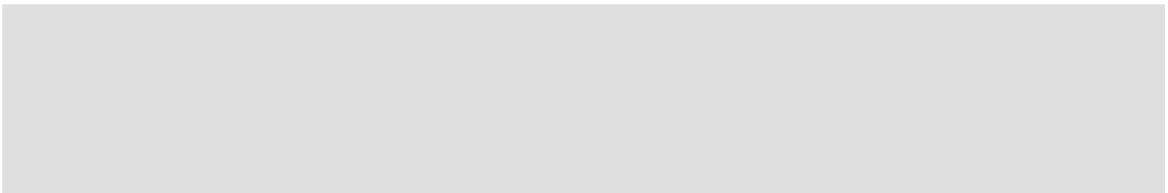
29.



30.



31.



32.



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

Affirmed by RONALD MARTIN  
SIMPSON on 17 May 2016  
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)).~~

~~[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, but was physically incapable of signing it. (If required: see UCPR rule 433(2)).~~

**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**

<b>Exhibit No</b>	<b>Exhibit description</b>	<b>Page numbers</b>
A	Email from Catherine Muir dated 3 May 2016	7-9
B	Letter from Ashley Hill dated 9 May 2016	11-12
C	Letter from Ashley Hill dated 12 May 2016	14-20
D	Community Contacts List for [REDACTED] received 24 January 2014	22-26

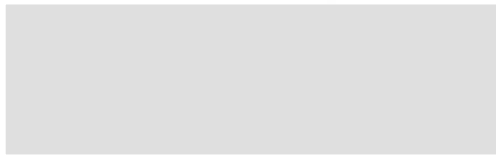
**In the matter of the *Commissions of Inquiry Act 1950***

**Commissions of Inquiry Order (No.4) 2015**

**Barrett Adolescent Centre Commission of Inquiry**

**CERTIFICATE OF EXHIBIT**

Exhibit A to the Affidavit of Ronald Martin Simpson sworn on *17 May 2016*



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

**Ronald X Simpson**

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**From:** Roland O'Regan [REDACTED]  
**Sent:** Tuesday, 3 May 2016 4:09 PM  
**To:** Ronald X Simpson  
**Subject:** Fwd: Ron Simpson

Ron,

Please see below.

I will call you in the morning to discuss.

Regards

Roly O'Regan  
Special Counsel  
Kaden Boriss Legal Brisbane  
[REDACTED]

Website: [www.kadenboriss.com](http://www.kadenboriss.com)

Begin forwarded message:

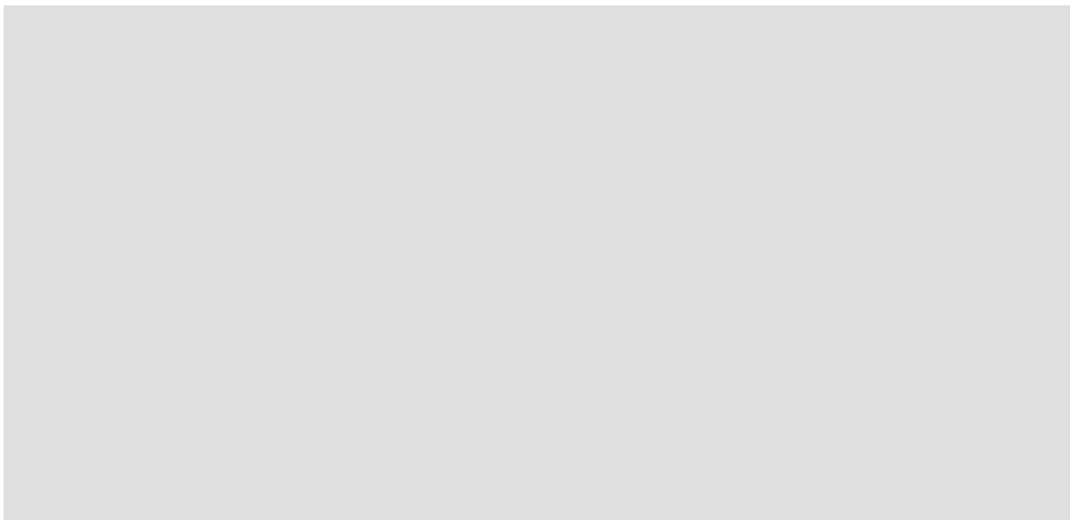
**From:** Catherine Muir [REDACTED]  
**Date:** 3 May 2016 3:17:57 pm AEST  
**To:** "Roland O'Regan" [REDACTED]  
**Cc:** Joanna Cull [REDACTED], Ashley Hill  
[REDACTED]  
**Subject:** Ron Simpson

Dear Roly,

I refer to my email of Monday 2 May 2016 and to our telephone conversation this morning.

Please find set out below, a list of further questions that the Commission would like Ron Simpson to consider and answer where possible.

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.





I understand that Ron is away until Wednesday. Once you have had the opportunity to speak to Ron and obtain some instructions, could you please contact me.

I was envisaging that perhaps you could prepare a draft statement and then we could meet with Ron and Joanna Cull one of the senior legal officers at the Commission, to finalise the statement (in case further questions arise from some of the answers).

I was hoping this meeting could take place either this Thursday afternoon say at 2.30 pm or this Friday at 10.45am.

Thank you for your prompt response and I look forward to hearing from you further.

Kind regards,

**Catherine Muir**  
Counsel Assisting  
Barrett Adolescent Centre Commission of Inquiry

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Level 10, 179 North Quay, BRISBANE QLD 4000  
[www.barrettinquiry.qld.gov.au](http://www.barrettinquiry.qld.gov.au)

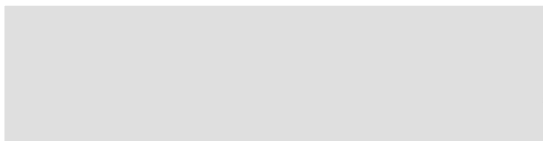
**In the matter of the *Commissions of Inquiry Act 1950***

**Commissions of Inquiry Order (No.4) 2015**

**Barrett Adolescent Centre Commission of Inquiry**

**CERTIFICATE OF EXHIBIT**

Exhibit B to the Affidavit of Ronald Martin Simpson sworn on *17 May 2016*



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

Barrett Adolescent Centre Commission of Inquiry

In reply please quote: RSI/20160509/CM

Level 10, 179 North Quay  
Brisbane Queensland 4000  
PO Box 13016  
George Street Post Shop  
Brisbane Queensland 4003

Web [www.barrettinquiry.qld.gov.au](http://www.barrettinquiry.qld.gov.au)

Roland O'Regan  
Special Counsel  
Käden Boriss Legal  
Level 7  
231 George Street  
BRISBANE QLD 4000

By email to: [REDACTED]

Dear Mr O'Regan, Mr Bartovich

**Barrett Adolescent Centre Commission of Inquiry -- Mr Ronald Simpson**

I refer to your email of Thursday 5 May 2016, attaching a draft Supplementary Statement of Mr Ronald Martin Simpson ("the Draft"). I thank you and Mr Simpson for your prompt attention to this matter. There are a couple of further questions set out below that arise from the Draft and generally from Mr Simpson's evidence, that the Commission would like Mr Simpson to address in his further statement.

1. Can Mr Simpson please set out in his further statement the source of his knowledge of the matters currently set out in paragraphs 4 and 5 of the Draft.

2.

3.

4.

5.

6.

7.

I would appreciate it if you could amend the draft Supplementary Statement in response to the points above and send the Commission an updated draft. I also confirm that this further letter should also be exhibited to Mr Simpson's further statement.

Yours sincerely

  
Ashley Hill  
Executive Director  
Barrett Adolescent Centre Commission of Inquiry  
09/05/2016

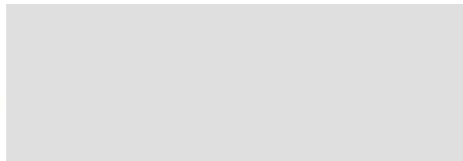
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**Barrett Adolescent Centre Commission of Inquiry**

**CERTIFICATE OF EXHIBIT**

Exhibit C to the Affidavit of Ronald Martin Simpson sworn on *17 May 2015*



A J.P., C.Dec., Solicitor

**Barrett Adolescent Centre Commissioned Inquiry**

In reply please quote: RSI/20160512/CM

Level 10, 179 North Quay  
Brisbane Queensland 4000  
PO Box 13016  
George Street Post Shop  
Brisbane Queensland 4003

Web [www.barrettinquiry.qld.gov.au](http://www.barrettinquiry.qld.gov.au)

Roland O'Regan  
Special Counsel  
Kaden Boriss Legal  
Level 7  
231 George Street  
BRISBANE QLD 4000

By email to: [REDACTED]

Dear Mr O'Regan/Mr Bartovich,

**Barrett Adolescent Centre Commission of Inquiry – Mr Ronald Simpson**

I thank you again for your and Mr Simpson's prompt responses to the Commission's further queries.

Further clarification in relation to the draft supplementary statement of Mr Simpson received yesterday is required. In particular, the Commission seeks clarification as to whether Mr Simpson received a 'community contacts list' from someone at the BAC other than Dr Brennan.

At paragraph 4 of the updated draft supplementary statement received yesterday, Mr Simpson stated he received only a mental health services risk screening tool (received on 14 January 2014) and a mental health services crisis intervention plan from Dr Brennan.

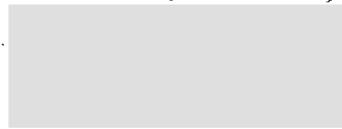
We note that during cross examination by Mr Fitzpatrick Mr Simpson acknowledged that "the combined effect of the three pieces of documentation [the above two documents and the report from the Specialist Disability Services Outreach and Assessment Team exhibited to Mr Simpson's original statement] was that by the end of January 2014 [he] had a full and adequate picture of [REDACTED] (Transcript reference 21-105 lines 42 to 45).

In their report Prof. Kotze and Tania Skippen stated that the DSQ CM was provided with 'an extensive Community Contacts list, including upcoming appointments and recent actions'

(appendix D to report of Prof. Kotze and Ms Skippen, which is attachment F to the statement of Prof. Kotze).

Could Mr Simpson please confirm that he received the community contacts list via email from Megan Hayes dated 24 January 2014. The Commissioner has authorised you to have access to this document (attached). The Delium reference is WMS.0025.0002.38278 and the attachment is at .38279.

Yours sincerely

A rectangular grey box redacting the signature of the sender.

Ashley Hill  
Executive Director  
Barrett Adolescent Centre Commission of Inquiry  
12/05/2016

WMS.0025.0002.38278

**From:** Megan Hayes  
**Sent:** 24 Jan 2014 12:44:54 +1000  
**To:** [REDACTED]  
**Cc:** Ronald X Simpson  
**Subject:** Contacts summary  
**Attachments:** Microsoft Word - [REDACTED] - Community Contacts.pdf

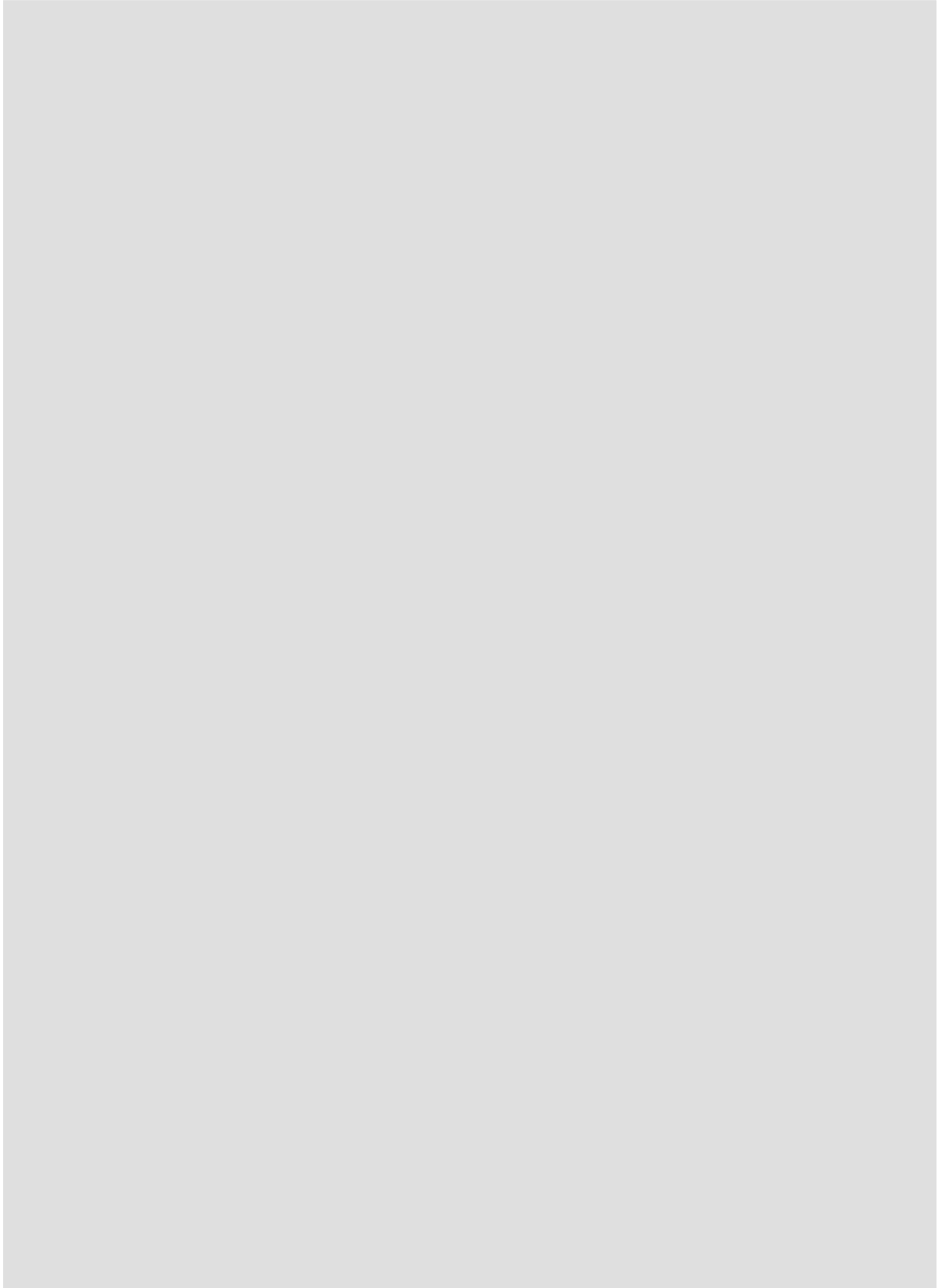
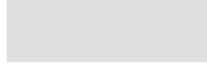
Hi all  
As discussed please find attached the list of Community Contacts that are relevant to  
[REDACTED]  
Kind regards

Megan Hayes  
Occupational Therapist  
Barrett Adolescent Centre  
The Park Centre for Mental Health  
[REDACTED]  
Tues, Thurs, Fri (alt)

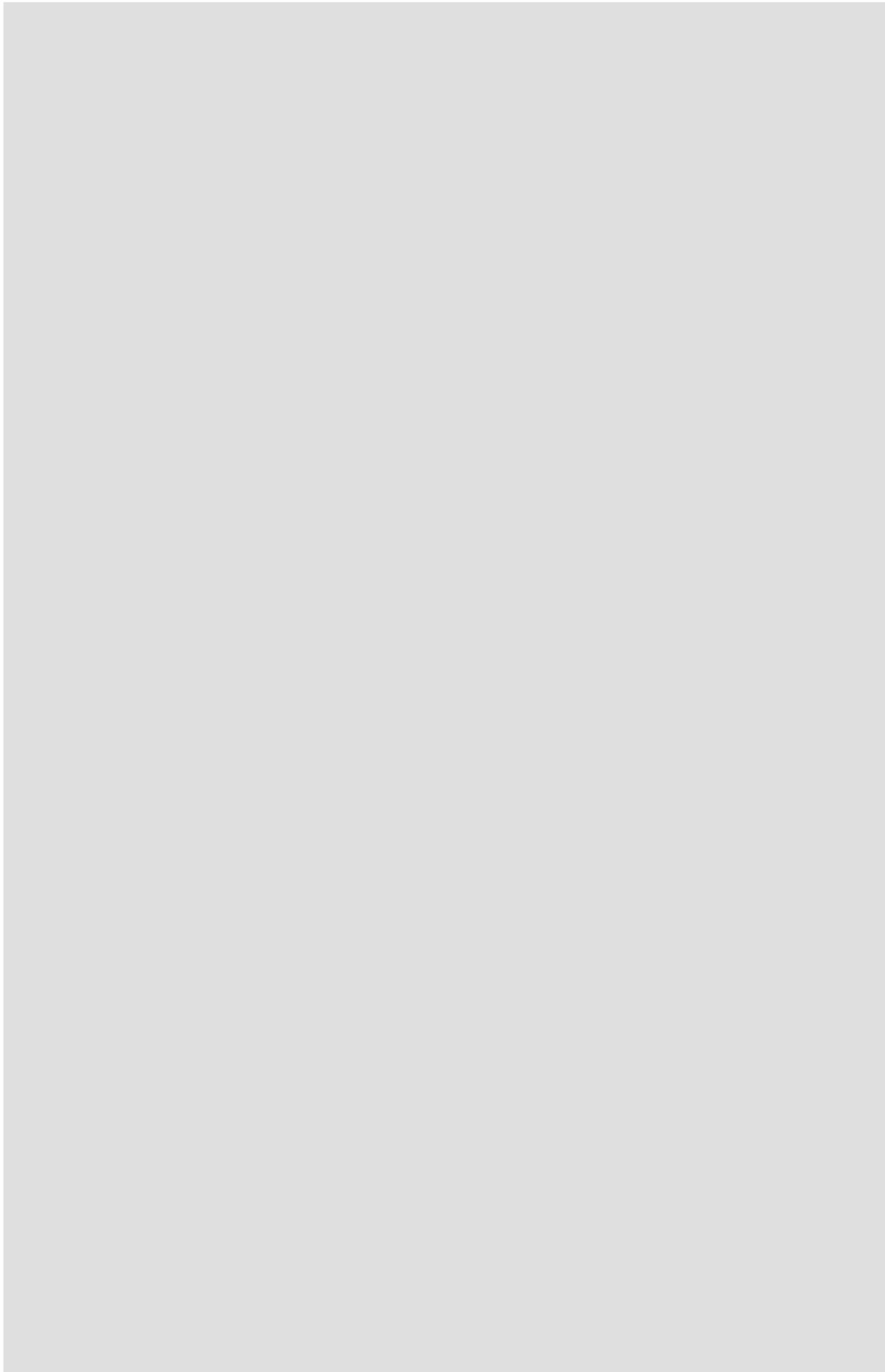


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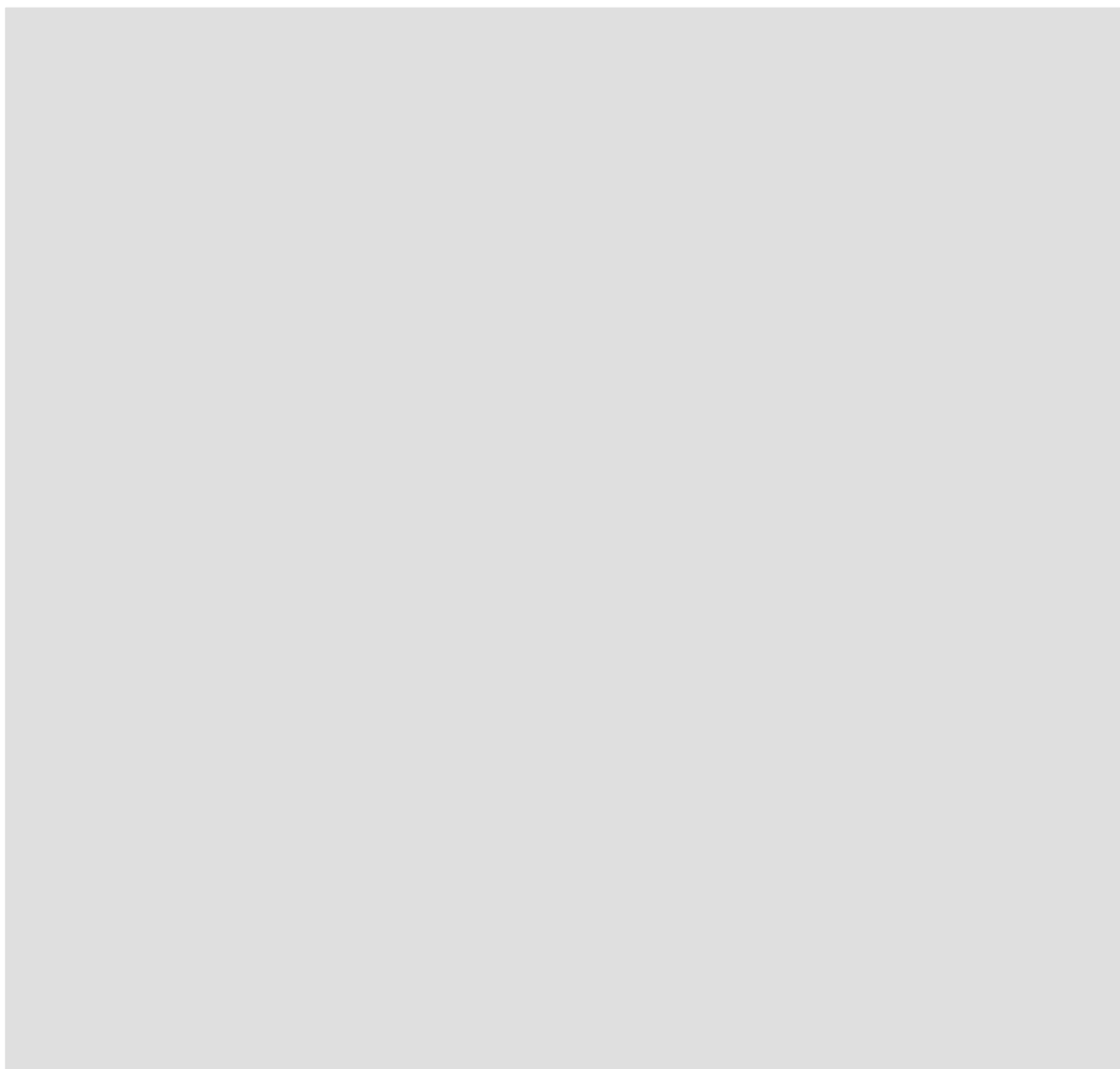
Community Contacts



WMS.0025.0002.38280



WMS.0025.0002.38281



Crisis Services	
Ambulance	<p>Emergencies: 000</p> <p>General enquiries: 13 QGOV (13 74 68)</p> <p><a href="https://ambulance.qld.gov.au">https://ambulance.qld.gov.au</a></p>
Police	<p><u>Emergencies:</u> 000</p> <p><u>Crime Stoppers:</u> 1800 333 000</p> <p><u>Policelink:</u> 131 444 (Non urgent property reporting and QPS general enquiries 24/7)</p> <p><a href="http://www.police.qld.gov.au">www.police.qld.gov.au</a></p>
Kids Helpline	<p>If you need to speak to a counsellor, call 1800 55 1800, 24 hours a day, 7 days a week. If you can't get to a phone, try our <u>email</u> or <u>web counselling</u> services.</p> <p>Phone counselling</p> <p>When kids call Kids Helpline, they are connected to a counsellor after listening to a message about the counselling process, including privacy and confidentiality information.</p> <p>All calls are private and confidential unless a Duty of Care situation arises. A Duty of Care situation occurs when:</p> <p>A child is being hurt or neglected</p>

WMS.0025.0002.38282

	<p>A child is seriously thinking about hurting him/herself A child has hurt, or is seriously thinking about hurting someone else If we have significant concerns about a child's health and safety If we suspect that one of these situations is happening, we will do all we can to ensure that the child and others remain safe. This includes encouraging the child to provide information about themselves such as their name and where they are. Calls to Kids Helpline are free from mobile phones, landlines and public telephones.</p> <p>Web counselling Web counselling allows young people to talk one-on-one, real time with a Kids Helpline counsellor. It works in the same way as phone counselling, but takes place over the web.</p> <p>Email counselling Young people can access Kids Helpline email counselling 7 days a week. Email counselling is also very popular so it can take a while for a counsellor to respond to an email. We suggest that kids use our phone counselling service if their problem is urgent, or if they need to speak with someone straight away.</p> <p>For general information please contact: Kids Helpline Administration GPO Box 2469, Brisbane QLD 4001 Phone: 07 3369 1588 Fax: 07 3367 1266 [REDACTED]</p> <p>Opening hours: Kids Helpline Administration is open 8am - 5pm, Monday to Friday.</p>
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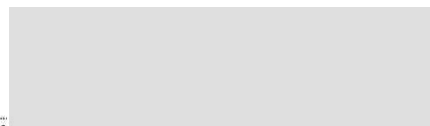
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Exhibit D to the Affidavit of Ronald Martin Simpson sworn on *17 May 2016*



~~A.J.R. O'Dec.~~, Solicitor

**Ronald X Simpson**

---

**From:** Megan Hayes [REDACTED]  
**Sent:** Friday, 24 January 2014 12:45 PM  
**To:** [REDACTED]  
**Cc:** Ronald X Simpson  
**Subject:** Contacts summary  
**Attachments:** Microsoft Word - [REDACTED] -Community Contacts.pdf

Hi all

As discussed please find attached the list of Community Contacts that are relevant to [REDACTED]

Kind regards

Megan Hayes  
Occupational Therapist  
Barrett Adolescent Centre  
The Park Centre for Mental Health  
[REDACTED]

Tues, Thurs, Fri (alt)

\*\*\*\*\*

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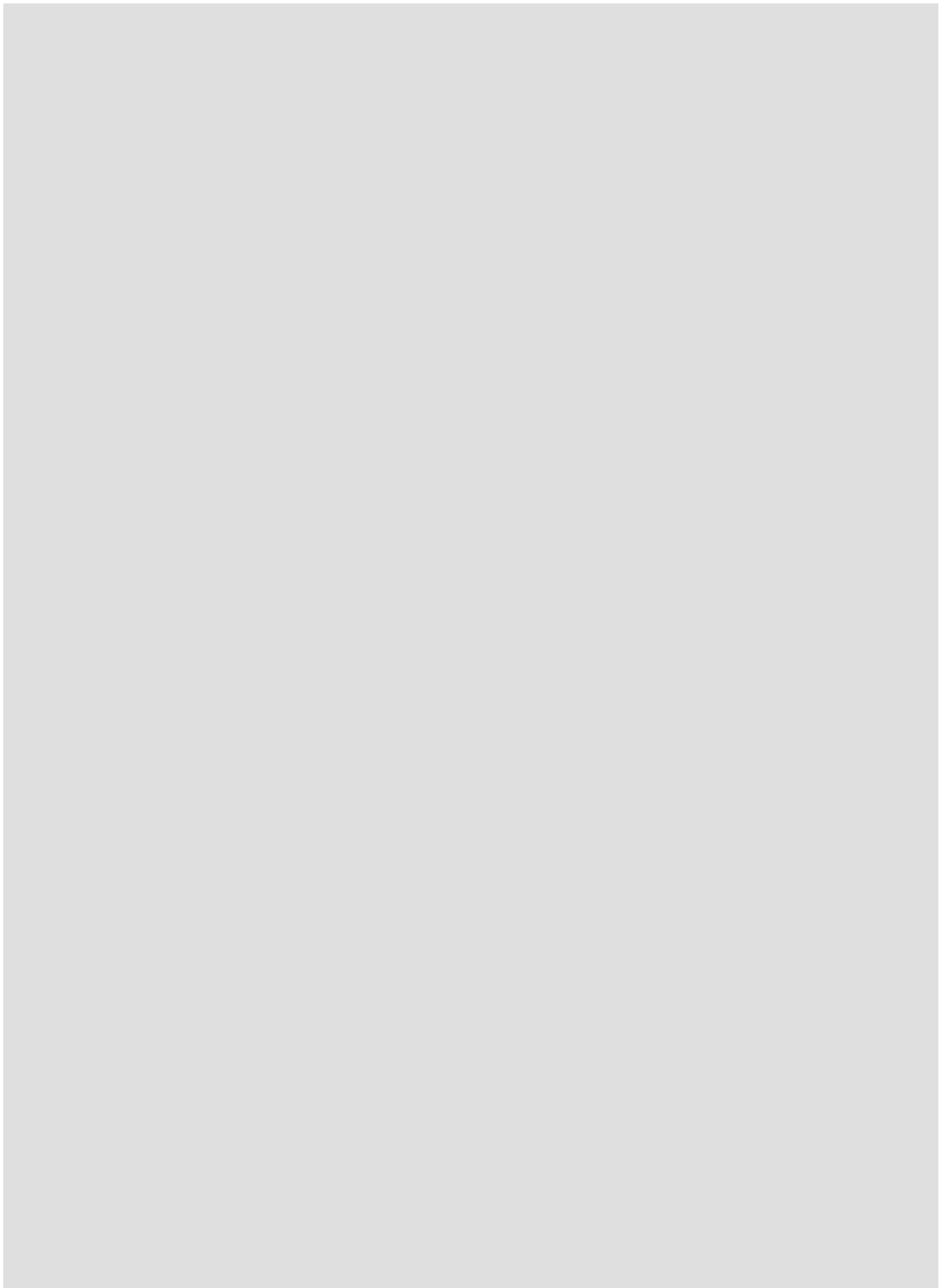
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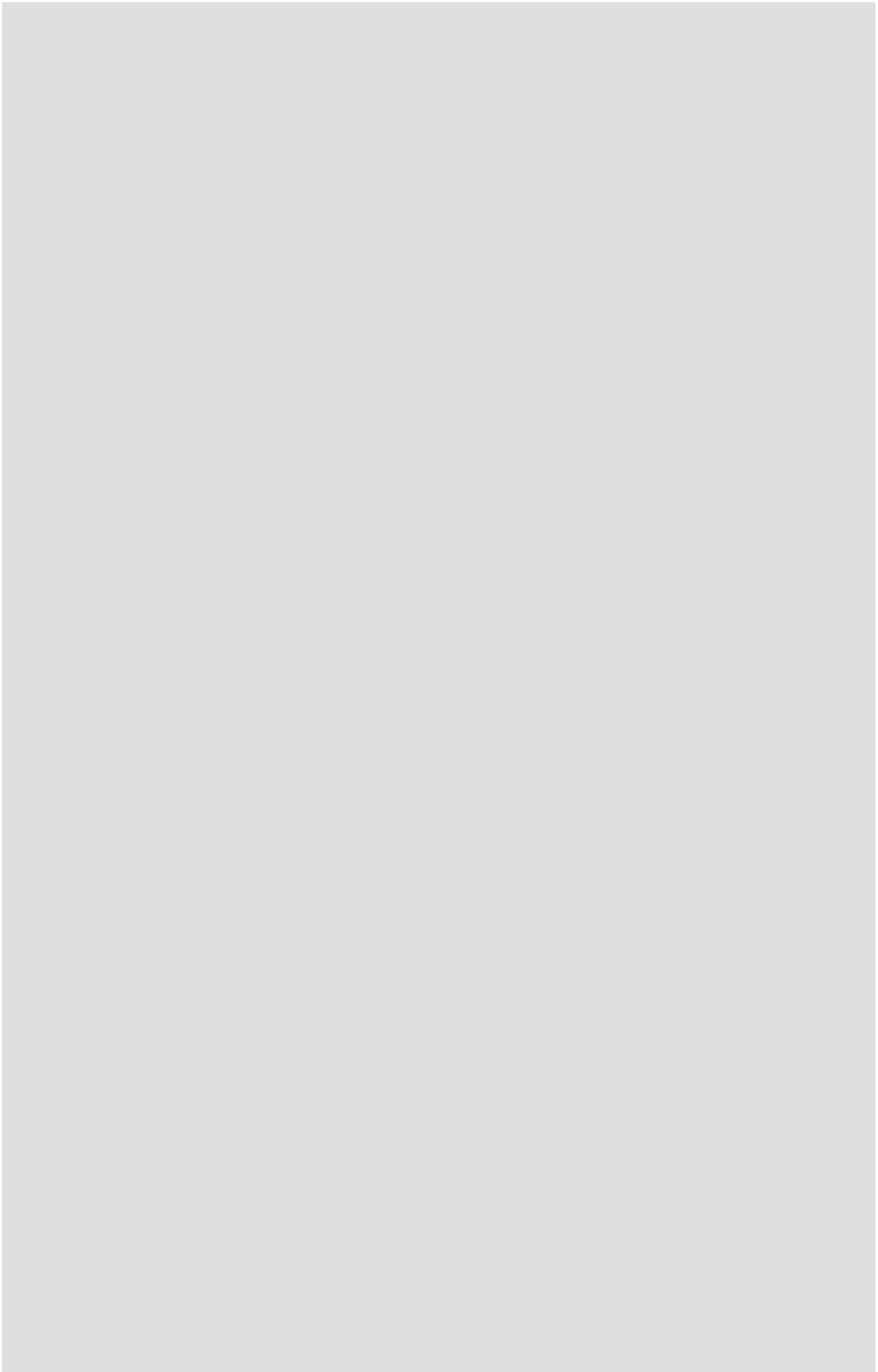
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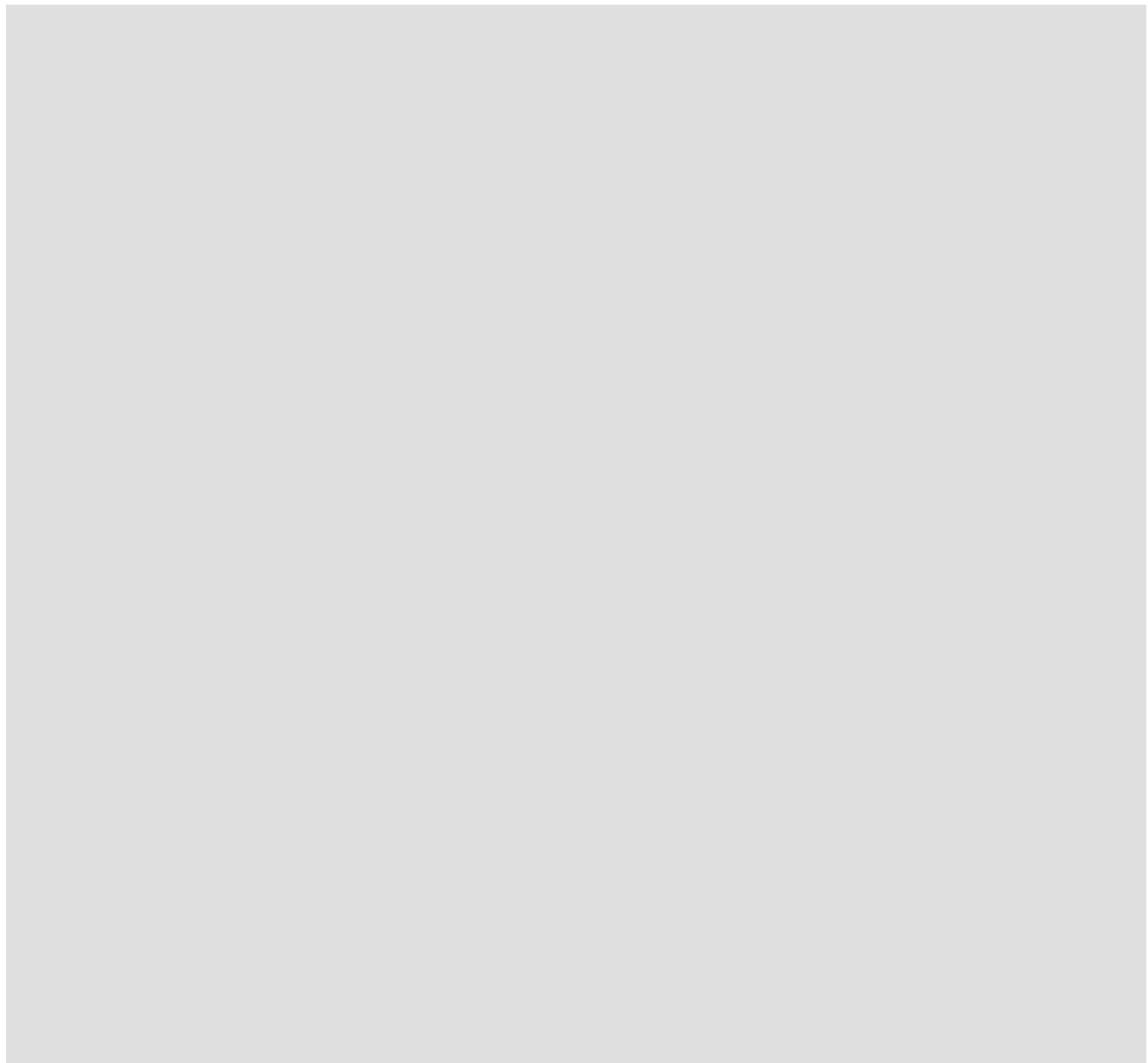
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**Community Contacts**









Crisis Services	
Ambulance	<p>Emergencies: 000</p> <p>General enquiries: 13 QGOV (13 74 68)</p> <p><a href="https://ambulance.qld.gov.au">https://ambulance.qld.gov.au</a></p>
Police	<p><u>Emergencies:</u> 000</p> <p><u>Crime Stoppers:</u> 1800 333 000</p> <p><u>Policelink:</u> 131 444 (Non urgent property reporting and QPS general enquiries 24/7)</p> <p><a href="http://www.police.qld.gov.au">www.police.qld.gov.au</a></p>
Kids Helpline	<p>If you need to speak to a counsellor, call 1800 55 1800, 24 hours a day, 7 days a week. If you can't get to a phone, try our <u>email</u> or <u>web counselling</u> services.</p> <p>Phone counselling</p> <p>When kids call Kids Helpline, they are connected to a counsellor after listening to a message about the counselling process, including privacy and confidentiality information.</p> <p>All calls are private and confidential unless a Duty of Care situation arises. A Duty of Care situation occurs when:</p> <p>A child is being hurt or neglected</p>

	<p>A child is seriously thinking about hurting him/herself A child has hurt, or is seriously thinking about hurting someone else If we have significant concerns about a child's health and safety If we suspect that one of these situations is happening, we will do all we can to ensure that the child and others remain safe. This includes encouraging the child to provide information about themselves such as their name and where they are. Calls to Kids Helpline are free from mobile phones, landlines and public telephones. Web counselling Web counselling allows young people to talk one-on-one, real time with a Kids Helpline counsellor. It works in the same way as phone counselling, but takes place over the web. Email counselling Young people can access Kids Helpline email counselling 7 days a week. Email counselling is also very popular so it can take a while for a counsellor to respond to an email. We suggest that kids use our phone counselling service if their problem is urgent, or if they need to speak with someone straight away. For general information please contact: Kids Helpline Administration GPO Box 2469, Brisbane QLD 4001 Phone: 07 3369 1588 Fax: 07 3367 1266 [REDACTED] Opening hours: Kids Helpline Administration is open 8am - 5pm, Monday to Friday.</p>
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