

Barrett Adolescent Centre Commission of Inquiry

- (l) any clinical advice obtained in relation to the potential effect of the Closure Decision on inpatients and outpatients of the BAC or their families, carers or friends, the Staff of the BAC or any other Relevant Stakeholder;
 - (m) in relation to the Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, Queensland Treasury, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to submissions from the Department of Health, and meeting notes between the Department of the Premier and Cabinet, and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, and any Human Services Agency;
 - (n) documents relating to the Closure Decision in so far as they concern the Queensland Government's obligations with respect to the Australian Government and its mental health priorities;
11. In relation to the announcement of the decision to close the BAC made by the Minister for Health on 6 August 2013 (the **Announcement of the Closure Decision**):
- (a) any correspondence with and records of meetings with inpatients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - (b) any correspondence, memoranda, submissions to or from the Department of Health, Queensland Treasury, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency, or any other Relevant Stakeholder;
 - (c) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between the Department of the Premier and Cabinet and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, Queensland Treasury, and any Human Services Agency.

Education Program Closure: [TOR: 3(a) to 3(d)]

12. Any documents relating to the decision to cease the on-site integrated education program located at the BAC (the **Education Program Closure Decision**), including but not limited to, documents relating to:
- (a) the bases of the Education Program Closure Decision;
 - (b) the relationship between the Closure Decision and the Education Program Closure Decision;
 - (c) the information, material, advice, processes, considerations and recommendations that related to or informed the Education Program Closure Decision;

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- (d) the decision-making process.
13. The documents sought in paragraph 12 above include but are not limited to, documents relating to:
- (a) the implementation of the Education Program Closure Decision;
 - (b) any internal or external documents or briefing papers relating to the Education Program Closure Decision;
 - (c) the Education Program Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, Queensland Treasury, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between the Department of Health, the Premier and Cabinet, and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, Queensland Treasury, and any Human Services Agency;
 - (d) the Education Program Closure Decision and the Queensland Government's obligations with respect to the Australian Government and its mental health and educational priorities.

The Closure: [TOR: 3(d) to (h)]

14. All documents relating to the Closure (including the closure of the on-site integrated education program following the Education Program Closure Decision) including, but not limited to, documents relating to:
- (a) the timing of the Closure in so far as it related to the closing of the BAC and the closing of the on-site integrated education program;
 - (b) how the Closure was to be implemented;
 - (c) the internal and external planning and consultation that took place and resulted in the timing of the Closure;
 - (d) the Closure, including:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, Queensland Treasury, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency or any other Relevant Stakeholder;

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- (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between the Department of the Premier and Cabinet and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, Queensland Treasury, and any Human Services Agency;
- (e) the internal and external planning and consultation leading up to the Closure including arrangements made in relation to the:
 - (i) physical premises at The Park - Centre for Mental Health at which the BAC and the on-site integrated education program were located (**Premises**);
 - (ii) furniture and office equipment located at the Premises;
 - (iii) storage and safe-keeping of patient files, education records, Staff records and BAC records generally, held on the Premises;
 - (iv) any property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises;
- (f) what in fact happened after the Closure to the:
 - (i) premises (including land and all buildings/material infrastructure);
 - (ii) furniture and office equipment located at the Premises;
 - (iii) patient files, education records, Staff records and BAC records generally, held on the Premises;
 - (iv) property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises.

Transition Arrangements: [TOR: 3(d), 3(e), 3(f) and 3(h) and 4]

15. All documents relating to:

- (a) the identity of the BAC patients transitioned to alternative care arrangements in association with the Closure (or anticipated closure), whether before or after the Closure Decision Announcement (the "**Transition Clients**");
- (b) how care, support, service quality and safety risks were identified, assessed, planned for, managed and implemented for the Transition Clients before and after the Closure (the "**Transition Arrangements**");

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- (c) the process leading to the development of the Transition Arrangements, such as:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, Queensland Treasury, or any other Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between the Department of Health, the Premier and Cabinet, and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, Queensland Treasury, and any Human Services Agency;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the Transition Arrangements;
16. The documents referred to in paragraph 15 above include but are not limited to documents relating to:
- (a) how long the Transition Arrangements were scheduled to take;
 - (b) who was to pay for the Transition Arrangements;
 - (c) the anticipated cost of the Transition Arrangements;
 - (d) the actual cost of the Transition Arrangements implemented;
 - (e) clinically appropriate models for the transition of young people with severe and complex mental illness from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
 - (f) best practice models for the care of young people with severe and complex mental illness being transitioned from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
 - (g) any assessment, monitoring and evaluation of the adequacy of the Transition Arrangements before, during and after implementation;
 - (h) any clinical or other advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the Transition Clients;
 - (i) the Transition Arrangements including:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, Queensland Treasury, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency or any other Relevant Stakeholder;

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- (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between the Department of the Premier and Cabinet and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, Queensland Treasury, and any Human Services Agency;
- (j) the Transition Arrangements in so far as they concern the Department of Premier and Cabinet's obligations with respect to other Queensland Government departments and also the Queensland Government's obligations with respect to the Australian Government and its mental health priorities.

Families of Transition Clients: [TOR: 3(e) and 3(h)]

17. All documents relating to the care, support and services that were provided to the families of the Transition Clients, including all documents relating to:
 - (a) any advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the families of Transition Clients;
 - (b) any consultations, meetings or dealings between the Department of the Premier and Cabinet and the Department of Health and staff, the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, Queensland Treasury, any relevant Human Services Agency or any Relevant Stakeholder, about the adequacy of the care, support and services that were provided to the families of the Transition Clients during the carrying out of the Transition Arrangements.

Alternatives to the BAC: [TOR: 3(g), 3(h) and 4]

18. All documents relating to whether, in association with the Closure Decision, there was any consideration of alternatives for replacing the BAC, including but not limited to documents dealing with:
 - (a) any alternative for the replacement of the BAC that was considered;
 - (b) the bases for any alternative that was considered not being adopted;
 - (c) any alternatives that were not considered;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the matters in 20(a), 20(b) and 20(c) above.
19. The documents referred to in paragraph 18 above include but are not limited to documents relating to:
 - (a) clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness;
 - (b) best practice models of care for intensive mental health services to young people with severe and complex mental illness;

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- (c) any consultations, meetings or dealings between the Department of the Premier and Cabinet, and the Department of Health and staff, the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, Queensland Treasury, any relevant Human Services Agency or any Relevant Stakeholder, about alternatives for replacing the BAC;
- (d) the option of transferring the on-site integrated education program to an alternative site.

Other Matters: [TOR: 3(i)]

20. All documents concerning patient safety and confidentiality in relation to the Closure Decision and Transition Arrangements including:
- (a) any report of self-harm by any patient or former patient of the BAC or Transition Client;
 - (b) any report of harm to any patient or former patient of the BAC or Transition Client, by Staff of the BAC;
 - (c) any report of harm to any patient or former patient of the BAC or Transition Client, by other patients or former patients of the BAC or Transition Clients;
 - (d) any consequential internal or external investigations or reports arising from or related to 22(a) to (c) above;
 - (e) policy or practice changes as a result of any such incidents or events in 22(a) to (c) above;
 - (f) any complaints from patients or former patients of the BAC or Transition Clients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the compromise of patient safety or confidentiality in relation to the Closure Decision or the Transition Arrangements;
 - (g) any consultations, meetings or dealings about patient safety and or confidentiality in association with the Closure and or the Transition Arrangements that took place between the Department of the Premier and Cabinet, the Department of Health, and any of the Department of Health, the Staff of the BAC, the families, carers, and or friends of the patients or former patients of the BAC or Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, Queensland Treasury, any Human Services Agency and any Relevant Stakeholder;
 - (h) any directives relevant to patient safety and or confidentiality that were issued by any Health Service Chief Executive appointed under s. 7 of the *Hospital Health Boards Act 2011* or otherwise.

General

21. Any other documents relating to the TOR.

EXHIBIT A5

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Commissions of Inquiry Act 1950
Section 5(1)(b)

REQUIREMENT TO PRODUCE DOCUMENTS

To: Mrs Liza Carroll, Director-General of the Department of Housing and Public Works
Of: c/- Crown Solicitor, by email to [REDACTED]

I, **THE HONOURABLE MARGARET WILSON QC**, Commissioner appointed pursuant to *Commissions of Inquiry Order (No. 4) 2015* to inquire into certain matters pertaining to the Barrett Adolescent Centre ("the Commission") require you to produce the following documents to the Commission:

All documents (including copies and originals of any books, writings, letters, emails, recordings or other records of information in any form, electronic or otherwise) in your possession or control set out in the Schedule hereto.

YOU MUST COMPLY WITH THIS REQUIREMENT BY GIVING THE DOCUMENTS TO THE COMMISSION BY 4.00 PM ON MONDAY 28 SEPTEMBER 2015.

You may do so:

- (a) in the manner described in the accompanying letter; or
- (b) by making the documents available for inspection by Commission staff at Level 10, 179 North Quay, Brisbane, and permitting Commission staff to take such copies of them as they require.

If you intend to hand deliver the documents, please contact the Commission's Executive Director, Mr Ashley Hill, on telephone (07) 3239 6040 or email to info@barrettinquiry.qld.gov.au. Your solicitor may attend and produce the documents in your stead.

If you believe you have a reasonable excuse for not complying with this notice, for the purposes of section 5(2) (b) of the *Commissions of Inquiry Act 1950* you will need to provide evidence to the Commission in that regard by the due date specified above.

DATED this 15th **day of** September **2015**

[REDACTED]
The Honourable Margaret Wilson QC
Commissioner
Barrett Adolescent Centre Commission of Inquiry

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SCHEDULE

Preliminary Matters*Version of Documents Required*

1. Where the Department of Housing and Public Works (**DHPW**) Document Management System has preserved multiple versions of a document requested below, all versions, in so far as they reflect the approval chain from initial author through to the final version, are required to be produced. *The request does not include any draft versions prior to the approval at each stage of the approval chain from initial author through to the final version.* It is each approved version of the document that must be provided.
2. Together with each approved version of a document extracted from the DHPW Document Management System that is provided to the Commission, all electronic annotations relating to and or attached to the document must also be provided.

Definitions

3. The term "Staff" in the request below includes all professional and non-professional persons performing work at or for the Barrett Adolescent Centre (**BAC**), such as:

medical practitioners,
 nurses,
 Allied Health professionals,
 social workers,
 administrative and clerical workers,
 builders and technical staff, including surveyors and site assessors,
 security officers,
 ground keepers,
 cleaners,
 teachers,
 teacher aides, and
 guidance officers

whether:

as employees of or pursuant to any contractual relationship with the Department of Education,

as employees of the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

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pursuant to any contractual relationship with the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

as employees, contractors or sub-contractors of any person or entity in a contractual relationship with the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

as professional consultants (for example, specialist medical practitioners and psychologists),

as non-professional consultants,

as visiting consultants (whether professional or non-professional),

as locums,

as employees, contractors or sub-contractors of any employment agency providing personnel to BAC,

as volunteers,

or otherwise.

4. The term "Relevant Stakeholder" in the request below is a reference to a non-Government person, entity, association or organisation.
5. The term "Human Services Agency" in the request below is a reference to a Government Department or arm of a Government Department with portfolio responsibilities for key human services including but not limited to Education, Child Safety, Disability Services, Community Services and Housing.
6. The acronym "TOR" is a reference to the "terms of reference" set out in the *Commissions of Inquiry Order (No. 4) 2015*.

Documents Required

Establishment of the Barrett Adolescent Centre: [TOR: 3(b) and 3(c)]

7. The documents relating to and leading up to the establishment of the Barrett Adolescent Centre (**BAC**) at Wacol in 1983 (**Commencement**), limited to:
 - (a) documents outlining the policy and legislative framework underpinning the establishment and the proposed operation and management of the BAC;
 - (b) policy documents, memoranda or other writings, relating to the entry criteria for all patients to the BAC at the time of Commencement;
 - (c) the initial BAC implementation plan in so far as it related to the delivery of an identified suite of services to inpatients and or outpatients, and or a day program care and or an on-site integrated education program at the BAC.

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Operation and Management of the BAC after Commencement: [TOR: 3(a), 3(b) and 3(c)]

8. Documents relating to the operation and management of the BAC between its Commencement and the decision to close the BAC made on or about 6 August 2013 (the **Closure Decision**), including:
 - (a) internal review or evaluation documents and briefing papers relating to the operation and management of the BAC during this time;
 - (b) policy documents, memoranda or other writings relating to the entry criteria for all patients to the BAC during this time;
 - (c) documents relating to any actions arising from internal considerations of any reviews or evaluations of the operation and management of the BAC during this time;
 - (d) any external advice commissioned or received by DHPW relating to the operation and management of the BAC during this time;
 - (e) any feedback (complaints or support) made by inpatients and outpatients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the operation and management of the BAC during this time;
 - (f) arising from the feedback in 8(e) above, any:
 - (i) correspondence, memoranda, submissions to or from the Department of Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and its Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
 - (g) documents relating to the intention to close the BAC in 1999 (the **Earlier Intention to Close Decision**), such as documents concerning or including:
 - (i) who made the Earlier Intention to Close Decision;
 - (ii) the bases for the Earlier Intention to Close Decision;
 - (iii) why the earlier Intention to Close Decision was never carried out;
 - (iv) any letters or other documents from inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the Earlier Intention to Close Decision;

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- (v) arising from the Earlier Intention to Close Decision:
 - A. any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - B. briefing papers, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (h) any external advice commissioned or received by DHPW relating to the Earlier Intention to Close Decision
- (i) documents relating to the ongoing viability of the BAC, and or the adequacy and appropriateness of the services it was providing or could provide to young people with severe and complex mental illness, in the period from the Earlier Intention to Close Decision up to and including the Closure Decision, such as:
 - i. correspondence with and records of, meetings with patients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - ii. correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - iii. briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and its Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency.

Closure Decision and Announcement of the Closure Decision in 2013: [TOR: 3(a) to 3 (h) and 4]

- 9. All documents relating to the Closure Decision and the Announcement of the Closure Decision, including documents relating to:
 - (a) the bases of the Closure Decision;
 - (b) the information, material, advices, processes, considerations and recommendations that related to or informed the Closure Decision and the Announcement of the Closure Decision;
 - (c) the decision-making process.

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10. The documents sought in paragraph 9 above include but are not limited to documents relating to:
- (a) when the Closure Decision was made;
 - (b) who made the Closure Decision;
 - (c) the communication of the Closure Decision to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any Relevant Stakeholder and any Human Services Agency;
 - (d) the timing of the Announcement of the Closure Decision;
 - (e) cost benefit analyses of keeping the BAC open;
 - (f) cost benefit analyses of closing the BAC;
 - (g) the Barrett Adolescent Strategy Group including:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
 - (h) the Expert Clinical Reference Group;
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
 - (i) all documents relating to clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness that were considered before the Closure Decision was made;

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- (j) all documents relating to best practice models of care for intensive mental health services to young people with severe and complex mental illness that were considered before the Closure Decision was made;
 - (k) any internal or external documents or briefing papers relating to the Closure Decision;
 - (l) any external advice commissioned or received by DHPW relating to the Closure Decision;
 - (m) any clinical advice obtained in relation to the potential effect of the Closure Decision on inpatients and outpatients of the BAC or their families, carers or friends, the Staff of the BAC or any other Relevant Stakeholder;
 - (n) in relation to the Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
 - (o) documents relating to the Closure Decision in so far as they concern the Queensland Government's obligations with respect to the Australian Government and its mental health priorities;
11. In relation to the announcement of the decision to close the BAC made by the Minister for Health on 6 August 2013 (the **Announcement of the Closure Decision**):
- (a) any correspondence with and records of meetings with inpatients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - (b) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (c) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency.

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12. All files relating to BAC patients (including inpatients, outpatients, patients at the day program care and students at the on-site integrated education program) at the time of the:
- (i) Closure Decision;
 - (ii) Announcement of the Closure Decision;
 - (iii) actual physical Closure of the BAC (including the closure of the on-site integrated education program), in early 2014 (the **Closure**).

Education Program Closure: [TOR: 3(a) to 3(d)]

13. Any documents relating to the decision to cease the on-site integrated education program located at the BAC (the **Education Program Closure Decision**), including but not limited to, documents relating to:
- (a) the bases of the Education Program Closure Decision;
 - (b) the relationship between the Closure Decision and the Education Program Closure Decision;
 - (c) the information, material, advice, processes, considerations and recommendations that related to or informed the Education Program Closure Decision;
 - (d) the decision-making process.
14. The documents sought in paragraph 13 above include but are not limited to, documents relating to:
- (a) the implementation of the Education Program Closure Decision;
 - (b) any internal or external documents or briefing papers relating to the Education Program Closure Decision;
 - (c) the Education Program Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between the DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;

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- (d) the Education Program Closure Decision and the Queensland Government's obligations with respect to the Australian Government and its mental health and educational priorities.

The Closure: [TOR: 3(d) to (h)]

15. All documents relating to the Closure (including the closure of the on-site integrated education program following the Education Program Closure Decision) including, but not limited to, documents relating to:

- (a) the timing of the Closure in so far as it related to the closing of the BAC and the closing of the on-site integrated education program;
- (b) how the Closure was to be implemented;
- (c) the internal and external planning and consultation that took place and resulted in the timing of the Closure;
- (d) the Closure, including:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (e) the internal and external planning and consultation leading up to the Closure including arrangements made in relation to the:
 - (i) physical premises at The Park - Centre for Mental Health at which the BAC and the on-site integrated education program were located (**Premises**);
 - (ii) furniture and office equipment located at the Premises;
 - (iii) storage and safe-keeping of patient files, education records, Staff records and BAC records generally, held on the Premises;
 - (iv) any property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises;
- (f) what in fact happened after the Closure to the:
 - (i) premises (including land and all buildings/material infrastructure);

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- (ii) furniture and office equipment located at the Premises;
- (iii) patient files, education records, Staff records and BAC records generally, held on the Premises;
- (iv) property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises.

Transition Arrangements: [TOR: 3(d), 3(e), 3(f) and 3(h) and 4)]

16. All documents relating to:

- (a) the identity of the BAC patients transitioned to alternative care arrangements in association with the Closure (or anticipated closure), whether before or after the Closure Decision Announcement (the **"Transition Clients"**);
- (b) how care, support, service quality and safety risks were identified, assessed, planned for, managed and implemented for the Transition Clients before and after the Closure (the **"Transition Arrangements"**);
- (c) the process leading to the development of the Transition Arrangements, such as:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any other Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (d) the information, material, advice, processes, considerations and recommendations that related to or informed the Transition Arrangements;
- (e) any request for assistance from DHPW by Transition Clients, their families, carers, friends, other Relevant Stakeholders, or any other Human Services Agency;
- (f) any assistance given by DHPW to Transition Clients, their families, carers, friends, other Relevant Stakeholders, or any other Human Services Agency;
- (g) clinically appropriate models for the transition of young people with severe and complex mental illness from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;

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- (h) best practice models for the care of young people with severe and complex mental illness being transitioned from one form of intensive mental health services to
- (i) another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
- (j) any internal or external documents or briefing papers relating to the Transition Arrangements;
- (k) any assessment, monitoring and evaluation of the adequacy of the Transition Arrangements before, during and after implementation;
- (l) any clinical or other advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the Transition Clients;
- (m) the Transition Arrangements including:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Department of the Premier and Cabinet, Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between DHPW and any of the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (n) the Transition Arrangements in so far as they concern DHPW's obligations with respect to other Queensland Government departments and also the Queensland Government's obligations with respect to the Australian Government and its mental health and housing and public works priorities.

Families of Transition Clients: [TOR: 3(e) and 3(h)]

- 17. All documents relating to the care, support and services that were provided to the families of the Transition Clients, including all documents relating to:
 - (a) any advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the families of Transition Clients;

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- (b) any consultations, meetings or dealings between DHPW and any of the Department of Health, the Department of the Premier and Cabinet (including any of the Department of Health, staff of the BAC), the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, any relevant Human Services Agency or any Relevant Stakeholder, about the adequacy of the care, support and services that were provided to the families of the Transition Clients during the carrying out of the Transition Arrangements.

Alternatives to the BAC: [TOR: 3(g), 3(h) and 4]

18. All documents relating to whether, in association with the Closure Decision, there was any consideration of alternatives for replacing the BAC, including but not limited to documents dealing with:
 - (a) any alternative for the replacement of the BAC that was considered;
 - (b) the bases for any alternative that was considered not being adopted;
 - (c) any alternatives that were not considered;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the matters in 20(a), 20(b) and 20(c) above.
19. The documents referred to in paragraph 18 above include but are not limited to documents relating to:
 - (a) clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness;
 - (b) best practice models of care for intensive mental health services to young people with severe and complex mental illness;
 - (c) any consultations, meetings or dealings between the DHPW and any of the Department of the Premier and Cabinet, the Department of Health (including any of the Department of Health, staff of the BAC), the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, any relevant Human Services Agency or any Relevant Stakeholder, about alternatives for replacing the BAC;
 - (d) the option of transferring the on-site integrated education program to an alternative site.

Other Matters: [TOR: 3(i)]

20. All documents concerning patient safety and confidentiality in relation to the Closure Decision and Transition Arrangements including:
 - (a)

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- (b) any report of self-harm by any patient or former patient of the BAC or Transition Client;
- (c) any report of harm to any patient or former patient of the BAC or Transition Client, by Staff of the BAC;
- (d) any report of harm to any patient or former patient of the BAC or Transition Client, by other patients or former patients of the BAC or Transition Clients;
- (e) any consequential internal or external investigations or reports arising from or related to 22(a) to (c) above;
- (f) policy or practice changes as a result of any such incidents or events in 22(a) to (c) above;
- (g) any complaints from patients or former patients of the BAC or Transition Clients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the compromise of patient safety or confidentiality in relation to the Closure Decision or the Transition Arrangements;
- (h) any consultations, meetings or dealings about patient safety and or confidentiality in association with the Closure and or the Transition Arrangements that took place between DHPW and any of the Department of Health, the Staff of the BAC, the families, carers, and or friends of the patients or former patients of the BAC or Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, any Human Services Agency and any Relevant Stakeholder;
- (i) any directives relevant to patient safety and or confidentiality that were issued by any Health Service Chief Executive appointed under s. 7 of the *Hospital Health Boards Act 2011* or otherwise.

General

21. Any other documents relating to the TOR.

EXHIBIT 2

EXHIBIT A6

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*Commissions of Inquiry Act 1950
Section 5(1)(b)*

REQUIREMENT TO PRODUCE DOCUMENTS

To: Mr Michael Walsh, Director-General of the Department of Health
Of: c/- Crown Solicitor, by email to [REDACTED]

I, **THE HONOURABLE MARGARET WILSON QC**, Commissioner appointed pursuant to *Commissions of Inquiry Order (No. 4) 2015* to inquire into certain matters pertaining to the Barrett Adolescent Centre ("the Commission") require you to produce the following documents to the Commission:

All documents (including copies and originals of any books, writings, letters, emails, recordings or other records of information in any form, electronic or otherwise) in your possession or control set out in the Schedule hereto.

YOU MUST COMPLY WITH THIS REQUIREMENT BY GIVING THE DOCUMENTS TO THE COMMISSION BY 4.00 PM ON MONDAY 28 SEPTEMBER 2015.

You may do so:

- (a) in the manner described in the accompanying letter; or
- (b) by making the documents available for inspection by Commission staff at Level 10, 179 North Quay, Brisbane, and permitting Commission staff to take such copies of them as they require.

If you intend to hand deliver the documents, please contact the Commission's Executive Director, Mr Ashley Hill, on telephone (07) 3239 6040 or email to info@barrettinquiry.qld.gov.au. Your solicitor may attend and produce the documents in your stead.

If you believe you have a reasonable excuse for not complying with this notice, for the purposes of section 5(2) (b) of the *Commissions of Inquiry Act 1950* you will need to provide evidence to the Commission in that regard by the due date specified above.

DATED this 14th **day of** September **2015**

[REDACTED]
The Honourable Margaret Wilson QC
Commissioner
Barrett Adolescent Centre Commission of Inquiry

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SCHEDULE

Preliminary Matters*Version of Documents Required*

1. Where the Department of Health's Document Management System has preserved multiple versions of a document requested below, all versions, in so far as they reflect the approval chain from initial author through to the final version, are required to be produced. *The request does not include any draft versions prior to the approval at each stage of the approval chain from initial author through to the final version.* It is each approved version of the document that must be provided.
2. Together with each approved version of a document extracted from the Department of Health's Document Management System that is provided to the Commission, all electronic annotations relating to and or attached to the document must also be provided.

Definitions

3. The term "Staff" in the request below includes all professional and non-professional persons performing work at or for the Barrett Adolescent Centre **(BAC)**, such as:

Allied Health professionals,
 social workers,
 administrative and clerical workers,
 security officers,
 ground keepers, and
 cleaners,

whether:

as employees of the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

pursuant to any contractual relationship with the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

as employees, contractors or sub-contractors of any person or entity in a contractual relationship with the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

as professional consultants (for example, specialist medical practitioners and psychologists),

as non-professional consultants,

as visiting consultants (whether professional or non-professional),

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as locums,

as employees, contractors or sub-contractors of any employment agency providing personnel to BAC,

as volunteers,

or otherwise.

4. The term "Relevant Stakeholder" in the request below is a reference to a non-Government person, entity, association or organisation.
5. The term "Human Services Agency" in the request below is a reference to a Government Department or arm of a Government Department with portfolio responsibilities for key human services including but not limited to Education, Child Safety, Disabilities Services, Community Services and Housing.
6. The acronym "TOR" is a reference to the "terms of reference" set out in the *Commissions of Inquiry Order (No. 4) 2015*.

Documents Required

Establishment of the Barrett Adolescent Centre: [TOR 3(b) and 3(c)]

7. The documents relating to and leading up to the establishment of the Barrett Adolescent Centre (**BAC**) at Wacol in 1983 (**Commencement**), limited to:
 - (a) documents outlining the policy and legislative framework underpinning the establishment and the proposed operation and management of the BAC;
 - (b) policy documents, memoranda or other writings, relating to the entry criteria for all patients to the BAC at the time of Commencement;
 - (c) the initial BAC implementation plan in so far as it related to the delivery of an identified suite of services to inpatients and or outpatients, and or a day program care and or an on-site integrated education program at the BAC.

Operation and Management of the BAC after Commencement; [TOR: 3(a), 3(b) and 3(c)]

8. Documents relating to the operation and management of the BAC between its Commencement and the decision to close the BAC made on or about 6 August 2013 (the **Closure Decision**), including:
 - (a) internal review or evaluation documents and briefing papers relating to the operation and management of the BAC during this time;
 - (b) policy documents, memoranda or other writings relating to the entry criteria for all patients to the BAC during this time;
 - (c) documents relating to any actions arising from internal considerations of any reviews or evaluations of the operation and management of the BAC during this time;

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- (d) any external advice commissioned or received by the Department of Health relating to the operation and management of the BAC during this time;
- (e) any feedback (complaints or support) made by inpatients and outpatients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the operation and management of the BAC during this time;
- (f) arising from the feedback in 8(e) above, any:
 - (i) correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and its Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (g) documents relating to the intention to close the BAC in 1999 (the **Earlier Intention to Close Decision**), such as documents concerning or including:
 - (i) who made the Earlier Intention to Close Decision;
 - (ii) the bases for the Earlier Intention to Close Decision;
 - (iii) why the earlier Intention to Close Decision was never carried out;
 - (iv) any letters or other documents from inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the Earlier Intention to Close Decision;
 - (v) arising from the Earlier Intention to Close Decision:
 - A. any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - B. briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (h) any external advice commissioned or received by the Department of Health and any Health Service Board relating to the Earlier Intention to Close Decision;

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- (i) documents relating to the ongoing viability of the BAC, and or the adequacy and appropriateness of the services it was providing or could provide to young people with severe and complex mental illness, in the period from the Earlier Intention to Close Decision up to and including the Closure Decision, such as:
 - i. correspondence with and records of, meetings with patients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - ii. correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - iii. briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and its Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency.

Closure Decision and Announcement of the Closure Decision in 2013 [TOR: 3(a) to 3 (h) and 4]

- 9. All documents relating to the Closure Decision and the Announcement of the Closure Decision, including documents relating to:
 - (a) the bases of the Closure Decision;
 - (b) the information, material, advices, processes, considerations and recommendations that related to or informed the Closure Decision and the Announcement of the Closure Decision;
 - (c) the decision-making process.
- 10. The documents sought in paragraph 9 above include but are not limited to documents relating to:
 - (a) when the Closure Decision was made;
 - (b) who made the Closure Decision;
 - (c) the communication of the Closure Decision to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any Relevant Stakeholder and any Human Services Agency;
 - (d) the timing of the Announcement of the Closure Decision;
 - (e) cost benefit analyses of keeping the BAC open;
 - (f) cost benefit analyses of closing the BAC;

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- (g) the Barrett Adolescent Strategy Group including:
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (h) the Expert Clinical Reference Group;
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (i) all documents relating to clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness that were considered before the Closure Decision was made;
- (j) all documents relating to best practice models of care for intensive mental health services to young people with severe and complex mental illness that were considered before the Closure Decision was made;
- (k) any internal or external documents or briefing papers relating to the Closure Decision;
- (l) any external advice commissioned or received by the Department of Health relating to the Closure Decision;
- (m) any clinical advice obtained in relation to the potential effect of the Closure Decision on inpatients and outpatients of the BAC or their families, carers or friends, the Staff of the BAC or any other Relevant Stakeholder;
- (n) in relation to the Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;

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- (o) documents relating to the Closure Decision in so far as they concern the Queensland Government's obligations with respect to the Australian Government and its mental health priorities;
 - (p) the identity, composition and employment or other records of the Staff of the BAC between 6 August 2012 and 6 August 2013.
11. In relation to the announcement of the decision to close the BAC made by the Minister for Health on 6 August 2013 (the **Announcement of the Closure Decision**):
- (a) any correspondence with and records of meetings with inpatients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - (b) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (c) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency.
12. All files relating to BAC patients (including inpatients, outpatients, patients at the day program care and students at the on-site integrated education program) at the time of the:
- (i) Closure Decision;
 - (ii) Announcement of the Closure Decision;
 - (iii) actual physical Closure of the BAC (including the closure of the on-site integrated education program), in early 2014 (the **Closure**).

Education Program Closure [TOR: 3(a) to 3(d)]

13. Any documents relating to the decision to cease the on-site integrated education program located at the BAC (the **Education Program Closure Decision**), including but not limited to, documents relating to:
- (a) the bases of the Education Program Closure Decision;
 - (b) the relationship between the Closure Decision and the Education Program Closure Decision;
 - (c) the information, material, advice, processes, considerations and recommendations that related to or informed the Education Program Closure Decision;
 - (d) the decision-making process.
14. The documents sought in paragraph 13 above include but are not limited to, documents relating to:
- (a) the implementation of the Education Program Closure Decision;

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- (b) any internal or external documents or briefing papers relating to the Education Program Closure Decision;
- (c) the Education Program Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (d) the Education Program Closure Decision and the Queensland Government's obligations with respect to the Australian Government and its mental health and educational priorities.

The Closure [TOR 3(d) to (h)]

15. All documents relating to the Closure (including the closure of the on-site integrated education program following the Education Program Closure Decision) including, but not limited to, documents relating to:
 - (a) the timing of the Closure in so far as it related to the closing of the BAC and the closing of the on-site integrated education program;
 - (b) how the Closure was to be implemented;
 - (c) the internal and external planning and consultation that took place and resulted in the timing of the Closure;
 - (d) the Closure, including:
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
 - (e) the internal and external planning and consultation leading up to the Closure including arrangements made in relation to the:
 - (i) physical premises at The Park - Centre for Mental Health at which the BAC and the on-site integrated education program were located (**Premises**);
 - (ii) furniture and office equipment located at the Premises;

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- (iii) storage and safe-keeping of patient files, education records, Staff records and BAC records generally, held on the Premises;
- (iv) any property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises;
- (f) what in fact happened after the Closure to the:
 - (i) Premises (including land and all buildings/material infrastructure);
 - (ii) furniture and office equipment located at the Premises;
 - (iii) patient files, education records, Staff records and BAC records generally, held on the Premises;
 - (iv) property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises.

Transition Arrangements [TOR 3(d), 3(e), 3(f) and 3(h) and 4]

16. All documents relating to:

- (a) the identity of the BAC patients transitioned to alternative care arrangements in association with the Closure (or anticipated closure), whether before or after the Closure Decision Announcement (the “**Transition Clients**”);
- (b) how care, support, service quality and safety risks were identified, assessed, planned for, managed and implemented for the Transition Clients before and after the Closure (the “**Transition Arrangements**”);
- (c) the process leading to the development of the Transition Arrangements, such as:
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any other Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (d) the information, material, advice, processes, considerations and recommendations that related to or informed the Transition Arrangements;
- (e) the identities of the persons (whether or not BAC Staff members) tasked to carry out the Transition Arrangements from time to time (“the **Transition Team**”);

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- (f) communications and negotiations between the Transition Team and the Transition Clients and their families, carers, friends, other Relevant Stakeholders, and any other Human Services Agency, relating to the Transition Arrangements;
 - (g) the transition plan prepared, developed and or implemented by the Transition Team for each of the Transition Clients;
 - (h) the support given to the Transition Team to implement the Transition Arrangements;
 - (i) the governance model put in place by the West Moreton Hospital and Health Service (and its Board) or any other Health Service and Board, the Department of Health and or any other arm of the Queensland Government, to manage the oversight of the Transition Arrangements by the Transition Team including documents relating to:
 - (i) the principal features of the governance model;
 - (ii) when that model was put in place, and if it was varied, when it was varied and in what way;
 - (iii) the identities of the members of the Clinical Transitional Panel and their respective roles ;
 - (iv) the identities of the key Staff of the BAC and their respective roles;
 - (v) the identities of the members of the Adolescent Extended Treatment and Rehabilitation Implementation Steering Committee and their respective roles;
 - (vi) the identities of the members of the West Moreton Management Committee and their respective roles;
 - (vii) the identities of the members of the Chief Executive and Department of Health Oversight Committee and their respective roles.
17. The documents referred to in paragraph 16 above include but are not limited to documents relating to:
- (a) how long the Transition Arrangements were scheduled to take;
 - (b) who was to pay for the Transition Arrangements;
 - (c) the anticipated cost of the Transition Arrangements proposed by the Transition Team;
 - (d) the anticipated cost and the actual cost of the Transition Arrangements actually implemented by the Transition Team;
 - (e) the Transition Arrangements for each of the Transition Clients that were proposed from time to time in association with the anticipated closure and the Closure;

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- (f) the Transition Arrangements for each of the Transition Clients that were in fact carried out by the Transition Team or otherwise in association with the anticipated closure and the Closure;
- (g) clinically appropriate models for the transition of young people with severe and complex mental illness from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
- (h) best practice models for the care of young people with severe and complex mental illness being transitioned from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
- (i) any internal or external documents considering the models identified in 17 (g) and (h) above;
- (j) any internal or external documents or briefing papers relating to the Transition Arrangements;
- (k) any assessment, monitoring and evaluation of the adequacy of the Transition Arrangements before, during and after implementation;
- (l) any external advice commissioned or received by the West Moreton Hospital and Health Service (and its Board) or any other Health Service and Board, or the Department of Health or any other arm of the Queensland Government relating to the adequacy of the Transition Arrangements;
- (m) any clinical or other advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the Transition Clients;
- (n) the Transition Arrangements including:
 - (i) any correspondence, memoranda, submissions to or from Cabinet, Queensland Treasury, or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, and any Human Services Agency;
- (o) the Transition Arrangements in so far as they concern the Department of Health's obligations with respect to other Queensland Government departments and also the Queensland Government's obligations with respect to the Australian Government and its mental health priorities.

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Families of Transition Clients: [TOR: 3(e) and 3(h)]

18. All documents relating to the care, support and services that were provided to the families of the Transition Clients, including all documents relating to:
 - (a) the identities and locations of each of those families;
 - (b) the information, material, advice, processes, considerations and recommendations that related to or informed the care, support and services that were provided to the families of the Transition Clients;
 - (c) any advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the families of Transition Clients;
 - (d) any consultations, meetings or dealings between any of the Department of Health, Staff of the BAC, the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, any relevant Human Services Agency or any Relevant Stakeholder, about the adequacy of the care, support and services that were provided to the families of the Transition Clients during the carrying out of the Transition Arrangements.

The Staff of BAC: [TOR 3(f) and 3(h)]

19. All documents relating to the support provided to the Staff of the BAC in relation to the Closure and the Transition Arrangements for Transition Clients, including all documents relating to:
 - (a) the identities, composition and employment or other records of the Staff of the BAC between 6 August 2013 and the Closure in early 2014;
 - (b) the information, material, advice, processes, considerations and recommendations that related to or informed the support given to the Staff of the BAC in relation to the Closure Decision and or the Announcement of the Closure Decision;
 - (c) the information, material, advice, processes, considerations and recommendations that related to or informed the support given to the Staff of the BAC in relation to the Closure;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the support given to the Staff of the BAC in relation to the Transition Arrangements for Transition Clients;
 - (e) any clinical or other advice and or reports obtained as to the likely or actual effect of the Closure on the Staff of the BAC;
 - (f) any clinical or other advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the Staff of the BAC;
 - (g) how the Staff of the BAC were informed of the Closure Decision;

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- (h) the support actually given to the Staff in relation to Closure Decision and or the Announcement of the Closure Decision;
- (i) the support actually given to the Staff in relation to the Closure;
- (j) the support actually given to the Staff in relation to the Transition Arrangements for Transition clients.

Alternatives to the BAC: [TOR 3(g), 3(h) and 4]

20. All documents relating to whether, in association with the Closure Decision, there was any consideration of alternatives for replacing the BAC, including but not limited to documents dealing with:
 - (a) any alternative for the replacement of the BAC that was considered;
 - (b) the bases for any alternative that was considered not being adopted;
 - (c) any alternatives that were not considered;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the matters in 20(a), 20(b) and 20(c) above.
21. The documents referred to in paragraph 20 above include but are not limited to documents relating to:
 - (a) clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness;
 - (b) best practice models of care for intensive mental health services to young people with severe and complex mental illness;
 - (c) any consultations, meetings or dealings between any of the Department of Health, Staff of the BAC, the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, any relevant Human Services Agency or any Relevant Stakeholder, about alternatives for replacing the BAC;
 - (d) the option of transferring the on-site integrated education program to an alternative site.

Other Matters: [TOR 3(i)]

22. All documents concerning patient safety and confidentiality in relation to the Closure Decision and Transition Arrangements including:
 - (a) any report of self-harm by any patient or former patient of the BAC or Transition Client;
 - (b) any report of harm to any patient or former patient of the BAC or Transition Client, by Staff of the BAC;

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- (c) any report of harm to any patient or former patient of the BAC or Transition Client, by other patients or former patients of the BAC or Transition Clients;
- (d) any consequential internal or external investigations or reports arising from or related to 22(a) to (c) above;
- (e) policy or practice changes as a result of any such incidents or events in 22(a) to (c) above;
- (f) any complaints from patients or former patients of the BAC or Transition Clients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the compromise of patient safety or confidentiality in relation to the Closure Decision or the Transition Arrangements;
- (g) any consultations, meetings or dealings about patient safety and or confidentiality in association with the Closure and or the Transition Arrangements that took place between any of the Department of Health, the Staff of the BAC, the families, carers, and or friends of the patients or former patients of the BAC or Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, the Department of the Premier and Cabinet, Queensland Treasury, any Human Services Agency and any Relevant Stakeholder;
- (h) any directives relevant to patient safety and or confidentiality that were issued by any Health Service Chief Executive appointed under s. 7 of the *Hospital Health Boards Act 2011* or otherwise.

General

23. Any other documents relating to the TOR.

EXHIBIT A7

Barrett Adolescent Centre Commission of Inquiry

Commissions of Inquiry Act 1950
Section 5(1)(b)

REQUIREMENT TO PRODUCE DOCUMENTS

To: Mr Jim Murphy, Under Treasurer. Queensland Treasury
Of: c/- Crown Solicitor, by email to [REDACTED]

I, **THE HONOURABLE MARGARET WILSON QC**, Commissioner appointed pursuant to *Commissions of Inquiry Order (No. 4) 2015* to inquire into certain matters pertaining to the Barrett Adolescent Centre ("the Commission") require you to produce the following documents to the Commission:

All documents (including copies and originals of any books, writings, letters, emails, recordings or other records of information in any form, electronic or otherwise) in your possession or control set out in the Schedule hereto.

YOU MUST COMPLY WITH THIS REQUIREMENT BY GIVING THE DOCUMENTS TO THE COMMISSION BY 4.00 PM ON MONDAY 28 SEPTEMBER 2015.

You may do so:

- (a) in the manner described in the accompanying letter; or
- (b) by making the documents available for inspection by Commission staff at Level 10, 179 North Quay, Brisbane, and permitting Commission staff to take such copies of them as they require.

If you intend to hand deliver the documents, please contact the Commission's Executive Director, Mr Ashley Hill, on telephone (07) 3239 6040 or email to info@barrettinquiry.qld.gov.au. Your solicitor may attend and produce the documents in your stead.

If you believe you have a reasonable excuse for not complying with this notice, for the purposes of section 5(2) (b) of the *Commissions of Inquiry Act 1950* you will need to provide evidence to the Commission in that regard by the due date specified above.

DATED this 15th **day of** September **2015**

[REDACTED]
The Honourable Margaret Wilson QC
Commissioner
Barrett Adolescent Centre Commission of Inquiry

Barrett Adolescent Centre Commission of Inquiry

SCHEDULE

Preliminary Matters*Version of Documents Required*

1. Where the Queensland Treasury (QT) Document Management System has preserved multiple versions of a document requested below, all versions, in so far as they reflect the approval chain from initial author through to the final version, are required to be produced. *The request does not include any draft versions prior to the approval at each stage of the approval chain from initial author through to the final version.* It is each approved version of the document that must be provided.
2. Together with each approved version of a document extracted from the QT Document Management System that is provided to the Commission, all electronic annotations relating to and or attached to the document must also be provided.

Definitions

3. The term "Staff" in the request below includes all professional and non-professional persons performing work at or for the Barrett Adolescent Centre (BAC), such as:

medical practitioners,

nurses,

Allied Health professionals,

social workers,

administrative and clerical workers,

security officers,

ground keepers, and

cleaners,

teachers,

teacher aids,

guidance officers,

whether:

as employees of the Department of Education or pursuant to any contractual relationship with the Department of Education,

as employees of the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

Barrett Adolescent Centre Commission of Inquiry

pursuant to any contractual relationship with the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

as employees, contractors or sub-contractors of any person or entity in a contractual relationship with the Queensland Government or the West Moreton Hospital and Health Service or any other Health Service,

as professional consultants (for example, specialist medical practitioners and psychologists),

as non-professional consultants,

as visiting consultants (whether professional or non-professional),

as locums,

as employees, contractors or sub-contractors of any employment agency providing personnel to BAC,

as volunteers,

or otherwise.

4. The term "Relevant Stakeholder" in the request below is a reference to a non-Government person, entity, association or organisation.
5. The term "Human Services Agency" in the request below is a reference to a Government Department or arm of a Government Department with portfolio responsibilities for key human services including but not limited to Education, Child Safety, Disability Services, Community Services and Housing.
6. The acronym "TOR" is a reference to the "terms of reference" set out in the *Commissions of Inquiry Order (No. 4) 2015*.

Documents Required

Establishment of the Barrett Adolescent Centre: [TOR: 3(b) and 3(c)]

7. The documents relating to and leading up to the establishment of the Barrett Adolescent Centre **(BAC)** at Wacol in 1983 **(Commencement)**, limited to:
 - (a) documents outlining the policy and legislative framework underpinning the establishment and the proposed operation and management of the BAC;
 - (b) policy documents, memoranda or other writings, relating to the entry criteria for all patients to the BAC at the time of Commencement;
 - (c) the initial BAC implementation plan in so far as it related to the delivery of an identified suite of services to inpatients and or outpatients, and or a day program care and or an on-site integrated education program at the BAC.

Barrett Adolescent Centre Commission of Inquiry

Operation and Management of the BAC after Commencement: [TOR: 3(a), 3(b) and 3(c)]

8. Documents relating to the operation and management of the BAC between its Commencement and the decision to close the BAC made on or about 6 August 2013 (the **Closure Decision**), including:
 - (a) internal review or evaluation documents and briefing papers relating to the operation and management of the BAC during this time;
 - (b) policy documents, memoranda or other writings relating to the entry criteria for all patients to the BAC during this time;
 - (c) documents relating to any actions arising from internal considerations of any reviews or evaluations of the operation and management of the BAC during this time;
 - (d) any external advice commissioned or received by QT relating to the operation and management of the BAC during this time;
 - (e) any feedback (complaints or support) made by inpatients and outpatients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the operation and management of the BAC during this time;
 - (f) arising from the feedback in 8(e) above, any:
 - (i) correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and its Board, and any Human Services Agency;
 - (g) documents relating to the intention to close the BAC in 1999 (the **Earlier Intention to Close Decision**), such as documents concerning or including:
 - (i) who made the Earlier Intention to Close Decision;
 - (ii) the bases for the Earlier Intention to Close Decision;
 - (iii) why the earlier Intention to Close Decision was never carried out;
 - (iv) any letters or other documents from inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the Earlier Intention to Close Decision;

Barrett Adolescent Centre Commission of Inquiry

- (v) arising from the Earlier Intention to Close Decision:
 - a. any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency, or any other Relevant Stakeholder;
 - b. briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, and any Human Services Agency;
- (h) any external advice commissioned or received by QT relating to the Earlier Intention to Close Decision;
- (i) documents relating to the ongoing viability of the BAC, and or the adequacy and appropriateness of the services it was providing or could provide to young people with severe and complex mental illness, in the period from the Earlier Intention to Close Decision up to and including the Closure Decision, such as:
 - i. correspondence with and records of, meetings with patients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - ii. correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, Department of Health, the West Moreton Hospital and Health Service (and its Board), or any Human Services Agency or any other Relevant Stakeholder;
 - iii. briefing papers, including those relating to Cabinet submissions from the Department of Health, meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and its Board, and any Human Services Agency.

Closure Decision and Announcement of the Closure Decision in 2013: [TOR: 3(a) to 3 (h) and 4]

- 9. All documents relating to the Closure Decision and the Announcement of the Closure Decision, including documents relating to:
 - (a) the bases of the Closure Decision;
 - (b) the information, material, advices, processes, considerations and recommendations that related to or informed the Closure Decision and the Announcement of the Closure Decision;
 - (c) the decision-making process.

Barrett Adolescent Centre Commission of Inquiry

10. The documents sought in paragraph 9 above include but are not limited to documents relating to:
 - (a) when the Closure Decision was made;
 - (b) who made the Closure Decision;
 - (c) the timing of the Announcement of the Closure Decision;
 - (d) cost benefit analyses of keeping the BAC open;
 - (e) cost benefit analyses of closing the BAC;
 - (f) the Barrett Adolescent Strategy Group including:
 - (i) any correspondence, memoranda, submissions to or from the Department of Health, West Moreton Hospital and Health Service (and its Board), any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, and any Human Services Agency;
 - (g) the Expert Clinical Reference Group:
 - (i) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, Department of Health, West Moreton Hospital and Health Service (and its Board), any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, and any Human Services Agency;
 - (h) all documents relating to clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness that were considered before the Closure Decision was made;
 - (i) all documents relating to best practice models of care for intensive mental health services to young people with severe and complex mental illness that were considered before the Closure Decision was made;
 - (j) any internal or external documents or briefing papers relating to the Closure Decision;
 - (k) any external advice commissioned or received by QT relating to the Closure Decision;

Barrett Adolescent Centre Commission of Inquiry

- (l) any clinical advice obtained in relation to the potential effect of the Closure Decision on inpatients and outpatients of the BAC or their families, carers or friends, the Staff of the BAC or any other Relevant Stakeholder;
 - (m) in relation to the Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, West Moreton Hospital and Health Service (and its Board), any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to submissions from the Department of Health, and meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), any other relevant Health Service and Board, and any Human Services Agency;
 - (n) documents relating to the Closure Decision in so far as they concern the Queensland Government's obligations with respect to the Australian Government and its mental health priorities;
11. In relation to the announcement of the decision to close the BAC made by the Minister for Health on 6 August 2013 (the **Announcement of the Closure Decision**):
- (a) any correspondence with and records of meetings with inpatients and outpatients, their families, carers, friends, Staff of the BAC, or any Relevant Stakeholder;
 - (b) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, Department of Health, West Moreton Hospital and Health Service (and its Board), or any Human Services Agency, or any other Relevant Stakeholder;
 - (c) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, and any Human Services Agency.

Education Program Closure: [TOR: 3(a) to 3(d)]

12. Any documents relating to the decision to cease the on-site integrated education program located at the BAC (the **Education Program Closure Decision**), including but not limited to, documents relating to:
- (a) the bases of the Education Program Closure Decision;
 - (b) the relationship between the Closure Decision and the Education Program Closure Decision;
 - (c) the information, material, advice, processes, considerations and recommendations that related to or informed the Education Program Closure Decision;

Barrett Adolescent Centre Commission of Inquiry

- (d) the decision-making process.
13. The documents sought in paragraph 12 above include but are not limited to, documents relating to:
- (a) the implementation of the Education Program Closure Decision;
 - (b) any internal or external documents or briefing papers relating to the Education Program Closure Decision;
 - (c) the Education Program Closure Decision:
 - (i) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, West Moreton Hospital and Health Service (and its Board), any Human Services Agency, or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, and any Human Services Agency;
 - (d) the Education Program Closure Decision and the Queensland Government's obligations with respect to the Australian Government and its mental health and educational priorities.

The Closure: [TOR: 3(d) to (h)]

14. All documents relating to the actual closure of the BAC in early 2014, (including the closure of the on-site integrated education program following the Education Program Closure Decision) (**Closure**), including, but not limited to, documents relating to:
- (a) the timing of the Closure in so far as it related to the closing of the BAC and the closing of the on-site integrated education program;
 - (b) how the Closure was to be implemented;
 - (c) the internal and external planning and consultation that took place and resulted in the timing of the Closure;
 - (d) the Closure, including:
 - (i) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, West Moreton Hospital and Health Service (and its Board), any Human Services Agency or any other Relevant Stakeholder;

Barrett Adolescent Centre Commission of Inquiry

- (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other relevant Health Service and Board, and any Human Services Agency;
- (e) the internal and external planning and consultation leading up to the Closure including arrangements made in relation to the:
 - (i) physical premises at The Park - Centre for Mental Health at which the BAC and the on-site integrated education program were located (**Premises**);
 - (ii) furniture and office equipment located at the Premises;
 - (iii) storage and safe-keeping of patient files, education records, Staff records and BAC records generally, held on the Premises;
 - (iv) any property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises;
- (f) what in fact happened after the Closure to the:
 - (i) premises (including land and all buildings/material infrastructure);
 - (ii) furniture and office equipment located at the Premises;
 - (iii) patient files, education records, Staff records and BAC records generally, held on the Premises;
 - (iv) property belonging to inpatients and outpatients of the BAC and their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder and Human Services Agency which was located at the Premises.

Transition Arrangements: [TOR: 3(d), 3(e), 3(f) and 3(h) and 4]

15. All documents relating to:

- (a) the identity of the BAC patients transitioned to alternative care arrangements in association with the Closure (or anticipated closure), whether before or after the Closure Decision Announcement (the "**Transition Clients**");
- (b) how care, support, service quality and safety risks were identified, assessed, planned for, managed and implemented for the Transition Clients before and after the Closure (the "**Transition Arrangements**");

Barrett Adolescent Centre Commission of Inquiry

- (c) the process leading to the development of the Transition Arrangements, such as:
 - (i) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, any other Human Services Agency or any other Relevant Stakeholder;
 - (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, and any Human Services Agency;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the Transition Arrangements;
16. The documents referred to in paragraph 15 above include but are not limited to documents relating to:
- (a) how long the Transition Arrangements were scheduled to take;
 - (b) who was to pay for the Transition Arrangements;
 - (c) the anticipated cost of the Transition Arrangements;
 - (d) the actual cost of the Transition Arrangements implemented;
 - (e) clinically appropriate models for the transition of young people with severe and complex mental illness from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
 - (f) best practice models for the care of young people with severe and complex mental illness being transitioned from one form of intensive mental health services to another that were considered and implemented or considered and dismissed in association with the anticipated closure or the Closure;
 - (g) any assessment, monitoring and evaluation of the adequacy of the Transition Arrangements before, during and after implementation;
 - (h) any clinical or other advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the Transition Clients;
 - (i) the Transition Arrangements including:
 - (i) any correspondence, memoranda, submissions to or from the Department of the Premier and Cabinet, the Department of Health, West Moreton Hospital and Health Service (and its Board), any Human Services Agency or any other Relevant Stakeholder;

Barrett Adolescent Centre Commission of Inquiry

- (ii) briefing papers, including those relating to Cabinet submissions from the Department of Health, and meeting notes between QT and the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, and any Human Services Agency;
- (j) the Transition Arrangements in so far as they concern QT obligations with respect to other Queensland Government departments and also the Queensland Government's obligations with respect to the Australian Government and its mental health priorities.

Families of Transition Clients: [TOR: 3(e) and 3(h)]

17. All documents relating to the care, support and services that were provided to the families of the Transition Clients, including all documents relating to:
 - (a) any advice and or reports obtained as to the likely or actual effect of the Transition Arrangements on the families of Transition Clients;
 - (b) any consultations, meetings or dealings between QT and any of the Department of the Premier and Cabinet, the Department of Health and staff, the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), or any other Health Service and Board, any Human Services Agency or any Relevant Stakeholder, about the adequacy of the care, support and services that were provided to the families of the Transition Clients during the carrying out of the Transition Arrangements.

Alternatives to the BAC: [TOR: 3(g), 3(h) and 4]

18. All documents relating to whether, in association with the Closure Decision, there was any consideration of alternatives for replacing the BAC, including but not limited to documents dealing with:
 - (a) any alternative for the replacement of the BAC that was considered;
 - (b) the bases for any alternative that was considered not being adopted;
 - (c) any alternatives that were not considered;
 - (d) the information, material, advice, processes, considerations and recommendations that related to or informed the matters in 20(a), 20(b) and 20(c) above.
19. The documents referred to in paragraph 18 above include but are not limited to documents relating to:
 - (a) clinically appropriate models of care for intensive mental health services to young people with severe and complex mental illness;
 - (b) best practice models of care for intensive mental health services to young people with severe and complex mental illness;

Barrett Adolescent Centre Commission of Inquiry

- (c) any consultations, meetings or dealings between QT and any of the Department of the Premier and Cabinet, the Department of Health and staff, the families, carers, and or friends of the Transition Clients, the West Moreton Hospital and Health Service (and its Board), any other Health Service and Board, any Human Services Agency or any Relevant Stakeholder, about alternatives for replacing the BAC;
- (d) the option of transferring the on-site integrated education program to an alternative site.

Other Matters: [TOR: 3(i)]

20. All documents concerning patient safety and confidentiality in relation to the Closure Decision and Transition Arrangements including:

- (a) any report of self-harm by any patient or former patient of the BAC or Transition Client;
- (b) any report of harm to any patient or former patient of the BAC or Transition Client, by Staff of the BAC;
- (c) any report of harm to any patient or former patient of the BAC or Transition Client, by other patients or former patients of the BAC or Transition Clients;
- (d) any consequential internal or external investigations or reports arising from or related to 22(a) to (c) above;
- (e) policy or practice changes as a result of any such incidents or events in 22(a) to (c) above;
- (f) any complaints from patients or former patients of the BAC or Transition Clients, their families, carers, friends, Staff of the BAC, any other Relevant Stakeholder or Human Services Agency, relating to the compromise of patient safety or confidentiality in relation to the Closure Decision or the Transition Arrangements;
- (g) any consultations, meetings or dealings about patient safety and or confidentiality in association with the Closure and or the Transition Arrangements that took place between QT and any of the Department of the Premier and Cabinet, the Department of Health, the West Moreton Hospital and Health Service (and its Board), the Staff of the BAC, the families, carers, and or friends of the patients or former patients of the BAC or Transition Clients, any other Health Service and Board, any Human Services Agency and any Relevant Stakeholder;
- (h) any directives relevant to patient safety and or confidentiality that were issued by any Health Service Chief Executive appointed under s. 7 of the *Hospital Health Boards Act 2011* or otherwise.

General

21. Any other documents relating to the TOR.


In the matter of *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No. 4) 2015

Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibits 'B1' to 'B19' to the Affidavit of William David Thompson affirmed on 11 November 2015.



William David Thompson



Solicitor

EXHIBIT B1



Crown Law

 Department of
Justice and Attorney-General

 Your ref:
 Our ref: PL9/PRE052/2103/SZL
 Contact: Louise Syme
 Direct ph:
 Direct fax:
 Email:

28 September 2015

 The Commissioner
 Barrett Adolescent Centre Commission of Inquiry
 Level 10, 179 North Quay
 BRISBANE Q 4000
By Hand

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

I refer to the Requirement to Produce Documents issued to Mr Michael Hogan, Director-General of the Department of Communities, Child Safety and Disability Services dated 15 September 2015.

Please find on the **enclosed** USB the following relevant documents:

Number	Document	Date	RTPD Reference
1.	The Department of Communities, Child Safety and Disability Services clinical file for [REDACTED] [REDACTED] including: <ul style="list-style-type: none"> • Electronic records - Communications summary and full printouts: [REDACTED] – Dates ranging from 1 October 2013 to 26 June 2014; • Electronic records - Communications summary and full printouts: [REDACTED] – Dates ranging from 20 September 2011 to 1 October 2013; • Electronic records - Disabilities Services communication record – Emergency 	Various	12, 15, 16, 17, 20.

 State Law Building
 50 Ann Street Brisbane
 GPO Box 5221 Brisbane
 Queensland 4001 Australia
 DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
 ABN 13 846 673 994

EXHIBIT 2

Barrett Adolescent Centre Commission of Inquiry - State representation

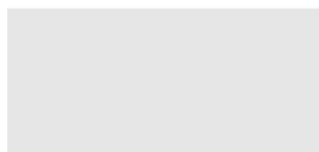
	<p>response funding Application –SCILS- After School care for 4 weeks – 24 February 2012</p> <ul style="list-style-type: none">• Electronic records - Notes, Summary and full printouts: [REDACTED] - Dates ranging from 9 August 2007 to 11 May 2009;• Electronic records - Contact Log List Summary and full printouts: [REDACTED] – Dates ranging from 9 August 2007 to 2 October 2014;• Folder DBRO/03692 part 1;• Folder DBRI/056/5;• Folder DBRI/05534 part 1;• Folder DBR4/02765 part 1;• Folder DBR4/03431 part 1;• Folder DBR4/03431 part 2;• Folder SUN1/08848 part 1; and• Folder SUNI/08005 Part 1.		
2.	Process Review into the response of departmental officers concerning the circumstances and events prior to the death or [REDACTED] on 10 June 2014.	May 2015	20(d)

Please note this disclosure amounts to partial compliance with the above mentioned Requirement to Produce. A request for an extension of time until **4pm on Friday 2 October 2015** has been made today.

The enclosed documents in relation to [REDACTED] are documents to which the Joint Submissions on Confidentiality made on 25 September 2015 relate. We ask that these documents be treated as confidential subject to a determination in relation to confidentiality as sought in those submissions.

We will continue to produce documents as soon as practicable and will confirm full compliance upon receipt of instruction from our client that all relevant documents have been disclosed.

Yours sincerely



Louise Syme
A/Assistant Crown Solicitor
for **Crown Solicitor**
encl

EXHIBIT B2



Queensland
Government

Crown Law

Department of
Justice and Attorney-General

Your ref:
Our ref: PL9/PRE052/2103/SZL
Contact: Louise Syme
Direct ph:
Direct fax:
Email:

2 October 2015

The Commissioner
Barrett Adolescent Centre Commission of Inquiry
Level 10, 179 North Quay
BRISBANE Q 4000

By email to: mail@barrettinquiry.qld.gov.au

Dear Commissioner

Barrett Adolescent Centre Commission of Inquiry - State representation

I refer to the Requirement to Produce Documents (Notice) issued to Mr Michael Hogan, Director-General of the Department of Communities, Child Safety and Disability (DCCSDS) dated 15 September 2015 and partial disclosure made on behalf of DCCSDS on 28 September 2015.

DCCSDS are continuing to undertake searches and attempting to provide relevant documentation to Crown Law. To allow for consideration to be given to and for instructions to be taken in relation to further anticipated documents, Crown Law seeks a further extension of time for compliance with this Notice until **4pm Wednesday 7 October 2015**.

Yours sincerely

A grey rectangular box redacting the signature of Louise Syme.

Louise Syme
A/Assistant Crown Solicitor
for **Crown Solicitor**
encl

State Law Building
50 Ann Street Brisbane
GPO Box 5221 Brisbane
Queensland 4001 Australia
DX 40121 Brisbane Uptown
Telephone 07 3239 6703
Facsimile 07 3239 0407
ABN 13 846 673 994

EXHIBIT B3

Catherine Aird

From: Ashley Hill
Sent: Tuesday, 6 October 2015 9:51 AM
To: Ashley Hill
Subject: Request for extension of time to comply with Requirement to Produce Documents on behalf of Department Communities, Child Safety and Disability Services (DCCSDS)
Attachments: CL_DOCS-#6176238-v1-
BARRETT_INQUIRY-_Ltr_to_The_Commissioner-_seeking_ex....pdf

From: Catherine Muir
Sent: Tuesday, 6 October 2015 9:38 AM
To: Louise Syme
Cc: Ashley Hill
Subject: RE: Request for extension of time to comply with Requirement to Produce Documents on behalf of Department Communities, Child Safety and Disability Services (DCCSDS)

Dear Louise,
In response to your letter of 2 October 2015, the Commission grants Crown Law's request for an extension of the time for compliance with the Notice dated 15 September 2015 issued to Michael Hogan, Director – General of the Department of Communities, Child Safety and Disability, until 4.00pm, Wednesday 7 October 2015.
Regards
Cathy

Catherine Muir
Counsel Assisting
Barrett Adolescent Centre Commission of Inquiry
Ph: [REDACTED]

From: Louise Syme
Sent: Friday, 2 October 2015 3:06 PM
To: Mailbox (Barrett Inquiry)
Cc: Catherine Muir
Subject: Request for extension of time to comply with Requirement to Produce Documents on behalf of Department Communities, Child Safety and Disability Services (DCCSDS)

Dear Counsel Assisting,

Please find attached a request for an extension of time to comply with the Requirement to Produce Documents issued to Mr Michael Hogan, Director-General, Department of Communities, Child Safety and Disability Services on 15 September 2015.

Yours sincerely

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

EXHIBIT 2



EXHIBIT B4