

**BARRETT ADOLESCENT CENTRE COMMISSION OF INQUIRY**  
**SUBMISSIONS ON BEHALF OF MS GEORGIA WATKINS-ALLEN**

**Ultimate Submission**

1. It is not necessary for the Commission, in discharging its obligations under the Terms of Reference, to make any findings about Ms Georgia Watkins-Allen ("**Ms Watkins-Allen**").
2. Even if the Commission felt it necessary to make findings about or to refer to the evidence of Ms Watkins-Allen, there is no basis (at all) for an adverse finding to be made against her.

**Submissions in support of Ultimate Submission**

3. Ms Watkins-Allen provided a comprehensive statement<sup>1</sup> in response to the Commissioner's Requirement to Give Information in a Written Statement dated 19 October 2015.
4. It is instructive that despite providing extensive information to the Commission, neither Counsel Assisting nor any other party sought leave to cross-examine Ms Watkins-Allen. No propositions, adverse or contrary to her statement, were put to Ms Watkins-Allen. This tells against the necessity to make any finding about Ms Watkins-Allen's involvement in matters relevant to the Terms of Reference.
5. Fundamentally, Ms Watkins-Allen's involvement is relevantly limited. Specifically:
  - (a) Ms Watkins-Allen left the Barrett Adolescent Centre ("the **BAC**") on or about 30 April 2013.<sup>2</sup> This was before the closure announcement<sup>3</sup> and Ms Watkins-Allen was not involved in transition planning;<sup>4</sup>
  - (b) Ms Watkins-Allen was not involved in the decision to close the BAC;
  - (c) Ms Watkins-Allen treated [REDACTED] in private practice in processes organised through the individual patients' General Practitioners and funded by Medicare.<sup>5</sup> In this sense, she was not the primary treatment provider nor care coordinator. Ms Watkins-Allen did not treat [REDACTED] in private practice;
6. The most significant controversy raised on Ms Watkins-Allen's statement is the transition of the care of [REDACTED] upon Ms Watkins-Allen's departure from the BAC. It must be noted that this was not a transition of care from the BAC but to other clinicians within the BAC and thus it is doubtful that it falls within the terms of reference, albeit that is a matter for the Commission.

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<sup>1</sup> GWA.001.002.0001.

<sup>2</sup> GWA.001.002.0001 at 0003 at para [12].

<sup>3</sup> See paragraphs 289 to 292 of Counsel Assisting's submissions.

<sup>4</sup> GWA.001.002.0001 at 0024 at para [74].

<sup>5</sup> GWA.001.002.0001 at 0002 at para [8], at 0020 at para [64],

7. Ms Watkins-Allen repeatedly sought a period of six months within which to effect transition of her patients.<sup>6</sup> It was determined by Mr Scott Natho, the senior psychologist in the Park Centre for Mental Health, that one month was sufficient.<sup>7</sup> The difference is one of clinical opinion and is not significant in the context of the Commission's task. In any event, the handover of patients on Ms Watkins-Allen's departure occurred.<sup>8</sup>
8. At paragraph 65 of her second statement,<sup>9</sup> Ms Watkin's Allen sets out the reasons provided to her by the patients as to why they sought treatment from her in her private practice. These statements are necessarily hearsay so far as they concern statements by the patients as to the availability of services to them after Ms Watkins-Allen left the BAC and the question of weight to be given to them is a matter for the Commission. Another use for the material though is that it provides an insight to the Commission into the minds of these young people and their perception of the state of affairs at the time.
9. No other witness has given evidence that is critical of Ms Watkins-Allen. Indeed, the tenor of the evidence is to the contrary; that is particularly so in the case of the parents and former patients.

### Conclusion

10. We are conscious that the Commission will need to consider the (lengthy) submissions of other parties with leave to appear. In the circumstances as at this time,<sup>10</sup> we feel that it is unnecessary to say anything further unless it would assist the Commission.

Andrew O'Brien  
Counsel

RBG Lawyers

23 March 2016

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<sup>6</sup> GWA.001.002.0001 at 0010 at para [33], at 0011 at paras [38] and [40], at 0012 at paras [43] to [46], at 0013 at para [48], at 0018 at para [61], at 0019 at para [62].

<sup>7</sup> See GWA.001.002.0001 at 0061.

<sup>8</sup> GWA.001.002.0001 at 0013 at para [49], at 0017 at para [58] and at 0018 at para [59]. The written handover reports are set out at GWA.001.002.0001 at 0014 at para [53].

<sup>9</sup> GWA.001.002.0020.

<sup>10</sup> That is, with no notice of an adverse finding, no critical position(s) recorded in the statements provided to the Commission or in Counsel Assisting's submissions and where Ms Watkins-Allen was not required for cross-examination.