

EXHIBIT 2

Barrett Adolescent Centre Commission of Inquiry - State representation

If you require any further explanation in relation to rolling disclosure as referred to in the Crown Solicitor's email. Please feel free to contact me directly on [REDACTED]

Yours sincerely

[REDACTED]

Louise Syme  
Assistant Crown Solicitor  
for **Crown Solicitor**

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 'D1' to 'D3' to the Affidavit of William David Thompson affirmed on 11 November 2015.



**William David Thompson**



**Solicitor**

# EXHIBIT D1

## Catherine Aird

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**From:** Louise Syme  
**Sent:** Wednesday, 30 September 2015 8:34 AM  
**To:** Catherine Muir  
**Cc:** Elizabeth Kenny [REDACTED]; Ashley Hill  
**Subject:** Access to email inboxes

Dear Cathy,

Thank you for taking the time to meet with us yesterday about the current difficulties and time delays faced by our clients at the Department of Education and Training (DET) and Queensland Health in relation to the "de-archiving" of email inboxes for the purposes of responding to the Notices to Produce issued to those entities.

As discussed, to expedite the production of emails from DET we will ask in the first instance that priority be given to the de-archiving of the inboxes relating to the staff whose personnel files have been disclosed to the Commission. Further, as Director-General, Assistant Director-General or similar level departmental officers and decision makers are identified as having information relevant to the terms of reference and Notice to Produce, we will ask DET to prioritise the de-archiving of those inboxes. In accordance with the extension of time to produce granted by the Commissioner, we will provide an update on the expected timeframes for the de-archival of the identified inboxes on 2 October 2015.

Further, with respect to the production of emails from Queensland Health, we have been instructed that a significant number of email inboxes have been de-archived but a very large number of inboxes that have been listed for de-archiving are still being processed. We have provided detailed information to the Commission regarding the anticipated periods that the de-archival of all of those inboxes will take.

Large volumes of material have been identified in the email inboxes that have been de-archived and we are sourcing litigation support software to allow for the prompt searching of those email inboxes and the retrieval of appropriate documents. That procurement process has advanced to consideration by the relevant Department of Justice and Attorney-General staff. Absent the procurement of litigation support, the manual searching of email inboxes will require significant time. With litigation support software we will be in a position to provide both refined (that is with duplicates removed) documents and the metadata that will assist the Commission in the management of those documents.

In the interim, to expedite the production of relevant material, we request that the Commission identify the individual's whose email inboxes are likely to be required for the purposes of statements etc so that priority may be given to the de-archiving of those inboxes. Whilst the process to be undertaken to de-archive inboxes will remain lengthy, we are committed to ensuring that the Commission receives the most relevant information as soon as possible. Your assistance in this regard would be greatly appreciated.

Yours sincerely

Louise Syme  
A/Assistant Crown Solicitor  
Advocacy - Galligan Chambers  
Ph: [REDACTED] / Mobile [REDACTED] / Fax: [REDACTED]  
Crown Law, State Law Building, 50 Ann Street, Brisbane Qld 4000  
[REDACTED] | [www.crownlaw.qld.gov.au](http://www.crownlaw.qld.gov.au)

EXHIBIT 2



# EXHIBIT D2



Crown Law

Department of  
**Justice and Attorney-General**

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

30 September 2015

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

Dear Commissioner

**Barrett Adolescent Centre Commission of Inquiry - State representation**

I refer to the Requirement to Produce Documents issued to Mr Michael Walsh, Director-General of the Department of Health dated 29 September 2015.

Please find **enclosed** a list of email inboxes identified for de-archiving (together with the names and positions of the relevant persons to whom the in boxes relate) relating to the Terms of Reference.

Yours sincerely

[REDACTED]

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 2

Email Account	Position in Department or Hospital and Health Service
<b>DEPARTMENT OF HEALTH BASED STAFF</b>	
<b>Director Generals - Queensland Health</b>	
Uschi Schreiber	Former Director-General
Andrew Wilson	Former Director-General
Michael Reid	Former Director-General
Tony O'Connell	Former Director-General
Ian Maynard	Former Director-General
<b>Office of the Director General</b>	
	Former Director, Office of DDG, Finance Procurement and Legal Services
Dawn Morris	Director SPFIG funding and Resourcing, PSR
Jessica Martin	Director, Departmental Liaison Executive Support Unit Former Executive Director, Office of the Director General
Catherine Katz	
Dan Harradine	Former Executive Director, Office of the Director General
Trish Nielsen	Senior Executive Support Officer, ODG
<b>Deputy Director General HSCI / Deputy Director General Policy, Strategy &amp; Resourcing / Office of the DDG HSCI</b>	
Michael Cleary	Deputy-Director General, Health Service Clinical Innovation (HSCI)
Jeannette Young	Chief Health Officer, Office of the Chief Health Officer
Sandra Daniels	Director, Office of the Deputy Director General, Health Service and Clinical Innovation
Jan Philips	Executive Director, Health Systems Innovation Branch A/DDG Policy Strategy and Resourcing
Bronwyn Nardi	
<b>SSS/ Finance / Funding</b>	



## EXHIBIT 2

Michael Kalimnios	Deputy Director-General Corporate Services
Susan Middleditch	Executive Director, CS DDG System Support Services Chief Executive Health Services Support Agency DDG System Support Services DDG Finance Procurement & Legal Services
Neil Castles	DDG, Finance, Procurement and Legal Services
Philip Davies	DDG, Performance and Accountability
Tony Hendry	General Manager, Budget and Analysis
Melinda Beckett	Principal Project Officer and Principal Advisor
Kim Woolgar	Director, Community Services Unit
Adrian Shea	Former Executive Director, Corporate Services Division
Joel Morehu-Barlow (Hohepa Hikairo "Joel" Morehu-Barlow)	Former Manager, Governance, Finance CSD and Finance, Procurement and Legal Services Principal Finance Officer, Budget Services CSD
<b>Mental Health Branch</b>	
Bill Kingswell	Executive Director, Mental Health, Alcohol and Other Drugs Branch
Bill Kingswell	Executive Director, Mental Health, Alcohol and Other Drugs Branch
Jagmohan Gilhotra	Former Director of Mental Health and Chief Psychiatrist (now Acting Director Patient Safety, TPCH)
Aaron Groves	Former Director of Mental Health
Leanne Geppert	Acting Director, Mental Health Implementation Unit, Mental Mental Health Plan
Laura Johnson	Implementation Unit, Mental Health Alcohol and Other Drugs

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Marie Kelly	Manager, Intergovernmental Relations and systems Redesign Unit, Mental Health
Janet Martin	Manager, Clinical Governance, Office of the Chief Psychiatrist
John Allan	Chief Psychiatrist and Director of Mental Health Alcohol and Other Drugs Branch
Vaoita Turituri	Senior Project Officer, Intergovernmental Relations and Systems Redesign Unit, Mental Health Alcohol and Other Drugs Branch
Jackie Bartlett	A/Manager, Clinical Governance, Office of the Chief Psychiatrist
Kevin Fjeldsoe	Director, Mental Health Plan Implementation Team
Paul Clare	Principal Project Officer, Mental Health Plan Implementation Team
John Quinn	Manager, Mental Health Directorate
Emma Foreman	Principal Project Officer, Planning & Partnerships Unit, MHAODB
Rachel Brown	Senior Project Officer, Planning & Partnerships Unit, MHAODB
Karissa Maxwell	A/Principal Project Officer, QH Mental Health Plan Implementation Unit
Kristy Moore	A/Administration Officer, QH Mental Health Plan Implementation Unit
Lauren Stocks	A/Senior Project Officer, QH Mental Health Plan Implementation Unit
Barnaby Kerdel	Information and Performance Unit, Mental Health Alcohol and Other Drugs Branch

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Glenn Rashleigh	Chief Health Infrastructure Officer Acting Deputy Director-General, Health Property and Infrastructure Division
Faileen James John Glaister	Deputy Director-General, Office of the DDG, Health Planning and Infrastructure Division
Linda Ryan	Principal Project Officer, Southern Area Health Service
Karen Ryan	Manager, Rural Service Planning Unit, Southern Area Health Service
Jennifer Stone	Assistant Director (Southern) Program Coordination, Capital Works Branch
	Area Director Southern, Capital Works
Chris Hollis	Network Coordinator, Mental Health - Central Area
Mark Wheelehen	Area Team Leader, Central Area Health Service
Elisabeth Roberts	Principal Project Officer, Southern Area Health Service
Terry Carter	Project Manager, Mental Health Capital Works Program
David Pagendam	Senior Architect, Project Services
Karen Riedy	Project Architect, Project Services
Bruce Collins	Principal Planning Officer, Planning Branch and Planning and Co-ordination, HPID
Colleen Jen	Senior Director, Health Planning
Marguerite Mobbs Hilary Hebblewhite	Manager, Planning Branch Director, Corporate Services, Redland and Wynnum Hospitals [MSHHS]
Cathy Hindmarsh Michelle Walter	Director, Planning Branch Senior Coordinator, Capital Delivery

## EXHIBIT 2

Alan Mayer	Director, Capital Delivery
Julie Nimmo	Project Officer, Capital Delivery

Kerryn Parrot	Coordinator, Capital Delivery
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Neil Payne	Project Manager, Building Engineering and Maintenance Services
Allister Hodge	

Jason Flenley	Program Director, CDPS, QH Health Planning and Infrastructure Division
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### Other

Lisa Pritchard	Director, Ethical Standards unit
Cathie Schnitzerling	Senior Director, Media & Comms

### Corro Accounts

SDLO

SDLO

DG Corro

DG Corro

Exec Corro

DG Health

SD Office of DG

DLO

HSCI Corro

DDG\_HSCI

Policy Strategy & Resourcing

DDG, Policy, Strategy & resourcing

CHO

CHO CHO

Office of the Chief Psychiatrist

Mental Health Directorate

Principal Advisor in Psychiatry

Executive Director MHAODB

## EXHIBIT 2

Mental Health Plan Implementation Unit  
Mental Health Branch  
DDG Systems Support Services

System Support Services Correspondence  
System Support Services Business Services

Finance Procurement and Legal Services

Finance Procurement and Legal Services

DDG, Finance Procurement and Legal Services

Finance Correspondence

Health Infrastructure Branch  
Health Planning and Infrastructure Division

HPID Correspondence

HPID Planning  
News  
Communications

Communications  
Design  
Online

Production & Broadcast

Finance Branch

Finance Governance

Corporate HR  
Human Resources  
Human Resources

Human Resources

Human Resources

Human Resources  
Human Resources

Human Resources  
Human Resources

**HOSPITAL AND HEALTH SERVICES**

## EXHIBIT 2

### West Moreton

Lesley Dwyer	Chief Executive Officer, Medway Maritime NHS Foundation Trust
Sharon Kelly	Executive Director, Mental Health & Specialised Services
Leanne Geppert	Acting Executive Director, Mental Health and Specialised Services
Trevor Sadler	Child and Adolescent Psychiatrist
Trevor Sadler	Child and Adolescent Psychiatrist
Terry Stedman	Director, Clinical Services, The Park-Centre for Mental Health
Terry Stedman	Director, Clinical Services, The Park-Centre for Mental Health
Will Brennan	Director of Nursing
Michelle Giles	Director Community Mental Health and Allied Health
Padraig McGrath	Nursing Director
Anne Brennan	Acting Clinical Director of BAC
Lorraine Dowell	Team Leader Non Secure
Jill Vonharten	Executive Support Officer
Laura Johnson	BAC Project Manager
Jacqui Keller	General Counsel
Holly Ahern	Lawyer
Kris Antal	Executive Support Officer
MD09-WestMoreton-HSD	Generic email account
WM_ED_MH&SS	Generic email account
Cary Breakey	Child and Adolescent Psychiatrist
Cary Breakey	Child and Adolescent Psychiatrist
Chris Thorburn	ED Corporate Governance
Desmond Suttle	Human Resources
Kerrie Parkin	Human Resources
Jane O'Brien	Communications
Naomi Ford	Communications
Monica O'Neill	ED Mental Health
Monica O'Neill	ED Mental Health
Katrina Mathies	Director Mental Health
Mark Kieran	ED Nursing and Midwifery
Pam Lane	Regional General Manager
Margaret Shinnars	Patient Safety Officer
Peter Howard	BAC Senior Nursing

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Peter Howard	BAC Senior Nursing
Kirsten Dyer	Acting Director Clinical Governance
Irene Francisco	Clinical Innitiatives Co-ordinator
Kathryn White	Director Industrial Relations
Allan Millward	ED Human Resources
Kevin Fjeldsoe	ED The Park Mental Health
Shirley Wigan	ED Mental Health
Shirley Wigan	ED Mental Health
Alexander Bryce	Clinical BAC Staff
Angela Clarke	Clinical BAC Staff
Vanessa Clayworth	Clinical BAC Staff
Susan Daniel	Clinical BAC Staff
Susan Daniel	Clinical BAC Staff
Megan Hayes	Clinical BAC Staff
Carol Hughes	Clinical BAC Staff
Mara Kochardy	Clinical BAC Staff
Peter Kop	Clinical BAC Staff
Thomas Pettet	Clinical BAC Staff
Elaine Ramsey	Clinical BAC Staff
Elaine Ramsey	Clinical BAC Staff
Rosangela Richardson	Clinical BAC Staff
Ashleigh Trinder	Clinical BAC Staff
Georgia Watkins-Allen	Clinical BAC Staff
Peta-Louise Yorke	Clinical BAC Staff
Kathy Stapley	[insert] unknown
Joanne King	
Laurence McDowell	
Lisbeth Gardner	
Nadia Beer	
Risto Ala-outinen	
Scott Natho	
Sue Cardy	
Elizabeth Edge	

### Metro North

Keryn Fenton	Operations Director, Mental Health TPCH
Michael Kilshaw	Nursing Director, Mental Health TPCH
Robin Counsel	Nurse Unit Manager, RBWH
Karen Northcote	Forensic Liaison Officer
Robert Stewart	Consultant Psychiatrist
Kylie Garrick	Director, Allied Health
Dr Robert Stewart	Consultant Psychiatrist, The Prince Charles Hospital Mental Health services

## EXHIBIT 2

Shannon Dawson	Service Integration Co-ordinator (SIC), Occupational Therapist Resource Team , Metro North Mental Health Service – TPCH
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<b>Townsville</b>	
John Reilly	Medical Director, Mental Health Services Group

<b>Metro South</b>	
Dr Ian Williams	Former Director of Adolescent Psychiatry at RBWH
Dr Jacinta Powell	Director of Medical Services, Logan Hospital
William Pepplinkhouse	Unknown
Amanda Hanaghan	Unknown
Angela Hain	Unknown
Christie Burke	Unknown
David Crompton	Unknown
Dianne Tarrant	Unknown
Emma Page	Unknown
Emma White	Unknown
Farouk Syed-jaffar	Unknown
Ian G Williams	Unknown
Janelle Bowra	Unknown
Julie Odonovan	Unknown
Kylie Carney	Unknown
Lorna Hampson	Unknown
Michelle A Armstrong	Unknown
Natalie Obrien	Unknown
Nathan Pasieczny	Unknown
Nicola Cantoni	Unknown
Nicole Munro	Unknown
Raymond Ho	Unknown
Renee Robertson	Unknown
Roderick Buchner	Unknown
Sean Hatherill	Unknown
Subramanian Purushothaman	Unknown
Suneel Chamoli	Unknown
Una Window	Unknown
Vicki Green	Unknown
MSMHS_CYMHS	Unknown
msmhs_MoodACU	Unknown
msmhs_psychosesACU	Unknown
msmhs_rehabilitationACU	Unknown
Executive Account	Unknown
ed_mhsmetrosouth@health.qld.gov.au	



# EXHIBIT D3

## Catherine Aird

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**From:** Catherine Muir  
**Sent:** Thursday, 1 October 2015 4:06 PM  
**To:** Louise Syme  
**Cc:** Amelia Barker  
**Subject:** BAC - list of inboxes - priority

Dear Louise,

In line with your email received at 8:30 am on 30 September 2015, and with reference to the list we received in response to the requirement to produce, issued by the Commission on 29 September 2015, I have categorised the email boxes in priority below. The emails recovered from the inboxes from the names on the list that are not specifically referred to below, are still required to be produced, but in third priority.

I confirm that once you are in a position to do so, you will write to the Commission with the expected timing for receipt by the Commission of the now 3 categories of emails in order of priority.

The highest priority should be given to the following email inboxes:

1. Bill Kingswell;
2. Jagmohan Gilhotra;
3. Aaron Groves;
4. Leanne Geppert (in her role as Acting Director Mental Health Plan Implementation Unit);
5. Laura Johnson;
6. Lesley Dwyer;
7. Sharon Kelly;
8. Leanne Geppert (in her role as Acting Executive Director Mental Health and Specialised Services);
9. Trevor Saddler;
10. Terry Stedman;
11. Anne Brennan;
12. Laura Johnson;
13. Cary Breakey;
14. Pam Lane;
15. Jeanette Young;
16. All the Corro accounts.

The next priority is to the following email inboxes:

1. Uschi Schreiber;
2. Andrew Wilson;
3. Michael Reid;
4. Tony O'Connell;
5. Ian Maynard;
6. Marie Kelly;
7. Janet Martin;
8. John Allan;
9. Michael Cleary;
10. Sandra Daniels;
11. Jan Philips;
12. Bronwyn Nardi;
13. Cathy Hindmarsh;
14. Will Brennan;

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- 15. Padraig McGrath;
- 16. Peter Howard;
- 17. Kirsten Dyer;
- 18. Irene Francisco;
- 19. Kathryn White through to Elizabeth Edge (under the west Moreton section) on the list.

Please do not hesitate to call me if you have any queries.

Regards

Cathy

**Catherine Muir**

Counsel Assisting

**Barrett Adolescent Centre Commission of Inquiry**

Ph: [REDACTED] M: [REDACTED]

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**

Exhibit 'E' to the Affidavit of William David Thompson affirmed on 11 November 2015.



**William David Thompson**



**Solicitor**

# EXHIBIT E

Party		Provided	Outstanding
CCS	Dept Communities, Child Safety and Disability Services	<b>17 documents</b>	Crown Law has indicated full disclosure
		Mostly patient records and extracts	No emails No project documentation No correspondence
CHQ	Children's Health QLD HHS Board	<b>20 documents</b> Board papers Agendas Minutes	Crown Law has indicated partial disclosure - additional material to come No emails Minimal correspondence
		Documents relating to patient transitions Education QLD comms Correspondence relating to Services and Service agreements, and alternatives AECRI Steering committee documents Staff transition documents	
CHS	Children's Health QLD HHS	<b>138 documents</b> Documents pertaining to alternatives Administrative documents relating to patients Budget/financial docs Media statements/community engagement docs patient profiles clinical records Documents pertaining to ECRG BAC administration documents	Crown Law has indicated partial disclosure - additional material to come Minimal emails Minimal correspondence
DET	Dept Education and Training	<b>33 documents</b> Student profiles	Crown Law have not stated whether full or partial disclosure No emails No correspondence
DPC	Dept of the Premier and Cabinet	<b>581 documents</b> Emails relating to closure	Crown Law have indicated partial disclosure - additional material to come No cabinet submissions or papers
		Documents extracted from DPC records system - not yet analysed but appear to be correspondence and briefing docs  Cover sheets for documents	No Cabinet Budgetary Review Committee related briefs or submissions No information about Redlands adoption as a replacement for Barrett (should be documents in the period 2010-2012) Limited or no information about Redlands cessation as a replacement for Barrett (should be documents in 2012)
HPW	Dept of Housing and Public Works	<b>24 documents</b> Emails about Redlands Emails about refurbishments	Crown Law has indicated full disclosure No documents re Redlands plans
MHC	QLD Mental Health Commission	<b>262 documents</b> Briefing docs Email and correspondence with parents Email and correspondence with officials/employees relating to closure documents relating to COI into closure	No indication given as to completeness of disclosure (not mentioned in covering letter)

QHD	Dept of Health	<b>6743 complete documents (extra placeholders included)</b> Patient files Clinical records Correspondence and Corro register Emails with parents regarding closure Emails regarding ██████████ and Townsville support	Crown Law has indicated partial disclosure - additional material to come No briefing notes to Minister or D-G (no final copies found) No estimate briefs to D-G or DD-G
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## EXHIBIT 2

			Provided non-compliant material:
Emails regarding other transition clients			
Treatment plans			
Confidential records relating to meetings			
Transition plans			
Engagement plans with service providers			
Certifications			
Root cause analysis docs			
Stake holder meeting docs (minutes and agendas)			
BAC closure meeting docs (minutes and agendas)			
Notification of abuse			
Emails relating to deaths of former patients			
AMHETI docs and reports, meeting docs			
SW AETRS project docs, meeting docs			
<b>QTR</b>	<b>3 documents</b>		Indicated partial disclosure - additional material to come
QLD Treasury	QLD Plan Mental Health - first evaluation July 2011		No financial records
	QLD Plan for Mental Health - progress report		No emails
	Addl Mental Health Beds for Outcomes Mental Health (Aug 07 to Jun 08)		No briefing notes/correspondence accompanying requests
			No Cabinet Budgetary Review Committee related briefs or submissions