Special Commission of Inquiry

into Healthcare Funding

Before: The Commissioner, Mr Richard Beasley SC

At Level 2, 121 Macquarie Street, Sydney, New South Wales

Wednesday, 31 July 2024 at 10.00am

(Day 041)

Mr Ed Muston SC	(Senior Counsel Assisting)
Mr Ross Glover	(Counsel Assisting)
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Mr Ian Fraser	(Counsel Assisting)
Mr Daniel Fuller	(Counsel Assisting)

Also present:

Mr Hilbert Chiu with Ms Emily Aitken for NSW Health

1 THE COMMISSIONER: Good morning. 2 3 Good morning, Commissioner. I call Daniel MR FULLER: 4 Angelico of the College of Intensive Care Medicine of 5 Australia and New Zealand. 6 [10.02am] 7 <DANIEL ANGELICO, sworn:</pre> 8 9 <EXAMINATION BY MR FULLER: 10 Mr Angelico, my name is Dan Fuller, I'm 11 MR FULLER: Q. one of the counsel assisting the Commissioner and I'll be 12 13 asking you some questions this morning. 14 Sure. Α. 15 16 Q. Firstly, you provided a witness statement to assist the Commission, which is dated 12 July 2024. Do you have 17 18 a copy of that with you? 19 Α. I do. 20 21 Q. Have you had the opportunity to read that recently? 22 Α. I have. 23 24 Q. And is everything in that statement true and correct 25 to the best of your knowledge and belief? 26 Correct. Α. 27 28 MR FULLER: Commissioner, that will be tendered in due 29 course, but it is proposed to be exhibit H6.3. 30 31 THE COMMISSIONER: Yes, thank you. 32 33 MR FULLER: Q. Mr Angelico, you are the chief executive 34 officer of the college; is that right? That is correct. 35 Α. 36 37 Q. How long have you held that role for? In a permanent capacity for two years, previously 38 Α. a year of acting from '21 to '22. But previously before 39 40 that I've been with the college for - since 2006 so I've 41 been there a very long time and started in the training 42 department, so have a good grasp on everything in that statement. 43 44 45 Q. What was the role that you held before you started 46 acting as chief executive officer? 47 It was the general manager of training. Α.

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1 2 Q. Firstly, can you tell us what your role as chief 3 executive officer involves? 4 Yes. So we have a - we're a not-for-profit with Α. 5 a governing board made up of intensive care specialists. My role is to support the board in driving the college 6 7 forward in terms of our purpose, which is to train 8 specialist doctors in the field of intensive care. I focus 9 on the operational aspect. We have 49 staff that are under 10 my purview and we have various functions that are all 11 geared towards training intensive care specialists. 12 13 Q. You are not, yourself, a medical doctor; is that 14 right? I am non-clinical; that's correct. 15 Α. 16 17 Q. So do we take it that the clinical expertise comes 18 through the college's council; is that right? 19 That is correct, and the various committees that Α. 20 report in to the board are made up of specialists but also 21 educational experts in different fields, to drive the 22 curriculum and anything clinical, whilst also the board is a - you will find the majority of the board members are 23 24 working clinicians, so this is a non-paid - anything they 25 give to the college is non-paid. 26 27 Just having a look on page 1 of your witness Q. 28 statement, in the first paragraph under item 1, you tell us that the college is the professional body responsible for 29 the training, assessment and accreditation of intensive 30 31 care specialists in both Australia and New Zealand. 32 Α. Yes. 33 34 Do you see the college as having any broader role in Q. 35 advocating for the interests of its fellows? 36 We do. I do think that's the case. Are you referring Α. 37 to fellows in other jurisdictions or --38 Q. Fellows of the college in Australia and New Zealand? 39 40 Α. We do. 41 42 But are we right in thinking that from the college's -Q. 43 from your college's perspective, its primary role is 44 training, assessment and accreditation of specialists? Is that fair? 45 46 However, once someone goes through the Α. It is. 47 training program and becomes a fellow, we very much

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1 consider ourselves helping them on their continual 2 education journey, so once you become a fellow, we don't 3 expect you to stop evolving and learning. CPD is a big 4 part of a fellow's journey, and there are different phases 5 of being a fellow that we consider the college is very much a part of helping them, all the way through to eventual 6 7 retirement, when they finish their clinical work. 8 9 Q. Do you see any part of the college's role as including 10 advocating for trainees or fellows in the context of 11 workplace disputes? 12 Α. We do, however, there is a fine line, because there is 13 the Australian and New Zealand Intensive Care Society, 14 which is a body that is a sister body of ours, that do 15 focus a lot more on advocating in that space. However, 16 because a lot of our doctors are the subject matter 17 experts, we feel like we do have a lot of value to give when trying to solve - if we're talking about workforce -18 19 trying to be a part of that solution, which I think it's 20 a multi-pronged attack. I don't thing one body can solve 21 workforce in Australia, New Zealand, and it's very 22 different in different jurisdictions. So we are part of the solution, I feel. 23 24 25 Q. Leaving aside general questions of workforce - for 26 example, numbers and distribution - in terms of, for example, complaints of a trainee or a fellow being bullied, 27 28 harassed, discriminated against, those sorts of complaints, 29 what do you see the college's role as being? Yes, one of support. Like, in terms of a complaint 30 Α. 31 coming through from a trainee or a fellow that happens at 32 a hospital, at a particular site, we don't necessarily have 33 the jurisdictional power to do too much but we want to be 34 providers of help and support for both the trainee and the fellow, with the local jurisdiction or the local HR 35 36 department or whatever it may be. 37 Some jurisdictions, it's a state-based approach to HR; 38 others it's a site-based approach. 39 So our complaints 40 policy and our - which are, I think, available on our 41 website - do detail that. We don't have too much jurisdictional power however we don't want to ignore things 42 43 that are going on in our accredited units. 44 45 Q. I'll come back to that a little bit later. 46 Α. Sure. 47

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1 Q. Just in terms of the training programs offered by the 2 college, are we right in understanding that the college's 3 training programs in intensive care medicine are the only 4 way for a doctor, based in Australia, to be registered as 5 a specialist in those fields? 6 That's a very complex question. At the moment, Α. 7 there's a lot of work being done in the SIMG space with the 8 Kruk report, and I believe that there's an expedited 9 pathway for specialists to come into the country and be 10 registered as a specialist, however, they don't have to be attached to a college. But, like I said, it's a very 11 complex question and --12 13 14 Sorry, to interrupt you. If we just leave aside the Q. question of international medical graduates, if I'm not an 15 16 international medical graduate and I want to be registered 17 as a specialist in intensive care medicine. I need to 18 complete a training program through your college; is that 19 right? 20 We're not the ones to give specialists recognition or Α. 21 registration. We offer the fellowship. It's a different 22 body that provides the specialist registration, that's the 23 Medical Board of Australia, Ahpra. Most - so that's not 24 the college's remit. 25 But if I want to be registered with the Medical Board, 26 Q. 27 through the Medical Board of Australia process in a 28 specialty, I need to have completed an accredited training 29 program; is that your understanding? It is my understanding, however, there are multiple 30 Α. 31 pathways in order to do that. Not everything has to go 32 through the college. In terms of us awarding the 33 fellowship, there are a few different streams you can go 34 through in order to achieve fellowship. 35 36 There's the training pathway, which we have described in the witness statement; there's also the SIMG pathway; 37 and then there's also a pathway called "Election to 38 39 fellowship", where you may be someone had a has a long 40 career in intensive care that is - this is all available on 41 our website - you may be given the fellowship based on your services to intensive care. I don't think I can answer 42 43 specifically about the process of giving specialist 44 registration because it's outside my remit. 45 46 All right. Just focusing on the training programs in Q. intensive care medicine that the college does offer, do you 47

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1 accept that there is no competition in Australia or 2 New Zealand between the college and any other entity for 3 the delivery of those sorts of training programs? 4 I would agree with that. Α. 5 And do you agree that that lack of competition makes 6 Q. it important for colleges such as yours to have fair, 7 8 effective and transparent processes for the governance and 9 administration of their training programs? 10 Α. Absolutely. 11 Are we right in understanding that your college 12 Q. accredits intensive care units rather than individual 13 14 training posts? That's correct. 15 Α. 16 17 Are you able to explain the reason for the college Q. 18 taking that approach? 19 It is historical. That has been the way it has been Α. since I've been at the college, and like I've put in the -20 21 like we've put in the witness statement, some colleges may 22 accredit specific positions, however, we do not dictate how 23 a unit should staff its - how it should staff its unit in terms of recruitment. 24 25 26 A unit would be made up of - you know, if I focus on 27 the JMO workforce, there could be multiple people in there 28 that aren't on a training program that are working within 29 a unit. There would be some that are college trainees on Like I said, it's historical 30 their pathway to fellowship. 31 that it's been that way since before I was at the college, 32 but, yes, you're correct, we only accredit units as opposed 33 to individual positions. 34 35 Q. Do you see any particular advantages of the college's 36 approach in accrediting units --Yes. 37 Α. 38 -- that is intensive care units, rather than 39 Q. 40 individual positions or posts? One of our focuses is to - if we focus on 41 Α. We do. New South Wales, New South Wales is made up of many 42 43 different units, different communities that have different 44 I think it would be difficult for us to apply needs. 45 something, a framework that worked in every jurisdiction 46 and every unit. I think you will find there are differences between, say, a Royal North Shore and a Sydney 47

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1 Children's Hospital. Each unit has different needs and, 2 like I said, it's very hard. 3 4 We like to work with the units in order to find out 5 what works best for them, especially if we're talking about metro and rural, regional, remote, there are large 6 differences between each of those units. 7 So the advantage 8 we see is that a unit can develop a roster that works for 9 them within a budget that they have and the FTE they might 10 have available, that the college isn't dictating how many staff they must have. 11 12 13 We've got some minimum standards which are in the 14 documents that you have, and available on our website, however, I think the advantage would be that different 15 16 units that have different needs can support the community and patient care the way that they see fit in line with, 17 18 like I said, the budgets and the rostering that they need 19 to work within. 20 Do the minimum standards that you just referred to 21 Q. 22 include a required ratio of supervisors to trainees? 23 Yes, there's a guide there of - and this will go back Α. 24 to our comment before about the unit being made up of a diverse group of people, and I'd like to touch on 25 26 trainees and unaccredited trainees, if I may, but usually, 27 we have a one to 10 ratio for our supervisors and our 28 trainees in order to help them through the training 29 program. 30 31 If you think about a supervisor of training, they 32 would be one of the main custodians of the training pathway 33 that gets delivered in the units, and so they have a large 34 responsibility in terms of helping people through the The unaccredited trainees, there could be a wide 35 pathwav. 36 range of - a large number of those trainees in particular units that we wouldn't have any, again, say on how someone 37 supervises them and what happens inside the unit with those 38 But to answer your question 39 unaccredited trainees. 40 specifically, CICM SOTs should have about a max of 10 to 41 focus on, and that's in our documentation. 42 43 Q. You have described that as a guide, and I think you 44 said usually it would be 1 to 10. Does that mean it's not 45 a binding or mandatory ratio? 46 It would be - if it becomes an issue through our Α. accreditation process, we would work with the unit in order 47

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1 to - so some units would have multiple supervisors of 2 training who are responsible, if the number of trainees is 3 beyond that 10. We'd work with the unit during 4 accreditation process to make sure we've got a solution 5 that works. But that is applied. I will say that, that is 6 applied, and if it's something that we find a unit isn't 7 adhering to, we would pop that into our accreditation 8 report, have that as something that we report on and we ask 9 the unit to report on, and we work through a solution with 10 them. 11 12 Q. Would we be right in thinking, then, that there's at least some level of flexibility in the ratio depending on 13 14 the circumstances of an individual unit? 15 Α. There would. There would, yes. 16 17 And why, if at all, do you think having that Q. 18 flexibility is important? 19 Sometimes it would be difficult to find supervisors of Α. 20 I think in the witness statement we make training. 21 a distinction between, like, a CICM SOT has to go - is 22 provided with training and it can be a difficult job, 23 because of the clinical commitments they might have. 24 25 Getting protected non-clinical time and time to be 26 a supervisor of training is really important. We find for the most part, a lot of our units are very supportive and 27 28 our directors are very supportive. In some units - and you 29 might find this in rural locations - the access to people would be an issue. I'm not saying that is the case in 30 31 every jurisdiction or in every rural unit, however, access 32 to people who have enough time to focus on the SOT role 33 might be a challenge for some units and that's where we 34 would like to work with them in order to apply that flexibility we were just talking about. 35 36 37 Q. So that may be a particular issue for sites in rural and regional locations? 38 39 Α. It might be. 40 41 Q. Potentially? 42 Potentially. Α. 43 44 In terms of working with the unit on those issues, are Q. you able to give any specific examples of things that the 45 46 college is doing or does to work with units that may have some inherent difficulty in meeting the supervision ratio 47

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1 2 3 4 5 6 7 8 9 10 11 12	requirements? A. Yeah, like I said, I referenced before about the multiple supervisor SOT hat might be worn by different people within the unit. We've worked with units in the past that have had trouble recruiting for staff in terms of advertising - and I know I've been quite clear about the college not having anything to do with recruitment. When I say "advertising", we have a newsletter that we send out monthly and there's a section of our website that would be for positions vacant. We would assist in that way. However, we have no - we don't do anything beyond that.
12 13 14 15 16 17 18	I do know over the journey - and this isn't specific to New South Wales - where, yes, some units may reach out to us if they have trouble recruiting and we would just share it on our socials, on our e-news and on our website, but beyond that we wouldn't be able to do anything further.
19 20 21 22 23 24 25 26 27 28	Q. Is intensive care medicine the kind of specialty where remote or fly-in/fly-out supervision may be viable for rural or regional locations? A. Mmm, I can comment on that but I would like to premise this with I do not know what it's like to live in a rural community. However, I do understand that part of the need in those rural settings is for people to be involved in the community, to live there, to really feel like you're part of a team.
29 30 31 32 33 34 35 36 37 38 39	Intensive care is a very team orientated specialty. The fly-in/fly-out model I believe works, however, sustaining relationships in terms of a - say a specialist to trainee relationship and if there was the need for someone to be a mentor, to help someone through the training program, you might - and I'm not saying that this is the case, however, it may be difficult to build relationships and have them sustained with a fly-in/fly-out model, however, there might be some units that to staff their roster, that has to be the way it is.
40 41 42 43 44 45	But we find - we've done research into - and this is not in New South Wales, but the optimal environment for feedback and a lot of the data points to it being a face-to-face relationship with access to people on a daily basis.
46 47	Q. You have told us on page 3 of your statement about three-quarters of the way down, that exposure to
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1 cardiothoracic neurosurgical and trauma intensive care 2 units is required as part of the core training for 3 intensive care training --4 Α. Yes. 5 Q. -- have I understood that correctly? 6 Α. 7 You have. 8 9 Q. Is it the case that, in order to be accredited, a site 10 needs to offer experience in each of those areas? I can clarify a little 11 Α. It would - you are correct. 12 There'd be certain units that see a certain number of bit. 13 cases in those sub-specialties that allow us to say if 14 a trainee went there, they would see - they would have enough exposure to that sub-specialty that they could tick 15 16 off those three sub-specialties. 17 18 So you would find that a lot of the tertiary centres 19 have that and that's based on - I think we provided you 20 with some links to our accredited units on our website, and 21 some of the bigger tertiary units would have all of the 22 sub-specialties, whereas some of the rural units simply don't have the case mix to tick that off. 23 So it would be -24 it has nothing to do with the quality of a particular unit, it's more just the case mix that flows through that unit, 25 26 would enable them to have different sub-specialties. 27 28 And if a rural unit didn't have a case mix that Q. 29 included all of those sub-specialties, it wouldn't be able to be accredited by the college; is that right? 30 31 They would still get accreditation, however, they Α. No. 32 might not get those sub-specialties, and on our website, 33 you'll see that there are some units that allow a trainee 34 to spend a maximum of six months, then it can go up to 12, or you could spend more time there, because they've got the 35 36 patients going through that provide them with that - those 37 sub-specialty exposures. 38 39 Some of the more rural units, you might find a patient, a complex case would be flown to a different 40 41 location, because they would have the support network there, and again, I don't want it to come across as if it's 42 43 an indictment on that particular rural unit; it's just the 44 case mix. 45 46 If I'm a trainee in an accredited rural unit that Q. 47 doesn't offer me exposure to any cases in, say,

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1 neurosurgical --2 Α. Yes. 3 4 Q. -- how do I go about getting the experience I need or 5 the exposure I need in that area to complete my training 6 requirements? 7 Yes, you would have to move to a unit that provided Α. 8 you with that exposure. We don't have - and I'll circle back to the recruitment, but we - because we don't have 9 10 any - our trainee body is quite transient and they would move around, our training program is quite flexible, and 11 12 that can have some really good pros, absolutely, but it 13 also has some drawbacks. 14 A trainee's journey to fellowship, two trainees would 15 16 be very different. They would be required to plan ahead and know what they need to do in order to become a fellow, 17 and you'll find that a lot of trainees would break up their 18 19 training around our exams and around things in their life 20 that are going on in terms of whether it be a dual 21 specialty - and I've referenced that in the witness 22 statement, we do have a lot of trainees that are dual, that are training with two specialties, and that circles 23 24 back to my point around intensive care being a team sport. 25 26 Intensive care is made up with people of varied 27 backgrounds and various skill sets, which makes intensive 28 care a good melting pot of skill and experience. You can't 29 have that without people doing multiple fellowships, 30 getting multiple - different experience in different areas. 31 32 The trainees that we find can get through the 33 program - and this is the vast majority - they would plan 34 ahead and, to answer your question, they would look at what they've got left and some trainees might plan three years 35 36 in advance and might move states, might move out to rural, 37 to focus on the exam and then come back, so they are quite But it would be on them to make sure 38 transient in nature. 39 that they acquire a position that satisfies their training 40 requirements. 41 42 The college is here to - but I'll go back to the 43 flexibility; the college is here to make sure that our 44 regulations, which are quite flexible, are applied. So if 45 they need help in navigating that pathway, we're here to 46 help. 47

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1 Q. How might the college help them navigate that pathway? Yes, like, in terms of - we find we've got our 2 Α. 3 state-based committees, which are on our website, are made 4 up of clinicians in a particular jurisdiction. We've had 5 experience in the past, if a trainee is struggling to complete a requirement, we find ourselves being good at 6 connecting people and brokering relationships, so we would 7 8 refer them to the state committee. 9 10 If someone's finding it difficult to get a position, whether it be an anaesthetic position - and I think we've 11 referenced medicine and anaesthetics in our statement. 12 about being potential bottlenecks, and the things we're 13 14 doing around those I can touch on as well to basically try and minimise those bottlenecks for trainees. 15 16 17 We find doing an exam can be a challenge for some 18 people, and our statistics would show that people that do 19 multiple attempts at the exam might find it harder to 20 complete the training program, but that's where - there are 21 some limitations in terms of the college and what we can 22 and can't do for trainees to get them through but we like to think we can connect people to broker those 23 24 relationships so that if they need to find a position for 25 neurosurgery, they can. 26 27 So in the case of your college, it's ultimately up to Q. 28 the trainees' initiative to, for example, apply for and 29 obtain the positions they need to complete the required components of their training; that's right? 30 That's correct. 31 Α. 32 33 Q. And so for your specialties, that is intensive care 34 medicine, there's no rotation or network system by which 35 a trainee can apply at the beginning and then be 36 effectively automatically rotated around the rotations they need to complete their necessary training? 37 Am I allowed to focus on areas outside of New South 38 Α. Wales or would you just like it specific to New South 39 40 Wales? 41 Just starting with New South Wales, to your knowledge, 42 Q. there's no such system in place in New South Wales; is that 43 44 right? 45 Α. Nothing that's administered by the college. 46 Is there a system that you're aware of that's 47 Q. .31/07/2024 (41) 4319 D ANGELICO (Mr Fuller)

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1 administered by someone else in New South Wales? 2 Not specifically. There are in other jurisdictions, Α. 3 which I can touch on if you like. 4 5 Q. Yes, please. Can you tell us about such a system that exists in another jurisdiction? 6 7 Queensland Health have a training pathway which Α. Yes. 8 I think is publicly available - information on that is publicly available - where exactly what you just said about 9 10 trainees applying to a pathway and getting - have that shepherding through the training pathway and that advocacy 11 12 on behalf of the trainee. That does have its drawbacks, but it does - it is a way that people who don't know how to 13 14 find a particular position, that's a support network for 15 them. 16 17 The college of intensive care recently received FATES funding, government funding, to develop a program in WA, 18 19 and the idea with the federal government funding for FATES 20 is that they give you some money to start with and then 21 you've got to look for ways to make that sustainable after 22 their funding has run out, and we - again, we brokered that 23 relationship between our fellows and a local training body 24 in WA to start a pathway. That is really new; it's just 25 started. However, there are two examples of what you're 26 alluding to there with your question around training 27 pathways and support networks for trainees to get through 28 the program and find those jobs. I don't know how 29 successful WA will be yet because it's very new. 30 31 Firstly, when you were describing the Queensland Q. 32 system or model, you mentioned that it had some drawbacks. 33 Can you elaborate on those, please? 34 Yes. You might find that there'd be people that Α. don't - and again if we refer to - people don't just have 35 36 training going on in their lives, they might have multiple things, work/life balance, partners that are also doctors, 37 we find that can also impact a trainee's ability to move to 38 39 different places. So yes, they might have an anaesthetic rotation they need to complete and the training pathway has 40 41 provided them with options, however, they're just not feasible for a range of reasons, and sometimes that could 42 be family, it could be things outside of the college that 43 44 we can't control. So the pathway is only as powerful as 45 the trainee's ability to undertake it, if that makes sense. 46 I don't see doctors being different to any other 47

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profession in terms of work/life balance challenges and
 things come up in life that take them in a different
 direction.

5 Q. So am I right in thinking that, from the college's perspective, to the extent there is a pathway or rotation 6 7 or network model implemented, it needs to incorporate 8 flexibility to allow for doctors' family life and the like? 9 Α. Correct. And I don't know if I specifically mentioned 10 this, but on our website we have a parental leave policy. The reason why I'm referencing that is because we think 11 12 that's quite a good progressive supportive thing for parents wanting to work but also have a family. 13 That can 14 sometimes be incongruent with a trainee's ability to get through the program in a certain amount of time, so having 15 16 a flexible training program is great.

18 Having supportive parental leave policies is also 19 However, that might limit someone's ability - sorry, aood. 20 prolong someone's ability to become a fellow in a certain 21 amount of time. Then you also need the units and the 22 jurisdiction, whether it be a director or a unit that's also supportive of someone having work/life balance or 23 24 changing their direction halfway through a training 25 program.

27 So it's very difficult for us to say there will be X 28 amount of fellows in 2026, because of the flexibility we 29 have in our program, which we think is also a good thing 30 and it promotes trainees being able to focus on multiple 31 disciplines and they can take different pathways in their 32 career. However, it does have an effect on someone's 33 ability to get through the program.

Q. This flexibility that we've been discussing and I think the way you put it earlier was that part of the trainee cohort at least is somewhat transient, they move around regularly?

39 A. Yes. 40

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41 Q. Do you know if that's a particular issue for intensive 42 care medicine as a specialty compared with others? 43 I don't believe so. Α. Like, every year we get - so 44 I think, again, our trainee selection policy was referenced 45 in the witness statement and it's on our website around how 46 we select trainees, and it is quite a - I don't want to say a low bar, because that gives the impression that we don't 47

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want to look for quality, however, we make sure that the
barrier to training with us is not insurmountable. We get
really healthy numbers; like, last year we had 222 people
across Australia and New Zealand join the pathway - join
our training pathway.

7 The attrition rate through training is for a number of 8 reasons. We do graduate, say, 70 to 80 people per year, 9 but, like, we get on 200 people. We don't graduate 200 people, it doesn't work like that, because everyone's 10 journey is slightly different and they take different 11 pathways to get to that end point of fellowship. 12 So at the 13 moment, I do understand, and I don't think I should name 14 them, but there would be colleges that prescribe trainees with particular pathways and it's quite - not rigid but 15 16 they would outline their training pathway for them. We do 17 not do that.

We've found in recent times that flexibility is becoming more and more of a need for our trainees because of work/life balance, and families and things change, and we want to be there to support the trainee through, as opposed to being obstructive, but it does come at a price, I guess, in terms of flexibility has to equal a long time to do something.

Q. If a pathway or network model could be implemented in
New South Wales, including rural and metro sites, that
gives trainees the amount of training they need in each of
the required sub-specialities but with a level of
flexibility that you've described, do you think that would
be a model worthwhile considering?

33 Α. Yes, considering, and we would be very keen to be part 34 of this solution. For us, we also apply standards, and what you will find is sometimes our applying a standard 35 36 might mean a trainee doesn't progress as expected. And 37 whether it be an exam or during their clinical training, not all trainees will finish a term successfully, for 38 Whether it be performance, culture, 39 various reasons. 40 personality differences, there are things that would - and 41 this is the minority, but there are things that would 42 change someone's direction through the training pathway.

44 So it's worth exploring, I definitely think the 45 college has a role in being part of it, and NSW Health have 46 been tasked with being the leaders of a health work task 47 force across Australia. We're very keen to be a part of

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1 that. And I think data and understanding where trainees 2 are and where they want to go, that's probably the missing 3 You could have static data that says there are piece. 4 100 trainees in New South Wales in 2024, however, you don't 5 know what those people are thinking and what their next move is and what they've got on their plate. 6 So it's very hard to say the exact number of trainees will be the same 7 8 2024, 2025 and onwards. 9 10 Just on the issue of data, on page 2 of your statement Q. you've told us, for example, that the college is not able 11 to comment on the demand for services in New South Wales? 12 13 Α. Yes. 14 15 Q. It doesn't have access to any data on the demand for 16 services. Is the absence of - is the lack of access to 17 data the reason why the college can't comment on demand for 18 services? 19 Yes, and also we would think that there'd be a number Α. 20 of different bodies that could comment on the demand, 21 because whether it be a unit, whether it be the executive 22 of that unit, a local health district, there would be multiple players in that space that would understand the 23 24 demand, the specific demand of a hospital, of a network, of 25 a state. 26 27 Like, I think there are different levels there and we 28 are just not in a position to comment on whether or not 29 there is a maldistribution of trainees or if there is - if our number of trainees are meeting the demands of the unit. 30 31 Like I said, it goes back to that JMO workforce is made up 32 of a number of different stakeholders, not all of them are 33 college trainees. 34 Would it be the college's preference to have access to 35 Q. more data on workforce distribution and demand for services 36 in order to be able to make a contribution on those issues? 37 Yes, and I think stats are a good start in terms of 38 Α. two-way communication. So, like, we would happily share 39 what we know about our trainees and then if information was 40 41 coming down to us as well, I think that would be helpful. 42 43 Again, if I refer back to the Queensland Health 44 pathway, what I've noticed from that - and I've been around 45 the college for a long time and I've observed those 46 meetings - the meetings with the pathway where, at the start of the year they might get together and talk about 47

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how many positions need filling, but they also talk about 1 2 the trainees and the human element to what person X needs 3 from their training in the next three years. That's 4 probably something that, unless you talk to the trainee and understand what the need is from them to progress through, 5 that might be a missing piece. But we find, yes, if - to 6 7 answer your question, yes, I think we would find that 8 helpful but we would look at it as a collaboration and 9 a two-way piece of work. Otherwise, I don't think it 10 works. 11 Is there any collaboration of that kind happening with 12 Q. 13 NSW Health at the moment? 14 I believe so. And so I'm not sure if you're familiar Α. with the body of the Council of Presidents of Medical 15 16 Colleges, CPMC, but that's where all 14 or 15 colleges have 17 regular meetings. NSW Health are now like a regular 18 contributor to those meetings and we'd have sessions on 19 workforce and it may seem old school but, like, we get 20 butcher's paper out and we talk about how to solve the 21 problem. 22 I think last year - and I don't - I think we've come 23 24 a long way with collaborating, as opposed to the colleges being seen as the ones that are kind of limiting workforce 25 26 or stifling trainees moving through the pathway, because 27 some colleges, and ourself included, you do want to - our 28 purpose is to apply standards to help people reach 29 a certain benchmark and if they don't reach it, we need to work with them to understand why and how we can get them to 30 31 that standard. 32 33 But I think there's been a real positive shift in the 34 last, I would say just under 12 months, especially with the Kruk report and the ombudsman review of accreditation 35 36 standards, which I think are yielding - it's helping colleges, and us in particular, improve our processes to be 37 in line with recommendations that have come down from us 38 from reviews. I think it's been a real positive. 39 But. 40 yes, I don't think it works without the collaboration. 41 42 Aside from the collaborative process that's happening Q. 43 at the moment that you've just described, do you think 44 there's room for anything more to be done today on the 45 issue of collaboration from your college's perspective? 46 From our college, I don't think so. Like, our -Α. intensivists are very good problem solvers by nature, so we 47

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find that our board, our committees, if we've - like, for 1 2 example, we've been given some recommendations from 3 a ministerial level regarding accreditation standards and 4 how we apply them and also how we assess SIMGs, and we've 5 looked at that as - rather than being punitive, we've looked at it as an opportunity to evolve our processes, 6 7 which we're doing and have. 8 9 The NSW Health work on the task force, it would 10 probably be at the earlier stages, so I'm not sure - we don't know if the results are yielding a positive change, 11 if it's moving the needle, but, like, in terms of working 12 13 with them, I don't have a problem with that. I'd like to 14 see that continue, to be honest. 15 16 You told us earlier, if I understood you correctly, Q. 17 that the college doesn't have a role in recruiting 18 trainees; is that right? 19 Yes, that is correct. We do not at present. Α. 20 21 Q. Does the college have any role at all in the selection 22 of trainee - intensive care trainees? 23 Α. To the program? 24 Q. 25 Yes. 26 Α. To us, to our program? We do. We've got a trainee selection policy. Being on the college training program 27 28 doesn't preclude you from working inside a unit, and that goes back to the JMO workforce is quite diverse, it's made 29 up of people that aren't just college trainees. 30 So that's 31 an important part. 32 33 Not every trainee - sorry, two things. Not every JMO 34 will become a fellow and also not every trainee will become There's a natural attrition which is I don't 35 a fellow. 36 think anything to be worried about, because it's natural. 37 Not everyone that starts the program will finish it for a range of reasons. 38 39 40 So in terms of selection on to our program, yes, we've 41 got a selection process that we do once a year, we do an intake, and at the moment - like, I can comment on the 2023 42 43 intake, we took on 223 people from various jurisdictions 44 and our numbers of rejecting people are very low. I don't 45 have them on hand but it is very low, and so we, as an 46 organisation, are governed by the AMC, who give us our accreditation, and they make sure our processes are 47

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1 2	transparent, fair, robust.
2 3 4 5 6 7 8 9 10 11	Our numbers of not letting people on to the pathway are so minimal that we don't believe it's an area of concern. We would want to make sure that we're still applying a standard for people to get on. However, at the moment, our trainee selection policy, which is available on our website, is quite clear and transparent and each year we take on a batch of trainees. Whether or not they will become fellows, statistically speaking, that's not the case - not everyone who joins the program becomes a fellow.
13 14 15 16 17 18 19	Q. Do we understand correctly that recruitment of doctors in an employment sense to a designated training position within a hospital, for example, is not the realm of the college, that's the realm of the jurisdictional health organisation; that's right? A. That is correct.
20 21 22 23 24 25	Q. But the college still determines whether an individual who may be recruited to that position is effectively admitted into the college's training program; is that a fair summary? A. That is correct. Yep, that is correct.
25 26 27 28 29 30 31 32 33 34	Q. Do you think it's desirable for your college not to have a role in the recruitment side of things? A. I think it is in the sense of we're really big on - when we do an accreditation, for example, we understand that each unit is different, and they could almost be in the same post code yet we still see that each unit has its nuances that we need to respect and I think that applies to recruitment as well.
34 35 36 37 38 39 40 41 42 43 44 45 46 47	We could have a role, however, there would be so many layers within a hospital, in terms of how recruitment is successfully done, that we just wouldn't be the main player in that, nor would we have the jurisdictional power to do anything, because each unit, each health service, might have - and I go back to a budget and service delivery; all that, we are not privy to any of that. So that's where I think most units - you could look at a hospital, it's a business that they are - in terms of that sounds - it's not the intent of my comment. It is - we want to make sure we've got specialists and trainees that can deliver optimal care for our sickest patients of the community.

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1 There would be things that a unit and an executive of 2 a unit and a health district know and have to work towards 3 that we have no knowledge of nor would we have any 4 jurisdictional - I don't think we could offer anything of We're here to support and try and help where we 5 benefit. can, however, that would happen in hospital land. 6 It would 7 have to. 8 9 Q. So you see the current division of functions between 10 recruitment at the workplace level and the college's role in selecting trainees as striking the right balance from 11 12 the college's perspective? I think - I believe so, from our perspective, yes. 13 Α. 14 I couldn't comment on how hospitals feel about that. And each hospital I think you'll find, especially in New South 15 16 Wales, there would be different pockets of New South Wales 17 that do it differently. 18 19 Q. We've touched on accreditation standards. Are we 20 right in understanding that your college's accreditation 21 standards are developed by the college's hospital 22 accreditation committee? Correct, and the college - the board as well. 23 Α. 24 Accreditation is an interesting one because of the ombudsman review that we had last year, and a lot of our 25 processes have improved based on their feedback, and a lot 26 of that was promulgated by - at a federal minister level 27 28 and came down to the colleges. 29 Initially, it was - it wasn't adversarial, I don't 30 31 think, however, the ministers were probably keen for us to 32 improve the way we do things in an expedited timeline and 33 we're - I think we've been really happy with how we've 34 managed to embed some improvements that mean units -35 withdrawing accreditation is not desirable for anyone. 36 That doesn't help anyone. We want to make sure we're part of the solution, not the problem, and any unit that we have 37 taken away accreditation, even though it hasn't happened 38 for a number of years, all those units in New South Wales 39 40 that we've referenced, and in my previous dealings with 41 this, we've spoken about certain units that have lost accreditation have since got it back and we're quite proud 42 43 of those units for putting in the work (internet 44 interruption) --45 46 Q. What do you view as being the function --47 Α. -- possibly the accreditation committee and the board.

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4327 D ANGELICO (Mr Fuller)

Transcript produced by Epiq

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1 Q. I'm sorry, I think we just lost you briefly and got 2 the end of your answer, thank you. What do you view as 3 being the function of accreditation standards? 4 -- (internet interruption) is there, however it goes Α. 5 back to --6 7 Q. I'm sorry to stop you, Mr Angelico --8 9 THE COMMISSIONER: Did you hear the question, Mr Angelico? 10 I did hear the question. 11 THE WITNESS: I did. 12 13 MR FULLER: Q. You just dropped out for us at the 14 beginning of your answer, so if you don't mind restarting 15 the answer? 16 Sure, no worries. We develop the standards, and IC1 Α. 17 and IC3 are available on our website. I made a reference before to each unit being different, in a sense, there are 18 nuances that happen at hospital level that we need to be 19 20 aware of. But we understand that one size doesn't fit all, but we need to have some sort of guide towards what we look 21 22 at being below standard and above standard. 23 24 However, the ombudsman - the work we've been doing 25 following the ombudsman review has been communicating 26 early, clearly and helping a unit understand what they need 27 to achieve in order to maintain their standard so that 28 trainees are not disadvantaged but also patient care is 29 being delivered to the optimal standard. 30 31 Do you view accreditation standards as a way of Q. 32 establishing and upholding general professional standards 33 for the practice of intensive care medicine going beyond training outcomes? 34 Accreditation has always been referred to as -35 Α. We do. 36 it's no longer - I think it has evolved, and this is a good It's no longer a stick for the college to use 37 thing. against units. It's a way of evolving and continually 38 Each unit is different and that's why the work 39 improving. 40 that goes in from a hospital accreditation point of view, 41 it is very in depth and it is time consuming and it takes a lot of our resources, but we're finding that that helps. 42 43 44 So in terms of - if we focus on some areas that might 45 be an issue for some units, and I'm not saying that this is 46 the case in New South Wales, however, but cultural issues within a unit can impact a trainee's experience or 47

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a fellow's experience, and we are very mindful that we need 1 to be part of helping the unit solve the problem themselves 2 3 as opposed to the college coming in and taking away accreditation. That model just doesn't work. 4 5 So yes, to answer your question. 6 I know that was a longwinded way of answering your question, but we do. 7 8 However, it is nuanced and requires work from both ends to 9 make sure that there's a solution that works for that unit, 10 whilst also keeping in mind we can't compromise our 11 standards, yes. 12 13 Q. Does the college view the accreditation process as, in 14 any way, being a mechanism for the college to try to achieve better working conditions for its fellows? 15 16 Correct. We would work with the unit, though. Α. So. 17 like, I've been - myself, personally, we would have - there 18 would be times there where we've been contacted to come in 19 to a particular unit to sort out an interpersonal 20 The key theme out of that is working with relationship. 21 the people within that jurisdiction to get to the desired 22 Sometimes that can be really challenging, but outcome. 23 yes, again, to answer your question, that would be our 24 position. 25 26 And is it the case that sometimes issues of Q. 27 interpersonal conflict will be dealt with by the college 28 through the accreditation process? 29 Α. I wouldn't categorically say that. We would attempt to, and sometimes we - so what we do in terms of 30 31 accreditation, it's really important for us to hear from 32 the various subgroups of people within the unit and then 33 we're very big on what you - what you walk past is what you 34 are willing to accept, would be a way that we operate from a HAC perspective. 35 36 Some of the more complex issues - and this is not 37 synonymous with New South Wales, I'm just referring to this 38 in general - there would be some complex issues that take 39 40 a lot of resources to ensure that we're allowing the unit 41 to solve the problem without taking over, because we don't have that jurisdictional pull, however, that can lead to -42 it takes time, and sometimes it would take a number of 43 44 repeated efforts from the college and the unit and the 45 trainees and fellows to come to an improved state. 46 47 Q. Is it the case that issues of interpersonal conflict

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1 may sometimes lead to a site's accreditation being 2 withdrawn or some other adverse action in relation to their 3 accreditation? 4 Not exclusively, unless there's something alarmingly Α. 5 wrong going on. And also with our college, if we were to remove accreditation, again, which we haven't done for 6 7 a number of years, in the current climate, removing 8 accreditation right now would be challenging and you would 9 be hard pressed to do that without really making sure - it 10 is the last resort and --11 12 Q. Just pausing there, can you just explain why that is 13 in the current climate? 14 The work that we're doing at CPMC with -Α. Yes, sure. and again, this came down from the federal health ministers 15 16 in terms of asking the ombudsman to help colleges improve 17 their accreditation processes. That body of work that started last year and has resulted in a lot of colleges 18 19 changing their processes would be around - again, it's 20 around communication with the unit and that communication 21 flowing up from a unit to the local health network, to then 22 the health minister, for example, because there would be 23 examples of withdrawal of accreditation can end up on the 24 front page of a newspaper. That has happened, and I think that's publicly available, and we would want to move away 25 26 from that kind of surprise that there are issues going on 27 that no-one knows about. 28 29 So again, I go back to the work that's done with

colleges - between the college and units that are having 30 31 difficulty. There's a lot of reporting, a lot of meetings, 32 a lot of ongoing work to help them improve the overall site 33 to make sure that the trainees are in a place, that they 34 can learn and continue their journey to fellowship, but also the fellows as well, it's not necessarily just the 35 36 fellows' responsibility to make sure a unit has the right 37 culture, it is a team effort.

I refer to intensive care being very much a melting 39 40 pot of different personalities, different experience. Ιf 41 I talk about the college that I oversee in terms of our culture, it's a very fine line between - like, we'd like to 42 43 think we've got a good culture, but that requires work and 44 effort, and when you have people coming and going from 45 a particular unit, that can be a challenge to have 46 a culture that's good and sustainable, and I refer back to your comment about FIFO, that would be an added complexity; 47

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1 to have a good culture with people that are in and out 2 quite regularly. That would be a challenge. 3 4 Q. Is it fair to say that the college accepts - to the 5 extent it might be considering taking any sort of accreditation action in relation to a unit because of 6 7 cultural issues, it is important for the college to be as 8 transparent as it can be while maintaining confidentiality 9 with management at the site? 10 Α. Correct. That is correct. 11 12 Q. And it is important for the college to ensure that management at the site is given a fair opportunity to 13 14 respond to any such issues that are raised before any action is taken on accreditation? 15 16 Α. That's correct. 17 18 I understand that the college has recently updated its Q. policy on the prevention of bullying, discrimination and 19 20 harassment in the work population; is that right? 21 Α. It is. That is correct. 22 Q. I might just show you a copy of that. 23 24 Α. Yes. 25 26 MR FULLER: Commissioner, it is not currently in the tender bundle, however I think we have a copy for you. 27 28 I will put it on the screen [SCI.0011.0284.0001]. 29 30 Mr Angelico, you should see that come up on the screen Q. shortly. 31 32 Α. Sure. Yes. 33 34 Thank you. I'm sorry, 0284.0001 - let's just start Q. with this policy, sorry to jump around. This is the 35 36 complaints policy, as opposed to the policy on bullying, discrimination and harassment; is that right? 37 Α. That is correct. 38 39 40 Q. This policy was also recently updated; is that right? 41 Α. Yes, and that was post our submission on 12 July. Are you happy for me to give some premise behind how we arrived 42 43 at this new policy? 44 45 Q. Yes, please, yes. 46 like, as I referred to earlier, the AMC are the Α. So, ones that provide accreditation for us and we do a 10-year 47

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1 review in addition to yearly updates from us to them about 2 how we're going against a set of standards. Our old policy 3 and process was that trainees or fellows that wanted to 4 submit a formal complaint had to contact myself, and it was also buried on page 10 of a pretty lengthy document. 5 So the AMC said, "It's not clear or transparent how to do 6 7 Some people might feel uncomfortable emailing the this. 8 CEO or contacting the CEO to go through a process." 9 10 The idea behind the work we've done with this, and in

addition to these two policies we've got an online module 11 12 that is either anonymous, or not for people to lodge complaints, and that's on our website, which is active as 13 14 of now, was to improve the accessibility for everyone, maintain privacy, ensure people felt like they were safe 15 16 and they weren't having to reach out to the CEO to grieve 17 some pretty potentially difficult parts of their life that they'd prefer to remain anonymous. So this is a byproduct 18 of that in terms of accessibility and transparency, that we 19 20 think this is a far better approach and in line with what 21 we're required to do from an AMC perspective.

We also ran this past our legal counsel but then also past the ombudsman as well, because they're experienced in dealing with complaints, and we've applied those principles to this as well. So that's how we've arrived here.

Q. Just on one of the guiding principles that's listed
down the bottom of this page, we see, "Procedural
Fairness"?

A. Mmm-hmm.

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33 Q. Do we take it that that includes what we were 34 discussing earlier, for example, giving anyone at the management level of a site who may be the subject of 35 36 a complaint a fair opportunity to respond, to the extent 37 they want to engage with the process? That's exactly right, 38 Α. ves. 39

40 Q. Can I then ask you, please, about the other policy,
41 which should be [SCI.0011.0284.0001].
42 A. Yes.
43

44 Q. Am I right in thinking this policy was also reviewed
45 recently?
46 A. Correct.
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1 Q. Was it around the same time as the complaints policy 2 that it came into effect? 3 Α. It was the same time, yes. 4 So that was, I think, around 22 July, so last week or 5 Q. the week before; is that right? 6 7 Α. Correct. 8 9 Q. Just going down, please, to page 4 of this policy, 10 clause 5, just in terms of the scope, starting with 5.2, so what is out of scope, we see there in the first paragraph: 11 12 13 Complaints about bullying, discrimination, 14 and harassment in which the complainant wants particular action taken against 15 16 a person or persons can only be addressed 17 by the employer, hospital or health 18 service. 19 20 Are you able to explain the reasoning behind that? 21 Yeah, it's kind of in line with some of the themes Α. 22 I've covered earlier today in terms of the college really not having any jurisdictional power within those sites. 23 24 I have had experience dealing with complaints under the old 25 policy, and it's a real challenge to come in to a hospital 26 and tell them how to administer a problem between two 27 employees, essentially, which is what it boils down to. So 28 that's in line with, again, the themes that I was covering 29 in terms of us being careful not to overstep our mark within the hospital setting, because we are not across 30 31 every process, and those existing processes are there for 32 a reason. 33 34 It might be not to the satisfaction of the person complaining. We find that people turn to us when they've 35 36 got no other alternative; they haven't felt like they've 37 been listened to. Themes that have come from the work that we've done with the ombudsman as well, which we found quite 38 helpful to understand why people would turn to the college. 39 40 I still envisage people will turn to us through our complaints process regardless; if they're in scope or out 41 of scope for that individual, they will still reach out to 42 43 That's where having the technology arm to this as us. 44 well, in terms of how we accept complaints, having it 45 documented and it can be anonymous, is a far better step 46 for us in terms of the way we were doing it previously. 47

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1 So, you know, I'm not sure if that answers your 2 question, but that's the - again, it's in line with the 3 themes I've been covering earlier today. 4 5 Q. Just having a look at what is in scope, so in the 6 clause 5.1, tell me if I've got this right, but if the 7 college forms the view that a complaint of bullying, 8 discrimination or harassment may have a negative effect on 9 trainees and their capacity to work and learn, to use the 10 language in the first paragraph, that is a situation where the college might look into the complaint, including as 11 part of the accreditation process; is that a fair summary? 12 13 Α. That is a fair summary. 14 Thank you. Firstly, how does the college go about 15 Q. 16 determining whether a complaint may have a negative effect 17 on trainees, as opposed to being some other kind of 18 interpersonal complaint? 19 Yes, and I will premise this with I've got - we Α. 20 haven't got any experience or data on the applicability of 21 this new policy, because it's very brand new and we haven't 22 received any complaints. I can comment on how we have 23 handled that in the past under the old policy. 24 25 Usually, you want to understand, from a college 26 perspective, is this a systemic issue or is it an 27 individual issue, and if there are trainees that feel like 28 they don't want to speak up around certain things, we want 29 to try and understand is this a unit-wide feeling or is 30 this just an individual-wide feeling. 31 32 The way we do help with that is, leading up to an 33 inspection, we survey the trainees the best we can and also 34 give them the opportunity that if they're not able to be there during the inspection visit, that they have an 35 36 opportunity to feed back. We've had instances in the past - and I'm not suggesting that this is a deliberate -37 deliberate from the unit, but some units, you know, they 38 might roster people on and off at certain times and a group 39 40 of trainees that aren't rostered on on the day that we are 41 coming to talk to them and interview them might have some 42 really helpful things to say about the culture of the unit 43 or how things are done or safety standards and safety 44 practices. We want to make sure that we're available and 45 we have had instances in the past where some people have 46 felt uncomfortable putting their name to things. We've maintained their confidentiality and made sure that the 47

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1 inspecting team - those inspectors are trained to deal with 2 handling sensitive issues with tact and also making sure 3 that there - a trainee who does speak up about something, 4 there is the worry that their career could be impacted by 5 speaking up. 6 Intensive care is known as guite a small community and 7 8 I think we touched on it earlier today about trainees are 9 required to develop relationships in order to get 10 recruitment, to get jobs into the future. You could understand a trainee's hesitation about speaking up. 11 12 13 Q. Is that a reason why, for example, trainees in your 14 experience, at least, may feel more comfortable approaching someone within the college than someone within their own 15 16 workplace? 17 Α. Correct. 18 19 Q. Is that a reason why the college thinks it's 20 appropriate, or you think it's appropriate for the college 21 to be involved at least in some situations where complaints 22 of bullying, discrimination and harassment are made? And, like, we still think of trainees and 23 Α. Correct. 24 fellows - they're our members, like, they're important to us, and we want to make sure, for the trainees - it's not 25 26 just about us churning out fellows - we want to make sure 27 that they're equipped to deal with the sickest people in 28 our communities but also they've got a fulfilled career. 29 Especially post COVID, we found a lot of trainees, 30 31 like being a trainee, being a doctor - and I'm not 32 necessarily basing this on statistics; I'm basing it on the 33 conversations we have with our trainees and just life in 34 general - it is a challenge and work/life balance is becoming more important. So I think we want to make sure 35 36 that both trainees and fellows, if they're our members, that we're being supportive of their journey. 37 38 I think both trainees and fellows are on a journey. 39 40 Trainees are a bit different. Yes, they've got that end point of, "I need to become a fellow, and once I'm in that 41 club and once I'm past that, everything's fine." We don't 42 43 just forget about them once they become a fellow; they are 44 still on a journey to improve and make sure they are 45 delivering quality care. That's what we - our ultimate 46 goal is that every critically ill patient receives optimal care, so the more trainees that we have that are able to 47

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become fellows we feel are equipped to do that - and it's no disrespect to those JMOs or those that aren't going to be fellows - but back to that support for our members, they're important to us, so if there are things that we can do to kind of alleviate or improve things and continually evolve ourselves, we want to be open to that.

Q. In clause 5.2, which we looked at in relation to out
of scope complaints, the college recognises that it doesn't
have adequate power to investigate complaints of bullying,
discrimination and harassment, but the same would be true,
wouldn't it, in relation to what are described here as "in
scope bullying, discrimination and harassment complaints";
is that fair?

I think that part of the policy - and 15 Α. It would be. 16 this is what was lacking in the other one - managing the 17 expectations of the complainant is important, and I've had 18 experience where we've had requests for a unit to lose 19 accreditation, for example, or requests for a fellow to 20 lose their fellowship, so that - like, that's nothing 21 against the person making the complaint.

23 I understand that - again, I referenced it before 24 about them - they're frustrated, they've got nowhere else 25 to turn, so managing those expectations are important. 26 I think with the - I understand what you're saying there, 27 like, the reason for - I think it's in paragraph 3 of 5.2, 28 like, we have had instances where someone has gone through 29 the process of the HR department or the local jurisdiction, had an outcome, and that they're not happy with, and then 30 31 tried to relitigate it with us. That's a challenge, and so 32 we - exhausting those resources to end up with the same 33 result, it's really important that we manage the 34 expectations up-front.

36 But the complainant, like I said, is a member of our organisation. We want to support them the best we can, it 37 just might not be getting them to where they want to go in 38 terms of what they see as the best outcome for a situation 39 40 that is complex and difficult. We feed information like 41 this, on some instances - it does become helpful with 42 understanding for the accreditation team, is this 43 a systemic thing or is this an isolated incident. But 44 there - yes, that's the best I think I can do with 45 responding to that.

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Q. In circumstances where the college isn't in a position

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1 to conduct at least a full investigation of any complaint 2 of bullying, discrimination, harassment or the like, do you 3 think it's ever appropriate for the college to withdraw 4 accreditation on take some other adverse action against 5 a site's accreditation on the basis of such a complaint? I think, again, removing 6 A very complex question. Α. 7 accreditation is quite a blunt tool and you would think 8 that jumping to that quite quickly, it would be remiss of 9 us to do so, and it would go against what we're trying to 10 do with the work we've done with the ombudsman and changing our processes - sorry, improving our processes to help be 11 the conduit for things that are going on between, from 12 13 a trainee perspective, the senior staff specialists, the director, the executive of the hospital - all those groups 14 might not fully understand what exactly is going on and we 15 16 try and be the conduit of that in a confidential way without hurting anyone's career down the track. 17

19 It is a challenge, but like I said, I can maintain 20 that taking away accreditation without doing what we say 21 we're going to do in our policies, that would be remiss of 22 us and I would be disappointed if it happened, and it 23 wouldn't happen because of the way we've evolved our 24 processes.

Q. When you say what you say, "we're going to do in our policies", that is, for example, affording procedural fairness to management at the site?

29 Α. Correct, yes. So we've got a good history, and this is outside of New South Wales, this is some other examples, 30 31 I will not go into specifics about the paper trail, but you 32 will see there is lengthy ongoing communicating between the 33 college and the unit about things that should progress. At times, you might find that that doesn't get up to, say, 34 a local health network level, it might not get up to 35 36 a local government level because people change, jobs 37 change, governments change.

The AMC have been doing a body of work with us in 39 40 terms of contacts within each jurisdiction to share 41 information with, because we would rely on the director and the executive to filter information up about, "Hey, this is 42 43 what we've found following our visit. These are the things we want you to work on." We don't have too much say in making sure that - like, obviously we'd love that to be 44 45 46 shared, that information to be transparent and shared with those higher up. It's very difficult to guarantee that 47

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1 that's the case. But to answer - back to your question 2 around that procedural fairness with units, yes, removing 3 accreditation, that is a shock, that means that we've 4 failed in our application of our process, I would say, and 5 the work that the hospital accreditation team does, the whole point of that is to engage with the unit and help 6 7 them understand how to improve. 8 9 Q. Would the college accept that if a complaint of 10 bullying, discrimination or harassment was being investigated by the employer or at the workplace level 11 through - and the college was satisfied that the workplace 12 13 was following a fair process in accordance with its 14 policies to investigate that complaint, then it wouldn't be appropriate for the college to take any accreditation 15 16 action in relation to the site while that investigation is 17 happening? 18 Correct. That - I would agree with that. Α. 19 20 Just finally, we've touched on the NHPO, the National Q. 21 Health Practitioner Ombudsman, report on a number of 22 occasions. Do we take it that the college agrees with the 23 recommendations of that report? 24 We do. You can, yes. Α. 25 26 One of the recommendations is that accreditation Q. 27 standards should be outcomes based and evidence informed. 28 What do you understand "outcomes based" to mean? 29 Α. It's similar to the work that we do, and I've referenced the AMC and how they apply their standards to 30 31 us, and it talks about meeting standards, progressing, and 32 it's a continuum. We reference there that we have 33 a five-year cycle. The changes we've made make it an 34 ongoing conversation with a particular unit about how they're progressing. So it's not a "You passed", "You 35 failed"; it's more of an iterative process, and I think 36 you'll see that there would be some units following an 37 accreditation visit that have a big tick and they are 38 hitting everything, they're amazing, a really good place to 39 40 work. We would say, "We will see you in five years' time. 41 You've got no reporting". 42 43 Other units might have reporting requirements where 44 it's - like we do with the AMC, we're reporting on a yearly 45 basis or every 18 months on the things that we've pointed 46 out in terms of what we want you to work on and how you're

setting about achieving those. We wouldn't have a, "You

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must do A, B and C", we would love to see what they want to 1 2 do that works for them in improving in a particular area. 3 4 So that ongoing engagement from the - one of the key 5 themes from the ombudsman report was ongoing communication that's transparent and it's an iterative kind of evolution 6 of that unit as opposed to "You failed and we're taking 7 8 away accreditation." 9 10 Q. Would you accept that, in formulating accreditation standards, the college's focus should be on what is needed 11 to produce a competent trainee in the college's field of 12 13 specialty? Correct. 14 Α. 15 16 MR FULLER: Thank you, Mr Angelico. 17 18 Commissioner, those are my questions for this witness. 19 20 THE COMMISSIONER: Do you have any questions, Mr Chiu? 21 22 MR CHIU: No questions, Commissioner. 23 24 THE COMMISSIONER: Mr Angelico, thank you very much for your statement and for your time today. We're very 25 26 grateful. 27 28 THE WITNESS: No worries. Thanks for having me. 29 THE COMMISSIONER: You are excused. 30 31 32 THE WITNESS: Thank you. 33 <THE WITNESS WITHDREW 34 35 MR MUSTON: Commissioner, I think the next witness is 36 37 Dr Winston Cheung. I note the time. It might be - it is a little bit early but --38 39 40 THE COMMISSIONER: Do you want to break now? 41 MR MUSTON: -- perhaps so as not to interrupt his 42 43 evidence, we might take the morning tea adjournment a 44 little bit early. 45 46 THE COMMISSIONER: All right. We will adjourn until 47 11.40. Adjourn until then.

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1 SHORT ADJOURNMENT 2 3 4 THE COMMISSIONER: Yes, Mr Muston. 5 Commissioner, the next witness is Associate 6 MR MUSTON: Clinical Professor Winston Cheung. 7 8 9 <WINSTON KUEN CHEUNG, affirmed:</pre> [11.46am] 10 <EXAMINATION BY MR MUSTON: 11 12 MR MUSTON: 13 Q. Could you state your full name for the 14 record, please? Winston Kuen Cheung. 15 Α. 16 You are a senior staff specialist in the intensive 17 Q. 18 care unit at Concord Repatriation General Hospital? 19 Α. Correct. 20 21 Q. It's a role you have held since 2005? 22 Α. Yes. 23 24 Q. You have prepared a statement to assist the Inquiry with its work dated 16 July 2024? 25 Yes. 26 Α. 27 28 Have you had an opportunity to read that statement Q. 29 before coming to give your evidence today? Yes, I have. Α. 30 31 32 Are you satisfied that the contents of that statement Q. 33 are true and correct? There is just one point I wanted to clarify with the 34 Α. statement. Paragraph number 36 --35 36 Q. Yes. 37 -- there is a reference --38 Α. 39 40 Q. Just pause for one moment so we can all get that 41 paragraph open. 42 43 THE COMMISSIONER: Sorry, I'm just getting my papers in 44 line from the last witness. Paragraph 36 did you say? 45 46 THE WITNESS: It refers to some minutes of the medical staff council, the minutes were watermarked as "Draft" on 47

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the minutes that were sent out. It, in fact, actually is 1 2 the real minutes, it's just that it was inadvertently sent 3 out as watermarked "Draft". So it is just to clarify that. 4 Other than that point of clarification, 5 MR MUSTON: Q. you are satisfied that the contents of your statement are 6 7 true and correct? 8 Α. Yes. 9 MR MUSTON: That will be tendered as exhibit H7.12. 10 11 [SCI.0012.0174.0001]. 12 13 MR MUSTON: Q. Dr Cheung, I might ask you, when you're 14 giving your evidence, to remember that the people sitting immediately in front of you are taking it down word for 15 16 word as best as they can so if you could do your very best 17 to speak as slowly as you can, that would be of great assistance to them. 18 Sure. 19 Α. 20 21 Q. Do you have a hard copy of your statement with you? 22 Α. Yes, I do. 23 24 Q. To the extent you're asked to look at it, you are free to use the hard copy, or if you look to your right, there 25 26 is a screen. There is another screen immediately in front 27 of you, you can choose, as between those three options, 28 which works best for your eyes. I otherwise have no questions for you, Doctor, but counsel who are appearing 29 30 for NSW Health may. 31 Thank you. Α. 32 33 <EXAMINATION BY MR CHIU: 34 35 MR CHIU: Q. Associate Professor Cheung, my name is Hilbert Chiu and I represent NSW Health in this Inquiry. 36 I'm just going to ask you some questions and take you 37 through some aspects of your statement, if that's okay. 38 Could you please turn to paragraph 9 of your statement. 39 40 There you refer to a meeting that occurred on 15 November 41 2022; is that correct? Yes. 42 Α. 43 44 Associate Professor Cheung, that meeting occurred Q. 45 about a month after you provided a letter to the board of 46 the local health district setting out some concerns; is 47 that correct?

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Yes. Α. 1 2 3 That was the first substantive letter that you sent to Q. 4 the board setting out those concerns? 5 Α. The one from October, yes, that was the one. 6 7 And at the meeting, did you raise concerns about, Q. 8 firstly, understaffing at Concord hospital? 9 Α. I can't specifically remember if I raised concerns 10 about understaffing. I know we talked in general issues about the letter. 11 12 13 Q. About, sorry? 14 I know we talked in general issues - in general terms Α. about the letter, but specifically about understaffing, 15 16 I can't recall if I specifically spoke about that. 17 Do you recall if you discussed at the meeting 18 Q. 19 underreporting of incidents at Concord hospital? 20 Α. I can't recall. I can't recall. 21 22 What about safety of patients? Q. I can't recall. 23 Α. 24 25 Q. Bullying, harassment and protection of staff from 26 reprisals? Yes, we spoke - spoke at length about that. 27 Α. That was 28 a very key point, and I wrote notes after that meeting 29 about what we discussed, and I specifically remember 30 writing about emphasising the issues with reprisals and how 31 staff did not feel safe to speak up. 32 33 Q. This was based on information that you had received in 34 your role as chair of the medical staff council? So this was based on my observations prior to 35 Α. Yes. 36 becoming chair, my discussions with staff, but also 37 information which had been provided - by staff after I became chair. 38 39 40 Q. So would it be fair to say it was an accumulation of 41 a number of conversations held over a period of time? Yes, and it was, if I can say, this was my 42 Α. Yes. 43 interpretation of those conversations. So this is what -44 what I was giving was my opinion based on what I had heard. 45 46 And at the meeting on 15 November, were you given an Q. 47 opportunity to expand on these issues of bullying,

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1 harassment and protection from reprisals? 2 I can't remember if I was given - I mean, I was given Α. 3 the opportunity to speak and I recall the - you know, the 4 meeting was a very civil and sincere meeting, and I was 5 given opportunity to speak. I can't recall if I actually 6 spoke specifically or the detail about that. 7 8 Q. And Dr Anderson was present in that meeting? 9 Α. Yes. 10 And did she invite you to provide specific examples of 11 Q. bullying, harassment and staff being treated badly, 12 13 reprisals occurring? 14 I can't recall. I can't recall. Α. 15 16 Q. Do you recall if you identified any specific examples 17 of those things occurring? 18 I don't think I did, but I can't - I can't recall. Α. 19 20 Why don't you think you did? Is there a particular Q. 21 reason you would not have given those examples? 22 The concerns that I had at that time were - the reason Α. I wrote that letter was that issues at the hospital were 23 24 coming to a head and bullying and harassment was a major issue, but the fundamental problem at the hospital at that 25 26 time was that we were losing staff, and staff were leaving, 27 and there were a multitude of reasons why staff were 28 Bullying, harassment and significant intimidation leaving. 29 by management was one significant reason, but it was not the only reason, and there were all sorts of problems, 30 including, you know, that of psychological safety and 31 32 psychological health, and I remember talking to those at 33 the meeting, that I was concerned of the welfare of the 34 staff, not so much as from bullying and harassment but I was worried about a significant incident that was going 35 36 to happen if things weren't done to improve working 37 conditions for staff. 38 So did you perceive working conditions, which included 39 Q. 40 bullying, harassment, et cetera, to be the fundamental root 41 cause, if you like, of what was going on with Concord? 42 I think if you would take it back a step, the root Α. 43 cause at Concord was years of, you know, what the staff 44 colloquially called a death by a thousand cuts, it was all 45 about the finances and how money was being cut in various 46 ways to all different departments. One of the worries at the time was - I don't know if you recall at the time, 47

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1 Prince Philip had just been in hospital, and one of the 2 nurses looking after Prince Philip in London while he was 3 in hospital committed suicide because of a prank which was 4 played on her by a radio station from Australia. 5 6 That sort of problem was what I was concerned about, 7 in that there were system issues which were contributing to 8 the safety of patients or which were causing adverse 9 problems, and what I was - what everyone was concerned 10 about was that not only would there be an adverse event with patients, but that staff would feel responsible for 11 12 that. Even though it wasn't entirely their fault, it was the system that was causing the problem, but there would be 13 14 staff who were vulnerable to that. 15 16 THE COMMISSIONER: Q. Just pausing there. These two concepts might be linked. When you say you were worried 17 18 about a significant incident that was going to happen if 19 things weren't done to improve working conditions for 20 staff, and when you were talking about the system causing problems, can you just explain to me with some more 21 22 detail - that's obviously at a general level - what are the 23 specifics underneath the working conditions and the system 24 issues? 25 Α. If you were to take it back, if you were to do one 26 thing with the system to improve it, and one thing only, 27 the fundamental issue with the system is it doesn't detect 28 problems as they occur and doesn't act on those problems, so the quality improvement system, in a whole, and so if 29 a problem occurred, staff --30 31 32 Give me an example of a problem, though, a workforce Q. 33 condition problem, for example? 34 Yes. So if I can give you a generic problem, let's Α. say, for example, the issue that you want to detect is 35 36 problems in relation to not enough nurses on the ward --37 Q. 38 Not enough nurses? Not enough nurses on the ward. Let's say, for example 39 Α. 40 the optimum ratio for nurses to patients is, say, one to 41 four and --42 43 Sorry to interrupt, but when you say "not enough Q. 44 nurses" on a ward, should I take that to mean, even if 45 everyone is there, there's not enough rostered on; or, for 46 some reason, not enough of the people that are rostered on have turned up? Which way should I understand it? 47

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Yes, so sometimes nursing staff may not be there for 1 Α. 2 sick leave; sometimes they may be redeployed; sometimes 3 they may not be rostered on in the first place because they couldn't fill that gap; sometimes there may be an influx of 4 5 patients --6 So there might be multifaceted reasons why, in your 7 Q. 8 view, there are insufficient nurses on a ward? 9 Α. Yes. 10 Q. 11 Sorry, I interrupted you. Keep going. 12 Α. So the example I use is if you were to take the 13 situation where the optimum ratio is one nurse to four 14 patients, if you were to have a ward of 20 patients, then ideally you would have five nurses there. 15 So what was 16 happening was that those wards would be losing one nurse, 17 instead of having five nurses, they would have four nurses; or there would be significant problems with the staffing 18 skill set, so instead of having five experienced nurses, 19 20 you may have no experienced nurses, who were trying to make 21 do. 22 The issue at the time was the problems were not being 23 24 detected because the nurses were very good at managing the 25 work flow so that they would manage the patients 26 appropriately. So, for example, if you had 20 --27 28 When you say "not being detected", do you mean some Q. 29 people knew about it but not detected at a certain level of 30 management or --Yes. 31 So it wasn't being reported on the detection Α. 32 systems; it wasn't being reported because people didn't 33 feel it appropriate to be reported; or some staff felt that 34 they were intimidated to not report it. 35 36 But what was happening was that, say, for example, if you had a ward of 20 patients, there might be one patient 37 who's quite unwell, and that one patient may take up one 38 nurse, most of the shift, and there may be another couple 39 40 of patients who require another nurse, which then leaves 41 three nurses to look after the remaining 17 patients. So if you took away one nurse, for example, the nurses would 42 43 still organise themselves so they would look after the 44 sickest patients and they would prioritise them, and the 45 patients who were not quite as unwell would be less 46 So you would have two nurses looking after prioritised. 17 instead of three, and it was all those problems that 47

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were not being detected. It wasn't the serious adverse 1 2 events - the patients dying and the major complications -3 it was all the little things which occur when you just 4 don't have enough staff. But it's those little things which are the precursors to the plane crashing, if I can 5 6 use that as an analogy. 7 8 Q. Yes. 9 Α. So things like patients not getting their medications 10 on time, patients not getting their food on time, patients not getting their painkillers when they require, or 11 12 patients not being helped to the toilet in time, those things were not being detected, but that was what was 13 14 happening, and those were the precursors to the more severe 15 events. 16 17 You know, the senior nurses could tell, because the senior nurses had worked for many decades, and they could 18 19 see the difference between patient care back when they 20 first started versus now, whereas the new influx of junior 21 nurses didn't know better because this was the only system 22 that they had worked in. 23 24 So there was a lot of distress, especially amongst the senior staff, both medical, nursing and allied health, 25 26 because they weren't - they felt that they weren't 27 providing the care which they had been trained to do and 28 which they had provided many years ago. The system had 29 been run down to a point that they were not coping. 30 31 THE COMMISSIONER: Thank you. 32 33 MR CHIU: Thanks, Commissioner. 34 I just wanted to take up a couple of those points that 35 Q. vou just raised. Associate Professor Cheung. One of those 36 was that the system wasn't picking it up. Is that because 37 of the way this slowly builds over time, this strain that 38 arises from understaffing, as you describe it? 39 40 Α. Yes, so there's multiple reasons, and in the 41 pre-hearing, I sent you - submitted some evidence and some 42 papers which haven't been tabled in regards to that, but --43 44 Q. I don't know about that. 45 Α. So the fundamental problem is that there are two ways 46 in which we pick up problems in the hospital system. There is the formal reporting systems, and in NSW Health, we used 47

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1 the ims+ system; and then there's the complaints mechanism, 2 and the complaints mechanism is the failsafe mechanism when 3 formal - when the formal reporting system doesn't work. 4 5 The problem with the formal reporting system is it was very difficult to use and took up a lot of time, and I can 6 7 actually - I've got some print-outs of the actual system, 8 if you want to have a look at it. So in order for a nurse 9 to, say, report a problem, they would have to spend quite 10 a bit of time typing into the computer, and if you are a nurse and you've got an eight-hour day and you've got an 11 additional five minutes or 10 minutes where you have to do 12 13 a single report, and you have multiple reports which you 14 may have to write, plus other new tasks added on, all of a sudden your eight-hour day becomes a nine-hour day and 15 16 you can't do your work. So the formal reporting was being 17 forgone. 18 19 Q. That's the formal reporting? 20 Α. That's the formal reporting. 21 22 The second component was the complaints mechanism? Q. 23 Α. Yes. Look, there was a lot of pressure from managers 24 for staff not to complain. There was a culture -I describe it as a culture of fear, but there was a culture 25 26 where nurses who complained were targeted. 27 28 Can you give any specific examples of the pressure Q. 29 that you are describing? 30 Most of it was around staffing. Most of it was around Α. 31 staffing and safety of patients. So if - and this was 32 demonstrated --33 34 THE COMMISSIONER: Sorry to interrupt. Were you asking for an example of someone being targeted, rather than --35 36 37 MR CHIU: Just an example of what he means by "pressure" being placed or "pressure" on staff. 38 39 40 THE WITNESS: So an example would be if there wasn't 41 enough staff for a shift and so the team leader or the 42 nurses would complain that there wouldn't be enough staff, 43 and they - there was a lot of pressure from their bed 44 managers not to put any further complaints in in regards to 45 that. 46 47 Look, I can give you names of staff where they can

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give you evidence for that, but it was those sorts of 1 Most of it was around staffing. 2 Most of it was problems. 3 around skill mix, and most of it was around lack of staff. 4 5 MR CHIU: Q. Did you raise these more specific problems 6 with Dr Anderson in the meeting? 7 Α. Not at that meeting. So the meeting was not about 8 specifics. 9 10 Q. Didn't she ask you about some specific examples? I can't recall. I can't recall. 11 Α. 12 The second point you raised, Associate Professor 13 Q. 14 Cheung, was the issue of budgeting. I think you used that word? 15 16 Α. Yes. 17 18 Q. Can you explain what you mean by that? 19 Α. So there is a perception, there is a perception that 20 budgets had been cut, either directly cut or there was 21 a relative cut in terms of budgets not being increased as 22 activity increased over time. 23 24 One of the problems was the lack of transparency of 25 the hospital accounts and the hospital finances, and, you 26 know, one of the problems that staff found it hard to reconcile was every year, we are told that, you know, we're 27 28 in the red, we need to tighten the belts, we need to cut 29 back spending, but if I use, for an example, four out of the last financial years, not including this one, four out 30 of the last financial years we've actually had a budget 31 32 surplus, so only one of those previous years was there 33 a budget - was there a paper deficit and there was 34 a surplus one year of 280 million. 35 36 So the staff, despite that information, perceived that Q. 37 you were in the red, that the district was in the red? Well, the staff perceived that there were cuts where 38 Α. 39 cuts should not be occurring, and you know, I think 40 everyone - everyone acknowledged that where there was waste 41 in the system, where the efficiency gains could be made. I think there was no-one who didn't acknowledge that we 42 43 should try to work more efficiently. But the problem was 44 that the cuts and the efficiencies had been achieved, and 45 further budget cuts, be they relative or absolute, were now 46 leading to problems with delivery of services, and the decrease of services. So that was a primary problem. 47

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1 2 Q. So if I take those two elements, the first being the 3 system, both in terms of the formal escalation of issues 4 and complaints mechanism, and secondly the budgeting issue, 5 those were, as you see it, the underlying root causes of that strain that you wanted to talk about in 2022? 6 7 Yes, I think - you know, obviously everything stemmed Α. 8 from there, but I think the fundamental problem was 9 actually the finances and I think that led to a lot of the 10 issues. 11 You would agree, though, firstly in terms of the 12 Q. complaints escalation process, that is not something that 13 14 could be changed across the entire district very quickly? 15 Α. Oh, I disagree. I disagree. There was a culture 16 where you - there was a culture where staff were expected 17 to remain silent, and there was a culture of denial. There 18 was a culture of concealing, actively concealing problems. 19 20 Q. How do you say an executive should change that 21 culture? 22 Oh, the culture comes from leadership. And so if Α. a leader comes in and says, "Well, this is a bad culture. 23 24 This is what we need to do to change", then it changes 25 overnight. 26 27 THE COMMISSIONER: Q. You might need that person to at 28 least listen first; that would be the first thing, wouldn't 29 it? 30 Yes, and that's assuming that the leader is willing to Α. 31 change and willing to change the culture or acknowledges 32 that there's a problem. 33 34 MR CHIU: Q. As the Commissioner said, first of all, there needs to be an acknowledgment and, secondly, there 35 36 needs to be some kind of a campaign, perhaps an 37 announcement? 38 THE COMMISSIONER: Well, I don't know that I said there 39 40 needs to be an acknowledgment, I don't mean this 41 critically, but what I said was there needs to be 42 a listening process. The listening process might mean the 43 whole thing is resolved and it might be found the problem 44 isn't as big, or whatever. On the other hand, a listening 45 process might result in, "Oh my God, this is really 46 a massive problem. We've got to get on top of it." Who 47 knows.

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1 2 MR CHIU: It's a matter for submissions, perhaps. 3 4 THE WITNESS: I think you have to understand the context. 5 In terms of the - in my view, the chief executive was a very difficult person to get on with, and I describe my 6 7 relationship with the chief executive, and a lot of people 8 would describe the same, similar circumstance, as that of 9 a headmaster/headmistress-pupil relationship. It was verv 10 much an authoritarian relationship where, you know, she would dictate what was done. We had very little input. 11 12 13 MR CHIU: Q. Can you give some specific examples of that 14 from your dealings on this issue? 15 16 THE COMMISSIONER: Which issue are we talking about? 17 18 We're still on the November meeting and the MR CHIU: issues raised in that letter. 19 20 21 THE WITNESS: So at the meeting, I remember talking about 22 I can't remember exactly what the points various points. were, and I wrote notes, and I remember getting to the end 23 24 of the - we were talking about the psychological safety 25 issues and that sort of thing, and the chief executive at 26 the time liked to do, I guess - how should I say it - liked 27 to do a lot of the talking and wouldn't actually listen. 28 And so you would get something across and then the chief 29 executive would butt in and tell her how hard it was to run 30 the hospital and how little money she had and how many 31 employees she had to listen to and she couldn't please 32 everybody, and that was essentially every time - well, not 33 every time, but that's the general message you got whenever 34 you approached the chief executive with issues. 35 36 When you say "whenever you approached the chief Q. 37 executive", is that what occurred on this occasion, in November 2022? 38 Well, that meeting was called by the board, but 39 Α. 40 I recall most of my meetings with the chief executive would 41 be very similar. I can't recall any meetings being pleasant with her, if you can - if you understand that. 42 They were always very, very - you know, I think that 43 44 headmaster/pupil description is very apt in the way all 45 those meetings went. 46 47 Q. But as I understand your evidence earlier, the meeting

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1 was respectful or cordial? 2 It was respectful. It was just like, you know, when Α. 3 you're sitting in front of the headmaster, you're 4 respectful. 5 6 Q. You would accept that a district has to operate within 7 budgeting constraints? 8 Absolutely. Absolutely. Α. 9 And that difficult decisions have to be made about 10 Q. allocation of a budget? 11 12 Α. Absolutely. 13 14 Q. And not everyone will be happy about the outcomes of 15 those decisions? 16 Absolutely, absolutely. Α. 17 18 And some people may be very unhappy with the outcomes Q. 19 over many years? 20 Α. That's correct. 21 22 And that's part of the job being an executive in a Q. district? 23 24 Α. Yes, except I think that the issue was not - there was not a single person, not a single staff member who 25 26 recognised or didn't acknowledge that there were budgeting 27 issues. The issue was the perceived unfairness of the way 28 resources were allocated and there was a perception that 29 those departments or the people who were closest or had the closest working relationship with the managers and the 30 31 chief executive were favoured ahead of others. Now. 32 whether that, on paper, is actually true, I don't know. 33 But there was a perception. 34 35 THE COMMISSIONER: Q. I was going to ask you, do you 36 know what was causing this perceived unfairness, the perception of unfairness? 37 Oh, I think it's only natural that if - you know, 38 Α. a person who has a close working relationship with someone 39 40 who controls the budget is more likely to influence the way 41 the budget is allocated. 42 43 One of the examples that was raised with me was 44 Concord had had a new building constructed. That was 45 \$370 million, and at the time when the government was 46 approached for that there was a lot of questions why more money wasn't asked for. So out of all the requests for 47

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money at that time, Concord, I think, was ranked number 10 1 2 in terms of monetary amount, as in it was the tenth lowest 3 amount of money asked for, and at the time, you know, we 4 needed well over a billion dollars to construct the hospital and so the question was, "Why was only 300 million 5 asked for?" And obviously 300 was asked for because it was 6 7 thought that it would get across the line, but then if they 8 asked for a bigger amount. 9 10 Then the problem was who would get - who would be allocated that 300 million, which department would be 11 12 used - would actually have use of that building, and there was a perception that the departments which ended up moving 13 14 into that building had a closer working relationship with the chief executive, and there was a perception that 15 16 they --17 18 Just out of curiosity, what were the departments that Q. 19 moved into the building? 20 Sorry, it was aged care, oncology and haematology. Α. 21 And it just so happened to be, whether it's coincidence or 22 not, that they had stream leaders, stream directors, who were based at Concord, whereas other departments had stream 23 24 leaders based at Royal Prince Alfred Hospital. So there 25 was a perception, rightly or wrongly, that there was, 26 I guess, perceived bias in the way resources were being 27 allocated. 28 29 THE COMMISSIONER: Thank you. 30 31 Did you ever raise with the chief executive MR CHIU: Q. 32 this perception? 33 Α. No. 34 From staff? Q. 35 36 Α. No. 37 38 Q. Any reason you didn't do that? It seems a pretty 39 important issue. 40 Α. It was nothing that I could prove and at the time, the 41 focus was stopping staff from leaving, and the focus was actually improving the working conditions for all staff, 42 and what had happened had happened, yes. And so I think at 43 44 the time, the focus was on other more, I guess, pressing 45 issues. 46 47 Q. Those pressing issues, if budgeting is a big component

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1 of that, that's not again something that could be changed 2 very quickly, even with the best will in the world? 3 The problem was we didn't know because we didn't - the Α. 4 budgeting was not transparent. 5 6 Q. So the problem was communication and transparency? 7 Absolutely. And I think if someone had come to us and Α. 8 told us, "Okay, this is the budget, this is the accurate 9 budget, this is - to the best of our knowledge, these are 10 the projections. These departments are over budget, these departments are within budget, these departments are doing 11 12 well", I think it would have been a different story. 13 14 But we never had that relationship. The budgets were 15 kept - I wouldn't say kept from us, but there was no 16 transparency in the budget. We would have one budget 17 presentation per year. The only source of information regarding the budget was through the clinical council where 18 there were budgets, where the monthly projections were 19 20 presented, but only people on the clinical council had 21 access to that information. And in fact, actually, when I asked - you know, I asked several times whether I could 22 23 take that data from the clinical council and present that 24 to the medical staff council, and I never received a reply, whether I could do that. 25 26 27 Q. Who did you ask that of? 28 Α. That was the general manager. 29 Q. 30 The general manager of Concord hospital? 31 Α. Yes. 32 33 Q. Who was that? 34 That was Joseph Jewitt at the time. Α. 35 36 Q. When was that? I can't recall. 37 Α. 38 I just missed that name. I missed that 39 THE COMMISSIONER: 40 name, sorry. 41 42 THE WITNESS: Joseph Jewitt. 43 44 Associate Professor Cheung, could I take you then to Q. 45 what is annexure D to your statement. 46 Commissioner, that is --47 MR CHIU:

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1 THE COMMISSIONER: That's 12.4. 2 3 It's a letter dated --4 MR CHIU: 5 It's a letter of 16 December 2022. THE COMMISSIONER: 6 7 8 MR CHIU: That's the one, yes. It's [SCI.0012.0113.0001]. 9 10 Q. And do you recall receiving this letter from Dr Anderson --11 Yes, ves. 12 Α. 13 -- after the meeting you had with her in November? 14 Q. 15 Α. Yes. 16 17 THE COMMISSIONER: Will the Associate Professor need to be reminded of what's in his 12 October letter in relation to 18 19 answer anything you want to ask? 20 21 MR CHIU: No. 22 In the letter of 16 December 2022, there's an 23 Q. invitation, is there not, to attend the district's clinical 24 quality council meetings? 25 Yes, yes. 26 Α. 27 Q. That was an invitation extended to you? 28 29 Α. Are you able to show me the letter? 30 31 MR CHIU: Sorry, can the letter be put on the screen? 32 I'm not sure you asked for it to go on 33 THE COMMISSIONER: 34 the screen, which is probably why it is not there. 35 36 MR CHIU: I'm sorry. It was my mistake. 37 From memory, I think there was an 38 THE WITNESS: I can't remember the exact --39 invitation. 40 41 THE COMMISSIONER: We will just wait. We will just wait. It will come up on the screen. Do you have your annexures 42 43 as well as your statement? 44 45 THE WITNESS: No - well, they're on computer, because 46 there are so many of them. 47

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1 THE COMMISSIONER: It will come up on the screen in a 2 moment. 3 4 MR CHIU: Would you like a moment to read that, Q. 5 Associate Professor Cheung? Yes, I remember - I think the part you're referring to 6 Α. 7 is at the end of the letter. 8 9 THE COMMISSIONER: The invitation is on page 2, isn't it? 10 11 MR CHIU: The top of page 2, yes. 12 13 THE WITNESS: Could you please just go up just slightly? 14 I just want to refresh myself. 15 16 THE COMMISSIONER: You can read the whole letter, if you 17 want. 18 19 MR CHIU: Yes, if the operator could move that to the 20 whole of page 1. 21 22 Associate Professor Cheung, please do re-read it. Q. 23 Α. Yes. 24 25 Q. So you see - sorry, if the operator could go to 26 page 2. 27 Α. Yes. 28 29 Q. The invitation that's at the top of page 2 to the district's clinical quality council, that was originally 30 made at the meeting in November? 31 32 That was made at the suggestion of Mr Ajaka. Α. So 33 Mr Ajaka - the board didn't want to meet us, and so he 34 suggested that, given that this was a clinical issue, that this should be presented to the clinical quality council --35 36 37 THE COMMISSIONER: Q. Did Mr Ajaka --That's what I recall of the meeting. 38 Α. 39 40 Q. Did the board chair tell you why the board didn't want 41 to meet you? No. I think he felt - yes, without putting words 42 Α. 43 to --44 45 Q. He didn't tell you why he didn't want to Hang on. 46 meet you? No, he didn't. 47 Α.

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1 2 Q. When you then went, "I think he felt", are you 3 guessing? 4 No, no, I'm guessing. I'm guessing. Α. 5 6 MR CHIU: Please do not guess. 7 8 THE COMMISSIONER: All right. Let's leave that for the 9 time being. 10 Did you ever take up that invitation to go 11 MR CHIU: Q. to the district clinical quality council meetings? 12 Yes, and I've attended - I've attended them since. 13 Α. 14 Did you attend them from December 2022 onwards? 15 Q. I can't remember if I attended that one or not. 16 Α. 17 I can't remember. 18 19 Q. And at those meetings did you raise the same concerns 20 that you raised in the letter in October 2022? 21 Α. Not at those original meetings, no. 22 23 Q. Why is that? 24 It's - they're really interesting meetings. Α. So the -I wanted to get a feel of the meeting first and to see what 25 26 they were talking about, and if you look at the minutes of 27 the meeting, it's attended by, you know, dozens and dozens 28 of people, and the meeting is not - it's not a meeting 29 where people share ideas and discuss: it's very clear. It's a meeting where everyone attends and you listen and 30 31 there's an expectation - this is what I felt --32 33 Q. Listen to whom? 34 Α. To whoever is speaking. 35 36 Q. I see. 37 Α. And so even though it was badged as a quality council meeting, the first part of the meeting was dedicated to 38 usually a speaker, who would be talking about a specific 39 40 new initiative. So you'd have a presentation on an 41 initiative. And then the rest of the meeting was dedicated really to talking about sort of quality indicators and, you 42 know, lots of graphs and just lots of data, and look, I've 43 44 got a copy. I've got a copy if you want to see it. 45 46 You don't need to, but I just want to ask this Q. 47 question: you had concerns about the quality of the health

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1 care that was being delivered --2 Α. Yes. 3 4 Q. -- in Concord hospital. You were attending these 5 meetings where --Yes. 6 Α. 7 8 Q. -- quality was discussed? 9 Α. Yes. 10 You had the opportunity, didn't you, to raise your 11 Q. 12 concerns - --13 Α. Yes. 14 -- about quality and you didn't do so? 15 Q. 16 Well, I had escalated it to someone far more senior. Α. 17 So - and at the time --18 THE COMMISSIONER: Q. Who was that? Who had it been 19 20 escalated to? 21 Α. Well, I'd written the letter to the board, and so, you 22 know, I felt it reasonable that I had already raised these concerns and they would be dealt with in a reasonable 23 And --24 fashion. 25 26 Sorry to interrupt again, just so I - the escalation Q. you are talking about, the fact that you had raised it 27 28 higher up, you are referring to the details in your letter 29 of 12 October --12 October, yes, yes. 30 Α. 31 32 Q. -- to the board? 33 Α. Yes. And in that letter, I detailed that there had 34 been multiple local escalation processes which had not worked. 35 36 37 MR CHIU: Q. Can I take you to paragraph 19 of your statement. Now, from paragraphs 19 to 24, you deal with 38 the medical staff council terms of reference? 39 40 Α. Yes. 41 42 And that's a draft terms of reference that you were Q. 43 preparing --44 It was a proposed draft. It was a proposed draft. Α. 45 46 A proposed terms of reference? Q. So I think we need to make it very clear that, you 47 Α.

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1 know, it was a concept that we were discussing around the 2 medical staff council, and it was in a very draft stage. 3 4 Q. And there's a particular draft version that was Yes. 5 annexed to your statement, and that's annexure N -Commissioner, I will just turn to it. 6 7 8 THE COMMISSIONER: I've got that. Do you want that on the 9 screen? 10 MR CHIU: Yes. It's [SCI.0012.0041.0001]. 11 12 Professor, at the bottom of the first page of that 13 Q. 14 document, if you look on the screen, it says: 15 16 Version date: 3rd March 2023 - draft only. 17 18 Α. Yes, yes. 19 20 And that's the version that you've annexed to your Q. 21 statement. Was there an earlier version of the draft terms 22 of reference? If you go down, there's some tracked changes. 23 Α. 24 In red? 25 THE COMMISSIONER: Q. 26 In red. So those were the changes to the previous Α. 27 version. 28 MR CHIU: 29 Q. Was there not an even earlier version that had a number of subcommittees --30 31 Α. Yes, there were. 32 33 Q. -- for the medical staff council? Yes, there were, yes. 34 Α. 35 36 Q. Do you recall when that version --I can't recall the exact date of that. 37 Α. 38 Sitting here, are you confident that the version that 39 Q. 40 we're looking at, which is dated March 2023, was the version that was discussed in a meeting with Dr Anderson 41 and others on 21 April 2023? 42 43 I can't recall. Can you just go down one page? I'll Α. 44 be able to tell if --45 46 MR CHIU: Could the operator please go down one page. 47

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1 THE WITNESS: If you go to the third page, page 3 2 3 THE COMMISSIONER: Sorry to interrupt. Is it possible to 4 give a hard copy of this to the witness? That might make 5 it easier for him. 6 7 THE WITNESS: If you just go to page 3, I can tell, 8 because it'll be marked red at the bottom. Yes, I think this is the one. 9 10 THE COMMISSIONER: 11 Maybe if there's a spare set of the 12 annexures, it can be given to the witness. Thank you. 13 14 Can you just find that one for him? It's behind tab 14, I think. Yes, 12.14. 15 16 17 MR CHIU: Q. So I think I was asking earlier if you 18 recalled whether this was the version that was discussed 19 with Dr Anderson at the meeting? 20 I can't recall with exact 100 per cent accuracy, but Α. 21 this was one of the versions around that time, so I think 22 this may be the one. 23 24 MR CHIU: Can I just show another version. I have a few copies, Commissioner, if I could hand up two copies, one 25 26 for the witness and one for yourself. 27 28 THE COMMISSIONER: Yes, of course, thank you. 29 30 MR CHIU: Associate Professor Cheung, you'll see that Q. 31 the document that is just handed up, which has the code 32 [MOH.0010.0043.0001]. 33 MR CHIU: 34 Commissioner, just for context, that is 35 a document that has been annexed to the supplementary 36 statement of Teresa Anderson that was only provided 37 yesterday. 38 THE COMMISSIONER: Should I mark it as an MFI at the 39 40 moment? 41 42 Perhaps that would be --MR CHIU: 43 44 THE COMMISSIONER: MFI 15 or 16, I think. 45 46 MR CHIU: It's 16, Commissioner. 47

MFI16 is a document titled "Concord 1 THE COMMISSIONER: Repatriation General Hospital Medical Staff Council, Terms 2 3 of Reference" "DRAFT" "Version date" 25th May 2022". 4 5 MFI #16 DOCUMENT TITLED "CONCORD REPATRIATION GENERAL HOSPITAL MEDICAL STAFF COUNCIL TERMS OF REFERENCE" "DRAFT" 6 "VERSION DATE: 25TH MAY 2022" 7 8 9 MR CHIU: Q. Associate Professor Cheung, you'll see the 10 version date at the bottom of that document is 25 May 2022? 11 Α. Yes. 12 13 Q. Was that before your tenure as chair of the medical 14 staff council? That was after. 15 Α. No. 16 17 Q. It was after - after you commenced? 18 Α. After I commenced. 19 20 So it was a document that you had been preparing from Q. 21 early on in your time as chair of the medical --22 I can't recall when I started preparing. I started as Α. chair in March. This is a document dated May. So I can't 23 24 remember exactly when I starred drafting it. 25 26 And if you turn to page 6 of the document that has Q. 27 just been handed up, MFI 16, you will see that a number of 28 subcommittees are set out there? 29 Α. Yes, ves. 30 31 And correct me if I'm wrong, but that section on Q. 32 subcommittees was removed --33 Α. Yes. 34 35 Q. -- in a subsequent draft? 36 Α. Yes. 37 Q. Can you tell us why that happened? 38 Yes. So the reason I - the background to all this, 39 Α. 40 I think we need to put this in context. When I was elected 41 as chair in March, in February prior to the election, I was 42 elected - it was a contested election. So it was the first 43 time that two people had vied for the chair. I was asked 44 to write a letter at the time to the MSC to describe why 45 I wanted to become the chair, what I thought the problems 46 were and my vision for the future, and in that letter -I haven't tabled that, I've got a copy here if you want, if 47

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you want to see that, it was 12-pages long. But obviously 1 2 there were a lot of problems, and these were all of the 3 issues that I identified in the letter, and I felt at the 4 time that if I became chair, there was no way I could 5 handle all of these issues by myself and the way to manage these issues was to get the relevant expertise from all the 6 7 people within the hospital, form subcommittees - so 8 specifically, for example, looking at redevelopment, 9 looking at workforce culture, looking at industrial 10 relations, looking at consumer engagement, you know, looking at quality and safety reforms. There was no way I 11 could - there was no way I could handle all this myself. 12 The manifesto was too big, so I felt - and this was in my 13 14 election pitch to the members and this was all detailed in my letter, that I felt that we should - we need to address 15 16 all these and this was my way of starting that process. 17 18 Now, Dr Anderson said that this was not allowed. 19 20 Let's get to that a bit later. We're still on the Q. 21 document first. 22 Sure, sure. Α. 23 24 So to use your words, your election pitch was to Q. 25 include these subcommittees? It wasn't specifically to include the subcommittees, 26 Α. it was to address these problems, but I realised there was 27 28 no way one person - if you look at all these issues here, 29 you know, research, education, quality, consumer engagement, there is no way one person can manage all this. 30 31 So my view was there was the expertise in the hospital at 32 the time, we should establish subcommittees to manage all 33 these, from a medical staff council point of view. 34 And it would have involved, wouldn't it, a significant 35 Q. 36 expansion of the sorts of things the medical staff council 37 would deal with? 38 Α. Well, so I guess therein lies the controversy, because the health - the by-laws and the Health Services Act are so 39 40 loose, and it really refers to the medical staff council 41 dealing with medical matters, and you could argue that just 42 about everything has an effect on medical matters so 43 education, research, guality and safety. So it depends on 44 your interpretation, and that interpretation is really open 45 to judgment. 46 47 Q. And your interpretation was a very broad

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interpretation, wasn't it? 1 2 My interpretation was a very broad - and my Α. 3 interpretation was that all of these subcommittees would be 4 covered under that remit. Now, obviously other people had 5 other interpretations of that. That was my interpretation, which is why I put this in that original draft. 6 7 8 Are you aware of any other medical staff councils in Q. 9 the local health district that have that broad 10 interpretation of their role? I'm not aware of any medical staff councils in the 11 Α. state who have these sorts of subcommittees. What I was 12 doing was something pretty radical, but I felt that 13 14 I needed to do this because there was just far too much work and I needed to delegate that work. But I'm not aware 15 16 of any medical staff council in the state which runs 17 subcommittees like this. 18 19 Q. And at some point, though, the draft removed the 20 subcommittees? 21 Α. I was asked to remove that. 22 23 Q. You were asked by whom? 24 Α. I was asked by Dr Anderson, as I recall. 25 26 Your first meeting with Dr Anderson about the terms Q. of reference was on 21 April 2023, was it not? 27 28 Oh, look, I had several meetings with Dr Anderson. Α. 29 They're not all included in the statement. There were 30 meetings at various stages for all sorts of things, and 31 I recall, though, that she asked me to remove this. Now. 32 I can't recall when she asked me. If she hadn't asked me 33 to remove it, I would have left it in. 34 So you don't recall if you had a meeting before 35 Q. 21 April 2023 with Dr Anderson on the terms of reference? 36 37 Α. I can't recall. I can't recall. 38 39 Q. If I suggest to you that was the first meeting you 40 had --41 I think the witness said he can recall 42 THE COMMISSIONER: 43 meetings but whether it was about this is a different --44 45 MR CHIU: Correct. 46 47 Q. If I suggest to you that that was the first meeting

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about the draft terms of reference, it would suggest, 1 2 though, that the document in that meeting was the version 3 MFI16, because you said that she asked to you remove the 4 subcommittees? 5 Α. It probably - it probably - it may well be. It mav 6 well be. 7 8 Q. That's all I needed to establish. 9 Α. May well be. I just can't recall what document she 10 showed me at that meeting. In fact, I'm not sure if we actually did look at a document. It may well be this one. 11 12 13 Q. And at the meeting, Associate Professor Cheung, she 14 explained to you, didn't she, that the reason she wanted you to remove aspects of the draft was because she 15 16 considered it placed the role of the MSC beyond what was 17 permitted by the by-laws? 18 So that was her interpretation. Α. Yes. My 19 interpretation was different. 20 21 Q. Sure. Did you have a debate about Sure. 22 interpretations at the meeting? I don't think we did, because, as you are aware of, 23 Α. 24 you know, what transpired afterwards, I - you know, you 25 just accept what she says. 26 27 I'm not aware of anything, Associate Professor Cheung. Q. 28 Can you tell me, at the meeting she did explain to you 29 which aspects of the terms of reference she considered were 30 not consistent with the by-laws? 31 I can't remember if she explained all the aspects. Α. 32 I specifically remember the - telling - her asking me to 33 remove the subcommittees because that wasn't consistent. 34 I don't know if we covered the rest of the document and those other issues, but I do remember her saying the 35 36 subcommittees were not consistent with the by-laws. 37 Accepting there are differing views about what the 38 Q. by-laws permit, though, you wouldn't regard her concerns to 39 40 be unreasonable, if she believed that --41 Oh, look, at the end of the day, it's not what Α. 42 I think is reasonable or unreasonable. It's what is lawful 43 and if the chief executive gives me a lawful instruction, 44 then, as an employee, I'm obliged to, you know abide by 45 that. 46 47 Q. That's not exactly my question.

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I may think it's unreasonable, but if she tells me to 1 Α. 2 do something, then I'm expected to do it. 3 4 Q. That's not quite the question, Associate Professor 5 Cheung. My question is: if Dr Anderson perceived that there was a legal issue with the draft terms of reference 6 7 and she asked that it be changed, that's not an 8 unreasonable position for her to take? 9 Α. Oh, no, it's definitely not. It is definitely not. 10 THE COMMISSIONER: 11 Is this based on her legal expertise? 12 13 MR CHIU: Or her advice. 14 THE COMMISSIONER: 15 Yes, all right. 16 17 THE WITNESS: Mv - just --18 19 THE COMMISSIONER: Q. You would agree it is not 20 unreasonable for someone else to have a differing view to 21 yours about the by-laws, provided it's an open view? 22 Α. Yes. 23 24 It may not be one you agree with, but if it's Q. 25 possible, your --26 Α. Her justification at the time - and it was a very 27 valid justification - was she was responsible for paying 28 staff and that to set up this number of committees, there 29 would be a significant cost in terms of there would be a significant monetary cost to pay staff to sit on these 30 31 committees, and so that is perfectly reasonable and, yes, 32 I accepted that. That's why I removed them. But that was 33 her concern at the time; it was to pay staff for their time 34 to sit on the committees. 35 36 MR CHIU: Wasn't her concern also that some of the Q. functions listed for the MSC would overlap with the 37 functions of the board in terms of oversight of the 38 39 executive? 40 Α. No, no, exactly. So that was - one of her concerns 41 was there were already committees. There was already a safety quality committee, there was already research 42 43 committees, you know, there was already a consumer 44 committee: why would we duplicate those committees? My -45 the reason for this was more from an adversarial point of 46 view from the MSC, as in I felt that we needed to have a greater voice; the staff needed a greater voice in all of 47

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these areas - education, research, consumer engagement -1 2 and the committees were set up from an MSC point of view 3 with a specific MSC focus. 4 5 Q. Right, and MSC is an organisation of doctors, isn't it, it's the medical staff? 6 Yes. 7 Α. 8 9 Q. So that doesn't include other staff of the hospital, 10 say nursing or allied health staff? But having said that, I felt - and many 11 No, no. Α. 12 felt - that we needed to represent nursing and allied health, and the one problem - the one fundamental problem 13 14 with the Health Services Act, as you're aware, is that there are medical staff councils which have been set up but 15 16 there are no nursing staff councils which are mandated and 17 there are no allied health staff councils. So when 18 I became MSC chair and before MSC chair I had allied health 19 and nurses come to me because they couldn't progress their 20 issues. 21 22 Do you see the MSC as primarily an advisory body for Q. 23 the executive? 24 Α. If you go back to page 3 of the document, that 25 document that you're talking about right here, this was my view --26 27 28 Q. Are you talking about the draft terms of reference? 29 Α. The one that you've got up here at the moment. If you go to page 3, this was my view on how I felt the MSC's role 30 should be. 31 32 33 THE COMMISSIONER: Just so the transcript records it, we're going to annexure N at page 3. Yes, please continue. 34 35 36 THE WITNESS: So one of the things I realised, when I became medical staff council chair, was that the medical 37 staff council had been dysfunctional for many years and 38 dysfunctional in a way that I think we had lost our 39 40 direction, and what I realised was that before we could get 41 the hospital in order, we had to get our own house in order So I wrote a set of guiding principles for 42 first. discussion, which I thought the MSC should abide by. 43 44 45 So if you see there the number 1 guiding principle was 46 "Act in the best interests of patients at Concord hospital, their families and the Concord community", and I felt that 47

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wasn't happening. The second was, "Protect the health and 1 2 wellbeing of Concord staff and students". I did that 3 because I felt it wasn't happening. The third was "Act 4 with integrity, and the highest ethical and moral standards", and again I put that in because I felt it 5 wasn't happening, and then, four, "Ensure accountability 6 and transparency in decision-making." So I put that there 7 8 because I felt that we needed to abide by our own set of 9 rules and our own set of values. This was what I thought should be the values of the MSC. That's why I put them 10 11 there. 12 Would it be fair to say, and tell me if I'm 13 MR CHIU: Q. 14 wrong, that you saw the role of the MSC not so much as an advisory body but as a body that had real power to move --15 16 No, no. Α. 17 18 Q. -- the executive one way or the other? 19 No, because if the system was working, you wouldn't Α. 20 need an MSC. So if --21 22 Q. Sorry, just on that --The reason you have regulatory bodies is because the 23 Α. 24 rules aren't working. 25 26 So do you consider MSC as a regulatory body? Q. 27 No, no, no. But if what you're implying is that we Α. 28 were acting like a regulatory body, my argument to you is 29 that the MSC is unnecessary if everyone does the right If people were acting in the best interests of the 30 thing. 31 public; if people were acting in the best interests of the 32 health and wellbeing of staff; if there was accountability, 33 transparency, and people were acting with integrity and the 34 highest ethical and moral standards, there would be no use for an MSC because everything would just be done and there 35 36 would be no problems. 37 But in the real world, even if everyone attempts to 38 Q. act in the best of their ways, in a large organisation, 39 40 there will be issues that arise day-to-day? 41 No, exactly. So in the real world, in the real world, Α. you need failsafe mechanisms to prevent things going wrong, 42 43 and, you know, that's - and I think that was why it's not 44 described in the Health Services Act or the by-laws, but 45 I think that's why those committees were mandated in the 46 Health Services Act and in the by-laws. You know, the two committees that were mandated were the clinical council and 47

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the medical staff council, and they were there as advisory 1 2 roles. But, you know, there is a reason why they were put 3 in there. 4 5 Q. So, just so I completely understand your evidence, you saw a need to expand the role of the MSC beyond being 6 advisory, because other mechanisms were not working? 7 8 I saw the MSC's role was being adversarial, where it Α. 9 needed to be adversarial. 10 Q. 11 Can you say that word again? Adversarial, where it needed to be adversarial. 12 Α. At 13 the end of the day --14 THE COMMISSIONER: I might get you just to explain 15 Q. 16 what you mean by "adversarial". 17 Α. I think we needed to speak up more where there were 18 issues which were not being progressed or were not being 19 dealt with in a reasonable manner. If I can just use an 20 example, as you see in the statement, there were many 21 departments which were asking for enhancements or machinery 22 or equipment or staffing, I didn't see the MSC's role -I didn't see it was our role to do the business case for 23 24 them or to manage their applications or their proposals to 25 either - for their enhancements, for example. 26 27 If they had a problem, the process was they would 28 still go through their department heads or through the general manager or through the reporting lines to have 29 their report - their issues resolved. 30 The MSC was here if 31 those departments or disciplines were not getting any 32 satisfaction with their problems, and we would then 33 advocate on their behalf and we would have another voice, 34 another avenue where we could raise those concerns. 35 36 Should I understand it this way - tell me if I'm Q. 37 wrong - fundamentally, the council is an advisory body; is that right? 38 That's my understanding, correct. 39 Α. 40 41 And to the extent that you've used the word Q. "adversarial", you mean it in the sense of - tell me if I'm 42 43 wrong again - as an adjunct to being advisory, in the sense 44 of speaking up more, to use your words? 45 Α. Yes, yes. 46 47 MR CHIU: Q. So almost an advocate - advocacy?

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Α. Yes. 1 2 3 Did you explain to Dr Anderson your view of how the Q. 4 MSC should work? 5 Α. I can't remember. I can't remember. I mean. I would have thought that it was pretty clear in terms of the 6 guiding principles. In my letter dated in February, before 7 8 I was elected chair, I made it very clear in the letter to 9 the members what I stood for and what I thought should 10 change and what the issues were. 11 12 Q. That's a letter to the members for your election? Yes, yes, yes. And at my very first meeting with 13 Α. 14 Dr Anderson, she confronted me with that letter and she made it very clear that she was not happy with that letter. 15 16 17 Q. What did she say? I can't remember exactly, but the impression that 18 Α. 19 I got from that meeting was she was not happy with the 20 letter. 21 22 THE COMMISSIONER: This letter has been raised more than once now and I haven't seen it. To understand the evidence 23 24 I might need to see it, I think. 25 26 Why don't we go to the letter. MR CHIU: 27 28 THE COMMISSIONER: I'm told it's somewhere, I think. 29 30 THE WITNESS: I've got copies here if you want to see it. 31 32 THE COMMISSIONER: Is it annexed to Dr Anderson's 33 statement that has just been provided? 34 MR CHIU: It's also annexed to Associate Professor 35 36 Cheung's statement. 37 Q. You are talking about the 16 October 2022 letter? 38 39 Α. No, I'm talking about - there is a letter --40 41 THE COMMISSIONER: I think it was a different letter. 42 43 Q. Is this the letter you drafted for the purposes of 44 running for the chair? 45 Α. For the chair, yes. This is --46 THE COMMISSIONER: I don't think that's in the witness's 47

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1 statement. 2 3 THE WITNESS: It's not in the statement. 4 5 THE COMMISSIONER: I'm told it's in Dr Anderson's statement, which I haven't - the problem is I haven't seen 6 those annexures, which is no-one's fault because it's only 7 8 just been received by everyone here. What I will do is 9 I'll have a look at it over lunch. 10 I will turn it up over the break as well, so 11 MR CHIU: 12 there is no --13 14 THE COMMISSIONER: You keep going. 15 16 MR CHIU: Q. Just to finish off on this topic, Associate 17 Professor Cheung, and going back to that meeting of 18 21 April 2023 about the draft terms of reference, at the 19 meeting, was there an agreement that Dr Hallahan would work 20 with you on redrafting the terms of reference? 21 Α. I can't remember exactly. I suspect there was, but in 22 terms of recalling whether there was, you know, a handshake agreement, I can't - I can't recall. Whether it was just 23 24 I was just told or whether there was agreement, I can't recall. 25 26 27 Q. And at the end of the meeting, you thanked Dr Anderson 28 for clarifying the role of the MSC? 29 Α. I can't recall. 30 31 Q. Was redrafting subsequently done for the terms of 32 reference? 33 Α. I think this - the version that you have was the last 34 version that was officially distributed, and then the next version was the version that Dr Hallahan drafted for us. 35 36 37 Q. Is that the version that became current, or is in force? 38 Well, I don't know if it's actually been officially 39 Α. 40 ratified. It was the version that was sent to me and it 41 was the version that I was asked to use. Whether it's been 42 officially ratified and is officially being used, I'm not sure. I can't tell you. 43 44 45 MR CHIU: I might move on to another topic. If I could go 46 to annexure PPP, which is [SCI.0012.0140.0001]. 47

THE COMMISSIONER: PPP? 1 2 3 MR CHIU: PPP, yes. 4 5 THE COMMISSIONER: Okay, yes. 6 7 MR CHIU: Q. Do you recognise that letter to you, 8 Associate Professor Cheung? 9 Α. Yes. 10 Q. It was dated 10 November 2023? 11 Α. Yes, I do. Yes, I do. 12 13 14 Q. So this was a letter sent to you about a month after a meeting dated 12 October 2023? 15 16 Α. Yes. 17 18 Q. Of the MSC, I should say? 19 Α. Yes. 20 21 Q. And that meeting of the MSC was where a resolution was 22 passed against Dr Anderson, a no confidence motion? That was a meeting where a resolution was passed - no 23 Α. 24 confidence. I can't remember if it was proposed against 25 the board. The resolution against Dr Anderson was passed 26 in June 2023. This was against the SLHD board. 27 28 Q. This was against the board? 29 Α. Yes. 30 31 I see. And there's a reference - sorry, first of all, Q. 32 you're familiar with the contents of the allegations set 33 out in this letter? 34 Α. Yes, yes, yes. 35 36 Do you deny those allegations? Q. Oh, look, at the end of the day, with - I deny the 37 Α. allegations in that I don't believe that I acted in the 38 manner that Dr Hallahan has suggested, but I acknowledge 39 40 that it's a highly personal feeling, as we know with 41 bullying and harassment, and the perpetrator does not always feel the same as the victim, and so I do acknowledge 42 that. 43 44 45 Q. If I could --46 THE COMMISSIONER: What is this letter? What's "an 47 .31/07/2024 (41) 4370 W K CHEUNG (Mr Chiu)

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1 opportunity to respond to concerns"? What is it? 2 3 Are you asking for a submission on that now MR CHIU: 4 or --5 THE COMMISSIONER: I'm asking you. 6 7 8 MR CHIU: It's under an HR --9 10 THE COMMISSIONER: Sorry? 11 MR CHIU: 12 It is under a human resources process within 13 health. Complaint has been made by Dr Hallahan. An HR officer writes to Associate Professor Cheung giving him an 14 15 opportunity to respond and inviting him to a meeting. 16 17 THE COMMISSIONER: Let's say there was an interruption, 18 these things happen because someone gets interrupted. 19 20 That may be so, Commissioner, but you can't deny MR CHIU: 21 that, as an employer, if someone raises a complaint about 22 someone's behaviour then it needs to be looked at, needs to 23 be dealt with, there need to be processes. I'm not 24 proposing to find a resolution to the complaint. 25 26 THE COMMISSIONER: Yes. You asked whether they were 27 denied. The reason for asking that is what? 28 29 MR CHIU: I just wanted to establish whether the witness would like to deny that that happened at all or what is his 30 31 position on it, because I'm going to take him to the 32 minutes of the meeting. 33 34 THE COMMISSIONER: Okay. 35 36 Could the witness please be shown the document MR CHIU: 37 that's at annexure AAA, which is [SCI.0012.0140.0001]. 38 THE COMMISSIONER: It's tab 12.59, if you have that, 39 Professor. 40 41 Oh, 12.59. 42 THE WITNESS: 43 44 THE COMMISSIONER: In the bundle that you've been given, 45 I think it's behind tab 12.59. It's the transcript of this 46 meeting of 12 October. It might be easier for you to look at it there. Yes, that's it, I think. 47

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1 THE WITNESS: 2 Yes. 3 4 MR CHIU: Q. Professor, do you recognise that to be 5 a record of a meeting on 12 October 2023? It looks accurate, yes. 6 Α. 7 8 You've annexed it to your statement, so it's Q. 9 a document you are familiar with? 10 Α. Yes. 11 12 Q. If I could ask you to go --13 14 THE COMMISSIONER: Q. Are the meetings recorded and then someone transcribes it, or how does it work? 15 16 Some of the meetings were - none of the meetings were Α. 17 recorded in terms of audio. Some of the meetings were or 18 many of the meetings were transcribed using the "transcribe" function on Zoom. 19 20 21 MR CHIU: Q. Could you go to page 34, please, Associate 22 Professor Cheung. You will see there at the top of page 34, bottom of page 33 - first of all, Dr Hallahan was 23 24 in attendance at this meeting? 25 Α. I'm sorry? 26 27 Q. Dr Hallahan was in attendance at this meeting? 28 Α. Yes, yes. 29 30 Q. It was a Zoom meeting, wasn't it? 31 Α. Yes, it was a Zoom meeting, yes. 32 33 Q. And at the top of page 34, that's when he first speaks 34 at this meeting? Yes. 35 Α. 36 37 Q. And you will see there that he's explaining there what the executive is attempting to do --38 39 Α. Yes. 40 41 Q. -- in response to the concerns that you had originally raised back in October 2022, and raised - and continued to 42 raise afterwards? 43 44 I think you need to take the entire meeting into Α. 45 context, and I think if you read it from the start, if you 46 read the transcript right from the start and go through how we reached this point, there was - the meeting was a very, 47

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1 very tense meeting. We had speakers who were breaking down 2 and crying during the meeting. I don't know if that came 3 across. 4 5 Q. It doesn't, but --So I'm just giving that you context before we get to 6 Α. 7 this point here. 8 9 THE COMMISSIONER: Just before we go on, perhaps - I have 10 heard what the witness has just said. Can you or the 11 witness help me. 12 Q. What was the meeting called for so I know the context? 13 Α. This was - I will just double-check. 14 It probably tells me in your statement. I keep 15 Q. 16 flicking to the --I think this was the meeting, if I recall, following 17 Α. the email where I wanted - if it is correct - I wanted 18 19 a discussion on --20 21 Q. Your statement actually does say it is about a vote of 22 no confidence in the board, at paragraph 57. Yes, so prior to that we sent an email out about a 23 Α. 24 vote of no confidence, and I was proposing a vote of no confidence in the board because of the way --25 26 27 THE COMMISSIONER: So the topic is serious at the 28 beginning. 29 30 MR CHIU: A serious topic. And you can take it the Q. 31 first 33 - would you agree with me that in the first 33 32 pages of the transcript, a large number of staff members 33 raised concerns of the kind that you had raised in your 34 letter of October 2022? 35 Α. Yes, yes, that's true. 36 37 Q. Including yourself. You also raised those concerns again? 38 39 Α. Yes. 40 41 Q. And the question came up as to what was the executive 42 doing about it? Yes. 43 Α. 44 45 Q. And a concern was raised as to whether they were 46 acting promptly enough, firstly? Well, I think the wording, if you go to the letter -47 Α.

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1 I remember the wording specifically was, Dr Hallahan said 2 that they had been meeting three times a week. I think that was the word that --3 4 5 Q. I'm just asking about the minutes. Α. Yes, no, so that's in the minutes. 6 7 8 Q. Yes, it is. 9 Α. And he was saying that the issues were complex, and at 10 the time I was saying to him, if I recall rightly - I was asking him why was it complex - what was so complex about 11 the problems? 12 13 14 Q. Well, we can actually go through the transcript but at 15 some time --16 17 THE COMMISSIONER: Q. Sorry, just pausing there, though, when you said, "If you go to the letter", what letter? A. Sorry, when I - the minutes. The minutes. Sorry, the 18 19 20 minutes. 21 22 THE COMMISSIONER: Oh, the minutes. I've got it, thank 23 you. 24 Commissioner, I see the time. Perhaps I might 25 MR CHIU: 26 start this afresh when we come back? 27 28 THE COMMISSIONER: Yes, it sounds like it's got a little 29 bit of substance to it, so we might do that. Thank you. We'll adjourn until 2 o'clock. 30 31 32 Thank you, Commissioner. MR CHIU: 33 34 LUNCHEON ADJOURNMENT 35 36 THE COMMISSIONER: Good afternoon. Go ahead. Mr Chiu. 37 MR CHIU: 38 Thank you, Commissioner. 39 40 Q. Associate Professor Cheung, before the break we were 41 at the minutes of the meeting of 12 October 2023. 42 43 If I could have that put before Associate Professor 44 Cheung again, that's document [SCI.0012.0140.0001], it's 45 annexure PPP [sic] - I'm sorry, I don't have a hard copy. 46 47 THE COMMISSIONER: No, that's all right. I'm fine,

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1 thanks. 2 3 It will come up shortly? MR CHIU: Q. 4 Α. I've got it here. 5 Oh, you've got it there as well. We were at the top 6 Q. 7 of page 34. 8 9 THE COMMISSIONER: Did you say PPP? 10 I'm sorry, AAA. I'm sorry, the wrong document. 11 MR CHIU: 12 13 Q. It's AAA, top of page 34. And you answered some 14 questions just before the break about the discussion that 15 had occurred up to this point? 16 Α. Mmm-hmm. 17 18 Q. And then this is when Dr Hallahan starts speaking. And Dr Hallahan is the executive director of medical 19 20 services for the district? 21 Α. Yes, yes. 22 He is the member of the executive who attends the MSC 23 Q. 24 meetings regularly? 25 Α. Well, the chief executive also attends, but the chief 26 executive had not attended since the vote of no confidence 27 in her. So he was the most senior member of executive to 28 attend the meeting, yes. 29 And then if you go to page 34, do you see there that 30 Q. 31 Dr Hallahan refers to an executive working party? That's 32 at 18:15:42? 33 Α. Yes, yes. 34 Can I just interrupt you, it's my 35 THE COMMISSIONER: fault. I've left my computer in what I will call my room. 36 Ordinarily I would send a message for someone to get it, 37 but without the computer I can't even do that. 38 Would someone be able to unplug my computer just so I get the 39 40 running transcript, thank you. 41 42 Would you like me to pause? MR CHIU: 43 44 THE COMMISSIONER: No, you proceed. I can just follow 45 without it. 46 47 MR CHIU: Q. Professor, so you see the reference there

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1 to an executive working party? 2 Α. Yes. 3 4 Q. And then reference to that party meeting three times 5 a week? 6 Α. Three times a week, yes. 7 8 Are you familiar with who is on - who was on that Q. 9 party? 10 No, no. Α. 11 12 Q. Did you ask Dr Hallahan who was on that party? I didn't ask Dr Hallahan, but I asked the 13 Α. 14 radiologists, because that working party was to deal with radiology, so I asked my radiology colleague who was on 15 16 that working party. 17 18 And Dr Hallahan refers to "a detailed action plan that Q. 19 is actually looking at many of these things that have been 20 mentioned". Did you understand that to be a reference to 21 things that had been mentioned about radiology? 22 So what had happened up to that point was that -Α. Yes. this was the first time that I had been told that they were 23 24 meeting three times a week, and so we actually don't know 25 when they started meeting the three times a week. We don't 26 know whether they started meeting three times a week after 27 my initial letter in October, or whether it was after the 28 vote of no confidence, or whether it was running up to 29 this. What we do know is that there was no radiologist on this working party, which was odd, because I actually asked 30 our radiology colleagues, "If there's a working party which 31 32 is meeting three times a week trying to sort this out, 33 shouldn't there be radiologists on this working party?" 34 And the radiologists said, "We weren't invited to this working party." 35 36 37 Q. Did you raise that concern with Dr Hallahan as to --38 Α. Not at this meeting, no. 39 40 Q. Did you ever raise it with him? 41 Α. I can't recall. 42 43 Did you ask him when the working party started Q. 44 meeting? 45 Α. No. I'm sure Dr Hallahan would be able to tell you 46 that. 47

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1 Q. Well, I'm just asking whether you asked him at the 2 Did you ask him subsequently when this working meeting. 3 party --4 No. I found it, however, very odd, because for an Α. 5 executive group to be meeting three times a week and - you know, I know where you're going to with this questioning. 6 The issue was, my view at this time was, that the 7 8 management of the radiology issue was substandard, and 9 I used the word "bandaids", and the reason I used that was, 10 despite meeting three times a week they had not addressed the fundamental core issue for why the problem had occurred 11 in the first place, which was the mismanagement and it was 12 the bullying and harassment. So where you get to in this 13 14 line of questioning --15 16 Q. Are you talking about my line of questioning? 17 Α. There was - no, no, because I know where you're going 18 What you're saying is that -to. 19 20 Q. That makes one of us. 21 Α. My issue with this was Dr Hallahan laid a complaint or 22 concern about me, and that concern obviously should be taken with the utmost seriousness, but there were concerns 23 24 about bullying and harassment in radiology which I felt 25 were not taken with the same degree of concern. 26 When you said earlier that you thought it was odd that 27 Q. 28 they were meeting three times a week, what was it that -29 why was it odd? 30 Well, I mean, I could have sorted this out - if I was Α. 31 an executive, I would have sorted this out in one meeting, 32 I wouldn't need to meet three times a week to sort it out 33 over many weeks or months. You could do this in one 34 meeting. 35 How does one do it, as an executive, in one 36 I see. Q. 37 meeting? You get everyone together, you get - you ascertain the 38 Α. facts. The first thing is to ascertain the facts, and that 39 40 was the one thing which they hadn't done. They hadn't 41 investigated the concerns, they hadn't looked into bullying 42 and harassment. 43 44 How do you know they hadn't investigated concerns and Q. 45 looked into bullying and harassment? 46 Because the radiologists had told me. Α. 47

1 Q. I see. Did you ask Dr Hallahan whether these meetings 2 were looking - gathering the facts? Oh, look, I imagine they talked about all sorts of 3 Α. 4 things, and they came up with various ideas. 5 6 THE COMMISSIONER: I think --7 8 THE WITNESS: I don't know whether they actually 9 occurred --10 THE COMMISSIONER: Just pause. Just pause there, 11 Q. Associate Professor, I think the question was: 12 13 14 Did you ask Dr Hallahan whether these 15 meetings were ... gathering the facts? 16 17 Α. Yes, no, I didn't. 18 19 MR CHIU: If we go back to the document, Associate Q. 20 Professor, a few lines down, towards the bottom of page 34, 21 Dr Hallahan says: 22 The planning is very ... Winston. 23 It deals 24 with staffing. With recruitment. With 25 conditions. With capital works. 26 Do you see that? 27 28 Α. Yes. 29 Q. 30 Then you say: 31 32 These have been requested for a long, long 33 time, Andrew. Where's the progress? 34 35 Α. Yes. 36 37 Q. Wasn't Dr Hallahan explaining precisely what the 38 progress was? Oh, yes, no, so when I said, "What's the progress", 39 Α. 40 where were the - where was the deliverables or where was 41 the actual progress? So there was a lot of talk about what was happening, there was a lot of promises, but what we 42 wanted to see was the deliverables. 43 44 45 So you weren't satisfied that they were planning; you Q. 46 wanted deliverables at this point? Oh, look, I think there was - there was a feeling that 47 Α.

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1 the executive was in crisis mode to manage the damage, and 2 that was my feeling. A lot of the things which they proposed were not possible. For example, the executive was 3 4 proposing that the radiologists work from home. Now, that 5 couldn't be done because the two IT people in the department had resigned and weren't replaced, so they 6 couldn't set up IT services. The 10-hour days which the 7 executive had proposed could not be done, even though they 8 9 said it could be done on paper, because there was too much 10 work onsite for them to do offsite, and so I think out of all the staff who were offered 10-hour days at this point, 11 I don't think anyone had actually taken it up. 12 13 14 Q. So you disagreed --So there were lots of promises and lots of talk, but 15 Α. 16 we in the MSC did not see a lot of action. 17 18 Q. Right. 19 Α. And the action only occurred because we started taking 20 a more aggressive stance in terms of our advocacy. 21 22 By "aggressive stance in terms of our advocacy", Q. 23 you're referring to --24 The votes of no confidence. Α. 25 26 Q. The vote of no confidence in June, first of all --Yes. 27 Α. 28 29 Q. -- against Dr Anderson? 30 Α. Yes. 31 32 So now we're four months later, in another meeting Q. 33 in October? 34 Yes. Α. 35 36 Q. And Dr Hallahan is explaining what has been happening? 37 Α. Yes. 38 THE COMMISSIONER: Dr Hallahan refers to, on the 39 Q. 40 page you're on, he says: 41 42 It's as Joseph has said. 43 44 I assume that's the Joseph first mentioned on page 2 of the 45 transcript, is it? 46 That's Joseph Jewitt who is the general manager of Α. 47 Concord.

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1 2 Q. Joseph? 3 Α. Joseph Jewitt. 4 5 THE COMMISSIONER: Right. I assumed he had a last name. he's not like Beyonce or anything, but he's only got one 6 name here. So that's the GM, I should understand that as? 7 8 9 MR CHIU: Yes. 10 Just to get that into evidence, he became GM in what 11 Q. year, do you recall? 12 13 It was around September '22 - around that time, give Α. 14 or take ah month or so. 15 16 Q. After you became chair of the MSC? 17 Α. After I became chair of the MSC, yes. 18 19 Q. If we then go down to the bottom of page 34, 20 Dr Hallahan said: 21 22 ... we are doing our very best to address 23 this and address this in a timely fashion. 24 There's a significant number of complex 25 underlying things here. 26 27 So I take it from your earlier answers you disagree that 28 they were doing their very best to address this, in a 29 timely fashion? Oh, look, I think - I think "best" is not the word. 30 Α. 31 I mean, people can do their best, but doing what was 32 reasonable and doing what was required - I mean, someone 33 could be doing their best but they may not be doing what 34 was required. What was required here - so the issue is 35 that you have - the system has broken to the point where 36 you have 50,000 - 50,000 - unreported radiology images, and 37 that didn't happen overnight. It wasn't as though 50,000 people came to the emergency department one weekend and 38 39 needed imaging. This happened over a significant period of 40 time, and there had been, from our point of view, no 41 significant attempt to look at the root causes of that; no 42 manager had been held accountable for the decision-making. 43 In fact, one of the managers had actually been promoted, 44 but the managers who were there at the time had all stayed 45 in their positions. And the radiologists were telling me 46 that that was untenable. And that was the primary reason, they told me, why no-one volunteered to be the head of 47

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1 department, because they felt that they could not work with 2 the managers who were there, because they felt it was the 3 managers which caused the problem. 4 5 Q. So just to be clear, what exactly are you saying was what they needed to do? What was required, in your view? 6 7 I think there needed to be an independent, external, Α. 8 thorough investigation into what happened. You know, 9 50,000 unreported scans is probably the greatest incident of patient - potential patient harm that we've ever had at 10 Concord. And that's - it's never been investigated. 11 12 13 Q. Did you ask for an external investigation at this - in 14 this meeting? If I can use an analogy, the plane has crashed. You 15 Α. 16 know, it's obvious to everyone that the plane has crashed. 17 I shouldn't need to ask for an investigation when the plane 18 has crashed. 19 20 Q. Sure, but you --21 Α. So the answer is no. 22 Q. 23 Yes. But I didn't feel that I needed to. 24 Α. 25 26 Q. At the time, wasn't there an investigation being undertaken by ProActive ReSolutions? 27 28 No, there wasn't. Α. 29 Q. Commissioned by the Ministry of Health? 30 31 There was no investigation. So let's make this very Α. 32 in the documentation, ProActive told us that they clear: were not investigating, they were not investigating any of 33 They were there to mediate and to look at the 34 the issues. 35 culture. They were not there to investigate any of the 36 concerns, and that was the fundamental issue. Had they been investigating, I think we would have been less 37 concerned about the action. But they were not hired to 38 actually investigate any of the concerns. 39 40 41 So if we go then back to the record, after Dr Hallahan Q. refers to "complex underlying things", and he says: 42 43 44 ... I can hear and feel the pain and we're 45 working on ... 46 47 You then, at the top of page 35, say: .31/07/2024 (41) 4381 W K CHEUNG (Mr Chiu)

1	
2	What complex underlying things, Andrew?
3	Tell us what's complex. What's complex
4	about it? What are the complex underlying
5	things?
6	
7	So you didn't consider there were any complex underlying
8	things?
9	A. Oh, to me, I'm very simplistic. To me, it was obvious
10	to me what needed to be done and it was obvious to the
11	radiologists what needed to be done. I didn't think it was
12	that complex.
13	
14	Q. And you could have solved it in one meeting?
15	A. Sorry?
16	
17	Q. You could have solved it in one meeting?
18	A. I think I could have.
19	
20	Q. Then if you go further down page 35, Dr Hallahan, this
21	is in the bottom half of the page, refers - there's
22	a sentence there that says:
23	
24	And that there is actually, you know,
25	a high level group which has, is working
26	through this. The chief executive met with
27	the radiologists or with the radiology
28	department. A few weeks ago that was
29	a 4 hour meeting.
30	a rhoar moothigi
31	THE COMMISSIONER: Sorry, where are we now?
32	
33	MR CHIU: Sorry, 18:17:19, the time stamp, at the bottom
34	half of that.
35	
36	Q. Did you understand that there was a four-hour meeting?
37	A. So again, this is - this is one of the issues that
38	we've been having with the executive, and it's the theme
39	which not only is in these minutes but is demonstrated in
40	all the subsequent minutes, in that what was being told to
41	people, what was being told to the MSC, was not actually
42	what was happening in reality, and there's documentation in
43	the subsequent minutes where the radiologists were
44	rebutting the assertions by the executive. So the
45	executive
46	
47	Q. Which assertion, sorry, are you referring to?

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1 Α. The assertions that things were happening - the 2 assertion was - the assertion from the executive was that 3 "Everything's fine, we've got this. This is all under 4 control. We're going fix this." And the radiologists 5 were telling me that was far from the truth, and they were demonstrating the numbers. So as this was happening, as 6 7 this was happening, radiologists were leaving, and I think 8 subsequent - I think during this period, I think another 9 four - I'm not precise about this but I think another four 10 radiologists either left or cut down their fractions during this time. 11 12 13 So the reason I was proposing the vote of no confidence in the board was partly because of these issues 14 but partly because we were losing staff. We were losing 15 16 nursing staff, we were losing radiologists, we were losing 17 other staff, and it was getting to a point where the 18 hospital was in a critical situation where if we lost any 19 more staff, there will be significant reductions in service 20 provision. 21 22 For example, I think at this point, if we lost one -I think after this, soon after this, it got to the point 23 where if we lost one more, and I think it was at this 24 25 meeting, if we lost one more radiologist, they would potentially lose accreditation, which would be a disaster 26 27 for training. 28 29 Q. Further down that page, 35, do you see there's a passage where Dr Hallahan starts: 30 31 32 We have had no reduction in approved 33 radiology FTE. We recognise that there's a significant gap which has been addressed 34 35 to the very best of our abilities at this 36 point in time. It is difficult. I aaree 37 with the comment that Hao made that we 38 really need to work on retaining our 39 registrars and attracting them to stay in 40 consultant positions. 41 Do you see that passage? 42 43 Α. Yes. 44 45 Does Dr Hallahan not, in that passage, start to Q. 46 explain what sort of things they are trying to do at the 47 executive?

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1 Α. Well, I think again, this comes down to the factual 2 So -accuracy. 3 4 Q. Which bit is factually inaccurate? 5 Α. Which was the "no reduction in approved radiology" FTE". I don't know whether that's true or not. 6 So as 7 you'll see in the subsequent minutes, over the next few 8 months, a lot of what was said was disproved and debunked. 9 10 Q. Which bit of what he said was disproved, sorry? 11 Α. Well, the issue in regards to the number of FTE that 12 was being employed. 13 14 Q. I see, FTEs, okay. So what actually happened was, in order to prove the 15 Α. 16 point in one of the meetings - I can't remember which 17 date - Dr Ridley actually put up a list of all the 18 radiologists, every radiologist that had worked, and went 19 through the list to see which ones were still in the 20 department, which ones had cut their fractions and which 21 ones had left, as opposed to the executives who were just 22 using numbers based on a spreadsheet, and Dr Ridley, at 23 that meeting, clearly showed that the information that was 24 being provided by the executive was different to the information that he had. 25 26 27 Just so I understand that fully, if a staff specialist Q. 28 leaves and that staff specialist's work or FTE is performed 29 either by a VMO or a locum, do you consider that 30 a reduction in FTE? 31 No. I wouldn't. So I think if it's like for like, Α. 32 it's not a reduction in FTE. And as I said, I can't refute 33 or confirm that particular statement. 34 35 Q. Were there any other statements in that passage that 36 you say are factually incorrect? 37 I'm not saying that - let me get this straight. I'm Α. not saying it's factually incorrect. What I'm saying is 38 the radiologists had concerns about the spin that was being 39 40 put by the executives. Now, it may have been correct, it 41 may not have been, I don't know. 42 43 THE COMMISSIONER: See, please don't take this as undue 44 criticism, it's not. A difficulty with starting on page 33 45 of this document is that there's a whole lot of context 46 about what is being said at the start of the meeting. So Joseph Jewitt, the general manager, has, right on page 2, 47

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1 said: "We also have had approved the 10-hour days for 2 diagnostic radiologists. We're getting the replacement 3 CT scanner. It's arrived. Fingers crossed we'll have it 4 operational at the end of the month. Capital works for the 5 additional scanner in the ED have commenced." 6 7 Then he goes on to say something about the MRI that 8 has been seven years in the making, or something. And then 9 a whole lot of what I assume are staff members make 10 comments, and Joseph - sorry, Mr Jewitt - makes some further comments, and then, in the section you have taken 11 the witness to - is it Dr Hao? 12 13 14 THE WITNESS: Hao, yes. 15 16 THE COMMISSIONER: Q. Sorry, is it Dr "Zhang"? How do 17 I say - H-A-O, X-I-A-N-G? Who is that? Actually, I honestly don't know how I should pronounce 18 Α. 19 his name. I don't actually --20 21 Q. What do you call him? 22 Α. Sorry? 23 24 Q. What do you call him? 25 Α. I actually - that was the first time I'd actually met 26 him, at that meeting. So --27 28 Q. I see. This is all happening on Zoom, I take it, or 29 on Teams? Bear in mind there are many, many radiologists, and 30 Α. 31 a lot of them I haven't met in person, yes. 32 33 Q. Hopefully, it is Dr Xiang, if I've --34 MR CHIU: "Xiang". 35 36 37 THE COMMISSIONER: Dr Xiang. I apologise for the way I'm I'm doing my best. 38 pronouncing that. 39 40 Q. He then, on page 32, is saying - after the general manager has said a whole lot of things, he's then saying, 41 "Look, the workload is still excessive" and talking about 42 the last time there was an advertisement for SRMOs. 43 There 44 are 140 applicants, I think he's saying, and they were told 45 they could have one, but the department really wants four 46 I assume that to mean "needs", but who knows. or five. 47 The district needs these things.

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1 2 Then it comes to Mr Hallahan, and I think this 3 exchange between Mr Hallahan and the associate professor 4 has to be seen in that context. 5 There is no opposition from me about that. 6 MR CHIU: It's 7 due criticism, but I didn't want to go through it 8 painstakingly --9 10 THE COMMISSIONER: No, it is not undue criticism, it's just I'm just trying to be vaguely helpful. I'm trying to 11 be helpful and it's probably vague. 12 13 14 Commissioner, there's no suggestion that this MR CHIU: 15 should be understood in anything other than in the context 16 of both this meeting and --17 18 THE COMMISSIONER: I'm certainly going to read it in the 19 context of what has gone before. 20 21 MR CHIU: And there are previous minutes, minutes of 22 previous meetings as well. There's no suggestion that this issue wasn't, you know, on the cards for a long time. 23 24 If I can add to that. 25 THE WITNESS: 26 27 MR CHIU: Of course, yes. 28 29 THE WITNESS: The issue in regards to the CT scanner - so this was one of the primary problems - was that we had this 30 31 announcement of the CT scanner, but there had been, as far 32 as I'm aware, no announcement of any staff to staff that 33 CT scanner. So we were going from two CTs to three CTs, 34 yet no increase in radiologists, no increase in nursing staff, no increase in radiographers, and we specifically 35 36 asked - because the radiographers at that point had said, "How are we going to staff this? You're opening up a new 37 scanner, we don't have enough." You know, we were told, 38 "Oh, we're about to do that." 39 40 41 But this was in October, these minutes are in October. Even by December, they still hadn't advertised for 42 43 radiographers and the CT scanner was due to open 44 in February. 45 46 THE COMMISSIONER: Q. Just so I understand what you've just said, should I take that to mean with this third 47

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scanner coming on, being purchased, that was because there 1 2 was a need for three scanners and three scanners to be 3 staffed because of demand or was the third scanner 4 replacing an old scanner so you would only - you would go 5 back to two? My understanding at the time was they already replaced 6 Α. one scanner and this was an extra scanner for demand. but 7 8 it was fast-tracked because of the issues and the 9 complaints leading up to this, and they fast-tracked the 10 infrastructure but they didn't fast-track the personnel that were required to operate the infrastructure. 11 12 13 MR CHIU: Q. I see. 14 And so this, again, placed not just the radiologists Α. and the radiology department under greater strain, it 15 16 placed the ED under greater strain because it was the ED 17 nursing staff which had to look after the scanner. 18 19 Q. But could that be because it's not that easy to source 20 quickly the staff to operate a piece of machinery like 21 that? 22 Well, we told them then and we said, "You need to be Α. advertising." The radiologists said, "Why aren't you 23 24 advertising? You need to advertise now because it takes 25 months to advertise, to recruit, to interview and to have 26 them to leave their other jobs to start." 27 28 Q. So from your perspective --29 Α. And so in terms of planning ahead, it may well have been that's what they had planned --30 31 32 Q. So from your perspective --33 Α. -- but they were more concerned about demonstrating to 34 us that they were trying to do something, without trying to do something - this is my impression, this is my 35 36 impression: they were more concerned about fast-tracking infrastructure to demonstrate that they were trying to 37 improve the system rather than actually sitting down and 38 working through and improving the system properly. 39 40 41 Q. But weren't you complaining at the time about the 42 speed of progress or the lack thereof? Oh, look --43 Α. 44 45 So are you critical of them for trying to move things Q. 46 as quickly as possible even when the execution is not 47 there?

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1 Α. No, I'm critical because this is what we heard at all 2 these meetings and you sit in all these meetings and, you 3 know, when you go through these meetings, the first part of 4 the meeting was - all the meetings were about how good 5 a job they were doing. There was no critical reflection on the issues that still needed to be tackled, and so if you 6 7 look at every set of minutes, it's all glowing and praise 8 about what a good job they're doing, when everyone in the 9 MSC knew that there were major issues which needed to be 10 tackled. 11 12 Now, no disrespect to the people who were there at the time, so Joseph Jewitt was the general manager who came in 13 14 after the problems occurred, and in some ways, you know, he was lumbered with the problem, and the problem wasn't, 15 16 obviously, of his making. But even so, there were things 17 which he needed to do to address the problems, which he 18 hadn't, such as investigations, open disclosure, all those - those elements which needed to be done. 19 20 21 Q. So after Dr Hallahan explains at the bottom of 35 what 22 he says was being done at the time, at the top of 36, you 23 say: 24 25 I'm going to read something out to you, 26 Andrew. 27 This is from the SLHD CORE values and 28 Workforce Factsheet, Sydney, behaviour. 29 it's your local health district. 30 31 Just pausing there, is that the document at annexure BBB to 32 your statement, which I'm just going to ask for it to be put on screen, [SCI.0012.0160.0001]? 33 34 THE COMMISSIONER: Did you say BBB? 35 36 BBB. It's headed "Workforce Factsheet CORE 37 MR CHIU: Values Behaviours." 38 39 40 THE COMMISSIONER: I've got it, yes, thanks. 41 42 MR CHIU: Q. Is that the document that you --Yes, that's the document. 43 Α. 44 45 Q. Was that a document that you put on screen in front of - in the Zoom? 46 Yes, I showed him the document. 47 Α.

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1 2 MR CHIU: Could the document be put up there, just briefly 3 on the screen? 4 5 Q. Just one moment, Professor. Α. That's okay. 6 7 8 MR CHIU: Sorry, it's [SCI.0012.0160.0001]. 9 10 Q. That's the document, Professor? That's correct. 11 Α. 12 13 Q. And the part that you were referring to in the 14 meeting --Is on page 2, down near the bottom, on the right-hand 15 Α. 16 side. 17 18 Q. So if we go to page 2, is it the bit that's 19 highlighted? 20 It's highlighted, yes. Α. 21 22 Q. So that's a reference to - so as I understand it, your concern was that this was effectively a directive to staff 23 not to complain about procurement issues? 24 25 Α. Yes. So if you actually blow it up so you can see it 26 better, it specifically says there "Below the line behaviour", so a behaviour that is bad in the eyes of the 27 28 organisation, is to: 29 30 Complain about resource limitations and 31 constraints rather than striving to work 32 creatively within available resources and 33 looking for innovative solutions. 34 So, you know, what I take from this - and my interpretation 35 36 may be wrong, but my interpretation is - if you complain, 37 then you are not acting within the code of conduct, or the core values. 38 39 40 THE COMMISSIONER: What is the status of this document? 41 This is what? 42 43 MR CHIU: Commissioner, I don't know. I can find out for 44 you. And maybe some of the witnesses coming in --45 46 THE COMMISSIONER: The witness just said "code of conduct". It's --47

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1 2 THE WITNESS: Sorry, the core values, I meant the core 3 values. 4 5 THE COMMISSIONER: Q. Which is the core values of, what, the LHD, or Concord --6 7 On the front page - on the top of the front page it Α. 8 says Sydney Local Health District. 9 10 MR CHIU: There's a separate document which is the code of --11 12 13 THE COMMISSIONER: "Which is your local health district". 14 "The following are (the Commissioner reads the document) "how you have modelled" - who is the "you" - "to identify 15 16 areas where improvements could be made". Okay. 17 18 MR CHIU: There's a separate document which --19 20 THE COMMISSIONER: In any event, the witness has 21 identified this as the document he was --22 Perhaps some further witnesses could deal with 23 MR CHIU: 24 this issue. 25 26 THE COMMISSIONER: Q. You were talking about how you Tell me, the bit you - did you 27 construed the document. 28 highlight that? Someone's highlighted that --29 Α. I highlighted that in my submission. 30 31 What did you understand, "Complain about resource Q. 32 limitations and constraints" to mean? 33 Α. I think if you didn't have enough resources or you 34 were constrained, then if you complained about it --35 36 How did you think you would manage it if you genuinely Q. 37 thought there were resource limitations or constraints? Well, I think if it wasn't picked up with normal 38 Α. detection systems then the failsafe mechanism is 39 40 a complaints system. So you would have to complain if you 41 felt that there was a resource problem. 42 43 Q. Either do that or work out some innovative solution, 44 whatever that might be? 45 Α. Well, I think at the end of the day, you know, if 46 there are resource limitations --47

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1 Q. I mean, if the resource limitation is you need an extra machine and you don't have the machine, the 2 3 innovative solution might be pretty hard without the 4 machine, wouldn't it? 5 Α. Yes. 6 7 MR CHIU: That's one resource limitation, potentially. 8 There could be many others. 9 There might be many others. But you 10 THE COMMISSIONER: can't --11 12 13 THE WITNESS: What I was getting at when I presented the 14 document, which is what you're referring to --15 16 MR CHIU: Q. I haven't got there. I haven't quite got 17 there vet, but --18 But I'm assuming that's where you're going to get to. Α. 19 What I was getting as was the frustration with the 20 executives and the system in not acting on the issues and 21 what was clear was that, even with complaining and bringing 22 these issues up, the issues were not being addressed fast enough, and what issues were being addressed, staff thought 23 24 that they were bandaid issues and they weren't addressing the root cause. 25 26 27 Before we get to that, can I ask you some questions. Q. 28 When you raised issues about resource limitations all the 29 way up to the chief executive, did any of the people you were dealing with say, "Professor, that complaint is 30 a below the line behaviour. See this document"? 31 32 Α. So the answer is yes, in that this --33 34 Q. Who was that? Without - people spoke to me. There were people who 35 Α. 36 spoke to me in a confidential manner who were concerned 37 about this document and this specific paragraph in the document. 38 39 40 Q. Sorry, before you get to other people, I was asking 41 specifically when you raised the complaint to the chief executive, did anyone say "That's a below the line 42 behaviour, Professor Cheung. You should not be raising 43 44 this with me"? 45 Α. No. 46 47 Q. Right. Now, you were starting to tell us about other .31/07/2024 (41) 4391 W K CHEUNG (Mr Chiu)

1 people who you've talked to confidentially. 2 Α. Yes. 3 4 Q. Did they say to you that they were told, "That's 5 a below the line complaint"? No, none of them were told --6 Α. 7 8 Q. Nobody said --9 Α. -- but they were concerned that this section of the 10 core values would be used against them if they complained. 11 Q. 12 I see. 13 Α. And so that - they were concerned about this particular element in the document, because they were 14 raising concerns about resource limitations, yet this 15 16 goes - this is a below the line behaviour in the core 17 values. 18 19 Q. But then going back to the meeting --20 21 THE COMMISSIONER: Just before you go on --22 MR CHIU: 23 Sorry. 24 THE COMMISSIONER: 25 Q. How did you first become aware of 26 this document? I had a copy of this a long time ago. 27 Α. I can't 28 remember when I first got it. 29 Do you know who gave it to you? Was it disseminated 30 Q. 31 by management or --32 I remember - I think I got it as part of a code of Α. 33 conduct pack, as in when we were given further documents. 34 35 Q. Was any assistance given to staff that you're aware of as to what precisely some of these things that are in this 36 document might mean? For example, were you given an 37 explanation about what "unwarranted micromanagement" might 38 39 mean? 40 Α. No, some --41 Q. Do you recall that? 42 No, I think this was --43 Α. 44 45 Just wait for my question. And what about the bit Q. 46 we're talking about "complain about resource limitations and constraints" --47

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Α. 1 No. 2 3 -- was any explanation that you're aware of either Q. 4 given to you or to your colleagues or staff as to what might actually constitute something that's below the line 5 or what might not be considered below the line? 6 7 Α. No. 8 9 MR CHIU: Q. Associate Professor Cheung, if I could take 10 you, then, back to the minutes, page 36, which was the document [SCI.0012.0036.0001]. Thank you, it's already up 11 12 on the screen. At the bottom of page 35, Dr Hallahan is 13 explaining what the executive has been doing, and then at 14 the top of page 36, you raise this document. What was the relevance of this document to what Dr Hallahan was talking 15 16 about? 17 Α. It was - again, it was the frustration with the 18 executives, in that the executives, I felt, were not 19 managing our issues in an appropriate manner, and this 20 again was one of the - this was one of, I guess, the 21 documents which the executive uses to manage stuff. 22 23 Q. But if that was your view at the time, you don't 24 specifically address, at least in this part of the meeting, 25 any of the things that Dr Hallahan was explaining in 26 page 35? 27 Α. Not at that point. 28 29 Q. You don't ask him any questions about what he says? 30 Α. No. 31 32 You don't challenge him and say, "No, those are all Q. 33 wrong. I'm told different things"? Well, as it comes out in the subsequent minutes, a lot 34 Α. of things - this was - as I said to you, this was the first 35 36 time that I'd been told that they were meeting three times 37 a week, that I can recall. 38 THE COMMISSIONER: 39 I'm not sure the question's absolutely 40 accurate because at the bottom of 36, the witness says: 41 42 The district have had months and You guys. 43 months and months. To manage this. And we 44 are in the worst situation from radiology 45 that they've ever been. 46 47 I would take that to be a global rejection of what's being

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	put.
	MR CHIU: I suppose a better question, Commissioner,
4 5	thank you, is:
6	Q. You didn't ask him for more details about what he was
	doing? A. No, no.
9	
	Q. If you can go, then, to page 39, do you see at the
	bottom of page 39 there is a reference to Judith Trotman? A. Yes.
13	
	Q. Who is Judith Trotman?
15 16	A. She's director of haematology.
	Q. Haematology?
	A. Yes.
19 20	Q. I'll just let you read what she says there. She says:
21	
22	you're not actually responding to what
23 24	Payam and Andrew had brought up, and I can only echo that I [am] not convinced that
25	these forums are being constructive in
26	moving things forward
27 28	et cetera. And then right at the end:
29	-
30 31	I'm finding that the way the meetings are conducted with this heckling style is
32	not constructive.
33	
34 35	And then in the following page you say:
36	So what's the suggestion? What do we do?
37	Did was discourse with what Dr. Tratman was service 2
	Did you disagree with what Dr Trotman was saying? A. I think you have to understand again the context of
	how we got to this point. So when - and I go back to when
41	I became the chair of the medical staff council, when
42 43	I became the chair of medical staff council, there were essentially two factions or the two groups of doctors.
44	There were the doctors, in relatively high senior
	positions, who were very closely aligned with the chief
	executive, who were in positions of influence and who many of the others felt had been rewarded for their obedience

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and their commitment to the chief executive. And then
 there was the other group who felt - the other group who
 weren't in the so-called inner circle, who felt that they
 had been neglected.

And so when you go through the minutes, everything from the first few minutes through to all the votes of no confidence, and if you recall that Judith Trotman was the person who seconded the vote of no confidence against me in June, there was a group of doctors who I guess were the other faction.

But I think what is important in these documents and these minutes is what is actually not said, and regardless of which faction people were in, no-one - no-one disagreed that there was a major problem. No-one disagreed that there were resourcing issues. No-one disagreed that there was bullying and harassment.

20 If you look through the minutes, I don't think there's a single clinician - regardless of the way they felt about 21 22 me and how I was conducting things, there were no 23 clinicians who were disagreeing with that. The 24 disagreement was in the way which we should tackle the 25 issue, and the specific disagreement was in the way which 26 we should approach the executives. So you had a group of clinicians who were very closely aligned with the chief 27 28 executive who wanted the status quo. They want the softly 29 softly approach, they wanted the negotiation approach, they wanted things to continue as they were, before I was -30 31 I became the chair. And then you had a very highly 32 militant group who wanted action, and so what you see here is a result of that friction between the two groups. 33

The disagreement is not about the facts of the matter. 35 36 The disagreement is not about the problem the hospital was The disagreement, as you see here, is about the way in 37 in. which the MSC should be approaching it, and I was of the 38 view that we needed to take a far more adversarial 39 40 approach, hence the votes of no confidence, hence the 41 letter writing that you've seen, hence all the minutes and the way in which we approached the meeting, hence the 42 43 transcripts of the meetings so that we documented 44 accurately what was being said. 45

46 Q. So just to understand your answer, firstly, you 47 disagree with what Dr Trotman said in that part of the

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1 meeting? 2 Α. Well, so the issue at hand --3 4 Q. Could you just answer the question. Did you disagree? 5 Α. Well, I'll get to that. I'll get to that --6 THE COMMISSIONER: 7 No --8 9 THE WITNESS: I disagree - I disagree. 10 I think it's important to answer the 11 THE COMMISSIONER: question that Mr Chiu has asked you unless it's some sort 12 13 of unfair question. 14 Did you want to ask that question again? 15 16 17 MR CHIU: Q. Did you disagree with what Dr Trotman said? 18 I'm not actually responding to what Payam and Andrew Α. 19 had brought up? Did I disagree with that? Yes, I'm not 20 sure whether I should be responding or not. Yes. 21 I disagree that my - I guess my questioning was out of 22 line, if that's what you're referring to. 23 And to use your words, was Dr Trotman in the other 24 Q. 25 faction from the faction that you were in? 26 Well, I was - my view was we should take a more Α. adversarial approach and there was, call it the faction, 27 28 call it the group, call it whatever. 29 30 I think you used the word "militant"; was that what Q. 31 vou said? 32 It was construed as being militant. So we were Α. 33 construed as being militant. We were construed as being 34 damaging to the relationship. We were construed as being not constructive, and you can see that there in the 35 36 comments. 37 38 Q. Finally, one last thing, Associate Professor. The 39 meeting then goes on to the vote of no confidence on the 40 board. 41 Α. It didn't - the vote was the following meeting, 42 I think. 43 44 I see. Anyway, if we go down to page 42, you'll see Q. 45 a time stamp, 18:33:02, you say: 46 Well, it's 6.30 and should wrap this up. 47

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1	I'm going to go ahead and propose the vote
2 3	of no confidence in the board.
3 4	Do you see that? And you refer to the reasons for that.
4 5	
6	So firstly you refer to having no confidence in the board. Do you see that there?
0 7	•
8	A. Yes, yes.
9	Q. And then you refer to feeling despondent, in terms of
9 10	"despite all the work that we have done. All the
11	complaints. All the submissions". And then if I could
12	take you down to page 43, at about the middle of the page,
13	18:34:22:
14	
15	I take the view that they want to run us
16	down. And reduce our services. And this
17	is just part of it. But that view may be
18	wrong, but that's the view that I have.
19	That's certainly the way they're acting.
20	
21	Can you just explain, what did you mean by "take the view
22	that they want to run us down. And reduce our services"?
23	A. So in our Sydney Local Health District, there is the
24	main hospital, which was Royal Prince Alfred; there's
25	Canterbury Hospital and Concord. And there was a view that
26	services were being removed from Concord and - not - maybe
27	not services but resources were being used - transferred
28	across to Royal Prince Alfred.
29	
30	So there were departments who felt aggrieved because
31	they would ask for an enhancement at Concord, but they
32	wouldn't get it, but Royal Prince Alfred would get an
33	enhancement. So there was this view that there was this
34	gradual downgrading of services at Concord. And if you -
35	there has been a prevailing view in management circles for
36 37	a long, long time, that Sydney has too many high-end hospitals.
38	nospitals.
30 39	Q. Sorry, just to clarify, when you say "there was a
40	view", and then you said later on is a view among
41	A. So this was amongst MSC.
42	
43	Q. Whose view are you referring to?
44	A. This was just talking to staff, so talking to surgical
45	colleagues, medical colleagues.
46	
47	Q. So your surgical and medical colleagues had this
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1 concern; is that right? 2 Α. Yes, yes, yes. 3 4 Q. Was that concern ever put to the executive, by you? 5 Α. None of the individual departments - I didn't put any of the concerns from the individual departments because 6 7 none of them officially came to me to articulate those 8 That was all the - those concerns were all concerns. 9 articulated in our resourcing complaints. 10 Nonetheless, you believed that that was where 11 Q. 12 management was going, trying --13 Α. I think - yes, yes. 14 -- to reduce the services at Concord and bring them 15 Q. 16 elsewhere? 17 Α. Yes. 18 19 And you saw both Dr Anderson and the board as being Q. 20 complicit in that? 21 Α. Yes. 22 And so you saw it as an existential struggle for the 23 Q. 24 survival of Concord hospital, as you viewed it? 25 Α. Well, the problem is that we didn't have any transparency at the time on where the funds were being 26 27 used, and so there was a prevailing view amongst many that 28 I spoke to that that was happening, and that Prince Alfred 29 was getting a significant share of the resources, and that 30 there were departments there which were doing well and 31 doing better than the same departments across here, and 32 radiology is the classic example. So radiology at Prince 33 Alfred has, I think, four MRIs or three MRIs, whereas 34 radiology at Concord has one MRI which services both Concord and Canterbury. That's just one example. 35 36 So you would agree it's an existential struggle for 37 Q. survival of Concord hospital? That's as you perceived it? 38 We're struggling for a share of the pie, and what was 39 Α. 40 happening at the time was the system was such that people 41 had to compete for a share of the pie and compete against each other, whereas what actually the problem - the problem 42 43 that needed to be fixed was we actually needed a bigger 44 pie. 45 46 MR CHIU: Thank you very much, Associate Professor Cheung. 47

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1	Commissioner, I have no further questions.
2	
3	THE COMMISSIONER: Thank you.
4	
5	Q. Can I just ask you a couple of questions. One of the
6	documents that Mr Chiu took you to is annexure PPP, which
7	is behind tab 12.74. It's the letter to you from
8	NSW Health, the employee relations manager, Ms Rex, of
9	10 November 2023. Tell me when you have that?
10	A. From Juliette Rex, 10 November 2023, yes.
11	
12	Q. If you look at the first page, I am not asking you
13	about - I just want to make this clear. I'm not asking you
14	about any of the allegations raised against you. I don't
15	want your view about that. But the meeting was on
16	12 October 2023 and this letter is 10 November 2023. In
17	that interim period, did Mr Hallahan speak to you at all
18	about what had occurred on the 12 October 2023 meeting?
19	A. I don't recall any meetings, no.
20	, , , , , , , , , , , , , , , , , , ,
21	Q. Is the first you understood that there was some form
22	of complaint against you this letter?
23	A. Yes.
24	
25	Q. So I take it by that, you don't - there was no
26	meeting, for example, between you and Mr Hallahan where he
27	said something like, "Winston, I want to discuss that
28	meeting. I didn't like being interrupted", that sort of
29	thing? There was no discussion along those lines?
30	A. There's a reference - no, there wasn't a meeting, but
31	he refers to the reason why that was, in the last - I think
32	it's the very last letter from Gina Finocchiaro.
33	
34	Q. Sorry, I don't understand that answer. You said,
35	"There's a reference - no, there wasn't a meeting". Okay.
36	A. There wasn't a meeting, no.
37	······································
38	Q. There was not?
39	A. I didn't have a meeting
40	
41	THE COMMISSIONER: No, that's all I wanted to know. And
42	finally - no, I won't go ahead with that. All right.
43	That's all the questions I had.
44	
45	Did anything arise that you it wouldn't re-examine
46	about, Mr Muston?
47	
-	

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1 MR MUSTON: Yes, very briefly. 2 <EXAMINATION BY MR MUSTON: 3 4 MR MUSTON: Dr Cheung, do you recall being asked some 5 Q. questions where it was suggested that difficult decisions 6 7 needed to be made in relation to budgeting and the 8 allocation of resources by the executive? 9 Α. We were told that all the time. 10 I just want to try and locate you within the evidence 11 Q. you've given. You were asked some guestions by my friend 12 about the need to make difficult decisions in relation to 13 14 budgeting and the allocation of resources and I think you accepted that those decisions did need to be made? 15 16 Α. Yes, yes. 17 18 I think you indicated that there was a general Q. 19 understanding of that fact - that is, the need to make 20 those decisions - by you and those who you spoke to within 21 Concord? 22 Well, we - I guess we weren't in charge of making Α. 23 those decisions. 24 25 Q. No, but just listen to my question carefully, though, 26 just so we can, again, put it into its context. You 27 weren't in charge of making those decisions but there was 28 an understanding by you and the colleagues you spoke to at 29 Concord that those decisions needed to be made? 30 Α. Yes, yes. 31 32 And that in making those decisions, it was not Q. 33 necessarily possible to please everyone? 34 Absolutely. Α. 35 36 You then indicated that there was a perception amongst Q. 37 your colleagues that there was some unfairness in the allocation of resources and a favouring of those who were 38 close to the chief executive? 39 There was a perception of that. 40 Α. 41 42 Q. A perception? Yes. 43 Α. 44 45 Q. And that was a belief, right or wrong, that was held 46 by colleagues who you spoke to at Concord? 47 Α. Yes.

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1 2 What I want to ask you is, throughout the time, at Q. 3 least the period of this dispute, so over the last, say, 4 three to five years, have there been occasions where there 5 has been consultation with staff at Concord about these 6 decisions in which input has been sought as to how they 7 should be made and in which some explanation is given as to 8 why decisions are made in the way that they have been made, 9 particularly those that are unfavourable or might be 10 perceived as being unfavourable to Concord? There were consultations of a nature which - I guess 11 Α. 12 of a superficial nature. So, for example, if there was 13 a budget presentation, that would happen once a year and 14 then questions were invited. We were asked to put in submissions for, say, the clinical services plan, and so 15 16 there were planning documents where people - you know, 17 where staff would be invited to put submissions in. 18 19 Q. Submissions about what sort of things? 20 About the way they felt about the planning. Α. So, for 21 example, the clinical services plan was supposed to be 22 a future document about future services required for Concord, and there were staff who told me that even though 23 24 they'd put in a submission, the plan wasn't changed, so a department may ask for more enhanced staffing, but that 25 26 wasn't included in the plan. So there was consultation, 27 but staff felt it was of a very superficial nature. 28 29 Q. So, just in coming back to my earlier question, there was consultation through that process where staff were 30 31 invited to, as it were, make submissions bidding for 32 additional FTE in order to deliver services and the like. 33 To the extent that decisions were made not to appoint extra 34 staff in response to those submissions, was there any 35 process through the medical staff council or otherwise at 36 Concord where the executive would provide you with an 37 explanation as to why those decisions had been made, having regard to the need to allocate resources across the 38 39 district? 40 Α. There was no mechanism to get an explanation from the 41 executive, but what I recognised at the start was when I first took on the medical staff council chair, one of the 42 43 issues was there was a lot of priorities, a lot of 44 initiatives which were being knocked back and being 45 rejected by the executives. So the two things that I did 46 at the time were I wanted to clarify the escalation process with the chief executive of what departments were to do if 47

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1 they had an important initiative or piece of equipment 2 which they needed but it had been rejected, and we never 3 clarified with absolute certainty what that escalation 4 The agreement at the end was if there was pathway was. 5 a problem, let the chief executive know. But that was 6 essentially the escalation pathway. 7 8 The other way that we looked at that was I created what was called the priority list, which was - when I first 9 10 became the chair I ran an electronic survey where departments could log in and input their priorities, 11 12 whether they needed a CT scanner or a new nurse or they wanted to change their service. I did that with the view 13 14 that we would create a spreadsheet of all the priorities that were required for the hospital, both immediate 15 16 priorities plus also long-term, five years or more and 17 everything in between --18 19 Just pausing there, these are priorities as perceived Q. 20 by the people --21 Α. As perceived --22 23 Q. -- who are working at the hospital? -- by the departments. So the departments wrote these 24 Α. And the reason for doing that was to actually 25 priorities. 26 provide visibility on what the issues were in the hospital 27 at the time, because no-one knew what was happening. 28 Individual departments didn't know what was happening in 29 other departments. 30 31 For example, when the issues with radiology and the 32 emergency department came out, that was the first that many 33 staff had heard about those issues. And so as part of 34 this - I knew about the issues, but I couldn't speak on the other departments' behalf, and so I felt the best way to 35 36 advocate for the departments was to create a list of all 37 the issues so that everyone could see, and in doing so, we could keep tabs on what was being rejected, what was being 38 approved, with the view that every six months we would look 39 40 back and review that to see what exactly had been done. 41 42 Q. You've referred to a lack of transparency in 43 decision-making in your evidence as well as a problem, what 44 you perceived to be a problem. Do you think some of the 45 temperature within the medical staff council at Concord 46 might have been lowered a little bit if there had been a more fulsome explanation from the executive about why 47

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1 some of those priorities and some of those requests that 2 had been made by various departments within the hospital 3 had been rejected? 4 Oh, definitely. Because perception is everything. Α. The perception may have been wrong, and had we received 5 information to the contrary, then I think perceptions would 6 7 have changed. 8 9 Q. I want to move on to another topic. You were asked 10 some questions about your early interactions with the clinical quality council. Do you recall being asked some 11 questions by my learned friend about those meetings that 12 I think you said you attended? 13 14 Α. Yes. 15 16 Q. You were asked whether you were given the opportunity 17 to raise the concerns about quality and the issues that had been raised with you at those meetings and you said you 18 19 didn't raise those issues at those meetings. 20 Α. (Witness nods). 21 22 Q. I think the answer you gave was: 23 24 Well. I had escalated it to someone far more senior. 25 26 27 Do you recall giving that answer? 28 Α. Yes. 29 30 Could I take you to the first volume of your exhibits Q. there? If you go to H7.1.6, I just want to make sure that 31 32 we understand what you mean when you refer to having 33 escalated it to someone more senior. Do you see that 34 document there? It's an email which would appear to be from you to John Sammut dated 1 February 2023? 35 36 Α. Yes. I do. 37 THE COMMISSIONER: This is annexure F. 38 39 40 MR MUSTON: Q. Annexure F. 41 Α. Yes. 42 MR MUSTON: 43 For the benefit of the operator, it's 44 [SCI.0012.0072.0001]. 45 46 In that email there, you propose that some time be set Q. aside at the meeting that you've been invited to so that 47

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1 clinicians with a more detailed knowledge of the particular 2 issues as they applied in each department could provide a five-minute report on those issues. 3 4 Yes. I asked for an hour, if I could. Α. 5 THE COMMISSIONER: I have undoubtedly been told but 6 Q. I've just temporarily forgotten. Mr Sammut is? 7 8 He's the chair of the clinical quality council at the Α. 9 time. He's also a board member of the SLHD. 10 THE COMMISSIONER: Right, 11 thank you. 12 13 MR MUSTON: Q. I think the chronology, as I understand 14 it, is you had sought to make a presentation of this type or have presentations of this type made to the board? 15 16 Α. Yes. 17 18 Q. You were then informed that instead there would be a meeting with Mr Sammut and Dr Anderson? 19 20 Α. Yes. 21 For you to raise these issues? 22 Q. 23 Α. Yes. 24 At that meeting, it was your understanding, at least, 25 Q. that the suggestion was that you should raise those issues 26 with the clinical quality council? 27 28 Α. Yes. 29 And this was you taking the next step following that 30 Q. 31 meeting, making arrangements for that to occur? 32 Α. Yes. 33 34 Am I right in understanding that, when you told us a Q. little bit earlier in your evidence that you'd escalated 35 36 the issue of raising these problems at the clinical quality council with someone more senior, Mr Sammut was one of 37 those more senior people who you had sought to raise these 38 39 issues with? 40 Α. He was at that meeting. So when I met Dr Anderson and 41 Mr Ajaka, Dr Sammut was at that meeting as well. 42 43 Q. Could I ask you to turn over now to H7.12.7, which for 44 the benefit of the operator is [SCI.0012.0071.0001]. This 45 was the response you received to that email? 46 Yes, the response from John Sammut on 1 February. Α. 47

TRA.0041.00001_0098

1 Q. Mr Sammut, not wanting to be unfair in my summary of 2 his email, said to you, or your understanding of what he 3 said to you, was, "You're not going to be given your hour 4 to present these concerns you've got to the district 5 quality council. Instead, you should just come along and watch"? 6 7 Α. That's exactly how I interpreted that email. 8 9 Q. So that you could see how seriously and carefully they 10 consider important issues relevant to the operation of hospitals in the district? 11 12 Α. Yes. You responded to that email, if you could go over to H7.12.8, which is annexure H. And for the benefit of the operator, [SCI.0012.0074.0001]. Do you see at the 13 14 top of page 2 of that document, there's your response to 15 16 Mr Sammut's or Dr Sammut's email, where, him having told 17 you that you should raise them at a local level, you've said, "Well, we have"? 18 Yes. That was the reason I raised it with him. 19 Α. 20 21 Q. And did Dr Sammut or Mr Sammut respond to that email 22 that you can recall? I think the next email after that was from 23 Α. 24 Dr Anderson. 25 26 Q. Is that the email that we see at H7.12.9, which, operator, is [SCI.0012.0073.0001], at page 2. 27 28 29 THE COMMISSIONER: What annexure is that? 30 MR MUSTON: 31 That is annexure I. 32 33 Q. We see at the top of page 2 of that email there, the 34 brief email: 35 36 Hi Winston. 37 We will arrange a meeting with you and the clinicians that you are suggesting with 38 John, Andrew and myself and they can 39 40 present to us. 41 Yes, yes. 42 Α. 43 44 Had you, prior to this, presented these issues or Q. 45 concerns to Dr Anderson? 46 No, no. Α. 47

1 Q. But to the extent that it was suggested that the 2 issues might be raised in the clinical quality council, 3 your understanding - well, what was your understanding of 4 that email exchange that we've just walked through as to 5 whether or not that was an appropriate thing for you to be 6 doing? 7 Oh, look, my feeling about this email exchange was Α. 8 that they were trying to cover up the issues, and the 9 problem with presenting all of this at the clinical council 10 was it would be out in the open and everyone would have heard it, and so my view was that they were trying to 11 arrange a smaller meeting where they could contain the 12 13 problem. 14 Having raised the issue at the subsequent meeting 15 Q. 16 which was being referred to by Dr Anderson in her email, 17 were you at any later stage invited to present any aspect 18 of your concerns or for anyone from Concord to present any aspect of their concerns at the district clinical quality 19 20 council meeting? 21 Α. No, I wasn't. 22 23 Q. I want to move on to one last topic. Do you recall 24 being asked some questions about the terms of reference and 25 the differing interpretations that might be applied to the 26 by-laws? Yes. 27 Α. 28 And I think you accepted that there may be different 29 Q. views about what could or couldn't be included in the 30 medical staff council terms of reference, having regard to 31 32 the by-laws, depending on how they were interpreted. 33 I think the concerns, at least in relation to the 34 subcommittees, if I've understood your answers correctly, that were being put to you by Dr Anderson, fell into two 35 36 categories. First, the broad proposition that such subcommittees weren't contemplated by the by-laws on her 37 interpretation of them? 38 Yes, on her interpretation, yes. 39 Α. 40 41 And the second issue was a concern she expressed about Q. having to pay staff to attend and sit on those subcommittee 42 43 meetings --44 Α. Yes. 45 46 -- to the extent they were going to occur? And the Q. third concern was that that would result in some 47

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1 duplication with what she perceived to be processes that 2 already existed within the district? 3 Α. Yes. 4 5 Q. I think, finally, you said your ultimate objective through the proposal was to give staff "a greater voice", 6 I think was the words you used --7 8 Α. Yes. 9 10 Q. -- to enable their concerns about the way in which the hospital was operating to be heard --11 Α. Yes. 12 13 14 -- and ventilated? At any stage during any of the Q. meetings that you had with Dr Anderson and others about the 15 16 terms of reference, did anyone ever ask you what you were 17 hoping to achieve through the amendments that you were proposing to the terms of reference? 18 19 Α. No. 20 21 Q. Did anyone ever try and explore with you different 22 ways of potentially achieving those outcomes? 23 Α. No. 24 That is to say, no-one said, "Look, we've got 25 Q. 26 a difference of opinion about the by-laws and the terms of 27 reference, but let's try and put that aside and work out if 28 we can find a solution to the real problem which underlies 29 all of this"? No. 30 Α. 31 32 Again, so I can make sure we're all talking about the Q. 33 same meeting, at the end of the meeting about the by-laws 34 where the difference of opinion about the interpretation, their interpretation relative to your proposed terms of 35 36 reference was concerned, could I ask you to go to annexure 0, which is behind tab H7.12.15. For the operator, it is 37 [SCI.0012.0079.0001]. Just to make sure that we're all 38 talking about the same meeting, is it at this meeting that 39 40 we're referring to, at the conclusion of which you were 41 handed this letter by the chief executive? 42 Α. Yes. 43 44 And at which you were also handed, if you go over to Q. 45 annexure P, which is page 7.12.16 - there's no need to 46 bring this up on to the screen, operator - you were handed a copy of the NSW Health code of conduct? 47

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1 Α. Yes. I wrote down the date that it was given to me 2 and who it was given to me by on the front of that. 3 4 THE COMMISSIONER: Q. That's your handwriting, is it, on 5 the front? That's my handwriting. 6 Α. 7 8 THE COMMISSIONER: Right, thank you. 9 10 MR MUSTON: Q. So as I can understand this properly, you had a meeting where there was a difference of opinion 11 expressed about the interpretation of the by-laws? 12 13 Α. (Witness nods). 14 I think the evidence you gave was you were directed to 15 Q. 16 change the by-laws - change, I should say, the terms of 17 reference in a particular way to bring them into accordance with what the chief executive felt the by-laws required? 18 19 Α. (Witness nods). 20 21 Q. You were then handed a document which confirmed to you 22 that that was a formal direction given by her? 23 Α. Yes. 24 25 Q. And you were advised that a failure to comply with that direction would amount to a breach of the code of 26 27 conduct? 28 Yes, that's what I understood. Α. 29 How did you interpret that exchange, that closing 30 Q. 31 exchange? 32 Oh, it was a very threatening meeting. It was again, Α. 33 as I described previously, the headmaster/pupil type 34 I was told what to do and I was told in no interaction. uncertain terms the consequences if I did not obey those 35 36 instructions. 37 MR MUSTON: 38 Thank you, Doctor. 39 40 I have no further questions for this witness, 41 Commissioner. 42 43 THE COMMISSIONER: Yes, thank you. 44 45 Associate Professor, thank you very much for your 46 We're very grateful for you coming in and you're time. 47 excused.

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1 2 THE WITNESS: Thank you. 3 4 <THE WITNESS WITHDREW 5 6 THE COMMISSIONER: My understanding, based on something 7 you told me earlier today, not in here, was that we adjourn 8 until 12 tomorrow; is that right? 9 10 MR MUSTON: Yes, adjourn until 12. There were three witnesses proposed for tomorrow. One of them, Dr Anderson, 11 is not going to be giving her evidence tomorrow, given the 12 relative freshness of her statement. 13 14 THE COMMISSIONER: Yes, I see. 15 16 17 MR MUSTON: But we are going to hear from Dr Hensley and Dr Hallahan. 18 Dr Hallahan has a commitment which can be 19 moved, but ideally, if we could accommodate it, would see 20 him giving his evidence at 2 o'clock. We're comfortable to 21 do that if that's convenient. 22 So Dr Hallahan is at 23 THE COMMISSIONER: All right. 2 o'clock? 24 25 MR MUSTON: Dr Hallahan is at 2, and to avoid a situation 26 where Dr Hensley comes at 10, for what I suspect will be 27 28 a relatively brief passage of evidence, and then --29 That makes sense. 30 THE COMMISSIONER: 31 32 MR MUSTON: -- we all sit around until 2, if we adjourn 33 until 12 --34 35 THE COMMISSIONER: I'm happy to do that. All right. We 36 will adjourn until 12 noon tomorrow. Thank you. 37 38 MR MUSTON: If the court pleases. 39 AT 3.15PM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED 40 TO THURSDAY, 1 AUGUST 2024 AT 12 NOON 41 42 43 44 45 46 47

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