STATEMENT OF JASON CAMERON

Name	Jason Cameron
Address	123 Eagle Street, Brisbane, QLD 4000
Occupation	Director, PricewaterhouseCoopers
Date	18 March 2013

I state that:

1. I have been employed by PricewaterhouseCoopers since 10 May 2010 and currently hold the position of Director in the Advisory Consulting Group.

2. In preparing this statement I have not had access to my emails from 2007. I understand that they were not retained when I left IBM. Prior to my interview by the Commission, the Commission provided two volumes of emails between Damon Atzeni and me. On 8 March 2013 I was interviewed by the Commission. Shortly prior to that interview, and on that day, I had been provided by Ashurst Australia, IBM's solicitors in relation to the Commission, with several volumes of emails between me and Lochlan Bloomfield. Those emails had also been provided to the Commission. I had virtually no time to review those emails at the time. I have corrected below some statements previously made to the Commission as a result of having had further opportunity to review those additional volumes of emails at Ashurst.

STATEMENT OVERVIEW AND BACKGROUND

3. This statement is intended to deal with matters related to the Inquiry, up to the signing of the Contract on 5 December 2007.

4. In this statement I deal with six matters:

   a. First: from about December 2005 to early-mid 2007, though I remained an IBM employee I was seconded to CorpTech. I was essentially on the Accenture team supervising Accenture personnel who were performing SAP programming;

   b. Second: from around early 2007, as expanded upon below, I spent some time each week with a desk at Queensland Health providing advice to its corporate services section (QHEST) in connection with the implementation of the SSS, which was to be delivered from CorpTech to Queensland Health. Whilst at QHEST attempts were made by IBM to provide 'resources' to Queensland Health to assist In their change management processes. Various contracts were prepared, though I do not know if one was ever executed or implemented.

c. Third: from about July 2007, I assisted with preparing materials to bid for work at CorpTech. This culminated in assisting with the preparation of IBM's response to the ITO in September 2007.

d. Fourth: I have been advised that the Commission had some particular questions for me in relation to certain relationships. I discuss those matters below.

e. Fifth: I have been asked to look at a series of emails provided by the Commissioner. Many of them are exchanges concerned with the kind of change management services for Queensland Health which I mention above.

f. Sixth: I have provided specific comment on some statements of other Witnesses provided to the Commission.

5. I worked at Coopers & Lybrand from 1998, which became PricewaterhouseCoopers Consulting. PricewaterhouseCoopers Consulting was acquired by IBM in 2002, which is when I commenced my employment at IBM. I worked at IBM as a Managing Consultant and ultimately left as a Senior Managing Consultant in 2010.

6. I do not have a copy of my emails from the time I was at IBM. I have been told that IBM has searched and do not have copies of my email from that time.

FIRST-EARLY WORK AT IBM

7. In around December 2005 I was seconded to work at CorpTech. I remained an IBM employee whilst on secondment.

8. My job at CorpTech was referred to as being a 'build manager'. It was my job to schedule and manage the activities of SAP development team members, most of whom were from Accenture and many of whom were contractors. These programmers were configuring and developing the SAP HR system for the whole of Government (**w-o-G**) solution.

9. As SAP was not handling the rostering components of the SSS solution, Workbrain was not a component that I was dealing with. I was generally unaware what was happening with the Workbrain components.

10. At the start, I was at CorpTech 5 days a week. However, this diminished over time. By late 2006 or early-to-mid 2007 I was not at CorpTech much at all, perhaps one to two days a week.

11. While at CorpTech, I increasingly had issues with the way the project was being managed. I saw that there was as a risk for IBM if I continued on at CorpTech. In particular:

a. There were significant components of the SAP HR solution that were not being developed in an appropriate way (such as following an appropriate development methodology).

b. I had limited power to coordinate my team, as although people technically reported to me, they were all ultimately managed by Accenture, and would follow Accenture's directions over my own. This would mean I could not properly resource and plan delivery of my aspects of the project; or that when I had, my team's instructions would be countermanded by Accenture.

c. The project estimates for delivery times were generally wrong.

12. From memory, I raised concerns with Richard Dunsdon and with Darrin Bond. I'm not ultimately sure what happened about it, though I remember it was significant enough for me to transition off the project around development methodology.

13. I had mostly transitioned out of CorpTech by around early-mid 2007. I believe that I was one of a small number of IBM employees working at CorpTech under IBM's HRBS agreement at around that time. I shifted from doing days at CorpTech to doing days at Queensland Health, though there was a transition period when I spent some days at Queensland Health and some days at CorpTech.

SECOND-QUEENSLAND HEALTH

14. From early 2007, I recall doing some work at Queensland Health. Though sales was not generally a part of my job, I needed to find something to do whilst I was waiting to be tasked onto another project. At about this time, Richard Dunsdon was in the process of retiring, and Lochlan Bloomfield was in the process of starting, at IBM.

15. I had met Damon Atzeni while he was the Queensland Health/QHEST client representative at CorpTech and I was at CorpTech as a build manager. Whilst at CorpTech, I would only generally interact with him on the basis that he would attend CorpTech's progress HR meetings. These were held weekly or fortnightly in early 2006 but infrequently, if at all, after that.

16. We had a normal, professional working relationship and I believe that he felt I would give him a 'straight answer' to questions about SAP and other products. I don't recall quite how it came about, but I believe he asked me if I would be interested 'doing a few days a week' at QHEST to assist them in getting ready for the transition to SSS, though I may have offered to assist QHEST with transition matters. In any event, he provided me with a desk at QHEST and I could attend or not attend as it suited me. I continued to receive my normal salary from IBM, though I don't believe that IBM was being paid for my time

there. I believe IBM were happy for me to be there as I had no specific other project to move on to, and it worked well for client relations. This can be a common practice when people are between projects.

17. Damon Atzeni's position was Business Integration Manager. As I understood it, his job was to ensure that the Queensland Health business and IT processes would be ready to receive the w-o-G solution from CorpTech.

18. I remember at the time that Damon Atzeni expressed his concern that QH would not have a replacement for QH's Lattice Payroll System in time to meet the date for which it would no longer receive support. He was also concerned that Lattice could collapse any day. At around this time, operating the Lattice system required significant manual intervention to pay correctly employees every pay cycle. The remediation cost was significant every week.

19. I also recall that Damon Atzeni was frustrated by the CorpTech model of working. I think he felt that CorpTech were dictating requirements and rollout schedules to agencies, including Health, which apparently agencies did not like. He and others in QHEST were frustrated as they did not believe that Health's requirements would be met, that the w-o-G project was taking an incredibly long time, and that he expected Health's systems would collapse long before CorpTech's solution would be ready.

20. Whilst at Corptech and QH, I would be used by Damon Atenzi as a 'sounding board' because I remember him saying that it was difficult to get responses from CorpTech. I believe he recognised that I had an understanding of what was possible with SAP and would give him my views about what was and what was not viable.

21. At the time, there were, I believe three separate groups of work going on in the HR/Payroll area:

   a. The CorpTech group was independent of Queensland Health. Its focus was to develop the template for the w-o-G which included all HR and Payroll aspects to the scoped specification to be capable of being deployed to all departments and agencies;

   b. Inside of Queensland Health, QHSSP was principally dealing with matters like payroll processing. This involved manual workarounds, entering timesheets, roster, pay adjustments and those kind of groups;

   c. The QHEST (Queensland Health Enterprise Solutions Transition) team was a Corporate Services group within Queensland Health. This group had representatives from the business (including the QHSSP) tasked with managing

the required change within the organisation to operationalise the implementation of the w-o-G solution.

22. The relations between these groups were generally acrimonious. At one point, QHSSP believed that they should be managing the SSS implementation at QH; however, given QHEST was established as part of a broader Corporate Services group that would later include other payroll functions, they saw it as their responsibility to manage the implementation. QH felt that CorpTech generally simply dictated to the agencies, and there was limited interaction with them, despite occasional scoping and feedback workshops.

23. In QHEST's view, the w-o-G SSS would not give them everything they needed. There was constant talk about whether QH would 'go it alone' rather than join in with others. I also recall that at this time there was some uncertainty around what would happen to CorpTech as it was failing to deliver on time and reviews of it were being undertaken.

Work at QHEST

24. I do not recall having any specific deliverables whilst at QHEST. I was there to provide advice as requested or as needed. QHEST and CorpTech were running 'impact assessment workshops' to ascertain how they would operationalize the w-o-G shared services solution within Queensland Health. I recall being asked to work on a project plan, though I do not recall what this project plan was for, nor do I remember if it was ever completed. I did not deliver anything else at QHEST to the best of my recollection. I was mostly used as a 'sounding board' as I set out above.

Change Management Resources

25. From having read the bundles (discussed below), I recall that IBM offered 'change management' resources to QH.

26. Change management involves ascertaining how a change (such as implementing the SSS) will impact people, processes and technology within an organisation. For example, this management would consider:

   a.   centralised vs. distributed/de-centralised payroll processing centres;

   b.   what, how and when to communicate with the 70-80,000 employees about the change;

   c.   how roster management would work, for example: how staff would receive a new roster, who would processes roster changes, how do staff get notified of changes changes; and so forth.

27. These offers of resources focused on management of the coming change, not on building a solution. I believe that these offers of 'resources' to Queensland Health would have been through me acting at either Richard Dunsdon or Lochlan Bloomfield's direction, or at the specific request of QHEST. Sales were not a part of my job, so I was likely providing a client-contact channel for others at IBM.

28. From having reviewed the bundle of documents (discussed below), it appears IBM went from suggesting about 14 people, down to suggesting two for QHEST work related to QH's internal change management requirements.

29. Further, it appears that this resourcing was initially sought to be performed under IBM's HRBS agreement. There then appears to have been some back-and-forth about other appropriate engagement methods. I remember that Queensland Health wanted people sooner rather than later and so we were all looking for a method that would enable that. There was never any resolution, as far as I recall.

30. I remember that by about July or August 2007, I was called back to IBM, as was Sara Simpson, who had also been working on change management at QHEST. This was to assist with preparatory work for IBM's responses to CorpTech. As far as I can recall, the resourcing proposals were shelved when the CorpTech matters started to significantly pick up.

Prior to the ITO process

31. At some time after I returned to IBM, though I cannot specifically recall when, a meeting was held of the CorpTech vendors (SAP, Logica, Accenture, and possibly SMS) to discuss systems. To the best of my recollection, after the meeting Lochlan Bloomfield indicated to me that we would propose using Workbrain for award interpretation and choose a single instance SAP model.

32. IBM prepared a powerpoint slide presentation called "Delivering Excellence with CorpTech – IBM Innovation" dated 12 July 2007 for CorpTech. To the best of my recollection Paul Surprenant coordinated the preparation of that document. I don't recall preparing any of the text which formed part of the document, but I recognise some of comments which may have originated from me in it.

33. The document was presented to CorpTech on 13 July 2007. It identifies that I attended the presentation, though I have no specific recollection of the presentation.

34. A further presentation took place on 6 August 2007. IBM prepared powerpoint slides called "Excellence with CorpTech – Partnering with IBM – Our recommendations". I cannot identify any parts of that presentation as having been drafted by me, but I was

part of the team working on it. I attended the 6 August 2007 presentation. To the best of my recollection Paul Surprenant presented, and Chris Prebble spoke about the Lattice replacement proposal.

35. From emails I have reviewed I am aware that I was invited to attend a "dry run" of that presentation which was scheduled to take place on 3 August 2007. Terry Burns was invited to that presentation. I have no recollection of that meeting.

THIRD-THE ITO PROCESS

36. Sometime around August or September 2007, I became aware that CorpTech was going out to RFP/ITO.

37. I remember working on IBM's response to the ITO. I recall that Lochlan Bloomfield split out sections of the IBM Response for different people on the team to develop. I only worked on the preparations until 21 September 2007 when I went on leave. After I returned on 8 October 2007 I assisted in the preparation of responses to the requests for clarification.

38. There were two rooms. The key people were Brooke Freeman, Johan Visser, Lochlan Bloomfield and Paul Surprenant. These key people would be in one room working on strategy, themes and composing the response, whereas the more junior people, like me, would be in another room working on different aspects, such as collating figures or answering specific questions from the ITO.

39. I believe that Chris Prebble was given the Queensland Health interim solution aspect. I also believe Keith Pullen was working on data migration and Sara Simpson was dealing with change management.

40. I believe my part was about trying to estimate the effort and resources for the SAP aspects, and to get estimation models together from IBM's Global Delivery Centre in India. I remember spending time in contact with IBM India about these aspects. I believe Brooke Freeman was collating the pricing aspects from all teams. I also liaised with SABA and RASP representatives to request that they provide relevant proposal material and estimates for their areas of expertise.

41. I do not recall what role, if any, I played between the contract being awarded and the entry into the contract.

FOURTH-COMMISSION QUERIES

42. I have been made aware by Ashurst that the Commission had some questions for me in relation Damon Atzeni.

43. I have never been to Damon Atzeni's home and he has never been to mine. I did not attend his wedding and I believe he did not attend mine. I did not attend the Christening of any of his children and I believe he has not attended the Christening of any of mine. I don't believe I ever had dinner with him, nor do I believe that I had lunch with him. I had coffee with him (as a co-worker) whilst I was working at QHEST. Mr. Atzeni would not have called me at home and I have never called his home. In fact, Mr. Atzeni is unlikely to have called after hours at all. He would generally be on the train by about 4.30pm, so you would rarely catch him after hours.

44. Whilst I believe that we had a trusting commercial relationship and we got along well, I don't consider this was more than, for example, someone like Paul Miles of Accenture who was also working on the project with whom I recall Mr. Atzeni got along well.

45. In relation to the ITO, I did not know who the decision making panel was, and it would not have been my job to know. As I say above, my job was to estimate effort and resources for certain aspects of the bid. I don't recall Damon Atzeni ever speaking to me about the decision making process in relation to the ITO.

46. The last time I saw Mr. Atzeni was about two or three months ago in passing at shops at Rosalie. We exchanged pleasantries but that was all. Prior to that occasion, I have only spoken to him on two other occasions since the project ended:

    a.   I recall Mr Atzeni calling me sometime in either 2010 or 2011 whilst I was working at PricewaterhouseCoopers. I do not recall the exact context of the conversation but believe he was asking advice around SAP functionality;

    b.   The second time I saw Mr Atzeni was in Edward Street sometime around the job cuts being announced by the State Government. We exchanged pleasantries but that was all.

47. IBM's solicitors have asked me if I know anything about Lattice support being included in IBM's response to the ITO. I do not recall if we put anything about Lattice support in our response to the ITO. However, I would say it was very well known at the time that Nigel Hey, Michael Kalimnios, Damon Atzeni and others all had significant concerns about payroll given the ongoing troubles at with it, and were vocal about it, both at QH and in CorpTech. The position about Lattice was not a secret. If the offer of some support were given, that would seem a sensible thing to do.

48. I have been told that Accenture provided a detailed proposal to CorpTech in August 2007. I have never seen that proposal, nor any strength and weakness document analysing it or any competing proposal.

49. I have never seen the Accenture Response to the ITO.

Bundles

50. I have been provided with two bundles of material by Ashurst, which I am told have been provided to them by the Commission and have read the correspondence in them. These bundles are entitled: "Correspondence between IBM and Queensland Health supplied for the purpose of witness interview with L. Bloomfield 27 Feb 2013"; and "Correspondence between IBM, Queensland Health and CorpTech; CorpTech Purchase Plan; Part E of IBM Response to ITO supplied for the purpose of Witness Interview with L. Bloomfield 28 Feb 2013". I am informed by Ian Innes of Ashurst that he was requested by Emma McGrath, solicitor for the Commission, to direct me to these materials.

General: Information Exchange

51. I have seen in the bundles that there were some documents relating to project plans, framework documents and the like being exchanged. There was nothing surprising about these exchanges. The documents in those attachments were freely available to any resource working on the w-o-G programme and, on my recollection, were not required to be treated as confidential.

52. The goal of the SSS project was for all departments and large suppliers to be informed of what was going on. I remember that if there were ever files that weren't available for general access, they would generally be on secured network directories. None of the documents I see in the bundle emails (either in the Framework documents I seemingly send to Lochlan Bloomfield, nor the rollout documentation sent from Damon Atzeni to me) would have been of that type.

53. IBM's solicitors have asked me about specific emails. I do not recall any of these emails in particular, but I will deal with each in turn.

4 February 2007 3.29pm

54. This is an email from me to Nigel Hey and Damon Atzeni, both at QHEST regarding the process by which they could engage IBM resources under the current CorpTech arrangements.

55. This email would have been me acting at Richard Dunsdon's direction. I had no specific knowledge of the HRBS agreement at the time, except that it was a possible way for government agencies to obtain IBM resources for particular projects. I would not have known to suggest it. I recall that IBM had a good working relationship with QHEST and they requested IBM resources.

8 March 2007 1.45pm

56. This is an email from Damon Atzeni to me, Mark Foley, Jim Sams, Leanne Bulmer, Neil Glentworth and Rosalie Crumblin. It attached a document called "Health Workbrain requirements". Mr Foley was working for CorpTech, and the others were employees at QHEST.

12 March 2007 4.30pm

57. This is an email from Lochlan Bloomfield to Geoff Waite, copied to me and Richard Dunsdon. It attached a document entitled "IBM Proposed Conceptual Model". The document stated that it was drafted in response to a request from Geoff Waite to propose a conceptual model to best position CorpTech moving forward with regards to agency implementation taking into particular consideration, the implementation rollout to Queensland Health and the Department of Training and the Arts (DETA).

58. To the best of my knowledge this document was largely prepared by Lochlan Bloomfield. I provided input that outlined challenges that were being faced by CorpTech at the time and amended paragraphs in the suggested improvements section of the document. I sent my updates to Lochlan Bloomfield and Richard Dunsdon for them to review. (I have refreshed my recollection of that work from emails since my interview with the Commission.)

59. I was asked by the Commission in my interview whether Lochlan Bloomfield took me into his confidence and discussed his proposed strategies in respect of expanding IBM's existing roles. These were not discussions we would generally have. More likely at this period he would have had them with Richard Dunsdon, his then outgoing predecessor.

16 March 2007 1.32pm .

60. This is an email from me to Nigel Hey and Damon Atzeni, copied to Lochlan Bloomfield. It attached a document called "QH Development Estimates". It provides an estimate of costings for Queensland Health to implement its own alternative to the shared services solution.

61. Mr. Atzeni and Mr. Hey had said to me that they were concerned that CorpTech may not continue or may not be able to deliver their payroll and rostering solution prior to Lattice support expiring. They said that one of their potential options to consider was to "go it alone" and to engage an implementation partner to assist them in implementing their requirements.

62. To the best of my recollection, QHEST requested that I provide a "ball park" figure that would outline the potential costs to develop the following:

    a.   Queensland Health SAP requirements that were not in scope for the W-o-G Standard Offer solution;

    b.   the Workbrain solution; and

    c.   custom interfaces and reports.

63. I do not recall who was involved in collating the high level estimates from IBM. I would not have been able to ascertain these figures on my own. I would have had to receive permission from Mr Bloomfield to provide these "ball park" estimates to Mr Hey and Mr Atzeni.

64. I do not know what QHEST did with this information.

65. At my interview with the Commission I was asked whether this email provided to QHEST was associated with the document provided to CorpTech on 12 March 2007. At that time it was suggested to me that they were, and I agreed. I have reviewed the documents again. I believe that they are completely unrelated.

30 April 2007 9.59am

66. This is an email to me from Damon Atzeni, attaching a document by Workforce Edge.

67. I do not recall receiving or reading this document at the time.

68. Given that Damon Atzeni and QHEST were sceptical of SSS's ability to deliver the W-o-G solution in time to replace Lattice, they were always considering options to "go it alone". I recall Damon was considering whether ESP or the custom interface needed to be replaced or not as, from memory, it performed the pay rule calculations. He would request my advice on potential solution options should they decide to go it alone. He could have shared this document with me to help me provide this advice, considering the role I was helping him with on QHEST.

69. Damon in his statement says that he sent it to me to assist in the scoping work being done by IBM. As I outline in paragraph 117, I cannot recall performing this work.

18 April 2007 2.18pm

70. This is an email from Damon Atzeni to Sandra Bowtell at CorpTech regarding an order for IBM resources.

71. Though I wasn't CC'd on this email, it appears to be Damon Atzeni's initial request for 14 people through IBM. Ultimately, there were none taken up to the best of my knowledge.

24 May 2007 1.23pm

72. This is an email from Lochlan Bloomfield to me, with CC to Keith Pullen. This email replies to what appears to be my email attaching "Corptech's strategy documentation as required for Workbrain Proposal". This work was separate from the later July or August presentations, or the ITO.

73. I do not specifically recall Lochlan Bloomfield's response. As I have stated above these kinds of documents were generally available, and despite whatever they may say, were not required to be treated as confidential.

74. On 5 April 2007, I sent an email to Kevin Keogh (Workbrain), Cindy Williams (Workbrain), Lochlan Bloomfield and Joseph Sullivan seeking a request for a proposal for assistance with the Workbrain application development component of the Human Resources Business Solution.

75. I was involved in various aspects of the preparation of that bid, being nominated by IBM as the bid leader. In that position my role was to coordinate the execution of internal IBM processes required to prepare the proposal. In around mid May 2007 regular meetings were held to manage the bid preparation, and in which I participated. As action items from those meetings Lochlan Bloomfield was tasked to ask the client for their standard test approach and requirements.

76. The documents attached to the email of 24 May 2007 appear to have been obtained by me in response to requests by IBM for documents for the purposes of preparing that bid proposal.

19 June 2007 8.30am

77. This is an email from me to Damon Atzeni attaching a copy of resource CV's in the "Format of Offer New and Replacement Specified Personnel". It appears to be under the HRBS agreement under GITC 5 Q-11.

78. As I set out above, this would have been IBM offering change management resources to QH. This time there are 6 people offered.

22 June 2007, 10.37am

79. This is an email from me to Chris Prebble attaching documents in a zip file called 'Corptech.zip'. The subject of the email is 'Corptech Documentation'.

80. I do not recall this email, nor do I remember what its attachments contain.

81. I reiterate, however, that I would have only sent documentation that was generally available as it was not my practice to send documentation required to be treated as confidential, other than to those persons entitled to access such information.

24 June 2007 8.31pm

82. This is an email from Damon Atzeni to both me and Nigel Hey attempting to coordinate a meeting time. Earlier in the chain of correspondence, I had proposed in an email to Nigel Hey, Damon Atzeni and Lochlan Bloomfield a meeting regarding finalising these pending resource requests.

83. This was a continuation of the same chain of correspondence about resourcing, and arranging meetings to sort out putting on more people.

2 July 2007 3.04pm

84. This is an email from me to Damon Atzeni and Dennis Brown attaching a revised services agreement.

85. This would have probably been from Ian Brushaber in the IBM legal team and I would be forwarding it on. I would not have edited the document myself, save on instructions.

3 "July" 2007, 10.18am (properly: 3 March 2007)

86. This is an email from Nigel Hey to my former boss, Richard Dunsdon asking about having me do some work at Queensland Health.

87. I was not CC'd on the email, however, Richard Dunsdon had left IBM by July 2007. I believe that the date on the email is properly read as "7 March 2007".

25 July 2007 12.17pm

88. This is an email from me to Damon Atzeni requesting the implementation rollout plan template provided by CorpTech and seeking a meeting with him and Dougal Ferguson.

89. There is nothing strange about requesting an implementation plan. This was not a confidential document. At the time, plans of this type were displayed on walls in offices at CorpTech and within the agencies. I do not recall for what purpose I requested the template.

90. I cannot recall the exact reason for the meeting but I believe that the meeting may have related to preparing the upcoming presentation for CorpTech. I believe that Mariza

Richards, Sara Simpson, Chris Prebble and others were present together with Dougal Ferguson, Damon Atzeni and me.

91. Dougal Ferguson was the awards specialist at Queensland Health.

25 July 2007 12.53pm

92. This was an email from Damon Atzeni to me. It appears to be him providing me with the requested plan.

93. His invitation for further information, I assume, was related to seeing if anything else was required for the meeting.

25 July 2007 4.23pm

94. This is an email chain commencing with Lynette Land at Queensland Health forwarding Leave Planner documents, and ultimately ending up with an email from Damon Atzeni to me regarding options in SAP for certain matters.

95. I do recall this email chain and there are a few aspects to mention.

96. This email is indicative of the kind of question that Damon Atzeni would ask me all the time. "Is this possible with SAP? What is standard functionality? This is our requirement, how can that be satisfied? How long would it take to do XYZ?" This would spare him having to go to CorpTech, whom he found to be generally unhelpful, and people there wouldn't respond to him, and so he would be left in the dark.

97. Lynette Land was a representative from the QHSSP who worked in QHEST. She and other members from QHEST across all business functions (i.e payroll, HR Recruitment and Learning) would all have questions regarding the functionality of solutions that were being provided as part of the w-o-G solution.

98. Where potential gaps were identified in the SSS Standard Offer, questions were generally asked about whether their requirement could be satisfied and, if so, how and the potential magnitude of effort required to implement that requirement.

99. In this instance, I reviewed a leave planner requirement Lynette had and, based on my knowledge, knew that it would take minimal effort to provide using standard SAP. Damon Atzeni also asked whether the requirement could be satisfied using Workbrain. I would not have the knowledge to answer the Workbrain question so I would have probably spoken to Joseph Sullivan whether it was a standard Workbrain functionality and, if not, whether it was possible to develop and, if so, a high level estimate of effort involved.

30 July 2007 3.28pm

100. This appears to be me forwarding a publicly available link to the SSI review to Damon Atzeni. I would have sent it as it was his job to implement SSS aspects, so he would have an active interest in it.

101. Though plans and the like would be exchanged between departments and CorpTech, there was often a thirst in multiple areas to know exactly what was going on.

8 August 2007 10.27am

102. This is an email from me to Damon Atzeni answering his question about how IBM's presentation at CorpTech had gone.

103. Again, Damon Atzeni would have been interested in what was going on vis-à-vis IBM and CorpTech, as it would have a direct impact on QH and QHEST. Also, this was generally common knowledge that things were possibly changing at CorpTech.

13 August 2007 4.46pm

104. This is an email from me to Nigel Hey, with CC to Damon Atzeni seeking the opportunity to share our CorpTech presentation with them, Michael Kalimnios, Paul Monaghan.

105. As to presenting to QH, this would likely have been about IBM's suggestions on how to mitigate the payroll problem. This was probably someone with sales responsibility, such as Lochlan Bloomfield, connecting through me because I had the relationship with QH/QHEST. Organising a meeting such as this was not within the scope of my IBM authority or responsibility. It's not the sort of thing I would have come up with on my own. I have never met Michael Kalimnios, so I don't know if this meeting ever took place.

106. In my interview with the Commission I was asked by counsel assisting the Commission whether I had sought to set up this meeting for the purposes of sharing the contents of the proposed response to the ITO prior to its being submitted by IBM. I mistakenly answered that this was the case. It was not the case. I did not discuss with QHEST the proposed contents of the response to the ITO prior to its being submitted. The proposed meeting referred to in the email only related to aspects of the 6 August 2007 presentation as I outline above.

14 August 2007 8.56am

107. This is an email from Nigel Hey to me, responding to my email of 13 August 2007 with the offer of a presentation. He asks me whether IBM had been selected to undertake the work or whether it related to some separate proposal.

108. At my interview with the Commission, counsel assisting the Commission put to me that this was a contract in relation to the prime contractor role. I mistakenly agreed. The work which would have been proposed to be performed under the 6 August 2007 presentation has a prime contractor proposal in it, but is not the prime contractor agreement which was ultimately offered under the ITO.

14 August 2007 1.38pm

109. This is an email from Susan Bishop at IBM to Damon Atzeni, with a copy to me and Charles Hoffman seeming to follow up on an earlier meeting, possibly about a software product supply.

110. This appears to have been a general software sales presentation by Susan Bishop, Aaron Brown and Charles Hoffman. I was likely CC'd because I was a client contact. I don't believe this is related to anything to do with HR/Payroll.

30 August 2007 3.06pm

111. As to the final email in the first bundle relating to DETA papers, as I say above, these kinds of requirement documents were not required to be treated as confidential. I recall that QH and DETA were working together on matters relating to the SSS as they were both considering 'going it alone'.

112. Since my interview with the commission I have been shown an email dated 22 August 2007 from Cheryl Bennett, sent to Lochlan Bloomfield and Rob Pagura, and copied to Brooke Freeman, Chris Prebble, Cliff Bailey, Kate Hillman, Keith Pullen, Sara Simpson and me. The email refers to results of a review of Accenture's and IBM's proposals, though I understand we had already advanced to the next round. I do not recall receiving the email. In reading the email I note the reference to agencies effectively being required to find their own suppliers for parts of what was then the shared services solution. This does not make sense to me and was not correct.

113. Since my interview with the commission I have been shown an email dated 30 August 2007 from Joseph Sullivan to Lochlan Bloomfield copied to me. The email refers to checking if vendor proposals were on the G drive of CorpTech. I am aware that this was in the context of IBM complaining to CorpTech about leaks of its information to other vendors, and it may have had something to do with that. I do not recall the email or conversation.

114. At no time did I see or obtain a copy of any proposal by any of the CorpTech vendors other than that of IBM.

SIXTH-WITNESS STATEMENTS

Statement of Damon Atzeni

115. There are two particular items of Damon Atzeni's statement that I wish to address directly.

116. At paragraph 18 of his statement Mr Atzeni says he had a view that Queensland Health needed to go it alone and seek an implementation partner with knowledge of the systems. He then refers to contacting me. I do not agree that my role was part of a wider role for IBM as an implementation partner to assist Queensland Health to develop its own new solutions. My main role was to answer queries raised from time to time and to arrange for change managers to assist with Queensland Health's proposed receipt of the shared services solution from CorpTech.

117. At paragraph 33 of this statement Mr Atzeni says that between May and August 2007 IBM carried out scoping work for the job of replacement of the Lattice system with the SAP system. I do not agree with him. I believe that this in the context of assisting in implementation roll-out activities and not build activities. At that time there were only two other IBM staff at QHEST, Kate Hillman and Sara Simpson. They were both change managers and were not in a position to perform such a scoping task. I, as the other staff member, would not have been able to perform such a large and complex review on my own, which would have resulted in a formal report. I would not have done it without a signed contract. I do not believe that I performed the work he suggests. I had also returned to IBM and was not at Queensland Health for part of that period. I further went on leave from 21 September to 8 October 2007.

Statement of Neil Glentworth

118. I have been asked by the Commission whether I or any person from IBM provided Mr Atzeni with a CD containing documents relevant to IBM's ITO response. I do not recall giving Mr Atzeni a CD with IBM documents. I am unaware of anybody from IBM providing Mr Atzeni with a CD of IBM documents. I did not give Mr Atzeni IBM's ITO response.

119. As to paragraph [29] of Mr. Glentworth's statement, I can say that document is not what Mr. Glentworth appears to suggest that it is. Appendix C – is a proposal from IBM dated 29th January from Mr Richard Dunsdon to Mr Nigel Hey offering consulting services to assist Queensland Health in meeting the training management requirements

for QH's Skills Development Centre (SDC). It has no relevance to assist in the upgrade of Queensland Health's Payroll System.

120.   As to paragraph [31], I do not recall any social event that Damon Atzeni attended with me.

121.   As to paragraph [32] and [34], I am not aware of any engagement of IBM in mid 2007.

122.   As to paragraph [36], to the best of my knowledge, no engagement agreement was ever signed.

Signed: *Jason L Cameron*

Date: 18/03/13 .

Witness: *Bogell*
             Brianna Bell