

## **QUEENSLAND HEALTH PAYROLL COMMISSION OF INQUIRY**

### **SUBMISSIONS BY MR MICHAEL REID**

1. These submissions deal in the First Part with the evidence before the Commission relating to the issues for submission identified by Counsel Assisting in the letter dated 10 May 2013. In the Second Part they set out the two issues for submission relevant to Mr Reid, and answer Counsel Assisting's specific questions.

#### **FIRST PART**

2. Should Mr Reid have done more than bring to Mr Grierson's attention Queensland Health's concerns as set out in the Briefing Note for Approval of 29 August 2008 (TB Vol. 5, pages 294-296)? In our submission the answer is "No". Nothing more was called for or sought of him.
3. It might be suggested that if Mr Grierson did not agree with Queensland Health's suggestion that the contract between IBM and CorpTech be terminated, Mr Reid ought to have "raised that with the Minister" (Transcript of 1/5/2013 P23-10 L20). However, the Briefing Note for Approval of 29 August 2008 did not call for the matter to be "raised with the Minister". It called for Mr Reid's approval to do something he was not empowered to do. After the meeting with Mr Grierson there was not an impasse; rather, Mr Kalimnios moderated his approach.
4. Mr Reid properly and sensibly sought more information from Mr Kalimnios before considering whether the recommendations in the Briefing Note for Approval of 29 August 2008 be approved. Thereafter Mr Kalimnios and Mr Reid met with Mr Grierson, the Director-General of Public Works. Mr Grierson's response did not call for the matter to be "raised with the Minister". Mr Kalimnios did not leave that meeting and advise Mr Reid that Mr Grierson's response was unacceptable. On the contrary, the next Briefing Note approved by Mr Kalimnios was a Briefing Note for Information dated 29 September 2008. That Briefing Note for Information did not renew the call for the termination of the contract or the withdrawal from the Whole of Government approach to the issue. On any fair reading, that Briefing Note for Information replaced the one of 29 August 2008. The "Background" is virtually the same and the

last bullet point is identical and states the purpose of the Briefing Note. It also records a change in view following agreement with CorpTech. This is consistent with Mr Reid's evidence that "... (Mr Kalimnios) agreed to go and prepare another memo" (Transcript of 1/05/2013 P23-10 L25-35).

5. On any view, there was no reason for the matter to be "raised with the Minister".
6. More weight might be given to such a suggestion if that second Briefing Note for Information had repeated the recommendations of the first, such that there was an impasse or deadlock between the senior Queensland Health officials and the Department of Public Works. Mr Grierson's recall is largely a reconstruction that he likely would have advised Queensland Health that if it wanted to remove itself from the Shared Services Initiative, Mr Reid should ask his Minister to take it up in Cabinet. This makes sense and likely explains the change of heart of Mr Kalimnios to moderate the first Briefing Note, which did not call on Mr Reid to take the matter up with the Minister.
7. It is tolerably clear that in fact Mr Kalimnios' position did change from the strong stand expressed in the Briefing Note for Approval of 29 August 2008. On 18 September 2008 Mr Kalimnios expressed willingness to work within the Whole of Government structure so long as it was not at the expense of Queensland Health. There was a new revised programme of governance and a "Go-Forward" strategy at this time which no doubt gave him confidence. Queensland Health was to be given a greater degree of autonomy whilst still within the constraints of the existing contractual arrangements (See Exhibit 53(d), Statement of Barbara Perrott at paragraphs 12-16). This is wholly consistent with the moderated view expressed in the Briefing Note for Information of 29 September 2008 authored by Mr Douglas and approved by Mr Kalimnios.
8. There was no other occasion which called for Mr Reid to "raise the matter with the Minister". No other complaint serious enough was made to him (aside from those issues that Mr Reid was advised were being progressively rectified).
9. In our submission, you would find Mr Reid received no other Briefing Note on this matter.

10. The Briefing Note for Information of 9 September 2008, referred to by Mr Kalimnios at paragraph 27 of his first statement (Exhibit 89), was not received by Mr Reid. Mr Kalimnios believes he sent it, but it is unsigned and unstamped, and unsigned by Mr Reid as having received it. Mr Reid denies receiving it, and in evidence Mr Kalimnios is unsure (Transcript of 29/04/2013 P21-115 L50). In our submission you would find it was a draft not sent to Mr Reid.
11. The Brief for Noting of 26 October 2009 addressed to the Deputy Premier and Minister for Health (TB Vol. 11, pages 295-297) was also unlikely to have been provided to Mr Reid. It is unsigned by the author (Mr Price) or by the person authorised to clear it (Mr Shea), and it is unsigned, unstamped and unmarked by Mr Reid. Mr Reid does not accept he received it (Transcript of 30/4/2013 P22-75 L44). Mr Reid was uninformed of the detail of the number of defects or the reclassification of defects, save in the most general of terms (Transcript of 30/4/2013 P22-76 L1-35).
12. The draft Brief for Noting of 6 July 2009 prepared by Mr Price (TB Vol. 9, pages 240-243) was never given to Mr Reid. The question remains whether the contents were raised with him in circumstances which called for him to "raise the matter with the Minister".
13. Mr Reid says he did not have a single particular meeting with Mr Kalimnios where the issues in Mr Price's draft Brief for Noting of 6 July 2009 were specifically discussed. Rather, only some of them were raised with him over a series of regular meetings over a period of a year after the first Briefing Note for Approval of 29 August 2008 (See Transcript 30/4/2013 P22-100 L1-10).
14. It is more likely there was not a single meeting around this time about the contents in either whole or large part which comprised Mr Price's draft Brief for Noting of 6 July 2009, else the meeting would have taken a very long time and both Mr Reid and Mr Kalimnios would have a clearer recollection of it. Further, there would surely have been no need to discuss all of the matters in Mr Price's draft Brief for Noting of 6 July 2009 given these would be expected to have been raised in the course of his regular reporting to Mr Reid. There would have been no need to repeat them. Mr Kalimnios does not suggest these only arose anew. Mr Kalimnios' Supplementary Statement dated 13 May 2013 assists in this regard.

15. It is more likely that a specific issue for example concerning delay on the part of IBM, how this might impact upon a vulnerable LATTICE system, and how it might be addressed, was the subject of discussion around this time rather than the contents (whether in whole or part) of Mr Price's draft Brief for Noting of 6 July 2009. Mr Reid says that the issues in Mr Price's draft Brief for Noting of 6 July 2009, or some of them, were raised over a period of time and he was advised they were being dealt with progressively. Mr Reid's view has overwhelming support on the evidence. Mr Kalimnios does not suggest that in about mid 2009 he wanted Mr Reid to take the matter up with the Minister. In fact by mid July Mr Kalimnios well knew the Minister for Health was aware of the matters discussed in the Price draft Brief for Noting. See paragraphs 32 to 37 below.
16. If there were issues from about mid 2009, they were being progressively dealt with. This is perfectly consistent with Mr Price's recollection of what was happening at about mid 2009 when he was required to look back for the purpose of considering his draft Brief for Noting of 6 July 2009 in response to a Freedom of Information application. In that response on 10 March 2010, Mr Price noted about his draft Brief for Noting of 6 July 2009 that "It was written at a point in time and QH management believes that those circumstances in the project have now changed" (TB Vol. 15, page 54 at 55).
17. Mr Reid's recollection that there were no major issues raised with him in mid 2009 that warranted the involvement of the Minister (given that all issues he had been advised of were being progressively rectified) and in particular those articulated in Mr Price's draft Brief for Noting of 6 July 2009 is also consistent with Mr Shea's evidence that "Toward the end of 2009 there was improved confidence with the new system. Functionality and UAT were starting to improve" (Exhibit 80, Statement of Adrian Shea at paragraph 37). Although to be fair, Mr Reid thought this was the position from an earlier point.
18. Mr Reid's recollection that there were no major issues raised with him in mid 2009 that warranted the involvement of the Minister (given that all issues he had been advised of were being progressively rectified) and in particular those articulated in Mr Price's draft Brief for Noting of 6 July 2009 is also perfectly consistent with the various Position Papers prepared by Queensland Health through Mr Burns and distributed to the QHIC Board.

19. It is also consistent with how the QHIC Board saw the matter. There was no dissent with the attribution of amber, red and green to the milestones set out in those Position Papers. Those Position Papers showed some concern about contract management and governance in the period from 15 July 2009 to 18 August 2009. This is consistent with the mood which probably caused Mr Price's draft Brief for Noting of 6 July 2009 to be written and which covered the history of the project. However, as the Position Papers show, from 18 August 2009 to 28 October 2009, contracts and governance was green. On 28 October 2009, it changed to amber. What caused the change is articulated as "contract changes being managed by CorpTech. C/R under preparation". This obviously means a change request (See TB Vol. 12, pages 33-36 at 34). But "governance" is not a current issue.
20. In short, these Position Papers are perfectly consistent with Mr Reid's evidence that the matters set out in Mr Price's draft Brief for Noting of 6 July 2009 were not subject of any specific discussion between Mr Kalimnios and himself. In fact, governance probably ceased to be any current problem at all, even if it had historically been a problem. Mr Price's draft Brief for Noting of 6 July 2009 at page 2 identifies three key reasons for the failure of the QHIC project. These are:
- *"Lack of recognised project management methodology has resulted in failure to manage development of solution requirements through design and build process*
  - *Lack of adequate skill and resources provided by IBM*
  - *Critical failures of governance to ensure Queensland Health business needs were met."*
21. It is no answer to say there was no point in senior officers at Queensland Health raising these matters at QHIC Board level because Queensland Health had been told they must make do with the existing arrangement of CorpTech governance.
22. If governance was a problem, if lack of adequate skill and resources was a problem, or if lack of project management methodology was a problem, or any one of these was adversely affecting the achievement of "Go-live", the QHIC Board was the very place these matters should be raised. If these problems existed at this time (after July

2009), one would have expected to see evidence of these matters at QHIC Board level. This is where these matters ought properly be addressed.

23. Shortly after the time of Mr Price's draft Brief for Noting of 6 July 2009, Mr Kalimnios had a meeting with Ms Berenyi on 17 August 2009 where he discussed various issues but significantly, as regards IBM, the main issue was to do with delay (See TB Vol. 10, page 54 and in particular the two larger paragraphs). There was no complaint about management or governance issues or about IBM providing inadequate resources or skills. Delay was the principal issue, and it is delay which Mr Reid reconstructs was the issue discussed with Mr Grierson at the second meeting if such a second meeting took place. (See Transcript of 30/4/2013 P22-65 L35).

*"Can I just ask, what did you hope to achieve from this meeting with Mr Grierson, the second meeting?---My recollection is that there was still a number of concerns that Michael was expressing to me, commissioner, about the delays to go live and functionality of LATTICE and he was trying to achieve, I understand, an arrangement whereby we could - now, I don't know where he drew the distinction, but he could gee up CorpTech and IBM to be more responsive to the requirements of Health in getting the system live."*

24. It is likely that delay in having an Interim Solution was the matter of pressing concern, and worthy of discussion between Mr Kalimnios and Mr Reid because of the perceived vulnerability of LATTICE. That would warrant a second meeting with Mr Grierson to see how IBM's solution might be expedited, but no more. It is also consistent with Mr Grierson's recollection that if Mr Reid needed his help with IBM, that would be a matter for discussion between them (See Transcript of 14/5/2013 P29-34 L25-35). If there was a meeting with Mr Grierson about the contents of Mr Price's draft Brief for Noting of 6 July 2009, he surely would have remembered it. The detail of the complaints is highly unlikely to have been raised at Director-General level. Again Mr Grierson would surely have remembered if Mr Kalimnios suggested that CorpTech might be willing to compromise solution quality. In evidence Mr Grierson bridled at the suggestion this would occur (See Transcript of 14/5/2013 P29 -35 L50 to P29-36 L1-10).

25. In our submission therefore, it is likely that Mr Price's draft Brief for Noting of 6 July 2009 was not a recital of current issues but at most a lengthy history of the matter and all of its problems through time as understood by Mr Price and his team. But they were not all current and they did not evidence a need for urgent attention. There was therefore no reason nor likelihood for the contents to be discussed between Messrs Kalimnios and Reid in any one single meeting.
26. It is also instructive to note the Recommendation in Mr Price's draft Brief for Noting of 6 July 2009 at page 1:

*"That you note issues in relation to the IBM contract with CorpTech and that both CorpTech and Queensland Health are working to obtain a solution to the issues."*

27. This is likely to be the matter discussed between Mr Reid and Mr Kalimnios. That is, how CorpTech and Queensland Health might work better towards a solution which was attendant with delay. Such a matter would be likely to result in a meeting with the Director-General of Public Works and not one with the Minister. This is what happened at least between Mr Kalimnios and Mr Grierson. Mr Reid is more likely to be correct when he says at Transcript of 30/4/2013 P22-64 L15 that some of the issues had been brought to his attention:

*"All right. Can I suggest that Mr Kalimnios actually discussed the contents of that memo specifically with you and gave you the effect of the concerns expressed by Mr Price in that memo?---That is not my recollection. I understand that the - my understanding is that certainly the issues - some of the issues which were in that memorandum were things he had brought to my attention, but at no stage do I recall him either with memo in hand or me seeing the memo discussing the specificity of the issues within the memo."*

28. It is sufficient that the discussion called for, and resulted in, another meeting with Mr Grierson to, as Mr Kalimnios says, "address what we might do in moving that forward" (Transcript of 29/4/2013 P21-88 L10). This is consistent with the recommendation in Mr Price's draft Brief for Noting of 6 July 2009. It is consistent with Mr Reid's recollection, although Mr Reid does not specifically recall a second meeting with Mr

Grierson and no diary record establishes one took place. Mr Grierson does not recall a second meeting with Mr Reid but does recall one with Mr Kalimnios and his counterpart from the Department of Education and Training. Mr Grierson's diary also bears this out (See Exhibit 117 at entry 8 September 2008).

29. It was no part of Mr Kalimnios's evidence that anything more was called for. In fact, Mr Kalimnios was clearly not advocating that Mr Reid "raise the matter with the Minister" else he would have actually given Mr Price's draft Brief for Noting of 6 July 2009 to Mr Reid. That draft Brief was, after all, addressed to the Deputy Premier and Minister for Health, and clearly, Mr Kalimnios had determined he did not want it to go to the Deputy Premier. It was sufficient, and appropriate, for there to be another meeting with Mr Grierson.
30. There was no call thereafter for Mr Reid to "raise the matter with the Minister". Mr Kalimnios gave to Mr Reid the clear message that Queensland Health was working through any issues. That also was consistent with the Recommendation in Mr Price's draft Brief for Noting of 6 July 2009. The whole of the evidence clearly establishes this. In addition, Mr Kalimnios did not ask Mr Reid to raise the matter with the Minister (Transcript of 30/4/2013 P22-63 L25).
31. Given this, there was nothing about any information given to Mr Reid in mid 2009 which called for his more active involvement or the involvement of the Minister.
32. Mr Price's draft Brief for Noting of 6 July 2009 (TB Vol. 9, page 240) makes a number of key points:-
  - a. That there has been significant delay in implementing the replacement solution;
  - b. There has been a significant increase in the cost of the solution;
  - c. IBM has been in breach of contract since 2008;
  - d. Queensland Health has not contributed to either the delay or the increase in cost;

- e. CorpTech is also largely to blame for lack of governance and failure to pursue IBM vigorously under the contract;
  - f. Queensland Health does not have confidence in the delivery and quality of the solution; and
  - g. IBM is at fault for the problems with the solution because:
    - i. IBM did not follow their recognised project methodology, namely Ascendant Methodology; and
    - ii. IBM failed to provide sufficient numbers of appropriately-skilled resources.
33. In fact the Deputy Premier and Minister for Health, Mr Lucas, was aware of these allegations.
34. Mr Price also wrote a Briefing Note for Minister Lucas's attendance at an Estimates Meeting (See Exhibit 151, Statement of Paul Lucas at PTL3).
35. That Briefing Note to the Deputy Premier for Estimates was also witnessed by Mr Kalimnios (See above Mr Price's name at the bottom of the first page). It is dated June 2009, which was one month before Mr Price's draft Brief for Noting of 6 July 2009 (TB Vol. 9 page, 240). We know Mr Price's draft Brief for Noting of 6 July 2009 occupied a number of people a number of weeks to compose.
36. Mr Price's Briefing Note to the Deputy Premier for Estimates makes the following points:-
- a. That there has been delay in the implementation of the replacement solution from when it was intended to be in place in July 2008;
  - b. The delay has caused project cost increases of \$14.7M with additional costs estimated at \$9.2M in 2009/2010;
  - c. IBM has been in breach of its contract since December 2008;

- d. There is no acknowledgment that Queensland Health has contributed to the delay or the increase in cost by change requests;
  - e. CorpTech has been too accommodating to IBM, and both it and the Department of Public Works were reluctant to pursue legal remedies under the contract;
  - f. Queensland Health has limited confidence in the "Go-live" date of November 2009 because of IBM's failure to adequately resource the project and because the multiple defects are still evident; and
  - g. IBM is largely at fault for the delay because:
    - i. IBM did not follow their recognised project methodology, namely Ascendant Methodology; and
    - ii. IBM failed to provide sufficient numbers of appropriately-skilled resources.
37. Even if one assumes that Mr Kalimnios had given to Mr Reid sufficient grounds for Mr Reid to take the matter up with the Minister because of the matters expressed in Mr Price's draft Brief for Noting of 6 July 2009, which is denied, it cannot be said that Mr Reid's failure was causative of any harm. Minister Lucas was apprised of each of the matters in Mr Price's draft Brief for Noting of 6 July 2009 and if he thought they warranted any action, he could have taken it.
38. Mr Kalimnios had no reason to give contents of Mr Price's draft Brief for Noting of 6 July 2009 to Mr Reid in July 2009 for the purpose of having him raise the matters with the Deputy Premier and Minister for Health. The Minister had already been informed of these matters by Messrs Price and Kalimnios.
39. In our submission the claims in both Briefing Notes are not a fair account of the reasons for the delay or the additional costs. They do not have any regard to Change Requests by Queensland Health. They are authored by people who never read the contract documents so claims of breaches are either unreliable or hearsay. It is unlikely then for these views to have come from within Queensland Health and more likely to be somebody from within CorpTech. To then attribute blame to the

Department of Public Works for not pursuing legal remedies under the contract smacks of an unhappy relationship between CorpTech and its new Department.

40. It is instructive to compare Mr Price's draft Brief for Noting of 6 July 2009 with the Department of Public Works Associate Director-General Briefing Note of 11 May 2009 (See TB Vol. 9, pages 74-80). Much of the complaint regarding IBM's performance under the contract seems to stem from here. This was written by Mr Campbell and endorsed by Mr Brown. Neither Mr Campbell nor Mr Brown is legally qualified. Mr Brown, if not a member of the QHIC Board, attended regular QHIC meetings along with Mr Price at this time. It is likely this was the source of complaint about IBM being in breach of contract.
41. Mr Reid has certain skill sets which he took to the role of Director-General of Queensland Health. The technical aspects of a payroll system were not one. He would have needed to act upon the advice of others in respect of those technical issues. See Transcript of 30/4/2013 P22-60 L50:

*"...As I explained earlier, I didn't think I could bring a lot of benefit to that micro-management. I had a role and an expectation by government that I was running a Health system. I employed people at all levels just as I wouldn't micro-manage Metropolitan South or Darling Downs or any other district, I had a range of people who were there to perform a role and my role was a much broader role in sitting across that in trying to put in place government policy today. It would be an inappropriate use of my time, amenity and certainly my skill set if I had tried to micro-manage it."*

42. See also Mr Reid's evidence that this was work that was well within the responsibility of the Mr Kalimnios at Transcript of 30/4/2013 P22-67 L40:

*"I think you would need to view this project in the context of the other responsibilities I had. I did not have a knowledge in this area. I do not profess to have a knowledge in this area and certainly there would be many other deputy director-generals who dealt with director-generals around problems they were dealing with in an agency that was obviously the largest in the state and had the most public focus in the state. So I don't quite contend that this more*

*than any other project lends itself to something to me managing in a more direct fashion."*

43. It is submitted there was no call for Mr Reid to micro-manage the payroll project at this time. The work on the payroll project was being done by the responsible persons in Queensland Health. They were Messrs Kalimnios and Shea. They were the officers consulted by the Department of Public Works for the purpose of the Cabinet Budget Review Committee's decision of 21 September 2009. They did not involve Mr Reid in any response to any discussion papers leading up to the decision. This all occurred after mid 2009. These gentlemen had delegation concerning this matter, and exercised it. They did not call upon Mr Reid and say they were unable to do so or were having difficulties in the performance of their duties such that they would benefit from his input beyond the one or two occasions when a meeting took place with Mr Grierson.
44. Many problems that arose with the payroll system after "Go-live" had not been previously brought to Mr Reid's attention in any respect. However, Mr Reid says that assuming the decision to "Go-live" was necessary despite the number of unresolved problems (of which he was unaware prior to "Go-live"), the measures he might have taken would have been to mitigate any associated risks and prepare Queensland Health staff to expect problems by advising them, by liaising with the Unions, etc. See Transcript of 1/5/2013 P23-62 L4-26:

*"Had you been told that there were serious risks of multiple payroll problems but that LATTICE would fail and it is still necessary to go live, what might you have done?---I would have undertaken a whole variety of steps, assuming that was the case and that was still the decision which would have probably had some government involvement in it as to - there would have been a much stronger risk mitigation strategy prior to go live whereby there would have been discussions with union staff and everyone else involved around the consequences of this and how we would try -and when changes would occur as a result of the things that might be subsequently fixed in the system, in essence, trying to manage what we scrambled to do immediately, which was to put payroll hubs in so people were paid cash pays, dramatically increasing the staff of the payroll offices; much more comprehensive briefing of CEO's, much more*

*comprehensive briefing of unions and being able to indicate to them, "When you get your first pay, you may not get your higher duties allowance and this is how it's going to be rectified," or whatever the issue might be or if you're a casual, "We have things already for you that you're going to get paid in a cash payment because the system may not be able to pay casuals."*

**SECOND PART**Issue paragraph 8

45. Did Mr Kalimnios and Mr Shea take sufficient steps to bring to the attention of the Director-General of Queensland Health, the problems which had been made known to them (including Mr Price) about the potential shortcomings in the system?
46. In the first place it is necessary to find what were the steps taken to bring the problems of the potential shortcomings on the system to the attention of Mr Reid. In our submission these were:
- a. One Briefing Note for Approval of 29 August 2008;
  - b. One meeting between Mr Kalimnios and Mr Reid on about 3 September 2008;
  - c. A modified approach as set out in the Briefing Note for Information of 29 September 2008 to that suggested in the Briefing Note for Approval of 29 August 2008, where it was agreed to work within the system and no longer to seek to depart from the Whole of Government approach; and
  - d. Various regular meetings between mid 2008 and "Go-live" where the tenor was whilst there were various problems, they were progressively being resolved and rectified.
47. In short, if Mr Kalimnios and Mr Shea believed there were potential shortcomings in the system and if these were real, they did not bring them sufficiently to the attention of Mr Reid. Indeed, many problems that arose with the payroll system after "Go-live" had not been previously brought to Mr Reid's attention in any respect. Mr Kalimnios confirmed that he did not go into detail of the specific risks of the system with Mr Reid (See Transcript of 29/4/2013 P21-122 L45).
48. More specifically, and by reference to Mr Price's draft Brief for Noting of 6 July 2009, Mr Kalimnios, Mr Shea and Mr Price could not have believed at the time approaching

“Go-live” that the quality of the build was still very poor and the risks identified under the heading Solution Quality at page 6 were current, or they could never have sensibly recommended or decided to “Go-live”. If they believed those risks were current, they were remiss in not informing the QHIC Board of them. As they did not, it follows they did not inform Mr Reid of them, and it follows there was nothing Mr Reid was called upon to do.

Issue paragraph 9

49. Ought Mr Reid, having been made aware of a high level of dissatisfaction by senior Queensland Health staff and advisors with the Whole of Government solution and with IBM’s performance, have done more to secure from CorpTech (or others) arrangements by which Queensland Health could itself manage its relationship with IBM, including by seeking the Health Minister’s assistance?
50. Mr Reid was made aware twice of a “high level of dissatisfaction” by senior QH staff and advisors in respect of the Whole of Government solutions and IBM’s performance. This occurred in the Briefing Note for Approval of 29 August 2008 and at the meeting of 3 September 2008 with Mr Kalimnios, but not thereafter. These matters were not raised again with Mr Reid in any way that would warrant the description “high level of dissatisfaction”. True, Mr Reid was advised there were problems, but he was reassured they were being worked out satisfactorily.
51. In our submission this must be correct. If Mr Kalimnios or Mr Shea were truly aware of problems about the shortcomings in the solution to the extent it was worthy of a description “high level of dissatisfaction”, they would never have supported the decision to “Go-live”. They would have dissented and the QHIC Board Minutes would have revealed the concern they had.

Peter Ambrose S.C.

Chambers 4 June 2013