



Senator Claire Chandler
Chair, Senate Finance and Public Administration Legislation Committee
PO Box 6100
Senate
Parliament House
CANBERRA ACT 2600

Dear Chair

Response by the Department of Parliamentary Services to evidence given by the:

- Community and Public Sector Union
- Electrical Trades Union
- Australian Manufacturers Workers Union and
- NSW and ACT Plumbing Trades and Employees Union

The union representative bodies have made a number of claims in evidence, both in their submissions and hearings, that the Department of Parliamentary Services (DPS) submits are incorrect and unsubstantiated. Due to the limited time to respond to a significant volume of assertions, DPS has addressed some of the more concerning statements for the Committee's information which have been used to create a false narrative about a toxic workplace culture.

Community and Public Sector Union (CPSU)

CLAIMS MADE	DPS RESPONSE
Staff consultation and feedback	
DPS has not released its staff survey results	This is not correct. DPS staff survey results were released to staff in February 2021. In addition, workshops discussing those results at branch level are already in progress.
There is a disconnect between CPSU feedback and DPS survey feedback	DPS agrees. DPS has provided empirical evidence to the committee that its staff survey has a 79% participation rate (718 staff) and the results do not accord with CPSU member surveys. The CPSU has produced two surveys without providing validating information regarding how many members they represent or how many members have completed surveys. In the Canberra Times on 22 June 2021, the CPSU stated it had 20—25% participation but has not

	<p>stated how many participated or the size of the representative population.</p>
<p>There is a lack of genuine consultation and that its delegates refuse to participate in scheduled consultative forums because they are not seen as effective vehicles for positive workplace change</p>	<p>This is not correct. The DPS Enterprise Agreement (the EA) has comprehensive workplace consultation mechanisms. Each business area has its own consultative sub-committee to discuss matters relating to the operation of the EA.</p> <p>The DPS Consultative Forum is the peak consultation body in the department and is comprised of management representatives and elected employee representatives from each division or branch. The Consultative Forum meets on a quarterly basis. We note the CPSU has missed some meetings.</p>
<p>The department has an expectation that all consultation and communicating will flow from the supervisor to the worker</p>	<p>The department recognises the importance of good communication and consultation arrangements and agrees with the CPSU's submission that effective consultation mechanisms require a legitimate input from the workforce. It is astonishing the CPSU admit their delegates "refuse to participate" in these forums because they are not seen as effective vehicles for positive workplace change". Accordingly, the department encourages all employees and industrial organisations to genuinely engage in these processes to ensure effective consultation.</p>
<p>Concerns raised about potential CCTV blind spots</p>	<p>Concerns of staff were accepted when raised and steps were taken to resolve the matter. This situation is evidence that consultation and feedback are managed without fear of reprisal.</p>
<p>Code of conduct processes</p>	
<p>DPS 'weaponises' disciplinary action use of the code of conduct process is excessive.</p>	<p>This has already been clarified in DPS evidence and rejects this assertion as unsubstantiated.</p> <p>In 2020-2021 so far, there have been three formal investigations. The previous year there were seven (not 12) formal investigations. This is not at all indicative of the punitive use of the code.</p> <p>The Parliamentary Service Code of Conduct is set out in section 13 of the <i>Parliamentary Service Act 1999</i> (Cth) (the PS Act). This Code is in near identical terms to that of the Public Service Code of Conduct and applies to all Parliamentary Service employees. Section 15 of the PS Act deals with the process for determining breaches of the Code of Conduct and provides for a range of sanctions that can be applied. These range in severity from a reprimand through to termination of employment. Pursuant to subsection 15(3) the Secretary has established procedures for determining breaches of the Code of Conduct and for</p>

determining sanctions. These procedures are on the DPS Intranet and available to all staff.

The procedures comply with the procedural requirements contained in the Directions (see section 15(4)(a) of the PS Act and Part 2 of the [Parliamentary Service Commissioner's Directions](#) (the Commissioner's Directions) and have due regard to procedural fairness. Section 15(4)(b) explicitly recognises that the administrative law principle of procedural fairness applies to the Department's established code of conduct processes.

DPS Processes

Business areas or individual managers do not individually determine whether conduct or behavioural issues should be subject to the department's code of conduct processes. Where such concerns are held, the matter is referred to the Human Resources team who independently consider and evaluate the allegations and any material to determine whether a formal code of conduct process is warranted. Factors considered include the nature and seriousness of the alleged conduct, and whether the employee has been counselled for similar conduct in the past.

If the decision is made to commence a code of conduct process, an independent investigator is appointed to carry out a factual investigation into the alleged conduct and to make a recommendation on whether the employee has breached elements of the Code of Conduct. In most, but not all cases, the department will engage an external investigator to carry out this work.

Consistent with the procedural requirements set out in Part 2 of the Commissioners Directions, employees are informed of the appointment of an investigator and advised of the allegations against them.

Staff turnover

High turnover of staff in the Parliamentary Security Service (PSS).

The department rejects this assertion as unsubstantiated.
The separation rate for PSS staff was consistent with the rate for the broader department and consistent with APS separation rates.

Significant number of leave requests are refused for PSS staff

The department rejects this assertion as unsubstantiated.
Meeting operational requirements is important in the consideration of any requests for planned leave. This has been the driver for a reasonable rate of annual leave being denied across the last three years.

	PSS unscheduled leave dropped significantly between 2020 and 2021.
DPS has not been conducting exit interviews	<p>The department rejects this assertion as unsubstantiated.</p> <p>When staff leave, DPS has well established exit interview processes with a voluntary online survey made available prior to someone departing. Staff may request a face to face interview as an alternative.</p>
Gender balance and career opportunities	
There is a gender imbalance in the PSS	<p>The gender imbalance in the PSS is openly acknowledged and actively being addressed with recruitment campaigns focused on attracting female applicants and a mentoring program designed for women in the PSS.</p> <p>It should be noted that female representation is 12% which is slightly above the industry representation level of 10% according to the Australian Security Industry Association in New South Wales, the Australian Capital Territory and South Australia. Source: Blog - Australian Security Industry Association Limited (ASIAL)</p>
There is a lack of career opportunities in the PSS	<p>A relatively flat structure in the Security Branch makes progression more challenging, however the departmental initiated programs such as a mobility program, other assigned duties opportunities and external secondments to address this. Several staff have used these to seek new professional opportunities.</p> <p>From January 2019 to June 2021 there have been 25 opportunities for temporary assignment of duties for PSS staff. Three PSS staff have taken up external secondments during 2020-21.</p>
Work health & safety	
Staff have been exposed to fumes and building dust	DPS has a range of controls to protect staff including mandatory WHS training, tools for dust control and special measures taken to ensure a low impact from painting fumes.
Staff have been rostered to stand on the hard surface of the forecourt for two to three hours without appropriate breaks	This was an issue raised in 2019 and dealt with at that time. DPS is not aware of any current issues with staff on the forecourt for no longer than 40 minutes at a time.
DPS failed to address staff concerns regarding smoke	The department rejects this assertion as unsubstantiated.

during the 2019-20 bushfires

Considerable efforts had been taken to minimise, as far as is reasonably practicable, the effects of the external poor air quality in the internal environment.

Between 7 January 2020 to 16 January 2020, the CPSU and the then Acting First Assistant Secretary, Corporate Services Division exchanged five separate emails in relation to the poor air quality as a result of the bushfires and the steps taken by the department to monitor the situation and communicate with employees. The department shared the results of multiple air quality tests with employees, building occupants, and the CPSU.

All test results were below the threshold limits, except on 3 and 30–31 January 2020. The 3 January 2020 report noted very high outside smoke levels, ‘more than 20 times higher than the threshold limits’, and ‘an extreme situation’. The number of external doors throughout Parliament house made it impossible to manage air quality within the threshold limits.

The department provided specific advice to work areas that may have been directly exposed to ambient (outdoor) air pollution including landscape, security and visitor services staff at building entry points. Staff were advised to limit their time outdoors and non-essential outdoor work was deferred.

In addition to the above, the department also provided updates to staff on the following dates:

- 6 January 2020
- 9 January 2020
- 28 January 2020

DPS took the following steps to protect all staff potentially exposed to the poor outdoor air quality:

- Landscape Services conducted daily assessments as to the potential impact of smoke on staff whose roles require them to be directly exposed to ambient air pollution. This occurred in consideration of general community advice from ACT Health
- Where necessary, work practice adjustments were made such as rotating security staff through points more frequently, limiting the time staff (such as the landscape teams) were required to work outdoors and deferring non-essential outdoor work
- Specific advice was provided to landscape, maintenance, loading dock and visitor services staff, as well as Parliamentary Security Service (PSS) officers at building entry points, on how to minimise exposure

- Additional personal protective equipment, specifically P2 face masks, were purchased (2,000) for staff who may have been exposed to poor air quality during their work. Masks were made available to landscape, maintenance and loading dock staff, as well as PSS officers patrolling outside the building
- From 3 January to 7 February 2020, the air conditioning system was predominantly operated continuously and during periods of poor air quality, the amount of external air being drawn into the building was reduced to minimum requirements. This was effective in reducing respirable airborne particulate levels within APH.

Staff were asked to avoid using courtyards for shortcuts and ensure external doors were closed where practical.

On 17 January 2020, DPS purchased two portable air quality monitoring devices to increase the number of readings that could be taken at one time. The vendor (Australian Environmental Monitoring) trained and provided support to Mechanical Services staff who used the devices to monitor air quality within APH. The vendor analysed the results and reported back to DPS.

Enterprise Agreement

Poor consultation and a late decision regarding a determination for DPS staff pay and conditions.

The department rejects this assertion as unsubstantiated.

The department progressed a roll-over of the Enterprise Agreement (EA) conditions as agreed by a staff vote and within an appropriate time when the Government policy changed.

The EA has a nominal expiry date of 11 January 2021. Throughout 2020, the department consulted with staff representatives at each Staff Consultative Forum on the preference for a determination made by the Secretary under the *Public Sector Workplace Relations Policy 2020* (the Policy). Such a determination provides for general pay increases for staff over the next three years without the need to commence bargaining.

The Policy came into effect on 13 November 2020 and sets the parameters for employment terms and conditions across the Commonwealth and is administered by Australian Public Service Commission. The department is bound by the Policy, which mandates for example that conditions are not to be enhanced overall and that the maximum pay adjustments offered must be in accordance with the private sector Wage Price Index (WPI) annual percentage change for the immediately preceding June quarter.

In late December 2020, a staff sentiment survey was held to help determine whether staff would prefer the Secretary make a determination, in lieu of bargaining.

On 22 December 2020, the Secretary announced that 62 per cent of eligible DPS employees participated in the survey. Of those participants, 81 per cent supported the determination.

Based on those results, DPS began the formal process of entering into a determination which has now been approved by the Australian Public Service Commissioner.

The department denies its consultation was poor and that this resulted in a lesser pay outcome for employees. The department commenced consultation with staff well in advance of the EAs nominal expiry date. There was no need to commence the consultation process earlier and the department had no indication that the Policy was to come into effect during this process.

Inadequate COVID response

Slow facilitation of working from home and lack of technical capability

The department rejects this assertion as unsubstantiated.

DPS followed Commonwealth Government advice and timelines on work from home (WFH) arrangements. The transition to WFH was staged, those with high risk factors were prioritised first.

Due to the diversity of work at DPS, WFH arrangements varied. Roles such as building maintenance cannot be undertaken from home. All people with risk factors were strongly encouraged to WFH regardless of their role and were provided with other duties to ensure productivity.

A risk assessment and official medical advice confirmed APH is a higher risk workplace than other office environments. DPS employees were encouraged to WFH during mid-2020 parliamentary sitting periods.

On 20 March 2020 staff were provided the [COVID-19 leave arrangements for DPS employees - Quick reference](#). This was based on APSC guidance to assist our people and their supervisors make attendance at work and leave decisions.

On 23 March 2020 NSW and ACT Governments announced schools would only be open to children of essential workers and vulnerable students. DPS staff were immediately provided with an [APS message](#) outlining the Commonwealth Government's leave policy.

On 26 March 2020 staff were [advised](#) that people in higher risk categories should immediately seek WFH arrangements. All other staff were encouraged to WFH where they could adequately perform their work. This was voluntary and WFH guiding principles were provided.

On 27 March 2020, prior to the National Cabinet's WFH announcement on 29 March 2020, our people were provided with WFH guidance packages to apply during the pandemic, noting that WFH was still voluntary at this time.

On 29 March 2020 DPS issued a [direction](#) to take additional physical distancing measures including WFH wherever possible.

Based on advice from the APSC, Comcare and Safe Work Australia, DPS provided everyone with WFH information including [COVID-19 – Guidance – Working from home arrangements](#), a [Working from home checklist for managers](#), and various templates and tip sheets to assist with planning, rostering and working wisely. Work Health and Safety information was included in this package.

Since March 2020, the department's response to COVID-19 has been comprehensively discussed as a standing agenda item at all Consultative Forum meetings. More specifically, WFH arrangements were discussed at March and July 2020 meetings.

Poor communication around public access to Parliament House and closures

DPS rejects this assertion as unsubstantiated. Every change was communicated publicly through the Presiding Officers and issue of media releases on each occasion.

The closure and reopening of the Australian Parliament House (APH) are decisions for the Presiding Officers, and are based on government health advice, and made in consultation with DPS and other stakeholders. Throughout 2020 the Presiding Officers released several statements regarding the temporary and precautionary changes to Parliament House operations.

At the release of each POs statement, DPS communicated the changes to staff, including:

- 16 March 2020: closure of the public galleries, suspension of school visits, cancellation of large events, and the revocation of private areas access for certain passholder categories.
- 25 March 2020: Parliament House closed to visitors.
- 2 July 2020: Parliament House would reopen to the public on 4 July 2020, including the resumption of school visits.
- 17 August 2020: Parliament House would close to the public for the parliamentary sitting period. This included revocation of access for certain passholder categories.

- 14 September 2020: Parliament House would close to the public for the first sitting week of the October parliamentary sitting period.
- 15 October 2020: Parliament House would close to the public for the Parliamentary sitting weeks commencing 19 October 2020.
- 3 November 2020: Parliament House would remain open to the public during Parliamentary sitting weeks and some operations would resume.

Poor management of secondment to Services Australia

The department rejects this assertion as unsubstantiated.

On 24 March 2020, the Australian Public Service Commission (APSC) called on all departments to provide a list of available staff that could support critical government functions during the COVID-19 pandemic. As part of this process, departments were asked to identify staff in non-critical functions that could redeploy to agencies such as Services Australia to process the high volume of Job Seeker claims.

Redeployment under the Temporary Mobility Arrangements demonstrated DPS' ability and willingness to support and contribute to the Australian Government's response to the COVID-19 pandemic. The department took steps to ensure all redeployed staff were not financially disadvantaged during their redeployment and maintained current workplace arrangements and remuneration.

The COVID-19 pandemic forced the closure of APH to the public and reduced the sitting calendar, both of which reduced demand for some services provided by DPS.

On 4 April 2020, the Secretary emailed 'all-staff' formally announcing DPS' commitment to redeployment to support the national effort to help Australians during this crisis. In his email, the Secretary informed staff that redeployments were voluntary.

On 6 April 2020, DPS provided the APSC with a first list of available staff for redeployment.

On 14 April 2020, Services Australia contacted DPS requesting the first cohort of 23 staff to commence redeployment on 16 April 2020. DPS responded quickly to this request and redeployed the first cohort of staff to Services Australia operating out of the Enid Lyons Building in Tuggeranong.

Throughout April 2020, a total of 55 staff, across four cohorts, were voluntarily redeployed to Services Australia to process Job Seeker claims.

	<p>To demonstrate the voluntary nature of these redeployments, staff were informed they could return to DPS at any time. Eight staff requested to return early to their original roles (including two people who returned the day after their deployment). Each request was granted.</p> <p>To support the reopening of APH, the Secretary recalled remaining redeployed staff back to DPS by 3 August 2020.</p> <p>The department supported redeployments over a three-month period from 16 April 2020 to 31 July 2020 and the redeployed staff made a substantial contribution responding to an unprecedented volume of work.</p> <p>Services Australia confirmed the cohort of redeployed DPS staff processed up to 200 Job Seeker claims a day. Redeployed staff quickly adapted to their new work environment and gained valuable skills, knowledge and experience – skills that will be transferrable to other internal roles.</p> <p>The proactive, professional and responsive way the department responded to the APS-wide workforce surge, demonstrates agility and a positive culture amongst our workforce. Further, at the annual Secretary Awards and Service Awards ceremony, the department recognised the contribution of each staff member who was redeployed with a commendation.</p>										
CPSU recommendations											
That DPS takes seriously the problems of nepotism	<p>DPS rejects the assertion as offensive and unsubstantiated.</p> <p>DPS follows merit selection and recruitment processes consistent with the APS including conflict of interest disclosures.</p>										
That there is significant investment in upgrading Parliament House IT capacity	<p>The suggestion is made without understanding that DPS invests heavily in IT capability each year. COVID-19 created a seismic disruption to ways of working across the world. DPS within a short time facilitated remote working for all network users and enabled virtual participation in parliamentary proceedings.</p>										
That DPS uses its full ASL allocation	<p>The suggestion is without reference to publicly reported DPS staffing levels have continued to increase over the last eight years:</p> <table data-bbox="560 1765 730 2007"> <tr> <td>2014-15</td> <td>725</td> </tr> <tr> <td>2015-16</td> <td>739</td> </tr> <tr> <td>2016-17</td> <td>820</td> </tr> <tr> <td>2017-18</td> <td>897</td> </tr> <tr> <td>2018-19</td> <td>900</td> </tr> </table>	2014-15	725	2015-16	739	2016-17	820	2017-18	897	2018-19	900
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	<p>2019-20 900</p> <p>2020-21 939</p> <p>2021-22 961</p>
<p>Recommends that DPS prioritise staff workplace safety in the planning of all capital works</p>	<p>DPS has a comprehensive framework already in place for the management of workplace safety issues as they relate to capital works.</p> <p>This framework is built around the relevant Australian Standards, Building Codes of Australia and associated legislation. Contractors engaged to work on site are required to provide evidence of their assessment of the site via the provision of:</p> <ul style="list-style-type: none"> • site management plans • staging and decanting plans • Environmental Management Plans • Work Health Safety Management Plans • Traffic Management plans. <p>The APH Site Book is also an important component of this framework and forms part of the contractual arrangement and induction process for contractors and new staff alike. It includes an articulation of the workplace health and safety and emergency procedures information relevant to work on site.</p> <p>A building certification process wraps around these arrangements (led by an independent building controller) and independent advice on fire engineering is also provided to support the framework.</p> <p>For highly complex/large value projects the department also requires ISO 9000 accreditation from contractors.</p>
<p>Recommends that DPS implement the recommendations from the Foster review</p>	<p>DPS engaged with the Foster review and helped shape the recommendations relevant to DPS that were made in the report.</p>
<p>DPS should provide training in bullying and harassment that focusses on safe and respectful workplaces</p>	<p>Bullying and harassment training was made mandatory in DPS from 19 March 2021.</p>
<p>To avoid miscommunication, suspicion and confusion regular staff updates should be provided in</p>	<p>The following communication mechanisms are used by PSS management to communicate to PSS staff:</p> <p>On a daily basis:</p> <ul style="list-style-type: none"> • A PSS brief is provided to all PSS, which details functions, events, protests, visits, delegation other important communications,

email as well as in staff briefings for PSS

such as changes to COVID arrangements and key policy amendments. This is communicated via email, in hard copy and accessible electronically via the Secure Communications Network at all security points.

- A verbal brief is provided to the Team Leaders - which covers matters such as recruitment, training, emergency management exercise, system testing, rostering matters and team member matters.

On a weekly basis:

- The Director Security Operations undertakes a walk around to staff and speaks to staff to provide general information and answer any questions that they may have.

On monthly basis:

- The Director Security Operations walks around every week and speaks to staff highlighting general information and answering questions that staff may have.
- An email is provided by the Director Security Operations that covers topical information, such as recruitment updates, training, leave matters (including personal, annual and Christmas leave), uniform information, rostering KRONOS processes, Individual Work Plans (IWPs), 12 hour shifts, team movements, and Workplace Consultative Committee (WCC) /WHS updates.

PSS staff are not desk-based so email advice alone is ineffective. PSS staff feedback has verified this.

Electrical Trades Union, Australian Manufacturers Workers Union, and NSW and ACT Plumbing Trades and Employees Union

CLAIMS MADE	DPS RESPONSE
The unions pressured engagement with DPS management (Mr Bubb, p16)	<p>This claim is not based in fact and was addressed broadly in the opening statement from Mr O'Brien.</p> <p>The invitation for union representatives was initiated and issued by DPS in an effort to work collaboratively with the unions and our staff. DPS management encouraged team members to attend regardless of whether they were union members or not.</p>
Australian Standards are not being applied (Mr Windsor, p17)	No examples were provided to support this assertion. DPS is confident that the framework employed in managing works for Parliament House is robust and operating effectively.

CLAIMS MADE	DPS RESPONSE
<p>Staff fear of losing their job by speaking up (Mr Windsor, p17)</p>	<p>This statement is inconsistent with evidence that DPS has encouraged staff to speak up on issues they believe are important. This is what led to the meeting the unions attended.</p> <p>One issue that was brought up by a team member during this meeting was that on at least one occasion union officials approached Property Services Branch (PSB) staff on site at APH asking individuals if they were union members and advising staff that they would risk losing their jobs if they didn't become union members. When this issue was raised at the meeting the union officials confirmed they were aware that this had happened.</p> <p>DPS believes this is intimidatory behaviour and advised the union that this was not acceptable. The union officials were asked to ensure it did not reoccur.</p> <p>Further, the actions could be construed as an adverse action, contravening the General Protections set out in Part 3-1 of the <i>Fair Work Act 2009</i> (Cth).</p>
<p>Distribution board placement, contractor lack of diligence, 8-month lead time for follow up, safety concern (Mr Bubb, p19)</p>	<p>This was one of the operational issues raised at the staff meeting which was prioritised by DPS. This issue was raised on 21 April 2021 by trade staff and not October 2020 as claimed by Mr Bubb.</p> <p>The issue raised on 21 April related to access to the distribution board, not its operation. By the time the union attended the meeting with DPS in late May 2021, the location of the board had already been addressed by the project and its electrical consultant. DPS is currently in the process of reviewing the location of all boards installed as part of this project to ensure that no access issues exist from a maintenance perspective.</p>
<p>Distribution board was metal, installed on a metal structure (Mr Windsor, p20)</p>	<p>This is not correct. The distribution board is housed in a PVC (non-conductive) box.</p>
<p>Ladders being tagged out, for up to 12 months (Mr Windsor, p20)</p>	<p>This issue was raised by a team member during the staff meeting. When this issue was raised DPS asked whether team members had used tagged out ladders and at least one staff member confirmed this was the case.</p> <p>DPS managers advised the meeting that making a choice to use tagged out equipment was not acceptable and that if this situation is encountered in the future the issues should be escalated so they are addressed.</p> <p>Immediately following the meeting, the staff member who raised the issues has been working with the department on a solution to specific ladders identified. The last discussion on this issue was held on 17 June and an external contractor has been engaged to assist with rectifying the issues identified.</p>

CLAIMS MADE	DPS RESPONSE
<p>“very loose” compliance with the Enterprise Agreement (EA) (Mr Bubb, p21)</p>	<p>This is an unsubstantiated assertion. Mr Bubb falsely asserted that management acknowledged that processes were not followed.</p> <p>DPS management made contact with Mr Bubb in January 2021 to advise of proposed changes to work schedules and to advise that consultation had already been undertaken with affected team members (in December 2020).</p> <p>No response was received from Mr Bubb until a follow up email was sent to him on 15 February 2021 (the day the proposed changes were planned to be introduced).</p> <p>To date, no changes to work schedules have been introduced. DPS believes that both the change in working times proposed (which extend trade coverage to 4:30pm) and the consultation undertaken are in accordance with EA requirements.</p>
<p>Roster change – “it was just brought in on the Monday” (Mr Bubb, p21)</p>	<p>This is a false statement.</p> <p>A discussion was initiated in December 2020 with Mechanical Services regarding a proposed EA compliant roster (schedule) to be implemented in 2021 – yet to be implemented.</p> <p>No date was advised at that time. DPS made contact with Mr Bubb in January 2021 and again in February 2021 following the December consultation with staff in relation to the proposed changes. The vast majority of staff affected by the proposed changes are supportive of the new schedule.</p>
<p>New camera installation (Mr Johnston, p28)</p>	<p>This is a false statement and was previously clarified at a meeting on 28 May 2021 where the unions were present.</p> <p>DPS management had explained that the camera in question had been in place for well over a decade. Even though the purpose of the camera was not to monitor staff, the camera was removed in early June following the 28 May meeting and the feedback from staff.</p> <p>The assertion that time sheets were adjusted based on information captured in the camera is also false. The camera did not record but simply served as an electronic mirror in order to see the front door of the workshop from the manager’s office. The camera also did not cover the lunch-room.</p>

Yours sincerely

Rob Stefanic
Secretary
22 June 2021