## TRANSCRIPT

## PUBLIC ACCOUNTS AND ESTIMATES COMMITTEE

# Inquiry into the Victorian Government's Response to the COVID-19 Pandemic

Melbourne—Tuesday, 25 August 2020

(via videoconference)

### **MEMBERS**

Ms Lizzie Blandthorn—Chair Mr Danny O'Brien
Mr Richard Riordan—Deputy Chair Ms Pauline Richards
Mr Sam Hibbins Mr Tim Richardson
Mr David Limbrick Ms Ingrid Stitt
Mr Gary Maas Ms Bridget Vallence

#### WITNESSES

Ms Debra James, General Secretary, and

Ms Loretta Cotter, Deputy Secretary, Independent Education Union Victoria Tasmania.

**The CHAIR**: We welcome the Independent Education Union to the second series of public hearings for the Public Accounts and Estimates Committee Inquiry into the Victorian Government's Response to the COVID-19 Pandemic. The committee will be reviewing and reporting to the Parliament on the responses taken by the Victorian government, including as part of the national cabinet, to manage the COVID-19 pandemic and any other matter related to the COVID-19 pandemic.

Members are attending these hearings remotely from home and from their electorate offices, and we ask that people note that members are not required to wear a face covering if they are working by themselves in an office under the stay-at-home directions of 6 August, part 2, section 7(i).

We also advise that all evidence taken by this committee is protected by parliamentary privilege. Therefore you are protected against any action for what you say here today, but if you repeat the same things outside this forum, including on social media, those comments may not be protected by this privilege. You will be provided with a proof version of the transcript for you to check. Verified transcripts, presentations and handouts will be placed on the committee's website as soon as possible.

We welcome you and invite you to make a brief opening statement of no more than 5 minutes. We ask that for the Hansard record you state your name, position and the organisation you represent, and then this will be followed by questions from the committee. Thank you.

**Ms JAMES**: Thank you very much, Ms Blandthorn. My name is Debra James, and I am the General Secretary of the Independent Education Union, Victoria and Tasmania branch. Also appearing with me today from her own remote location is Loretta Cotter, the Deputy General Secretary.

Look, the IEU has just on 20 000 members in Catholic and independent schools across the state. We cover teachers, education support staff, principals in Catholic primary schools and school services staff, such as cleaners and ground staff. It is a diverse membership. Most of our members are in Catholic schools, more than 500 Catholic schools across the state, and about a third of our membership is in the independent school sector, in around 200 schools.

Look, our fabulous members have been really up to the job this year. It has been an incredibly challenging year for them, and I want to acknowledge straight up their phenomenal effort, commitment and versatility. We are immensely proud of them and all they have done to keep educating our students through this unprecedented school year, which still has a long way to go. I want also to particularly acknowledge the challenges for principals and school leadership who, like our educators, are managing the day-to-day, week-to-week implementation of this very disrupted year in education and doing an enormous job in keeping their staff and community safe.

Over the past few months we have heard from members through online sub-branch meetings, meetings of our sector councils and our committee of management, as well as thousands of individual member queries and comments coming in and a lot of feedback via snap surveys that we have been undertaking with members through the year. There is certainly a great degree of anxiety amongst our members for themselves and for their families but also for their students and how their students are going to get through the year.

We have been engaged with our own education authorities—the Catholic Education Commission of Victoria and Independent Schools Victoria—who were heavily involved in the discussions and planning around education. We have also had the opportunity for consultation with and by the Department of Education and Training, DHHS staff, ministerial staff and Deputy Premier Merlino. At all times we have been concerned about and have been advocating strongly for the safety and wellbeing of our members and their students, while being confident in the capacity of our members to put their shoulder to the wheel to get the job done.

From our perspective a critical factor in the handling of education in respect of the pandemic was that right back at the start of term 2 the government was able to bring the three sectors together to act in unison and that

their messages were clear and strong. I have to say that was a really important part and remains for us an important factor of the way this is dealt with in terms of education. It was welcomed by us, and it was entirely appropriate that essentially the same expectations and arrangements were in place across all schools across the sector. A little minor tweaking here and there in days with the independent school sector when it came to Easter or to the school holidays, but by and large schools have operated in the same way.

Unfortunately the same cannot be said of the federal government, who tried to bribe Victorian Catholic and independent schools to commit to returning to normal operations in early June. Fortunately all but a few schools resisted the enticement and held the line with their Victorian colleagues to keep pace with the remote learning schedule and an eventual gradual return to onsite learning.

The very end of term 2 was a little difficult as COVID numbers began to increase and a few schools had to either close or return to remote learning. Members advised us that the opening and closing was more inconvenient and disruptive to the continuity of learning than a planned remote learning program. As term 3 started, with numbers of cases rising steadily, we welcomed the decisive position that all sectors in Melbourne and Mitchell shire would return to remote learning for P–10, with the designation of some additional pupil-free days to get ready. While the default position was that all staff would be on site, flexibility was given to principals to make local arrangements. In our view, consistent with all that we were hearing from the Premier and the Chief Health Officer, having as many people working from home was appropriate.

We appreciate the pressure around VCE students given their disrupted year and the desire to keep them on site, but we were hearing from leadership and members in senior secondary colleges that it was very difficult to implement effective measures to keep students appropriately distant, and initiatives to modify programs to have some VCE classes offsite or limit attendance were met with pushback from school system authorities. We called on the CECV—Catholic Education Commission—Independent Schools Victoria, the Deputy Premier and the department to have a look at this and consider alternatives. As it transpired, it was only a week later that we moved to stage 4 restrictions in Melbourne and schools around the state went to remote learning.

Given the additional pressure on VCE students in this particular year, we welcomed the announcements regarding individual assessment of the VCE and the giving of consideration to the disruption to all students in calculating their scores and with meeting the schedule with the VCAA.

We will of course rely on the advice from the Chief Health Officer as to health issues and when and how a return to onsite learning is possible. We sincerely hope that it will be possible in term 4, but if it is not to be, then it is not to be. What is most important for us is that the directions are clear, the directions are consistent, that there is time to consider what needs to be put in place and that all sectors act in unison. So we look forward to continuing with those clear directions and consistent approach, and for the government to keep us all as safe as possible and to see our students get the best year possible given the circumstances.

**The CHAIR**: Thank you very much. I will pass to Ms Pauline Richards, MP, for the first questions.

**Ms RICHARDS**: Thanks, Ms James, for that comprehensive report, and to Ms Cotter as well. Of course I would like to start by asking you to pass on our incredible appreciation for the work that your members have been undertaking. The educators and the service staff and the administrators have been extraordinary. Very grateful.

Ms JAMES: Thank you.

**Ms RICHARDS**: So I would like to perhaps ask that you expand a little bit on the evidence you have given about the experience of the IEU and your members during the COVID pandemic. I am particularly interested in any lessons that have been learned and even, if you have the opportunity, any case studies you think are appropriate.

**Ms JAMES**: I think what people are going to find out of this in terms of the way education is run in schools is that there are a lot of lessons about workload that we can learn for the running of schools in the future and for making better use of technology to try to be more efficient and reduce workload generally. I think our members certainly have a level of anxiety about being called upon to go into schools. There is no doubt about that, although the situation is different depending on that person's personal circumstances. Some people are more

ready to work from home than others. But I think by and large they have kind of had a crack at this rather enthusiastically.

What I also hope out of this is that there is going to be a very comprehensive study—survey—into exactly how things went for students, and this would need to be almost long term. It is not just about 'How do people feel today?'; it is 'What are the effects at the end of the year and into next year?', so I think we need to be looking back at this year to see what the effects have been. Certainly there will be students who have actually benefited from a remote learning environment—who will have come into their own, as it were—and others who were perhaps a little more challenged. Loretta, feel free to add.

Ms COTTER: Just if there is time, thank you.

Ms RICHARDS: Yes, absolutely there is time.

Ms COTTER: Just to add to what Deb said, and of course a lot of our evidence is anecdotal—well, not anecdotal but through our own engagement processes—but certainly it has been very varied for some students. Some students who were sort of quiet in the classroom environments and overlooked often actually got more one-on-one attention in a remote environment. But clearly also without all of the management issues that happened in some classroom environments some teachers felt they were able to focus more on some students. The other positive that was mentioned was increased engagement with parents—more three-way conversations. And I know how hard it has been for parents and for many of you in terms of trying to keep that going, but the old system of a parent-teacher afternoon where you only got the engaged parents has been a little bit turned around by the fact that there have been many more conversations with parents during this time.

**Ms RICHARDS**: There are going to be some fascinating insights that come out of this period in so many ways. I am interested in unpacking and having some insights as evidence into some of the challenges that are associated with teaching and learning remotely, and maybe the second part of that is how some of your members have overcome these challenges, but if you take that in two parts.

Ms JAMES: Okay. Well, certainly a challenge is, 'How good is your wi-fi?'—that might be a first-up comment about the remote learning. The other aspect I think is if there was a requirement of the school for you to deliver the program exactly as is, as if you were in school, that was particularly challenging. The department did not require that in their directions or their guidelines, and nor did the Catholic sector or the independent sector require it, but some schools defaulted to running the timetable as usual. So if you had a day when you were a number of periods on in front of students face to face and then you had to go and do that in a Zoom-type environment all day, that was particularly punishing. People were describing being really tired at the end of a day, so people found ways I think to vary the way the delivery was happening so that they could get a bit of a break through the day. Loretta, you might—

Ms COTTER: I think what was also really challenging, Ms Richards, was the experience for a lot of our non-teaching staff, learning support officers in particular but also, as you might have known, we were trying to attempt the standdown in some independent schools of people like instrumental music teachers, people who were considered ancillary to the program that the school wanted to run, and we were fairly successful with that. But it was actually wonderful to see—particularly in the Catholic sector, where there was a very strong commitment made around people not losing pay or conditions—learning support staff standing up in very different ways, I think with more confidence, working very closely with teachers to do that remote check-in on vulnerable kids or disadvantaged kids. A lot of them I think actually have almost a higher sense of confidence; again this is just anecdotal, so I think we need to work through that. But also, to agree with what Deb said about workload, the schools that took an almost traditional approach to switching to remote learning, where you just went from the same program and you tried to replicate it with technology, in our view put really, really terrible workload pressures on our members. Because on top of that, remember, they were trying to keep up with email and keep up with responding to individual parents, responding to individual students. The schools that did better adopted the government's policy direction, which was to try and be more minimal about what you try to achieve in a particular day with students so that you have the capacity to follow up with individuals.

**Ms RICHARDS**: Thanks again for those insights. I am interested now in gaining some understanding around communication and how the government has responded, actually. What communications have you had

with the Victorian Department of Education and Training during this time? I am also interested in understanding whether you have been satisfied with that level of communication.

Ms JAMES: I would have to say we have certainly been satisfied as a union in respect of that. We have had quite a lot of contact with senior staff in the Department of Education and Training, also with ministerial staff and with the minister. In communications that have come out, we have been included in those communications that have gone out to schools. We have had the opportunity to, on occasion, have input or to raise issues in relation to them and then found that issues were picked up later in revised versions of those guidelines that have come out.

Fortunately for us, because the government has done such a great job, I think, in bringing the Catholic sector and the independent sector together, the Catholic sector would issue guidelines for their schools and they would mirror the requirements that were happening for government schools. Similarly the departmental guidelines would frequently be sent out to independent schools. I think those guidelines generally tended to be pretty clear. They were updated frequently as things would change or as something that perhaps had not been considered came to light. They would be revised as they needed to be, and our general sense of satisfaction with that, I think, would be pretty high.

**Ms RICHARDS**: Perhaps you could provide some insights into how that compares with the communication with the federal government. You did mention that in your initial evidence.

Ms JAMES: I did. Well, at the start of the pandemic, over Easter, and perhaps at the end of term 1, as Victoria went to their school holidays earlier than other states and territories did—we also represent members in Tasmania, and they were two weeks behind in going to the holidays—I was on a number of teleconferences with the federal education minister and with the Chief Medical Officer about health issues. Because education is very much a state-controlled and -focused issue, I think in that kind of space, to be frank, the federal government really just sort of trotted over that a bit too forcefully and should have left it to the states to determine what they needed to do at state level. Victoria was kind of leading the way, partially because I think the Victorians were doing a stellar job, but we were the ones to come back to term 2 earlier than any other states needed to come back. So I think those things were put in place very quickly, and people do have quite a bit of respect—clearly have respect—for the organisation of education at the state level.

I grant you that the funding for independent and Catholic schools comes predominantly from the federal government, and that is why I thought that it was a bit rich of the Prime Minister to get in and try to bribe schools to go back at the start of June, I think it was that he was asking people to go back, and getting schools to commit to that weeks out from the date. Fortunately the vast majority of schools said, 'Look, thanks, but no thanks. We'll stick to the Victorian health advice and the Victorian directions about education', and I was very pleased to see schools respond. As it worked out, we were back to learning, if not completely on-site, by that time.

**Ms RICHARDS**: Can you tell me about that federal government approach—the effect that had on the members of the IEU?

**Ms JAMES**: Well, across the IEU nationally I think it was a bit kind of divisive because there was not a consistent approach across schools nationally, because it was really a matter that fell to states to sort out and of course each state was having its own experience at that time of its own term dates and of its own numbers. Certainly very, very early on in proceedings, like right back at Easter, there was one meeting I was on with the Chief Medical Officer—not the state, the federal medical officer—who was talking about how schools were very safe places and students did not pass it on, and that was the very early, early, early advice based on numbers and what had happened then. But of course we now see that there are certainly students capable of contracting the virus, and the staff who work with those students are capable of contracting the virus, as we have seen.

**Ms RICHARDS**: Thank you. In the short amount of time I have got left I am interested in gaining some evidence and insights about the financial impact of COVID on independent schools and then in turn, importantly, what effect that has had on the retention of staff.

**Ms JAMES**: Okay. That is a very good question, Ms Richards. Funding in schools varies considerably according to the individual school. There are a number of schools that would have very high income from

parental fees and then others that would not have such high income through parental fees—through school fees paid by parents. A number of schools moved immediately to give consideration to families who are struggling and to perhaps hold off receiving fees. Certainly in the independent sector, perhaps a little more than the Catholic sector although it would be there as well, there was a nervousness about belt tightening and about what we have to do. The funding was certain; the funding was going to come. That was not an issue. It was about: what will the effect be on school fees?

A number of schools did move to stand down staff; not a widespread number of schools, and not in the Catholic sector, but in the independent sector some schools moved to stand down staff almost immediately, and we felt that was a little harsh. Some of those schools were not able to access JobKeeper, for example, because they had not actually at that time lost that much income. They were just thinking, 'Aha, we're not running that remote program' or, 'We're not having football on Saturday anymore; we don't need the football coaches, so let's just go and stand them down' or, 'Let's stand down instrumental music teachers'. We fought those schools, and we have managed to get some of those standdowns reversed. Whilst I am not unsympathetic at one level to it, there was probably very little reason this year for any school to stand down any member of staff through this process.

**Ms RICHARDS**: Thank you. You have had some fascinating insights. I am not sure if I have got time left, Chair—

**The CHAIR**: About 5 seconds, Ms Richards.

**Ms RICHARDS**: All right. Well, I will take the opportunity again to say how grateful we are to all of you and your members, so thank you.

The CHAIR: Thank you very much. I will pass the call to Ms Bridget Vallence, MP.

Ms VALLENCE: Thanks, Chair, and thanks, Ms James and Ms Cotter, for appearing before the inquiry today. I would like to echo that comment from Ms Richards: a shout-out to all teachers, principals, educators—everyone—who have contributed really well and done a great job during really difficult times never faced before by the school sector. So thank you, and please pass on our thanks on.

Ms James, are any of your members educators at Al-Taqwa College?

**Ms JAMES**: Yes, they are.

**Ms VALLENCE**: And at Al-Taqwa and indeed at other schools that unfortunately had positive COVID cases, what did you hear from your members at those schools?

**Ms JAMES**: What we heard was that the school had implemented procedures as best as they could, but it is incredibly difficult to keep secondary students apart. There is a lot of close contact. It is a very large school. It has got 240-odd education staff onsite, leaving aside that the number of students is up at the 1000 mark. You can imagine how difficult it would be to keep people apart. Al-Taqwa is also a school that is very embedded in the local community. A lot of students would have contact obviously with their own family members but the families of other students and with each other outside of school time. So I suppose it was a little bit inevitable that there would be a cluster, as it were, at a school, and I do not think that it was for want of the school really trying hard.

Staff were not complaining to us that they felt the school had let them down with respect to the sort of things that they should have been doing and could have been doing. They were doing those things. I think it was one of those cases that was probably just inevitable. If the school had been closed—as in if there had been remote learning and the students had not been seeing each other on the school site for the couple of weeks prior to the breakout occurring—the chances are that the number of students who were students at Al-Taqwa would have been found positive anyway regardless of whether or not they were at school. Sorry, does that make sense?

**Ms VALLENCE**: Yes, absolutely. It clearly was a very challenging situation for all the educators at Al-Taqwa and the students to deal with. I am just interested in what advice did Al-Taqwa receive from DHHS in terms of the level of communication, when did the communication occur, infection control measures to put in place and contact tracing expectations of the school.

**Ms JAMES**: Well, the school closed before the end of term 3 and it has been actually closed. There have been no people onsite—I mean, it has been cleaned, obviously—for weeks, so from that perspective there was nothing else that the school could do. DHHS closed the school and it was closed for a number of weeks. Of course it went over school holidays when it would have been closed in any event.

Ms VALLENCE: What time from the first cases announced to the school did the school close?

**Ms JAMES**: Oh, within days, the very next day I think. But I would have to take the precise timing on notice to find out exactly how long it was from the identification of the very first positive case of a student or staff member at Al-Taqwa to the closing.

Ms VALLENCE: If you could take that on notice, that would be great.

**Ms JAMES**: Loretta, unless you know the answer to that question?

Ms COTTER: No, I do not. Sorry, Ms Vallence, we will have to take that on notice.

Ms VALLENCE: That is okay. Are any of your members educators at Trinity College in Colac?

**Ms JAMES**: Yes, there are. We have many members at Trinity College, and it was a similar kind of situation, although when we went back at the start of this term Trinity of course was outside of the Melbourne and Mitchell shire—I was going to say bubble, the giant bubble. It was outside of the Melbourne—

Ms VALLENCE: It was not in the metropolitan bubble.

**Ms JAMES**: That is right, it was out of the metropolitan bubble, and of course that is the challenge. The school had become aware—I know leadership had become aware that that was a positive case. I know that a member of staff had become aware that there was a positive case but it takes—and the school closed in order to deal with those issues.

**Ms VALLENCE**: On that, you just mentioned about them becoming aware of there being a positive case. Are you aware of how long it took DHHS to make contact with the school?

**Ms JAMES**: No, I am not aware of how long it took DHHS to get in touch with the school, but the school itself knew because the school were advised by the family I think almost immediately and took steps—as anybody would do if they had become aware that there was a positive case in their—

**Ms VALLENCE**: We understand that it was five days before DHHS made contact with the school. Does that concern you at all?

**Ms JAMES**: Well, obviously DHHS would be incredibly under the pump. Yes, I think that that probably went to why the department started to take over from DHHS some of the notifications to schools, because it is a difficult kind of—

Ms Vallence interjected.

**Ms JAMES**: Yes, five days would be concerning of course, and you would hope that they would be able to move much more quickly to notifying schools. The thing is that schools themselves, school communities, are such tight communities. You know everybody who is onsite at any given moment through the day and you have the contact details of everybody, and they should have actually kind of had school leadership on to the contact tracing certainly in terms of the school because they would be the ones obviously best placed to be able to know in a school context who had been in touch with students or staff.

**Ms VALLENCE**: Just on that, is it your understanding that DHHS asked the school to conduct the contact tracing then?

**Ms JAMES**: No, no, they did not. No, that was my speculation that schools would be well placed to be able to have a go at letting members in their community know. Sorry.

Ms VALLENCE: Oh, and you think they would be best placed then to do the contact tracing?

**Ms JAMES**: DHHS are obviously the professionals and able to do it. My only observation, Ms Vallence, is that in respect of a school, principals know who is on site on any day because of timetabling and they can pretty much track who will have been in touch with or in reasonable proximity to other people as they are going along. In saying that, though, I would want to acknowledge that people are entitled to privacy and to not have their names splashed around, but I am aware that schools, when they learn of a particular student who has had close contact—or a member of a student's family—then themselves take some action to deal with the situation, as you would expect them to.

**Ms VALLENCE**: Yes, and I think that because they care about their school community they naturally would do that, but does it concern you that in the case of Trinity College Colac DHHS actually asked the school to conduct the contact tracing?

**Ms JAMES**: I am not aware that they actually asked the school to conduct the contact tracing. The school cannot conduct full contact tracing. They cannot conduct contact tracing that goes to where students might have been at a shop or a restaurant or at a sports field, but what schools can do and can provide information on is who has been in touch with who during the course of a school day if people have been at school.

**Ms VALLENCE**: And with DHHS obviously having the results first, how long do you think that DHHS should take before they notify a school of a positive case?

Ms JAMES: The least amount of time possible for DHHS to get the job done, obviously.

**The CHAIR**: Sorry to cut the member off there, but her time has expired. I will pass the call to Mr Sam Hibbins, MP.

**Mr HIBBINS**: Thanks, Chair. And thank you both for appearing before the inquiry today. I want to first ask about the impact on the employment of teachers. I think you have mentioned before that some teachers have been stood down, so if I could just ask you to provide a bit of information to the extent that that has occurred. Also the impact on the casual teacher workforce as well and relief teachers, if I could get you to just expand on the impact on those teachers as well.

Ms JAMES: Thank you, Mr Hibbins. Casual relief teachers in the Catholic and independent sector have really, I think, been hit a bit hard this year by it. They would be not registered but they would be known at a number of schools and taking positions at schools as work came up. They definitely have had far less work this year than they would have anticipated getting. Relief teachers—people who get replacement positions for a term or two—would probably also be missing work a bit this year because people were running around cancelling their long service leave as quickly as they possibly could because no-one was able to travel or get away. So there would definitely have been casual relief teachers who would have had weeks worth of work in schools that were not then able to get that work. I understand in both the Catholic and the independent sector if they were already engaged to perform the work those schools kept them on, but if they had not actually been engaged then obviously they missed out on work that might have otherwise come their way. For teachers, by and large, it is really only teachers on the periphery—not that I want to describe instrumental music or rowing coaches as the periphery of education, but it is in that space—but core effect jobs have been there as usual.

**Mr HIBBINS**: Okay. And is there any support or anything that you would be recommending to government to support those teachers or support the workforce?

**Ms JAMES**: Well, yes, certainly picking up people who would otherwise be working in our sector into government schools if there is any casual relief teaching work going would be excellent. We have been encouraging schools to try to take on CRTs as far as possible to maybe do the in-school supervision that is required. Perhaps CRTs might be able to get some more work as we come up to VCE exam time in terms of supervision. In our sector, though, schools will be trying to keep their belts a little tightened. So to the extent that the government could do something about it, that would be marvellous, but I am not sure what it is exactly they could do other than start employing them—away from our sector.

**Mr HIBBINS**: Well, that is pretty good. That is a good start. I just want to touch on the contact tracing as well. Are you satisfied with the level of advice and the timeliness of advice that had been given to teachers at schools where there had been an outbreak?

**Ms JAMES**: Look, I mean, in a perfect world you would want everybody to know. As soon as one person found out, you would want the next phone call that person made to be to the school. It is one of those things where I have trusted that it has been as soon as it could be done. If it could be faster, of course who would not want it to be faster? But there is a pandemic going on, and what we can see is that between DHHS and the department they are really working incredibly hard to get these things done. If it could be faster, yes, that would be great—of course.

**Mr HIBBINS**: Do you know if teachers were advised to self-isolate prior to contact tracing commencing or being completed?

**Ms JAMES**: Yes, certainly I think people who were in touch with or who had had reasonably close contact with a known case were going and getting tested and were monitoring their own symptoms. Certainly that was happening. I cannot speak to whether that was happening officially or whether that was put in place by schools. But where there had been a known contact, even if it was an informally known contact, I understand that people were going to get tested and keeping to themselves, as it were.

**Ms COTTER**: And just to add, Mr Hibbins, I may be wrong, but I thought that the health advice changed at some point. There was an earlier stage this year where if a person was asymptomatic, people were reasonably comfortable at that stage about people attending workplaces. And then as more knowledge started to occur about the disease itself, the advice, from my memory, changed as well so that there was a very strong emphasis on isolation after that.

Mr HIBBINS: Okay. Terrific. Thank you. No more further questions.

The CHAIR: Thank you, Mr Hibbins. And that concludes our time for questions this afternoon. Thank you both very much for taking the time to appear before our committee today. The committee will follow up on any questions which were taken on notice in writing, and responses will be required within five working days of the committee's request. We will now be taking a short lunch break, so we declare this hearing adjourned. Thank you both for your time.

Ms JAMES: Thank you.

**Ms COTTER**: Thank you.

Witnesses withdrew.