

PSA Second Submission to ICAC SafeWork SA Evaluation

23 July 2018

At the public hearing on Wednesday 11 July 2018 the Commission and counsel assisting asked a number of questions which the PSA took on notice.

This submission is the response to those matters about which the Commission sought further information.

References to "Transcript" are to the transcript of 11 July 2018.

1. Inspectors' contracts of employment. (Transcript page 14, paragraph 35)

Attached to this submission is an Inspector's contract of employment, which the PSA understands is in similar terms to a number of other Inspectors' contracts of employment. At the time of making its submission on 11 July 2018 the PSA understood it had a number of these contracts on record. At this time the PSA continues to explore its records and will provide further copies of contracts we may locate.

2. Measures that genuinely enable SafeWork SA to more effectively discharge its functions as the State's Work Health and Safety regulator. (Transcript page 16, paragraph 15)

The PSA supports a well resourced workplace safety regulator in South Australia. SafeWork SA has suffered from funding cuts, instability of leadership and direction and poorly planned implementation of change. With the support of government, many of the issues arising from inadequate resourcing, inconsistent training, inadequate technology and provision of tools, efficient use of time and reductions in unnecessary administrative processes could be resolved. By way of example, ASO5 Inspectors now spend much more time doing office-based work. This means fewer inspections and consequently less safe workplaces. Administrative tasks formerly performed by lower classified but more administratively efficient staff are now the responsibility of the Inspectors. Returning many of these administrative tasks to administrative staff from Inspectors would assist in reducing the potential for corruption or maladministration in the early stages of the process.

3. Percentage of SafeWork SA employees who are PSA members.
(Transcript page 15, paragraph 25)

The PSA confirms the percentage of SafeWork SA Inspectors who are PSA members is approximately 73%.

The percentage of SafeWork employees who are PSA members is lower than that.

4. Inadequate policies and procedures. (Transcript page 16, paragraph 40)

Numerous policies and procedures are in place in relation to the work of SafeWork SA Inspectors.

When we refer to adequate policies and procedures we are principally referring to the significant inconsistency in the implementation of policies and procedures across the organisation, as well as the sheer number of policies.

In relation to tools not being adequate we are referring to, for example, problems with the functionality of IT systems and the availability of tools necessary to perform the work. These issues, together with, for example, issues about communication across teams, and relevance of training often mean practices need to be adapted to circumstances.

Inconsistent approaches become the norm for individuals and teams.

In relation to training not being adequate we provide the following:

Members report that their training when they started as WHS Inspectors about five years ago took place over a 12 month period. This included two weeks of in-house training and the requirement to complete an attributes folder – which provided evidence of competency, prior to being signed off. Members were also required to spend approximately three months shadowing other Inspectors from each team.

The current training appears to be approximately five weeks for the new Investigators. The partnering with CSU has occurred and PEACE model interview training is compulsory across the inspectorate. However, members report that this training does not cover expectations in relation to investigations such as note taking, photographing and videoing, scene examination, obtaining documents, the taking of measurements and other forensic evidence, gathering admissible evidence, use of powers and notice writing. All of these are fundamentals to conducting thorough and seamless WHS investigations.

Further examples of inadequate training are in regional areas where Inspectors are required to conduct investigations without adequate training as a result of decisions made not to send Investigators due to the distance from Adelaide Investigators would need to travel.

One example of inadequate resources, tools, policies and procedures and relevant training can be seen in email correspondence (**attached**) between a PSA member, [REDACTED], and [REDACTED], Project Support Officer, Office of the Executive Director in response to the document "*Initial Response Guideline*" dated 20 June 2017 (attached). [REDACTED] provided to [REDACTED] a list of issues with the guideline in November 2017. Some of these issues remain unresolved. The PSA acknowledges that some issues raised are due to the workplace being regional, but a number of the issues are not. Many of the issues should have been resolved regardless of the workplace's distance from Adelaide. The issues [REDACTED] raised in [REDACTED] email include:

- Tools: eg, access to investigation equipment
- Consistency of practices: investigators being assigned based on distance to the scene
- Training: Inspectors needing to have investigation training when the scene is deemed too far for an Investigator to attend
- Facilities: risk to chain of evidence because of the lack of an Evidence Room at Berri

5. Whether Inspectors start work when they leave their house or when they arrive at the premises which are to be inspected. (Transcript page 17, paragraph 35)

Inspectors who leave their home and go straight to a job have been instructed by management that their working day starts from when they get in their car at their home.

Inspectors who drive from their home straight to the office have been instructed by management that their working day starts from when they arrive at the office.

Inspectors who go to a job in the afternoon and then from that job drive home have been instructed by management that their day finishes when they arrive at home.

Inspectors who drive from the office direct to their home, have been instructed by management that their day ends when they leave the office.

Attached is a document headed "Frequently Asked Questions SafeWork SA Inspector Recruitment". This document is referred to and also included in the 2011 contract information referred to above. The PSA understands this

document was provided as a minimum to all SafeWork SA Inspectors who were employed through the 2012 and 2014 intake (approximately 24) and understand it to have been provided to others as well.

The document includes a question *"Do Inspectors use a company vehicle, and can it be used for personal use?"*. The answer provided is that *"Vehicles are provided to Inspectors to undertake the necessary travel to undertake tier duties, which includes out-of-hours call-out rosters. They are used to commence and finish the work day and they are expected to be garaged at home after hours. Whilst Delegate approval can be given in special circumstances for private use, in general, they are not to be used for private purposes, or to carry private individuals without this approval."*

A document headed *"Team Norms and Operational Processes"* is **attached**. This June 2016 document is for the Manufacturing, Wholesale Transport and Utilities Team.

On page four is included the following:

"Timesheets"

- *To admin @ end of period*
- *Start/finish time*
 - *if doing a site visit on way to or from the office – start and finish at home*
 - *if no site visit on way to/from – start/finish times at office*
 - *Be mindful checks and audits will take place of timesheets"*

This document sets out terms for use of vehicles consistent with that contained in employees' contracts of employment.

Attached is a document of March 2013 which is a memorandum to Executive Director [REDACTED] in relation to an individual's request to transport his son to school on a small number of days of the year. The document indicates the Executive Director's approval for the use requested.

6. Authorised Investigators – Unauthorised Investigators (Transcript page 19, paragraph 5)

An authorised Inspector /Investigator is a worker who has been formally authorised by the Executive Director (the Regulator) to utilise all of the powers within the WHS Act. An unauthorised Inspector is in training and yet to receive the authorisation of the Regulator. They are unable to use any powers under the Act, and should be mentored/monitored by an authorised Inspector when undertaking any Inspector /Investigative work.

7. Consultation and reference to multiple disputes. (Transcript page 19, paragraph 24)

The PSA has had three disputes involving consultation since the start of 2017. Two disputes sought to preserve the status quo in relation to the same matter while it was resolved. These two disputes were resolved without reference to the SAET.

The third dispute arose when SafeWork SA failed to implement a list of principles it had provided to the PSA in relation to a restructure. The principles included how incumbents would be considered for matching to positions during a restructure. A conciliation conference was listed in the SAET in November 2017. The outcome was that SafeWork SA was directed to follow its own principles.

8. Examples in recent past of insufficient consultation. (Transcript page 23, paragraph 25)

By way of introduction, PSA members see consultation as an opportunity to influence the implementation of a change in order for it to have the best chance of achieving the optimum outcome without creating undesired effects.

Consultation should occur in SafeWork SA according to the *South Australian Modern Public Sector Enterprise Agreement – Salaried 2017* and the *SafeWork SA Agreed Procedures for WHS Consultation*.

We provide two specific examples of where consultation has been insufficient to achieve the optimal outcome for SafeWork SA.

The first example is the introduction of tablets. Through trialling tablets Inspectors had the opportunity to identify what functionality would be needed, and to determine if there were any issues which would make the tablets difficult to use in circumstances in which Inspectors might find themselves while performing their tasks. Issues that were raised by the workers trialling the tablets, and issues raised by the general inspectorate, were left unaddressed and unresolved prior to the procurement of tablets on a broader scale.

PSA members believe the purchase of the tablets might have been rushed in order that they could be paid for prior to the end of the budget period. The tablets did not, and still do not, have the ability to upload photos to InfoNET, burn discs, and upload photographs and documents from SD cards. A subsequent purchase of SD card readers has remedied one of these issues, although some Inspectors still do not have the SD card readers.

Sufficient consultation, which included taking into account the views of employees, could have resulted in a far better, more efficient, more effective and more productive outcome for SafeWork SA.

The second example is in relation to the seven day time limit to complete InfoNET files. From the PSA's perspective initial consultation was perfunctory, but subsequent consultation appears to have resolved the issue.

SafeWork SA proposed to reduce reporting timelines for InfoNET from 14 days to seven days in order to improve the reporting to AGD of SafeWork SA KPIs.

Members accepted the rationale for the change, ie to ensure information necessary to meet AGD KPIs would be loaded to InfoNET within the seven day period, and they considered ways to meet it. Members proposed that non-KPI relevant information (such as basic administrative entries) would be uploaded later, as multiple issues made meeting a seven day timeline for all entries difficult.

Management's initial response indicated that they thought that members did not realise InfoNET was actually entirely functional. The PSA pursued further consultation. It is now clear that management did not realise there were issues and that different teams dealt with problems in different ways, and had different expectations of what constituted a complete InfoNET file.

In the PSA submission of 15 June 2018 we said that *"Recently the organisation has improved its consultation processes by providing more opportunity for feedback on proposed change. However, consideration of that feedback and provision of responses to members' input remains an issue."* The matters raised here pre-date the June 15 2018 PSA submission to the ICAC SafeWork SA Evaluation. Some consultation since that time has been better.

9. Issues arising from the introduction of InfoNET. (Transcript page 24, paragraph 20)

For several months after the transfer of SafeWork SA to the Attorney General's Department, InfoNET was not functioning properly.

Issues in relation to dysfunction with InfoNET are recorded in the SafeWork SA / PSA Consultative Committee minutes of 16 November 2016.

10. Issues identified two years ago. (Transcript page 24, paragraph 45)

This principally refers to the dysfunction with InfoNET, which is addressed in the previous paragraph.

11. Issues arising with the move of SafeWork SA from AGD to Treasury and Finance. (Transcript page 25, paragraph 5)

While PSA members recall the dysfunction in InfoNET which the agency experienced with the change to the jurisdiction of the Attorney General's Department, they do not necessarily expect it will occur again with the move of SafeWork SA to the jurisdiction of Treasury and Finance.

There are differences between the respective policies of AGD and DTF. PSA Worksite Representatives have sought clarity through the Workplace Consultative Committee and, while there are differences, it is not expected this will be a significant issue.

There is uncertainty about certain matters. For example, SafeWork SA Corporate Services has been reviewed but changes are yet to be proposed. It is likely the delay is in part due to the transfer of SafeWork SA to DTF.

12. Budget cut of \$6.3m in coming financial year – clarification.
(Transcript page 25, paragraph 25)

The reference to a budget cut of \$6.3m arose from an email sent to all SafeWork SA staff by the Executive Director Martyn Campbell on 15 May 2018. In that email Martyn Campbell advised all SafeWork SA staff the following:

"Today I was provided an update savings target, to reflect the incoming Governments (sic) savings targets. Our savings target for 2017-18 is now \$6.4 million."

Mr Campbell did not cover this significant issue in his submission to the ICAC Evaluation.

The Commissioner has sought clarification regarding SafeWork SA's budgetary position.

Funding for SafeWork SA's operations is derived from two sources – income from regulatory licence fees and a government budget allocation through the Attorney-General's Department.

In the 2017-18 State Budget, SafeWork SA anticipated licensing income was \$27.846m. In contrast, the government allocation was only \$9.242m. Total expenditure for the year was an expected \$37.088m.

In May 2018, however, SafeWork SA employees were informed that SafeWork SA's 'savings target' for 2017-18 had been dramatically increased to \$6.4m.

As noted by the Executive Director at the time, this funding cut *"would be a challenge for a number of reasons, including successfully delivering strategies to reduce costs and meet our targets"*.

The significance of this 'savings target' is twofold.

Firstly, it slashes the government's contribution to SafeWork SA's operations from \$9.242m to a mere \$2.842m – a 69% decline in the government's financial support for the agency.

Secondly, if fully implemented, it will reduce total funding for the WHS regulator from \$37.088m to \$30.688m – a very substantial 17% hit to SafeWork SA's overall budget.

Cuts of this magnitude will inevitably have serious implications for SafeWork's operational capacity.

The bottom line is that these cuts will likely result in fewer inspectors, fewer inspections, less assistance for employers, less enforcement, fewer prosecutions, less deterrence and, most importantly, reduced safety for South Australian workers and their families.

13. What is meant by "Members have noted that files have been opened in the lead-up to the ICAC evaluation to ensure the content is as required." (Transcript page 25 paragraph 35)

PSA members have advised that files were reopened prior to the commencement of the ICAC Evaluation to ensure all materials were complete. The PSA understands that file summaries, supporting evidence, and other materials have been added to previously closed files.

The PSA has also been advised that changes to files can be tracked if the Evaluation wishes to do.

14. Review of prosecutions and access to recommendations (Transcript page 26, paragraphs 5 and 15)

We confirm PSA members are aware that the 18 recommendations are available.

Members have a number of responses and perceptions in relation to SafeWork SA's response to the recommendations.

Members report that they are unclear which of the recommendations have been implemented; which are ongoing; and which have not been acted upon. The main change since the recommendations were issued appears to be the reclassification of the Investigator role, and the spill and fill of current Investigators.

The main issues involving procedures, use of powers, briefs of evidence, communication between SafeWork SA and the Crown Solicitor's Office; provision of legal advice during investigations and rigorous management of investigations have not been resolved.

It is the view of some members that the DPP review and recommendations appear to have been made with little to no consideration of the state of play of the Investigations Team and the prior history which led to excessive workloads on the current Investigators, as well as there being no framework for Investigators to work with.

Members have advised the PSA that many of the investigation files that were reviewed were not from investigations conducted by current Investigators in the team at the time. This, however, has never been clarified as Investigators have never been provided with a list of cases that were reviewed.

Members' perceptions also include that out of the 18 recommendations made, none of them were about removing current Investigators and replacing them.

Members' understanding is that the review identified the same gaps that the Investigators had already raised and for which they had requested clarification and training during the preceding 18 months.

SafeWork SA's immediate answer to the 18 recommendations was to reclassify the Investigator role and essentially 'spill and fill' the positions with 'new Investigators'. Members' perceptions are that little to no emphasis was placed on the new Investigators having any understanding or experience in dealing with the Work Health and Safety Act and Regulations. This is despite the DPP review making clear that:

"Prosecutions under the WHS Act are amongst the most complex types of prosecutions that can be brought. There are a number of reasons for this. One of those reasons is that the central element of some of the relevant offences is the exposure to risk of death or injury. Therefore, the investigation must determine not only what occurred, but also what the exposure to risk was - the two are not necessarily the same thing. The prosecution also has to prove beyond reasonable doubt, what the defendant should have done to remove or mitigate the exposure to risk, and that it was 'reasonably practicable' for them to do so - that is, there is frequently more involved in investigating WHS Act breaches than determining what has happened in the particular case"

This direct quote from the DPP review in members' minds begs the question as to how SafeWork SA believes that simply having Investigators with an emphasis on investigation skills (rather than WHS experience and knowledge) is reasonable, when the main and significant complexities of these matters consist of specific issues directly correlating to work health and safety legislation. This includes having a thorough understanding of what is reasonably practicable (or what ought to be considered reasonably practicable), risk, risk mitigation and exposure to risk. Without specific WHS knowledge and experience, members believe it is difficult to properly and deeply investigate these matters.

Other matters members have raised in relation to the recommendations include that rigorous case management has completely ceased. A case conferencing system was originally set up and included CSO, but has not continued.

There is still no MOU or agreed framework for the exchange of information between SAPOL and SafeWork SA. Members say that SafeWork SA Investigators have followed instructions given by the Director of Investigations and still continue to find it difficult to obtain relevant information from SAPOL in a timely and efficient manner.

15. The effect of Section 155 (2) (c) (Transcript page 26, paragraph 20)

This section is about the power of the regulator to obtain information.

The issue here centres on the interpretation of section 155 (2) (c) concerning the obligation of a person to provide the regulator with specified information *“either orally or in writing”*.

Members have advised that there is a lack of clarity and no clear direction on this matter. This appears to be due to inconsistent advice to different SafeWork SA inspection teams from Crown Solicitor’s Office solicitors as to whether Inspectors can conduct taped interviews or not when seeking specified information. This has resulted in different teams adopting different approaches.

It appears to the PSA that closer co-operation between the two CSO advisors and the investigation teams, and/or advice from more senior lawyers, is required to clarify the situation.

Members also report that although Investigators generally have a good grasp of the legislation and how to use Section 155, they are often directed to go against their better judgement, knowledge and skills. Members report that there is evidence of inconsistent management decisions around this within the minutes from the Investigation Team Meetings.

Previous Investigators have adopted a position that Section 155 (2)(c) could only be invoked after fulfilling the obligation set out in Section 155 (4).

Members report that SafeWork SA management has given instructions to previous Investigators directing them to issue Section 155 (2) (c) notices, either without fulfilling Section 155 (4), or when information has actually been previously provided by the entity or individual.

Investigators were also of the view that when compelling an entity or individual to appear before them to answer questions or provide documents, the only information that could be compelled is information that had previously been sought and not provided, and that anything which the Investigator had not previously made efforts to obtain could not be introduced.

Investigators have also sought clarification on whether only the specific questions asked previously under Section 155 can be asked, or alternatively, if a new topic is introduced by the person/entity answering the questions, whether the Investigator can continue to question them about this topic under Section 155.

16. Interrogation of data on the use of powers. (Transcript page 26 paragraph 45)

Members are concerned about their obligations under the confidentiality provisions of the Work Health and Safety Act in relation to providing information about this matter.

The PSA understands that individuals have made submissions to the ICAC Evaluation in relation to specific matters. One matter involves an Executive decision not to act on a recommendation to seize a workplace, but from which serious charges and a conviction resulted.

17. Culture among employees at SafeWork SA. (Transcript page 27, paragraph 40)

Members report that at the present time morale is low due to a perception that management want to blame them for the issues of the organisation. Those issues are dealt with elsewhere in this submission.

18. Question as to whether there is a culture of entitlement among some SafeWork SA employees. (Transcript page 28, paragraph 15)

It appears that the question of "entitlement" has arisen specifically in relation to the use of vehicles.

The PSA is not aware of any "culture of entitlement".

Members report that provisions concerning the use of vehicles have generally arisen from seeking to achieve efficiencies.

Members have used vehicles under the terms of their employment arrangements and under the direction and instruction of their management.

19. Two Inspectors attending workplaces. (Transcript page 29, paragraph 45)

The PSA confirms that it is not the PSA's submission that all inspections should be carried out by two Inspectors rather than one.

Our submission was specifically in relation to the PEACE training.

Members report that the PEACE model interview training that has been made compulsory by the Executive Director (the Charles Sturt University training) requires that any jobs where statements and or interviews are obtained must have a minimum of two Inspectors present. The PEACE model that the Executive Director wants Inspectors to implement does not work unless there are two Inspectors present.

The PEACE model interview training also requires that the statements and records of interview conducted are voice recorded and not typed. The recording of statements has still not been confirmed as an acceptable SafeWork SA practice, and there is inconsistent information between Managers around this.

PSA members say they are aware that these two matters have been raised with the Executive Director by the CSU trainers. Members report that these two issues have also been raised during the training and were placed in a 'parking lot'. Members are still awaiting a response.

20. Issues and concerns in relation to Inspectors from compliance teams being sought to relieve in the investigations team. (Transcript page 32, paragraph 20)

By way of clarification and explanation, PSA members advise that the Inspectors did not refuse to relieve in the Investigations Team because of their own lack of resources and workloads.

The issues and concerns raised by Inspectors included the following:

- Members viewed the management of the investigations team as poor, and saw that there was no consistency within the team. They also perceived an attitude within the agency that unless you were an 'Investigator' then you were not considered to be suitable for the role.
- Members say they could see how stressed the individuals in the Investigation Team were. They did not want to voluntarily put themselves in the same situation

In summary, members say they chose not to relieve in the roles because they knew about the workloads of the Investigators, and because they also had concerns about the Investigation team management at the time.

21. Expiation notices: question about consultation required in order to enable Inspectors to utilise the power under the Act. (Transcript page 32, paragraph 25).

The PSA confirms that any requirement for consultation was not about enabling Inspectors to use their powers under the Act. The PSA did not seek consultation about enabling the use of powers arising from the Act.

There were two parts to the consultation. One was about health and safety. Another part was about administrative arrangements.

Consultation about the administrative arrangements was about planning and SOPs. The PSA received the proposals and wrote two separate responses, one from Customer Service, who would be taking queries and payments, and the second from Inspectors who would be issuing expiation notices. There were a number of issues and subsequent consultation is resolving them. These included:

- the level of explanation or service the Customer Service staff (they are in the Educator, not the Regulator) would be required to give when a PCBU wishes to understand or dispute the offence/fine.
- Standard Operating Procedures for Customer Service Officers to escalate disputes
- training for dealing with difficult callers
- the role of the proposed Expiations Officer – this is still being developed including a Job and Person Specification and role classification

Consultation about health and safety included a discussion about appropriate training in relation to dealing with angered PCBUs. Subsequent consultation clarified that expiation notices would not be issued on the spot. This matter was about ensuring the safety of Inspectors in the conduct of their duties. The work health and safety of Inspectors is a legitimate subject for consultation.

22. **What is meant by “*structure of briefs of evidence*”.** (Transcript page 32, paragraph 40)

PSA members advise that in the past, and even to this day, SafeWork SA and the Crown Solicitor’s Office cannot agree on how a brief of evidence should be compiled for prosecution.

PSA members advise that SafeWork SA and the CSO have been exchanging views on this issue for some time and still cannot agree on the best way to compile a WHS prosecutions brief.

This is principally because each CSO solicitor has their own preference about how they prefer a prosecution brief to be structured. This is the reason the Investigators asked for an agreed structure, so that everyone could have a shared understanding as to expectations in this regard.

Some of the issues include:

- Whether documents obtained by the Investigator should be appended directly behind their Investigator’s statement, or placed in other locations throughout the brief.
- Whether documents obtained from individuals should be appended directly behind that individual’s statement, or placed in other locations throughout the brief.
- Where to place evidence in relation to the element of what is reasonably practicable.
- Where to place evidence of compliance with notices (as often this is also evidence of reasonable practicability).
- In what order witness statements should be compiled (for example, chronologically, or most relevant to incident i.e. those that were present at the time of the incident).
- In what order documents should be provided, i.e. chronologically or in groups of evidence, which proves each element of the offence.

23. **What is meant by “*witnesses versus defendants*”.** (Transcript page 33, paragraph 5)

PSA members advise that, in the past, the Investigation Team Manager has directed that anyone who could *possibly* be a defendant must only provide a record of interview (ROI). However, this often results in including individuals (such as Supervisors and Managers), whom it is unlikely SafeWork SA would prosecute (unless they have done something quite reckless or knowingly putting another person at risk).

Quite often it is these individuals who can provide the Investigation with the most relevant and reliable information in order to support a prosecution, therefore making for a much stronger case.

PSA members advise that including these kinds of individuals as possible defendants, who can only provide information by an ROI, means:

- They can refuse to attend the voluntary ROI
- A Section 155 notice is then sent
- They can refuse to answer questions based on Section 172. If they answer only some questions and not others then Section 155 (2) (c) may be invoked. However, as an individual they have the right still to refuse to answer questions under Section 172 (and SafeWork SA never pursues this).

PSA members say that better management in relation to determining actual likely defendants and witnesses needs to happen. PSA members also acknowledge an improvement in this area more recently.

24. Procedures and consultation on matters listed at page six of the PSA's submission of 15 June 2018. (Transcript page 33, paragraph 10)

The PSA as an organisation, and PSA members, expect consultation on all matters arising from workplace change that may affect employees' working conditions or the services employees provide. The degree, nature and extent of consultation are all dependent on the issues and circumstances that apply in relation to the matter under consideration. Many matters are relatively inconsequential and require little if any consultation. In other matters the contributions of employees can be critical to the effectiveness and success of implementing changes, and can also have major effects on people's lives.

Consultation means that better decisions will be made if the contributions of those affected by, and expected to implement, change have their contributions taken into account in the decision making process.

Consultation involves sharing information and exchanging views between employers and employees and their representatives, and the genuine opportunity to contribute effectively to decision making processes.

It is an accepted principle that effective workplace relationships can only be achieved if appropriate consultation between the parties occurs on a regular basis.

These consultation principles comprise the expectations of the PSA as an organisation, and PSA members, in relation to the matters under consideration in this part of this submission.

Issues, concerns and suggestions which would form part of the consultation contributions and expectations of PSA members in relation to all six matters listed in this question have been covered in other parts of this submission and are not repeated here.

This completes the PSA's responses to the questions the PSA took on notice at the hearing on 11 July 2018.

