

**ROYAL COMMISSION INTO INSTITUTIONAL
RESPONSES TO CHILD SEXUAL ABUSE**

**Public Hearing - Case Study 40
(Day 195)**

Level 17, Governor Macquarie Tower
1 Farrer Place, Sydney

On Tuesday, 28 June 2016 at 10.05am

Before:

The Chair: Justice Peter McClellan AM
Commissioners: Mr Robert Fitzgerald AM
Professor Helen Milroy

Counsel Assisting: Mr Angus Stewart SC

1 MR STEWART: Your Honour and Commissioners, yesterday
2 I tendered a document that became exhibit 40-025, which was
3 the schedule of discharges at Leeuwin and your Honour
4 raised some questions about it. Your Honour will recall
5 that there was a list of intakes by number but not by date.
6 That has now been amended and if I might hand up
7 a replacement document to replace the existing 40-025
8 tender which shows the dates of each of the relevant
9 intakes, so that one can deal with it with greater ease.

10
11 THE CHAIR: Yes, thank you.

12
13 MR STEWART: I call Professor John Devereux

14
15 <JOHN ANTHONY DEVEREUX, sworn: [10.07am]

16
17 <EXAMINATION BY MR STEWART:

18
19 MR STEWART: Q. Would you state your full names and
20 occupation, please?

21 A. My name is John Anthony Devereux. I am Professor of
22 Law at the University of Queensland.

23
24 Q. Do you have available a copy of your statement,
25 prepared for the Royal Commission dated 11 June 2016?

26 A. I do, Mr Stewart, yes.

27
28 Q. Is that statement true and correct?

29 A. There are two minor amendments, if I may.

30
31 Q. Yes. Will you bring them to my attention?

32
33 THE CHAIR: Professor, we're not picking you up
34 particularly well.

35
36 MR STEWART: Q. Perhaps we can also ask you to speak up.

37 A. Yes. Sorry. There are two minor amendments. The
38 first is paragraph 18(e) refers to a document which, as at
39 the date of my statement, which was 11 June, was then in
40 draft form. Since that time, on 16 June, that particular
41 draft policy has been promulgated by the AAFC and is
42 therefore now extant guidance and policy for the AAFC.

43
44 Q. What I suggest you do is change that to that "the
45 document known as "SI (PERS) 1-7" was in draft format and
46 has now been finalised".

47 A. Yes.

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Q. And the other?
A. The other is in paragraph 37. Paragraph 37 records my recollection of a conversation that I had with Flight Lieutenant AAFC Todd Oakley. You will note that in paragraph 37 I say I do not have a clear recollection and I unfortunately did not keep notes. The second-last sentence says, it starts with the words "that the matter would also be referred to the Queensland Police". I do recall discussing the involvement of the Queensland Police but I don't think I said to him that it would definitely be referred to the Queensland Police, and my better recollection is that the matter may also be subject to an investigation by the Queensland Police.

Q. So instead of the words "would also be referred to", it should rather say "might also be dealt with by"?
A. Yes.

Q. Yes, thank you. Just those amendments?
A. Yes.

Q. So subject to those, do you confirm that the statement is true and correct?
A. I do.

MR STEWART: I tender the statement, your Honour.

**EXHIBIT #40-033 STATEMENT OF JOHN ANTHONY DEVEREUX
DATED 11/06/2016**

MR STEWART: Q. Professor Devereux, I understand you are a Wing Commander in the Australian Air Force Cadets; is that correct?

A. Yes.

Q. You joined the AAFC on 1 April 2012?
A. I did.

Q. Prior to that date, you had no involvement in the organisation?
A. Correct, sir.

Q. Can I ask what it was that caused you or drove you to join the AAFC?
A. I saw an advertisement in a national newspaper calling for people to apply for a job as OC of Number 2 Wing. I've

1 always enjoyed my Association with Defence and over the
2 years I've gained a great deal out of it and this seemed
3 a good way to give something back.
4

5 Q. Then in paragraph 6, as you have said already, your
6 full-time employment is as Professor of Law at the
7 University of Queensland. That's a position you have held
8 since 1999; is that right?

9 A. That's correct.

10
11 Q. What in particular is your area of academic study and
12 teaching?

13 A. I primarily research and teach in the area of tort, so
14 I teach the first year law of torts A course and I teach
15 a final year course called medical law - a final year or
16 second-last year elective course.
17

18 Q. I understand that you worked as Officer Commanding
19 Number 2 Wing of the AAFC from 1 April 2012 to 31 December
20 2014; is that right?

21 A. That is correct.
22

23 Q. That's in paragraph 12 of your statement. And then
24 moving on to paragraph 14, it was your role as
25 Officer Commanding Number 2 Wing to deal with the complaint
26 regarding Flight Lieutenant AAFC Todd Oakley which is now
27 the subject of inquiry in this hearing; is that right?

28 A. That is correct.
29

30 Q. That position as Officer Commanding 2 Wing - you say
31 you saw an advert in relation to it in the newspaper. What
32 sort of time commitment did the position demand?

33 A. Look, it varies enormously. Theoretically, the
34 headquarters, which was then situated at Amberley, paraded
35 every Friday evening, and so that could be typically four
36 to five hours, but, in addition, there was a fair amount of
37 paperwork and administration that had to be done out of
38 those hours.
39

40 Q. And was that done from the headquarters or from your
41 university office or home or somewhere else?

42 A. A combination of the above.
43

44 Q. You did actually have a work space, as it were, at the
45 headquarters, did you?

46 A. I did, I had an office, yes.
47

1 Q. Within 2 Wing there are a number of squadrons; is that
2 right?
3 A. That is correct.
4
5 Q. Those are the squadrons beginning with the number 2 -
6 is that how it words?
7 A. Absolutely correct.
8
9 Q. How many squadrons are there?
10 A. We need to look that up, I'm sorry. I don't know off
11 the top of my head.
12
13 Q. What sort of geographic area does 2 Wing cover?
14 A. It covers everything from the Gold Coast in the south
15 to Roma in the west and to Rockhampton in the north, so an
16 enormous area.
17
18 Q. As part of your responsibilities, did you have to
19 travel from time to time to the different squadron bases?
20 A. I did from time to time, yes.
21
22 Q. You say in your statement, and I'm moving on really to
23 deal with the Symonds and Oakley question, at paragraph 29,
24 that on 28 April 2014 Mick Brett, the commanding officer of
25 217 Squadron, informed you of Aaron Symonds' allegations
26 about Todd Oakley; is that right?
27 A. I'm sorry, is that paragraph 20?
28
29 Q. It could be 20.
30 A. Yes, that is absolutely correct.
31
32 Q. Then you thereafter met with Symonds and with Brett;
33 is that right?
34 A. I did.
35
36 Q. The following day?
37 A. Yes. So I accessed the phone message on the 28th:
38 I'd been away. Mick Brett had left a message before that,
39 some time over the Anzac Day long weekend. I'd accessed
40 the message on the 28th and I asked Mick to coordinate with
41 Mr Symonds and we arranged a meeting. We met on the 29th.
42
43 Q. Is that the practice by which I mean if an issue
44 arises within a squadron, how serious does it have to be to
45 be escalated to the wing?
46 A. I don't think there is a fixed rule on that. Our
47 local area commanders, so the squadron COs, could handle

1 matters as they saw fit, but they would always pass it up
2 the chain. There have been some other incidents referred
3 to in the latter part of my statement where they were
4 handled at unit level, but for whatever reason, Mick Brett
5 decided to immediately escalate the matter.

6
7 Q. I take it since you then acted on it, you regarded
8 that to be appropriate in this instance?

9 A. I did.

10
11 Q. If we can take a look at tab 5 of the bundle - it will
12 come up on your screen, I'm hoping. While we wait for
13 that, one of the matters you asked Symonds, as I understand
14 it, is whether you had his consent to refer the matter to
15 the police; is that right?

16 A. That is correct.

17
18 Q. What answer did you get to that?

19 A. Mr Symonds agreed that he was happy to be referred to
20 the police.

21
22 Q. So if we have a look at tab 5, in particular, the
23 email at the foot of the page, you will see this is an
24 email from you on 29 April. It is to Ken Given and the
25 subject is "Hot Issues Brief". You say:

26
27 *As foreshadowed, please find attached a Hot*
28 *Issues Brief.*

29
30 *For your consideration, determination and*
31 *on-forwarding as appropriate.*

32
33 Firstly, who was Ken Given?

34 A. Ken Given was then a Group Captain AAFC and he was the
35 Commander of the Australian Air Force Cadets.

36
37 Q. I am sorry, he was the Commander of?

38 A. The Australian Air Force Cadets, the AAFC.

39
40 Q. So the overall Commander, as it were?

41 A. Yes. So the cadets operates in a bifurcated approach,
42 so there is a gentleman or a lady who occupies the position
43 of Commander of Cadets, who is a cadet officer or an
44 officer of cadets. In addition, there is
45 a Director-General, who is the representative of Defence,
46 who has higher-level responsibilities.

1 Q. And so the position of Commander of the AAFC - so
2 that's the former of the two positions you have identified
3 in this bifurcated approach - typically, is that person,
4 firstly, a civilian?

5 A. Look, it varies. Ken Given is an ex Royal Australian
6 Air Force officer but his appointment was as a civilian
7 officer of the cadets.

8

9 Q. And was that, to your knowledge, a full-time
10 appointment or similar to yours, on a more part-time basis?

11 A. To my understanding it was a part-time role.

12

13 Q. It is referred to as a hot issues brief. That seems
14 to suggest, and from other documents I've seen, that that's
15 some sort of standard process that is adopted to pass
16 information on; is that right?

17 A. My understanding is that it indicates, because it is
18 a hot issue, that it is a matter of some importance and
19 that it is time critical and that labelling in that way
20 will then pass on the information and indicate the
21 importance and seriousness of what is attached to the
22 document.

23

24 Q. And you passed it on one up the chain, as it were?

25 A. I did.

26

27 Q. You say there, "and on-forwarding as appropriate" in
28 your email. Do we understand from that that that is then
29 a matter for whom you have passed it to, Mr Given, as to
30 whether it needs to go further or not?

31 A. I think it is. I probably should clarify something
32 I just said. There was then a chief of operations officer,
33 whose name was Wing Commander Ian Harding. He was above
34 me. In addition, there was a deputy commander of cadets.
35 And above them, at the top of that tree, was Group Captain
36 Given, so I passed it straight to Group Captain Given. In
37 terms of on-forwarding, my intent was that he would then
38 discuss it with the Director-General and with relevant
39 officers in Defence.

40

41 Q. If we take a look at the hot issues brief itself,
42 which is at page 0026 in the same tab, this is the document
43 prepared by you and passed on as attached to that email; is
44 that right?

45 A. That is correct.

46

47 Q. For the most part it speaks for itself. If we can

1 look at the second page of it, 0027, you summarise there
2 what it is that Mr Symonds told you. And then, towards the
3 foot of the page, in paragraph 11, you record there that
4 Mr Symonds consented to advise CIVPOL - which I take to be
5 the police; is that right?

6 A. That's correct.

7

8 Q. -- and the AAFC of the above matters. You obviously
9 considered that this matter should be referred to the
10 police; is that right?

11 A. I did, yes.

12

13 Q. Why is it that you took that view?

14 A. The operative policy at the time was a document called
15 the Interim POLMAN, which is referred to in my statement,
16 and it makes it clear that any cases of suspected child
17 abuse need to be referred to, and it says the relevant
18 authorities. In addition, there was training provided
19 across the organisation, which I took part in, called the
20 SCAP training, and it said if there was a reasonable belief
21 that there may have been child abuse, that it needed to be
22 reported to the authorities - and that document identifies
23 that if the alleged abuser is outside the family that it
24 should go to the police, and something I also checked when
25 I spoke to Group Captain Given was that it was appropriate,
26 but it seemed to me to be utterly appropriate.

27

28 Q. You seem to imply in that that if it was inside the
29 family then it wouldn't necessarily be referred to the
30 police; is that right?

31 A. Yes, perhaps bad phrasing on my part. The suggestion
32 in the SCAP training is that the normal first port of call
33 would be for the child protection agencies, if it's within
34 the family situation. It is for them then, as I understand
35 it, to liaise with police. There were two issues here.
36 One was that it was an historical complaint and the fact
37 that it was in the past and therefore the person alleging
38 that the abuse had occurred was no longer a child, so it
39 seemed inappropriate for me to send it to
40 children's services and it struck me that it was a police
41 matter.

42

43 Q. If we just look up to the top of that page, in
44 paragraph 6, you have recorded there that Mr Symonds told
45 you that he was 16 or 17 at the time?

46 A. Mmm.

47

1 Q. And this was of course in Queensland and we are aware
2 that there are no special care provisions with regard to
3 age of consent in Queensland?

4 A. Correct.

5

6 Q. Did you give consideration to that particularly at
7 that time when deciding whether to refer to the police or
8 not?

9 A. No. I didn't. I didn't, no, not at the time.

10

11 Q. It may be difficult to put your mind back in this
12 position, but are you able to say, at that time, whether
13 you were aware of the special care provisions and that they
14 operate differently in different States and Territories?

15 A. Look, I had a broad understanding that there were
16 special care provisions in other States. The reason -
17 I think I referred this to the police. Apart from the fact
18 that - leaving aside the age was that the clear implication
19 of what Mr Symonds was telling me was that what had
20 occurred had occurred without his consent and therefore the
21 question of whether he was under or over the age of consent
22 was not to me immediately relevant. The question was did
23 he give consent or not.

24

25 Q. I was going to get to that, because what he told you
26 does suggest that there's an issue about consent,
27 isn't there?

28 A. Yes.

29

30 Q. So it would be an assault in any event?

31 A. Correct, yes.

32

33 Q. Then if we can take a look at tab 7, this is an email
34 from you and although it's redacted, it's to Todd Oakley.
35 You say there:

36

37 *Dear FLTLT (AAFC) Oakley.*

38

39 You will see that. You say:

40

41 *I have received this evening a complaint*
42 *alleging that you may have engaged in*
43 *unacceptable conduct with a cadet.*

44

45 *The allegation, if proven, would indicate*
46 *you have contravened the code of conduct.*

47

1 *The matter is now the subject of an*
2 *investigation ...*

3
4 And:

5
6 *While the investigation is proceeding, and*
7 *without prejudice, I am suspending you from*
8 *your appointment as an Officer of Cadets.*

9
10 Now, what process did you consider yourself to be following
11 in suspending Oakley in this manner?

12 A. For me it was all about risk. The difficulty was that
13 what I had before me was an allegation and it was a serious
14 allegation. That allegation, if proven, would indicate
15 that Mr Oakley was not a fit and proper person to have
16 contact with children on an ongoing basis. And in that
17 case, I needed to remove him from a situation where he
18 would have a sanctioned access to children. By doing it
19 without prejudice, it maintains his rights in the sense
20 that he's not terminated or he's not forced to leave the
21 AAFC, and it's simply a note that, "Under current
22 circumstances, until we hear to the contrary, we're not
23 satisfied that you would be safe to be in contact with
24 children in our organisation."

25
26 Q. And you obviously considered yourself to have the
27 power to do that?

28 A. I did.

29
30 Q. Did you reference any documents or rules within the
31 organisation that give you that power?

32 A. I took advice on that one from Group Captain Given.
33 There were a number of different policies and procedures
34 which you will see subsequently came up in terms of
35 reviewing the suspension, but my review of those documents
36 indicated that either I and/or Group Captain Given clearly
37 had the power to suspend Flight Lieutenant Oakley.

38
39 Q. Was it necessary, in your understanding, to first
40 conduct an initial assessment?

41 A. Normally, the process, as you say, would be an initial
42 assessment, which is the cadet equivalent of what used to
43 be called the quick assessment, a fact-finding mission.
44 I took the view that Mick Brett had been given reliable
45 information and that information was given to me as the
46 commander. I then formed the view, I made the initial
47 assessment that there was something here and that I would,

1 therefore, use that as the basis to start an investigation.

2

3 Q. So, in effect, your interview with Symonds constituted
4 the initial assessment?

5 A. That was the relevant evidence. I guess with the
6 benefit of hindsight, I would have said Mick Brett had
7 conducted the initial assessment and by providing the
8 information to me I could then decide whether an
9 investigation was appropriate or not.

10

11 Q. Yes. Of course, by this time, because this is now
12 in April 2014, the Cadet Forces Regulations of 2013 had
13 come into force; is that right?

14 A. That's correct.

15

16 Q. Perhaps we can just take a look at those. They are at
17 tab 327. This particular version doesn't seem to say
18 when - they are dated 13 June 2013 and Regulation 2 says
19 they come into effect, or they commence, on the day that
20 they are registered. I take it that's the date - would you
21 know if that's the date?

22 A. I'd need to look it up. I don't know off the top of
23 my head.

24

25 Q. Dealing particularly with this question of suspension
26 and who has the power and what process should be followed,
27 if one has a look at Regulation 9 - that's on page 1013 -
28 and in particular, subparagraph (4), it says:

29

30 *The service chief may suspend or terminate*
31 *the appointment of an officer or instructor*
32 *at the service chief's discretion.*

33

34 I will come to the question of delegations in a moment.
35 You are obviously not the service chief?

36 A. Correct.

37

38 Q. And then it also says in (5):

39

40 *The service chief must not act under*
41 *subsection (3) or (4) unless:*
42 *(a) the service chief has acted in*
43 *accordance with the principles of natural*
44 *justice in relation to the proposed*
45 *suspension or termination; and*
46 *(b) the cadet, officer or instructor [as it*
47 *is in this case] has been accorded*

1 *procedural fairness in relation to the*
2 *proposed suspension or termination.*

3
4 Did you apply your mind particularly to the question of
5 procedural fairness in this suspension?

6 A. I did and that became a live issue. My view was that,
7 basically, by simply outlining the nature of the allegation
8 against him in broad terms and explaining to him that the
9 investigating officer would outline to him in greater
10 detail, that that satisfied the principles of natural
11 justice.

12
13 Q. Would that be on the basis that if he had something to
14 say which persuaded you that he should not be suspended,
15 you would then have the opportunity to reverse the
16 suspension?

17 A. I think so. I mean, the other thing that occurs to me
18 is that while I accept that the Cadet Forces Regulations
19 governs this, and it was one of the documents that
20 I advised command on in terms of reviewing and renewing
21 Flight Lieutenant Oakley's suspension, my other view was
22 that whatever the Cadet Forces Regulation says is the
23 normal course of events, that there must be an inherent
24 power of command which can be used to deal with serious and
25 emergency situations.

26
27 Q. Which you considered this to be?

28 A. I considered it to be a very serious matter.

29
30 Q. Because of the risk?

31 A. Correct.

32
33 Q. Yes. And "delegation" is dealt with at Regulation 13,
34 which is two pages further on. It provides that:

35
36 *A service chief may delegate his or her*
37 *powers and functions under this regulation,*
38 *other than this power of delegation.*

39
40 Were you aware of a standard set of delegations at that
41 time?

42 A. I was, yes.

43
44 Q. And unless I have missed it, I don't find it in the
45 bundle of documents that we have. Do you have
46 a recollection as to what it said in relation to
47 suspension?

1 A. Yes. I mean there were two - I sent it in to - one of
2 my emails to the then director-general. There is -
3 I expressed some - this does not speak well of me as
4 a lawyer. I expressed some concern when I wrote to the DG
5 saying that it wasn't clear, given that I had
6 a conversation with Group Captain Given, whether he had
7 exercised the power to suspend, or given that I
8 communicated it to the member and it was on my initiative,
9 it was me, but it was clear that both of us had the power
10 but one of us could only suspend for a short amount of
11 time, whereas the commander could suspend for a longer
12 period of time, yes.

13
14 Q. There is a set of delegations that we have but it is
15 dated May 2014, which would be the very next month. I have
16 no need to take you to that, but for anyone who is
17 following it, it is at tab 329. Then if we look at tab 8,
18 you appointed Flight Lieutenant Mike Crome to conduct an
19 investigation for the AAFC; is that right?

20 A. I did.

21
22 Q. How did that come about?

23 A. Immediately after I got home from seeing
24 Flight Lieutenant Brett and Mr Symonds, I contacted
25 Group Captain Given and advised him what was happening,
26 that it a hot issues brief would be coming through. I then
27 spoke to my executive officer who was Squadron Leader AAFC
28 Greg Southey and I took Greg's advice on who I should
29 appoint as an investigator on two bases: one, Greg is
30 a very experienced cadet officer and knew their wing staff
31 much better than I did, but most importantly, Greg is also
32 a psychologist and a RAAF psychologist and is a reservist
33 and I wanted someone who would handle the matter
34 sensitively and appropriately, as well as adhering to the
35 appropriate practice and his advice was Mike Crome was the
36 person I should approach. I immediately rang Mike and
37 asked him to conduct the investigation, he agreed, and then
38 the following day I sent a follow-up email with a summary
39 of the allegations.

40
41 Q. That's the one we see here at tab 8; is that right?

42 A. That is correct.

43
44 Q. Your hot issues brief had said the matter will be
45 referred to the police?

46 A. Correct.

47

1 Q. And now you have also appointed an investigator?

2 A. Correct.

3

4 Q. The matter was referred to the police; is that right?

5 A. It was. I met with Mr Symonds on the 29th.

6 I appointed an investigator immediately. I set up a hot
7 issues brief that night. On the 30th I then attempted to
8 refer the matter to the Queensland Police.

9

10 Q. How did you see or understand the relationship between
11 the investigation that was taking place by Mike Crome
12 within the AAFC and a simultaneous police investigation?

13 A. Look, I thought it was important that we start an
14 investigation immediately, that there was going to be
15 a time delay before the matter would come before the
16 police. I didn't think we could avoid or be seen to be
17 complicit in the matter; we needed to do something.

18

19 There was a delay. I went to see the
20 Queensland Police, you will see in my statement, on the
21 30th, the day, the same day Mike received this email.
22 I attempted to lodge or to speak to someone at my local
23 police beat, but they were closed. I went to another
24 police station and was told I had to speak to a specialist
25 officer, which is fine. I took a business card and then on
26 that very evening I sent the summary of the allegations to
27 the Queensland Police. I then heard nothing for a couple
28 of days, so I contacted the police on May 2nd, by which
29 time Mike had already started contacting Flight Lieutenant
30 Oakley and Flight Lieutenant Oakley had raised certain
31 legal questions which were then put back into the system
32 and at that point I had a question from the commander
33 saying, "Why are we continuing if the Queensland Police -
34 if the matter has been referred to the police?"

35

36 My response, which you will see in the statement, is
37 that it wasn't clear to me by that point whether the police
38 had accepted let alone were actioning the investigation.
39 As soon as it became clear they were, I got a clear
40 direction to immediately suspend and then Flight Lieutenant
41 Crome took advice from the legal officer and actually
42 terminated his inquiry and sent me a report on what had
43 occurred.

44

45 Q. So then you have the situation where there is a police
46 investigation going on, Oakley is suspended, your
47 investigation is suspended; is that right?

1 A. As soon as I became aware that the police
2 investigation - that the police were taking carriage of the
3 matter, we immediately suspended and the advice, in fact,
4 was not to suspend but to terminate our inquiries and
5 that's what happened, and I wrote to Crome telling him in
6 accordance with the director-general and the commander's
7 determination that he was immediately to contact the legal
8 officer and to advise both parties.

9

10 Q. Of course, at that stage you could have no confidence
11 as to what the outcome of the police investigation might
12 be?

13 A. That is correct.

14

15 Q. Or how long it might take?

16 A. Correct.

17

18 Q. I know you subsequently left the position, as we have
19 been through, and the matter hadn't been resolved. Do you
20 know what the ultimate outcome has been, firstly, in
21 relation to the police investigation?

22 A. No, I don't.

23

24 Q. And in relation to the position of Flight Lieutenant
25 Oakley?

26 A. I don't know what his position is except that I have
27 seen his name in AAFC documents which indicates to me that
28 he is back in the system.

29

30 Q. Perhaps we can look at --

31

32 THE CHAIR: The regulation, 2013, has clause 10 in it.
33 Can we bring that up?

34

35 MR STEWART: It is tab 327.

36

37 THE CHAIR: Q. I just want to know how the regulation is
38 understood. Clause 10. The chief is to make arrangements
39 to ensure that information about working with children is
40 made available to all members and ensure that all members
41 are suitable to work with children. Is that understood as
42 imposing an obligation that the service chief and those to
43 whom responsibility is delegated are to ensure that from
44 time to time the conduct of members continues to make them
45 suitable to work with children?

46 A. I think certainly, your Honour - in terms of my
47 reading, and it's not binding on the organisation,

1 obviously --

2

3 Q. No.

4 A. Paragraph (a) deals with matters which are now
5 contained in Vice Chief of Defence Force Directive Number 3
6 of 2014, which is quite prescriptive in terms of
7 obligations and working safely with children. In terms of
8 paragraph (b), all members of the AAFC, all uniformed
9 members, are required to have a Working With Children
10 Check. They are required, since VCDF Directive Number 3 of
11 2014, to have what is called the Defence Purple Card and to
12 sign a declaration as to their understanding of what is
13 required.

14

15 Q. You see, what I'm looking for is whether there is an
16 understanding in the cadets that, irrespective of what the
17 police might do or irrespective of what any other authority
18 might do, whether it is accepted as an obligation within
19 the cadets to ensure that you have in the cadets
20 appropriately considered the conduct of a member and
21 whether they continue to be suitable to work with
22 children - do you understand?

23 A. I do understand and sorry for misunderstanding your
24 question. I think that's - I take that as axiomatic,
25 that --

26

27 Q. But is that coming from the regulation or is that
28 coming from an inherent understanding?

29 A. I think it pre-dates that. It certainly is reflected
30 in lots of documents in the cadet organisation - the
31 Interim POLMAN, the move towards YOUTHPOLMAN, the
32 CDF Directive - all of them are directed at working with
33 children in a safe environment, not only in terms of
34 suspected child abuse but in terms of neglect or in terms
35 of activities undertaken by Defence.

36

37 Q. So if we have the circumstance where a matter is
38 sufficiently serious to warrant a police investigation but
39 for whatever reason - and there can be multiple reasons -
40 the police don't proceed to charge --

41 A. Yes.

42

43 Q. -- does the service or the cadet force accept that it,
44 irrespective of the police outcome, must itself investigate
45 and determine whether that person is suitable?

46 A. I can't comment on behalf of the organisation. My own
47 view is yes. As you say, there are reasons that a police

1 investigation might not proceed, in terms of the - it may
2 be difficult to track down evidence from some time ago,
3 a complainant may be unwilling to give evidence, the DPP
4 may advise that the matter won't proceed to trial. But as
5 an organisation, we have an ongoing obligation to children
6 and the standard of proof we use is obviously much less
7 than beyond reasonable doubt, yes.

8
9 MR STEWART: Q. So do we understand from that,
10 Professor, that had one reached the position - and
11 I understand you left, so you are not sure exactly what has
12 happened and maybe someone else will be able to tell us,
13 but hypothetically, had we reached a position where the
14 police declined to press charges, that the cadet
15 organisation would then, or at least in your view should
16 then recommence its own investigation to make a decision as
17 to the officer's or instructor's position?

18 A. That is my position. If you take a look at
19 paragraph 42 of my statement, it refers to an extract of an
20 email I sent to the commander and the then director -
21 sorry, the current director-general. In paragraph 1, it
22 notes:

23
24 *It is possible that the Queensland Police*
25 *decide not to investigate the matter or,*
26 *having investigated, to take no action. We*
27 *will need to consider our options if and*
28 *when that happens.*

29
30 Q. And did you get an answer to that?

31 A. I did not.

32
33 Q. Can you take a look at tab 15. Perhaps that doesn't
34 deal with it. I will leave that aspect. The email you
35 have quoted from, of course, is at tab 13, if we can look
36 at that. In particular, on the second page, at 0030, that
37 is where you set out what you quoted from a minute ago. If
38 we just go a little bit further down, one of the things you
39 said at that stage - you will see there is
40 a paragraph there beginning with the word "Might". You
41 say:

42
43 *Might I respectfully suggest, given the*
44 *current climate of understandable concern*
45 *with respect to institutional child abuse,*
46 *that the child protection chapter needs*
47 *a jolly good nudge along?*

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What was your concern at that time?

A. Look, at that point, the Interim POLMAN was still in force, and, as the name suggests, it was designed only as an interim document. It made the position clear, which was that abuse was to be reported, but it did refer to some documents which were due to be created that I was unable to locate.

My concern was that the policy - I beg your pardon, we were moving to the Manual of Management and that policy, in the Manual of Management on child protection, said "drafting not yet commenced". I was concerned that there were some discrepancies on my reading between the Interim POLMAN chapter, between the SCAP training, and there was nothing in the Manual of Management. I was concerned that there were too many sources and that they were starting to conflict. The wording is a little inelegant, but I was trying to encourage that something be done.

Q. You remain a wing commander in the AAFC?

A. I do.

Q. So we are now a couple of years further down the track. What is your view now as to whether the position is, firstly, improved and, secondly, satisfactory?

A. I think it is much improved. The Interim POLMAN has gone. My understanding is we will be moving to a YOUTH POLMAN, which will be an authoritative guidance. In the meantime, the VCDF's directive Number 3 of 2014 is absolutely clear and prescriptive, and the SI, which was until recently draft, still needs a little bit of work, I think, to bring it in accordance with VCDF's directive but I think the situation is vastly improved.

Q. How do you see the interaction between policies and procedures that are in place at the level of Australian Defence Force Cadets across all three services and those within a particular service, in your case, the AAFC?

A. I don't have exposure to the policies and procedures of the Australian Army Cadets and the Australian Navy Cadets, but I think in a tri-service parent organisation it is desirable that the same principles apply across all organisations.

Q. Is it not the case that there remains some level of

1 impenetrability in the policies and documents because one
2 has them across the service level in the ADF Cadets and
3 then replicated, not necessarily exactly, but replicated
4 in, in your case, the AAFC?

5 A. Look, I agree, and I think that's - one of the great
6 advances, I think, of the Standing Instruction is an
7 attempt - and it is early days, but an attempt - to place
8 the broader instructions in a specific AAFC context that
9 makes sense to AAFC members. I think that that is a good
10 thing.

11

12 Q. As I understand it, some of the chapters of the
13 YOUTHPOLMAN have been completed and are operative; is that
14 right?

15 A. Correct.

16

17 Q. And some chapters remain in the process of
18 development; is that right?

19 A. That's correct.

20

21 Q. And, I suppose, your view would be that the sooner
22 those are completed and there is a uniform set, the better,
23 would that be the case?

24 A. I think it is. I mean, I note this Commission has
25 done some ground-breaking work on best practice in
26 reporting suspected abuse and I have already written to the
27 Commonwealth suggesting that we need to take heed of that
28 and incorporate it as part of our process, and I think we
29 need to acknowledge the levels of expertise beyond our own
30 organisation in terms of assistance in devising best
31 practices.

32

33 Q. I know this is outside of the area of the law of tort,
34 which is where your particular specialty is, but do you
35 have anything to say about - this is really from running
36 a child-safe organisation is concerned, from that
37 perspective - the lack of uniformity between the different
38 States and Territories in the law dealing with, firstly,
39 age of consent and then, secondly, related to that, special
40 care provisions?

41 A. I think it is undesirable. Obviously, in a
42 Federation, you accept that there will be changes from
43 State to State on matters. It would be better, far better,
44 if we had uniformity on both of those issues.

45

46 We do have some movement within our organisation,
47 people moving from State to State, and I suspect they would

1 find it challenging, so uniformity is to be applauded,
2 I think, in this field.

3
4 MR STEWART: I have no further questions.

5
6 THE CHAIR: Does anyone else have any questions?

7
8 MR BENJAMIN: Yes, thank you, your Honour.

9
10 **<EXAMINATION BY MR BENJAMIN:**

11
12 MR BENJAMIN: Q. Professor, my name is Benjamin and
13 I represent Mr Symonds. I have a few questions for you
14 too.

15 A. Sure.

16
17 Q. As far as your statement is concerned, the decision to
18 immediately suspend was one that you made in consultation
19 with Group Captain Given; is that right?

20 A. That is correct.

21
22 Q. Did you notify Mr Oakley of that decision to suspend
23 him prior to contacting Mr Crome and appointing him as the
24 investigator, or was the investigation commenced prior to
25 the suspension being notified?

26 A. I am not sure; I honestly can't remember.

27
28 Q. The initial notification to Mr Oakley of his
29 suspension was done by email; is that right?

30 A. It was.

31
32 Q. And that's the email we have been shown, where there
33 was the brief description of him being told that an
34 allegation had been made of unacceptable conduct or
35 behaviour with the cadet?

36 A. (Witness nods).

37
38 Q. Was the first telephone contact you had with Mr Oakley
39 when he called you several days after that suspension - and
40 this is contained, in fact, in the paragraph you amended at
41 the beginning of your evidence, paragraph 37.

42 A. Yes. Look, I sent Mr Oakley, as you note, an email.
43 There was then an email from Mr Oakley of 30 April, in
44 which he inquired as the identity of the investigating
45 officer, and I emailed him back then and then he called me
46 about some other matters that are recorded in my statement.

47

1 Q. During that telephone conversation can you recall
2 whether he asked you about the nature of the allegations
3 that had been made?

4 A. He did. I explained to him in broad terms the nature
5 of the allegation, but I explained to him the investigating
6 officer would give him more details.

7
8 Q. When you say "in broad terms", can you recall whether
9 you told him that it was an allegation of a sexual nature?

10 A. I can't recall.

11
12 Q. You, at the very least, told him that the matter might
13 be referred to the Queensland Police?

14 A. I said that it may be the subject of an inquiry by the
15 Queensland Police, yes.

16
17 Q. Did you consider that by doing that, that would, at
18 the very least, put Mr Oakley on notice that the allegation
19 was potentially of a sexual nature because it was serious
20 enough to warrant referral to the Queensland Police
21 Service?

22 A. I don't think so. I mean, Mr Oakley was and is, as
23 I understand it, a long-standing member of the AAFC, and
24 I assumed that an allegation of unacceptable behaviour,
25 which is in terms of the interaction with cadets, would be
26 enough of itself to raise concerns that it may end up
27 before the police.

28
29 Q. So you thought that Mr Oakley's understanding of
30 "unacceptable behaviour" would clearly mean behaviour of
31 a sexual nature?

32 A. No, I don't think so, but some sort of interaction,
33 physical interaction, between a cadet and a staff member,
34 was my understanding of how he would understand it.

35
36 Q. Certainly the sort of interaction that could
37 constitute a criminal offence?

38 A. Correct.

39
40 Q. During your initial meeting with Mr Symonds, you
41 obtained his consent to refer the matter to
42 Queensland Police?

43 A. I did.

44
45 Q. Was your understanding of the policy that was in place
46 at the time that that mandated the referral of any
47 allegation of a sexual nature, particularly something that

1 might amount to a sexual offence involving a cadet, had to
2 be referred to Queensland Police?

3 A. My understanding was the policy was quite clear - that
4 if it was suspected abuse of any description, it needed to
5 be referred.

6

7 Q. And that's the case regardless, as you have already
8 said - your understanding from the allegations Mr Symonds
9 made was that regardless of the age of consent, this was
10 clearly potentially sexual conduct without consent and so
11 an offence regardless of his age?

12 A. I think that's right and look, the reason I asked him
13 if I could refer it out was that I thought it was
14 respectful, given that he had come to see me, and
15 I reassured him that he had done the right thing, but
16 I needed to let him know what my course of action was from
17 there, which was to send it up my internal chain of command
18 but to refer it to an external agency as well.

19

20 Q. So your intention, from the moment you've heard the
21 allegations, was that you were always going to inform the
22 police --

23 A. Correct.

24

25 Q. -- and obtaining his consent was simply out of
26 politeness to him?

27 A. Correct.

28

29 Q. In any event, he freely gave you that consent and the
30 consent to pass his contact details on?

31 A. He certainly did.

32

33 Q. Now, had you had much in the way of previous
34 interactions with the Queensland Police Service?

35 A. No.

36

37 Q. Did you at least have an understanding that it may
38 take some time for the material which was sent to the
39 police to be allocated to an investigating officer and for
40 that investigation to commence?

41 A. I didn't know how long it would take, but my concern
42 was that it wouldn't be instant, which is why I decided to
43 start my own investigation internally in the meantime.

44

45 Q. And when you decided to commence the investigation,
46 your own investigation, you appointed Mr Crome as the
47 investigator?

1 A. I did.

2

3 Q. And you directed him to contact Mr Oakley as soon as
4 possible in relation to the investigation?

5 A. I directed him to make contact both with Mr Oakley and
6 with Mr Symonds, yes.

7

8 Q. Did you give Mr Crome any direction as to the
9 information that he ought to provide to Mr Oakley at the
10 time that he got in contact with him?

11 A. No, I spoke to Mike and I told him I would send the
12 allegations in the following day. My advice to Mike, from
13 memory, was that he should tell him in broad terms the
14 nature of the allegation. Mike then raised a question that
15 it would be responded to by Oakley before the two of them
16 could meet, which was he wanted to know the identity.
17 Because I was the appointing officer of this investigation,
18 I didn't feel I could step into the breach and give legal
19 advice, so I referred it to defence legal and they provided
20 certain advice, which was that it was not necessary to
21 identify the complainant.

22

23 Q. That use of the phrase "in broad terms" - is that the
24 way in which you gave the direction to Mr Crome about what
25 he should disclose to Mr Oakley?

26 A. I can't remember but that would be what - it sounds
27 like something I would say.

28

29 Q. Do you recall having any conversations with Mr Crome
30 as to whether the fact that it was an allegation of
31 a sexual nature ought to be disclosed?

32 A. I don't remember having a conversation to that effect.

33

34 Q. During your evidence before you mentioned that you in
35 fact thought that there was a good possibility of there
36 being a delay in the commencement of the police
37 investigation, and you thought that by not commencing your
38 own investigation, it may lead to the appearance of cadets
39 being complicit in the conduct of Mr Oakley; is that right?

40 A. Well, I thought it was appropriate that the system
41 needed to respond and an important allegation had been
42 made, as yet unproven, but we couldn't simply sit on our
43 hands and say it wasn't our problem. If this staff member
44 was to have continued association with children, we needed
45 to do something; we couldn't just sit still.

46

47 Q. You are aware that the Queensland Police Service have

1 certain powers and investigative techniques that they use
2 in the investigation of offences of this nature?

3 A. I wasn't aware of that, but go ahead.
4

5 Q. Are you familiar, for example, with the process of the
6 police having a complainant in a sexual offence matter make
7 what is called a pretext call to an alleged offender?

8 A. I wasn't aware at the time that I started the
9 investigation, no, but I became aware subsequently, yes.
10

11 Q. You became aware subsequently of those techniques.
12 Were you aware of what investigative techniques might be
13 available to Mr Crome as part of his investigation through
14 Australian Air Force Cadets?

15 A. In the sense that I understood the procedures that we
16 would use, yes.
17

18 Q. Is your understanding that procedures like that - that
19 pretext call - are the sort of procedures that might be
20 used in an investigation by the cadet organisation itself?

21 A. I'm not aware that we would use pretext calls -
22 I'm sorry, as part of an AAFC investigation?
23

24 Q. Yes.

25 A. Yes.
26

27 Q. Did it occur to you at any point - and if this
28 question comes across as critical, it's certainly not the
29 way I intend it - that by alerting Mr Oakley to the fact
30 that there was the potential for a police investigation or
31 the matter being referred to the police, that that might
32 put him on notice as to the potential of police using their
33 own investigative techniques at some point down the track?

34 A. No, it didn't occur to me. Mr Oakley is not a lawyer,
35 either.
36

37 THE CHAIR: Q. I am sorry, I'm not sure I understand
38 that. When you say "Mr Oakley is not a lawyer", what do
39 you mean?

40 A. My understanding of counsel's question was that the
41 implication was that as a lawyer I would understand the
42 Queensland Police Service investigative processes. They
43 were not aware to me. I would be surprised - but I can't
44 comment for Mr Oakley - if he knew about them either.
45

46 Q. No, but I think the question is somewhat differently
47 aimed.

1 A. Okay.

2

3 Q. What is being suggested is that by telling Mr Oakley
4 then he is put on notice that the police may be
5 investigating him and, thus, he might be ready in the way
6 he responds.

7 A. Phrased in that way, your Honour, that - it's hard to
8 disagree with that proposition, yes. By being aware - but
9 I think - I would be surprised if Mr Oakley wasn't aware
10 that under extant policy, an allegation - a serious
11 allegation in this nature would automatically be referred
12 to the authorities. Mr Oakley had done the SCAP training,
13 which makes that absolutely abundantly clear. I would be
14 surprised if he wasn't aware, but Mr Oakley isn't here; I'm
15 not sure what his position would be.

16

17 Q. You don't have to be a lawyer, necessarily, to know
18 how the police might operate?

19 A. That is true, your Honour.

20

21 MR BENJAMIN: Q. During the process of the investigation
22 proceeding and then being terminated - this is the AAFC
23 investigation, I'm sorry, just for the sake of clarity -
24 Mr Oakley, in fact, made contact with someone through the
25 cadets wondering what sort of legal services may be
26 available to him through the cadets; is that right?

27 A. That is correct.

28

29 Q. Could I ask you to look at the document contained at
30 tab 20, referred to as annexure M to your statement. We
31 have there what on the first page is an email. At the top
32 of the document - it is essentially an email chain and at
33 the top is an email to you from Jaqueline Hatch?

34 A. Mmm-hmm.

35

36 Q. That sets out what was essentially advice to you about
37 what should be told to Mr Oakley about the options
38 available to him in terms of assistance from the cadets; is
39 that right?

40 A. That is correct.

41

42 Q. Do you recall whether you read the entire email chain
43 when it was sent through to you?

44 A. I don't recall, no.

45

46 Q. If we go to the very bottom of the document, in fact,
47 the relevant part is on the bottom of the second-last page,

1 we have an email to you - I will just wait for that to be
2 brought up - the email address that it is from has been
3 redacted, but we can see - actually, it is at the very top
4 of the next page, if we can scroll down a little. We can
5 see that it is signed from Todd Oakley. The email reads:

6
7 *It has now been one month since my*
8 *suspension and three weeks since the matter*
9 *was referred to QPOL --*

10
11 I am assuming that's a reference to Queensland Police --

12
13 *from whom I have heard nothing. I have two*
14 *questions at this stage;*

15
16 *1. Is my suspension to be open-ended and*
17 *indefinite based on how long it takes QPOL*
18 *to investigate (if they investigate)? What*
19 *if this is going to take some time? How*
20 *long can I be suspended for "without*
21 *prejudice" before I start to be*
22 *disadvantaged by the situation?*

23
24 *2. Since the matter has been referred to*
25 *QPOL, am I eligible for Legal Aid or*
26 *assistance from the AAFC?*

27
28 That is an email you received from Mr Oakley asking about
29 what assistance might be available to him. And if we
30 scroll up, you replied to him saying that you would need to
31 seek advice on the matters that were raised and you would
32 let him know as soon as you heard anything. You cc-ed that
33 email to Paul Gregory.

34 A. Yes, I did.

35
36 Q. Who was Paul Gregory?

37 A. Paul Gregory was then the Deputy Commander of Cadets
38 and on that date, he was, as I understood, the Acting
39 Commander of Cadets. He has since become the Commander of
40 Cadets.

41
42 Q. Continuing to scroll up, we can see then an email from
43 Paul Gregory to Terry Delahunty. Who was Mr Delahunty at
44 that time?

45 A. He is the Director-General of Cadets Air Force.

46
47 Q. So this is Paul Gregory essentially moving this

1 further up the chain to somebody who he answers to?

2 A. Correct.

3

4 Q. Looking at that email, going down to about halfway
5 down, it says:

6

7 *There is no such thing as "Legal Aid", or*
8 *"assistance" for AAFC members beyond the*
9 *usual Defence wide support services.*

10

11 *Given the long history of issues with this*
12 *member (I am privy to a small area relating*
13 *to his being stood aside as C0219SQN)*
14 *I feel that referring him to any Defence*
15 *assistance may be troublesome.*

16

17 *Are you able to provide any advice?*

18

19 Do you recall reading that aspect of that email that was
20 part of the chain that was sent to you?

21 A. I do remember seeing that, yes.

22

23 Q. I beg your pardon?

24 A. Yes, I do.

25

26 Q. Do you have any awareness yourself of what might be
27 meant by the "long history of issues with this member",
28 that is referred to in that email, that came to you as part
29 of your investigation or your establishment of an
30 investigation?

31 A. The only - the only input I can provide is that I took
32 over as OC2 Wing on 1 April 2012. On that date and for
33 about a week or so later I received a series of complaints
34 from parents and cadets complaining that the CO of their
35 squadron, 219 Squadron, had been removed by my predecessor,
36 and it had happened, my understanding was, shortly before
37 I took over, in an attempt by my predecessor to quieten
38 things down or sort things out before I took over. My
39 response to those complaints was that it had involved
40 matters prior to my time and I didn't have a visibility of
41 it and I referred them then to the commander, Group Captain
42 Given, for resolution.

43

44 Q. I am sorry, the complaints were received from parents
45 and cadets?

46 A. As to the - my understanding was as to the fact that
47 the CO of their squadron, 219 Squadron, Flight Lieutenant

1 Todd Oakley, had been removed from his position.

2

3 Q. So you had had no input in that process and so you
4 referred them to Group Captain Given?

5 A. That is correct.

6

7 Q. During your interaction and your involvement with this
8 matter, did you at any point become aware that Todd Oakley
9 had been investigated for any sort of misconduct
10 previously?

11 A. No.

12

13 MR BENJAMIN: Thank you, your Honour. I have no further
14 questions.

15

16 THE CHAIR: Does anyone else have any questions?

17

18 MS McLEOD: No, thank you, your Honour.

19

20 <EXAMINATION BY MR STEWART:

21

22 MR STEWART: Q. I do have something further I wish to
23 ask you about, Professor. Can I ask that you are shown
24 tab 29, which is Flight Lieutenant Todd Oakley's service
25 transcript from the Australian Air Force Cadets.
26 I understand that Mr Delahunty is going to give evidence in
27 due course and he may be able to explain what the current
28 position is, and I'm hoping that he can, but in the
29 meanwhile, you can perhaps interpret this document for us.

30

31 You will see under the heading "Promotional History",
32 and it is in reverse chronological order, it has adjacent
33 to the date 29 January 2016 the rank Flight Lieutenant
34 (AAFC). Are we to understand that Oakley was promoted to
35 that rank on that date? How are we to interpret this
36 document?

37 A. I'm just looking at it now. The way the rank
38 structure works in the AAFC is that, by and large, people
39 are brought in at a junior rank and there is some - sorry,
40 at an officer rank, and there is some promotion. Beyond
41 that, if you occupy a particular position in the hierarchy,
42 you are granted acting rank. So just looking at this here,
43 if you look at 1 April 2011, Mr Oakley was
44 a flight lieutenant. Something has happened on 1 November
45 2015, which indicates to me that he has occupied a position
46 in the hierarchy as at that date, and, therefore, been
47 given a temporary promotion to that date, and then, when

1 that appointment or position has changed or moved, he has
2 then reverted to his former rank on or about 29 January
3 2016.

4
5 Q. If we scroll it a bit further down, you can see the
6 next section, where it says "Posting History". Does that
7 assist you to make sense of - essentially, what I'm trying
8 to get at is how are we to understand this document with
9 regard to the present position?

10 A. Right.

11
12 Q. It does have "Terminations 30 January 2016" and
13 reflected in the right hand column, "Current", but, of
14 course, that's the day after the date of 29 January, which
15 is adjacent to the "Flight Lieutenant" under the
16 promotional history?

17 A. I'm not sure what that first entry is. The other ones
18 I can explain, if it would assist. So it looks to me
19 like - as I said, I don't know what the "terminations"
20 means. The reference to Number 2 Wing suggests to me that
21 he was probably posted to a headquarters position in
22 Number 2 Wing. Prior to that, he was posted in what is
23 called the "unallotted list", which is for, effectively,
24 people who are still in the organisation but want to be on
25 leave for whatever reason, and prior to that, you will see
26 that he was at number 217 Squadron as a staff member.
27 Prior to that, again, he was at a headquarters position of
28 some description.

29
30 Q. If we look further down, and scroll it a bit further -
31 I'm sorry you don't have the whole thing available to you -
32 you will see an appointment history, which would indicate
33 Number 2 Wing personnel officer, 16 December 2015 to
34 30 January 2016.

35 A. Right.

36
37 Q. So would it be right, ex facie that, to draw this
38 conclusion, that for that period, December 2015
39 to January 2016, there was an appointment to the Number 2
40 Wing head office, and then equally, for the periods prior
41 to that reflected there, staff officer management services,
42 but from the end of January 2016, there was a termination?

43 A. If that's the last appointment history, it does look
44 like - I do remember seeing - the reason I gave my answer
45 earlier, that I had seen some correspondence with his name
46 on it, was that I had seen a 2 Wing instruction which
47 appeared to have him referenced as Staff Officer Management

1 Services; so I had some visibility of that. I hadn't seen
2 the personnel officer and I hadn't seen the termination.

3

4 MR STEWART: I am sure we will have some further
5 explanation on this in due course. Thank you, Professor.

6

7 THE CHAIR: Yes, thank you, Professor, that concludes your
8 evidence. You are excused.

9

10 MS McLEOD: Just by way of clarification, your Honour,
11 I can confirm that Todd Oakley resigned from the cadets on
12 30 January 2016, if that is of assistance. That matches
13 the termination date under "Posting History".

14

15 THE CHAIR: So that's not a reference to a role; that's
16 a reference to an end of a role?

17

18 MS McLEOD: Yes.

19

20 <THE WITNESS WITHDREW

21

22 MR STEWART: Your Honour, the next witness is [CJF]. Her
23 statement should be at tab 26 of the statements bundle

24

25 <[CJF], sworn: [11.15am]

26

27 <EXAMINATION BY MR STEWART:

28

29 MR STEWART: Q. Ms [CJF], your names and other details
30 are known to the Royal Commission. Do you have available
31 to you your statement dated 10 June 2016, prepared for the
32 Royal Commission?

33

34 A. Yes, I do.

35

36 Q. Do you confirm that it is true and correct?

37

38 A. Yes.

39

40 MR STEWART: I tender that, your Honour.

41

42 **EXHIBIT #40-034 STATEMENT OF [CJF] DATED 10/06/2016**

43

44 MR STEWART: Q. I understand that in 1999, when you were
45 13 years old, you joined the Australian Air Force Cadets;
46 is that right?

47

48 A. Yes.

49

50 Q. You remained as a cadet with the AAFC for seven years?

1 A. Yes.
2
3 Q. When you turned 18 years old, in 2004, you remained
4 with the AAFC as a cadet staff member, through until 2006;
5 is that right?
6 A. Yes, as a cadet under officer.
7
8 Q. And after 2006, you took time away from cadets,
9 although you still frequently attended as a volunteer; is
10 that right?
11 A. Yes.
12
13 Q. And in 2010, when you were 24 years old, you became an
14 adult cadet instructor in the AAFC; is that right?
15 A. Yes.
16
17 Q. Dealing, firstly, just with some questions of
18 structure, which you deal with in your statement, if I can
19 just understand it, there are a number of Air Force cadet
20 squadrons around the country; is that right?
21 A. Yes.
22
23 Q. And they are grouped into different wings; is that
24 right?
25 A. Yes.
26
27 Q. In respect of the squadron that you were a member of,
28 are you aware how many squadrons formed the wing?
29 A. Roughly between 37 and 39, I think.
30
31 Q. Within a squadron I understand that there is
32 a commanding officer, who is the highest ranking official
33 within the squadron; is that right?
34 A. Yes.
35
36 Q. And then beneath the commanding officer there would be
37 what is referred to as an executive officer?
38 A. Yes.
39
40 Q. Who is effectively a second in charge; is that right?
41 A. Yes.
42
43 Q. There would also then be other instructors in charge
44 of logistics, training, administration and discipline?
45 A. Yes.
46
47 Q. Dealing with your experience as a cadet member, you

1 joined, as I understand it, 2 Flight Squadron at Sydney
2 Technical High School as a 13 year old?
3 A. Yes.
4
5 Q. And there were about 60 cadets in that squadron?
6 A. I think at that time.
7
8 Q. And about 10 of whom were female; is that right?
9 A. Yes.
10
11 Q. And there were six or eight adult members?
12 A. I think so.
13
14 Q. Did you receive any induction or training at
15 commencement with regard to what is referred to as the no
16 fraternisation rule?
17 A. Not that I can recall. We did have briefings at
18 different activities, but I can't recall that specifically
19 at this time.
20
21 Q. I take it at some stage you became aware that there
22 was a rule against fraternisation; is that right?
23 A. Yes, in those days it was called chapter 19, and it
24 was spoken about or joked about quite frequently.
25
26 Q. What was your understanding as to what the effect of
27 chapter 19 was?
28 A. That we weren't allowed to touch each other.
29
30 Q. So that's cadets were not allowed to touch each other?
31 A. Yes, and we had to maintain Blue Book distance,
32 which - the Blue Book was a little book, so we would hit
33 each other, for instance, with the book, because that was
34 maintaining Blue Book distance.
35
36 Q. And did you have an understanding as to whether that
37 rule, the no-touching rule, applied as between cadets and
38 instructors?
39 A. I --
40
41 Q. As opposed to just between cadets?
42 A. Yes, the instructors weren't meant to touch us either,
43 because it was all Blue Book distance.
44
45 Q. Did you have an understanding as to the reach of that
46 rule beyond just the question of touching and the Blue Book
47 distance, as you have referred to it?

1 A. I knew that we weren't meant to fraternise with other
2 cadets, as in, like, kiss, and stuff like that.
3
4 Q. So your understanding of the non-fraternisation aspect
5 was that it was addressed to - I'm looking for words which
6 might accurately describe it, so you must correct or
7 qualify what I say - intimate touching?
8 A. Yes.
9
10 Q. And if someone fell over or tripped, would you be able
11 to hold out your hand to pull them up again on to their
12 feet?
13 A. Yes.
14
15 Q. So somehow embodied in the rule, in your
16 understanding, was some question or notion of intent - in
17 other words, the intent or object of the touching?
18 A. Yes. There were times where we were allowed to touch.
19 For instance, if we were correcting someone's arm movement
20 for a drill move or something like that, in which you would
21 say, "Permission to touch?" And then they would say,
22 "Permission granted", and then you could touch the cadet or
23 your fellow member and move them accordingly.
24
25 Q. And now, that example you have given seems to imply
26 that the no-touching rule was observed by the cadets?
27 A. At times, yes, but I think, as well, sometimes we sort
28 of did it mucking around - we were kids, so it was just,
29 you know, sometimes a bit of a joke.
30
31 Q. Do you have an understanding as to whether the rule
32 applied just whilst you were on cadet activities or whether
33 it applied even when you were away and perhaps at school or
34 on holidays, not related to cadet activities?
35 A. Just when we were at cadets and on duty.
36
37 Q. And that understanding - was that in relation to both
38 touching between cadets as well as cadets and instructors?
39 A. Yes.
40
41 Q. You do mention in your statement, at paragraph 20,
42 that presumably in breach of that rule, during your time as
43 a cadet, it was common for cadets to fraternise with other
44 cadets and instructors, and you say, for example, when you
45 were 17, you were intimate with a cadet instructor at
46 a cadet party:
47

1 *Although staff members were aware of*
2 *fraternisation, it was not monitored and*
3 *there was little consequence or punishment*
4 *if a cadet engaged in fraternisation.*

5
6 If I just break that down, firstly, in respect to the
7 incident that you referred to yourself, when you were 17,
8 was that known about by any other cadet instructor?

9 A. Yes.

10
11 Q. And was there any consequence to that, any uptake on
12 it?

13 A. No.

14
15 Q. By which I mean did anyone pick you out about that or
16 criticise or charge you in any way within the organisation?

17 A. No.

18
19 Q. Or perhaps more pertinently, are you aware whether the
20 cadet instructor with whom you were intimate was picked out
21 about that?

22 A. The cadet instructor was an ADF member in the Navy and
23 it was - and we had done a combined activity with the Navy
24 cadets. We had been doing rifle shoots with the Navy
25 cadets and sometimes you would team up with another cadet
26 unit to do activities or you would team up with another
27 organisation to do activities as well, and we were going
28 shooting a few weekends in a row and then all the cadets -
29 so Navy cadets and Air Force cadets - we went back to his
30 house after one of the shoots, and he brought us alcohol
31 and there were other Navy cadet instructors at his home as
32 well at that time, when the incident took place.

33
34 Q. And there was no consequence to that, no-one was
35 disciplined or?

36 A. No.

37
38 MR STEWART: Your Honour, would this be a convenient time?

39
40 THE CHAIR: Yes, very well, we will take the morning
41 adjournment.

42
43 **SHORT ADJOURNMENT**

44
45 MR STEWART: Q. Ms [CJF], I just have one question to go
46 back to in relation to the incident that you mentioned just
47 before we broke for tea, and that is, were there any

1 officers or instructors of your squadron who knew about the
2 intimate involvement that you had had with the Navy cadet
3 instructor on that occasion?

4 A. Not that I'm aware of.

5

6 Q. You subsequently transitioned from being a cadet
7 member to then becoming a cadet staff member; is that
8 right?

9 A. Yes.

10

11 Q. I understand that when you turned 18, which would have
12 been in 2004 - is that right?

13 A. Yes.

14

15 Q. -- you were a cadet under officer and you transitioned
16 at that time to become a staff member?

17 A. When you are 18 and either a cadet under officer or
18 a cadet warrant officer in the AAFC, then you can be
19 counted for ratio purposes and you are counted as a cadet
20 staff member. So that is - you are a cadet - it's hard
21 because we use the same terminology for a few different
22 things; so I was a cadet staff member at that time, after
23 age 18.

24

25 Q. You say in paragraph 27 of your statement that you
26 recall completing a promotion course where you were taught
27 by adult instructors about leadership, administration and
28 duty of care in general terms. It will come up on the
29 screen in a moment. You say that you understood from the
30 course that as a cadet staff member, a duty of care was
31 owed to other cadet members, and you recall that the
32 overall tone of the instruction was to the effect of,
33 "Don't let the cadets hurt themselves or each other", and
34 you say that as a cadet staff member, you don't recall
35 receiving any specific courses to prepare you for
36 supervision of children. You obviously did this course in
37 2004 or thereabouts. Did you do other courses subsequent
38 to that as a staff member?

39 A. As an adult staff member?

40

41 Q. Yes.

42 A. I completed a bridging workshop in Queensland
43 in December 2011 and I completed a couple of days at
44 a Staff Initial Course at RAAF Base Wagga in January 2012,
45 and they would be other courses.

46

47 Q. Earlier, when you started giving evidence, I asked you

1 what your understanding as an ordinary cadet was with
2 regard to the no fraternisation or, as you put it, no-touch
3 rule. In the courses that you did from 2004 onwards, were
4 you taught anything more about that rule?

5 A. I did have, in my mind, a thought that staff and
6 cadets weren't meant to associate outside of cadets, and
7 I thought that was a policy. However, looking back and
8 attempting to find that, I can't find that specifically, so
9 I think it was just a verbalised rule or comment in the
10 organisation at that time.

11
12 Q. But it's something you came to understand to be
13 a policy or rule of the organisation?

14 A. Yes.

15
16 Q. Do you recall what, if anything, you were taught about
17 child protection within the organisation?

18 A. As I did my bridging workshop in Queensland, I wasn't
19 taught too much, as they said that their laws and what they
20 were teaching on that course did not apply to me, as I was
21 from New South Wales, and then on the next course, I can't
22 recall if I learnt anything specifically about that, as
23 I was only on the course for a couple of days.

24
25 Q. In paragraph 28 of your statement, perhaps if we just
26 scroll down a bit, you say:

27
28 *It was my experience that not all*
29 *instructors followed or enforced the*
30 *policies and often were in breach of the*
31 *policies themselves. I recall that when*
32 *I was a cadet staff member, I submitted*
33 *a complaint about a male instructor who had*
34 *a sexual relationship with a female cadet*
35 *aged 16 at a party at another cadet's*
36 *house. After I lodged the complaint, I was*
37 *told by a superior at NSW HQ that the*
38 *instructor had been spoken to, but*
39 *I observed he continued to be an instructor*
40 *at the AAFC.*

41
42 Firstly, can I just clarify, was this when you were an
43 adult staff member or prior to becoming an adult staff
44 member?

45 A. Prior to becoming an adult staff member.

46
47 Q. Was it then about 2004/2005 that this occurred?

1 A. It was in 2005.
2
3 Q. Do you know anything about what actual process was
4 followed, what investigation there was, if anything, beyond
5 what you have written here?
6 A. I don't know anything about what happened at that
7 time. I do know that he continued to be a staff member and
8 when I became a staff member, an adult staff member, later
9 on, I had to then lodge another complaint regarding the
10 same instructor approaching female cadets at my squadron.
11
12 Q. And was anything done about that?
13 A. Not really.
14
15 Q. What was the age of this instructor, approximately,
16 relative to the cadets?
17 A. Back in 2005, he would have been maybe between 20 and
18 22, and then when I complained again about him in 2010, he
19 would have then been around 28.
20
21 Q. Dealing with your experience as a cadet instructor,
22 I understand from your statement that in 2010, when you
23 were 24, you applied to become and were appointed an
24 instructor with the AAFC; is that right?
25 A. Yes.
26
27 Q. You were required to attend a Staff Initial, as you
28 have put it, Course; is that right?
29 A. Yes.
30
31 Q. An SIC, within 12 months. Did you manage to attend
32 that course?
33 A. Not within 12 months, no.
34
35 Q. Did you subsequently attend it?
36 A. I completed a bridging workshop, which was available
37 at the time, and then I completed a couple of days of the
38 Staff Initial Course. As I had been trained as a cadet
39 under officer, that then meant that I didn't have to attend
40 the entire course.
41
42 Q. And then you go on to detail that you attended General
43 Service Training or GST courses where you were responsible
44 for supervising and managing cadets; is that right?
45 A. Yes.
46
47 Q. And were those typically in the holidays at a RAAF

1 Base somewhere?
2 A. Yes.
3
4 Q. I want to move on and deal, in particular, with your
5 involvement in the matter of Christopher Adams, which you
6 deal with in your statement from paragraph 44 onwards.
7 Ms [CJF], how did you become aware of Chris Adams' sexual
8 involvement with a cadet?
9 A. Before [CJE] confided in me and told me what was going
10 on, one of her friends commented to me that something was
11 going on between her and headquarters, and I said that it
12 was really important that, if something was going on, [CJE]
13 express that to me but, as far as I was aware, nothing was
14 going on, as the commanding officer at the squadron had not
15 been informed of anything like that.
16
17 Q. At that time were you an instructor in the same cadet
18 squadron in which [CJE] was a cadet?
19 A. Yes.
20
21 Q. How did you know that the squadron commanding officer
22 had not been informed?
23 A. Because he told me everything and I was the executive
24 officer at the time.
25
26 Q. So you were the executive officer of that squadron?
27 A. Yes.
28
29 Q. Which is to say the second in command, effectively?
30 A. Yes.
31
32 Q. What were you intending to do by being involved in
33 this and talking to people about what was happening?
34 A. In regards to [CJE] and the matter?
35
36 Q. Yes.
37 A. As soon as she disclosed what was going on and
38 I understood how headquarters was dealing with her and her
39 family, it became obvious to me that the matter was not
40 being dealt with correctly and so I then acted in a way to
41 attempt to protect her and her family from any further harm
42 from the AAFC.
43
44 Q. What I want to ask you to do is identify in what
45 respect do you say the matter was not being handled
46 correctly?
47 A. [CJE] would speak with me about her conversations, in

1 particular, with Sharon O'Donnell, that she was having on
2 the phone, and the conversations between [CJE]'s parents
3 and headquarters as well, and just the way that they were
4 being treated and the tone in the conversations that [CJE]
5 would repeat to me came across to me that it wasn't being
6 dealt with with compassion or in a professional manner,
7 or - and it wasn't being taken seriously. It was also
8 a concern that there were other cadets that had been abused
9 by Adams and headquarters, again, did not seem to be taking
10 that seriously. And I was also concerned about what was
11 going on as a whole and why there was no sort of quick
12 resolution to what was going on or why it wasn't referred
13 to police or - yeah.

14
15 Q. As I understand it, but correct me if I am wrong, you
16 were not directly involved in the chain of responsibility
17 with headquarters as to the dealing with the matter; is
18 that right?

19 A. Yes, that's correct.

20
21 Q. So is it right that you saw yourself as being
22 a support to [CJE]?

23 A. Yes.

24
25 Q. And her family?

26 A. Yes.

27
28 Q. You said the way in which [CJE] and her family were
29 treated and then you went on to talk about the tone and
30 lack of compassion and professionalism. Are there other
31 aspects of the treatment that you have in mind, other than
32 the ones you have already spoken about, being tone and
33 professionalism?

34 A. Just some comments that were said to them throughout
35 the investigation, such as, "Don't blow this out of
36 proportion", or "This isn't that serious" - things like
37 that, which they were telling me, sort of came across that
38 the AAFC headquarters was attempting to patronise them and
39 to also quiet them down, so that became a concern to me.

40
41 Q. One of your concerns at one point was that your
42 squadron commanding officer, Matthew McCarthy, had not been
43 informed or involved; is that right?

44 A. Yes.

45
46 Q. And you say that he didn't know that there was
47 a headquarters investigation going on; is that right?

1 A. Yes.
2
3 Q. Are you able to give a reason, either based in the
4 rules and policies or otherwise, a reason why, in your
5 view, he should have been informed and involved?
6 A. It's just the way it works. If your cadet is under
7 investigation or a staff member is - or, sorry - or a staff
8 member is involved in any investigation, the commanding
9 officer of that member should be informed.
10
11 Q. That's your understanding of how the practice should
12 work, is that what you are saying?
13 A. Yes.
14
15 Q. Is that your experience of how it has worked in other
16 cases?
17 A. Not necessarily.
18
19 Q. It may be - I don't know - that someone would say that
20 another consideration is to try to reduce as much as
21 possible the number of people who are involved and who are
22 spoken to and, on that basis, it's a justification for not
23 informing a commanding officer. I don't know what your
24 response is to that?
25 A. From conversations with [CJE], in the lead-up to her
26 telling me what was going on, she felt uncomfortable and
27 that she was walking around the squadron on eggshells. She
28 had thought and she had been informed by Sharon O'Donnell
29 that Matthew McCarthy knew about the investigation that was
30 going on at headquarters. [CJE] assumed that
31 Matthew McCarthy would speak to her about that
32 investigation. However, he did not know about the
33 investigation. So [CJE] continued to attend cadets
34 expecting Matthew to talk to her about this, and to
35 approach her or to offer her support, and it appeared to
36 her that he was just ignoring her and the investigation; so
37 even headquarters had told [CJE] that Matthew McCarthy knew
38 about it.
39
40 Q. At some stage he did come to know of it and he was
41 supportive to [CJE]; is that right?
42 A. Yes.
43
44 Q. Perhaps we could just take a look at tab 42A. This is
45 an email from Matthew McCarthy to [CJE], where he says:
46
47 *Hi,*

1 *[CJF] called me this afternoon and told me*
2 *what happened. I want to reassure you that*
3 *you will always have my full confidence and*
4 *support, and I am not disappointed in you.*

5
6 And so he goes on. To your knowledge was that a source of
7 some comfort and support to [CJE]?

8 A. Yes.

9
10 Q. You took up a few issues on behalf of [CJE], which you
11 deal with in your statement. One of those, which you deal
12 with at paragraph 60, is gossiping; is that right?

13 A. Yes.

14
15 Q. You were concerned that people within the squadron
16 were gossiping about what had happened and what was
17 happening; is that right?

18 A. Within the wing, yes.

19
20 Q. So broader than your squadron?

21 A. Yes. At the time I do not know of any gossiping
22 within the squadron, but there were other members of the
23 wing that were gossiping about the situation.

24
25 Q. And when you refer to "the wing" in that context, you
26 mean the headquarters, or do you mean other squadrons
27 within the wing?

28 A. Other squadrons within the wing, so within New South
29 Wales and the ACT.

30
31 Q. Then you also took up some issues in relation to
32 Comcare and support; is that right?

33 A. Yes.

34
35 MR STEWART: Those are my questions, your Honour.

36
37 THE CHAIR: Does anyone else have any questions?

38
39 MR HAMMOND: I do, your Honour.

40
41 **<EXAMINATION BY MR HAMMOND:**

42
43 MR HAMMOND: Q. Ms [CJF], my name's Hammond and I appear
44 on your behalf. Can I take you to paragraph 73 of your
45 statement, please. Can you see that?

46 A. Yes.

47

1 Q. You refer in paragraph 73 to being targeted and
2 bullied after becoming involved in supporting [CJE] by
3 being refused promotion and opportunities. Are you able to
4 give the Commission an example of that?

5 A. Matthew McCarthy was taking leave at the end of July
6 and beginning of August 2013 for three weeks.

7
8 Q. This was your commanding officer at the squadron?

9 A. Yes.

10

11 Q. Yes.

12 A. And he had put forward his request for leave to
13 headquarters and also nominated me to be temporary
14 commanding officer for those three weeks, as I was the
15 executive officer of the squadron at the time.
16 Unfortunately, that request was denied and Wayne Laycock,
17 the officer commanding of 3 Wing at the time, denied me
18 that opportunity.

19

20 Q. Is it the case that you requested from Mr Laycock an
21 explanation as to why you were refused that opportunity?

22 A. Yes, I sent Mr Laycock an email on more than two
23 occasions regarding the denial.

24

25 Q. And is it the case that on 16 August 2013, he sent you
26 an email saying that he had lost confidence in you,
27 primarily because of your communications and decisions
28 during the [CJE] matter?

29 A. Yes.

30

31 Q. What did you understand that criticism to mean - your
32 communications and decisions in this matter?

33 A. I think he didn't appreciate me standing up for [CJE]
34 and her family; for also contacting Comcare and - well, my
35 contact from Comcare subsequently had the Director-General
36 of Cadets call me personally, so he may have got into a bit
37 of trouble after I became involved in the incident.

38

39 Q. In your statement you refer to your involvement in
40 contacting Comcare, at paragraph 62 of your statement. You
41 say that you contacted Comcare, essentially, to assist
42 [CJE] and her family meeting medical expenses and funding
43 for counselling; is that right?

44 A. Yes.

45

46 Q. Is it the case that you considered what happened to
47 [CJE] to be a Comcare issue?

1 A. Yes.
2
3 Q. The email that you received from Mr Laycock on
4 16 August 2013 in which he said he had lost confidence in
5 you - you said earlier on that before that email you had
6 contacted him a couple of times to ask him why he had
7 refused your application or refused your nomination to be
8 a temporary CO; is that correct?
9 A. Yes.
10
11 Q. Apart from those two emails that you sent to
12 Mr Laycock, had you ever met Mr Laycock face to face?
13 A. I realise today that I have met him face to face once.
14
15 Q. What was the context of that meeting?
16 A. That was on my officer selection board in 2011, where
17 I was approved to become an officer of cadets.
18
19 Q. In relation to the [CJE] matter had you met Mr Laycock
20 or had any conversations, apart from your email contact
21 with him?
22 A. No.
23
24 Q. Did you lodge a complaint in relation to this denial
25 of an opportunity --
26 A. Yes.
27
28 Q. -- of you acting as the CO?
29 A. Yes.
30
31 Q. Was that lodged on 23 September 2013?
32 A. Yes.
33
34 Q. Taking your role as a support person for [CJE], since
35 you found out about the incident with Adams, how many
36 complaints have you lodged with either the AAFC or Comcare
37 in relation to your involvement?
38 A. Four.
39
40 Q. Have any of those complaints ever been dealt with to
41 your satisfaction?
42 A. No.
43
44 Q. Do you feel as though you have been treated fairly in
45 your dealings with the AAFC?
46 A. Not at all.
47

1 Q. Why is that?

2 A. I feel that during the four complaints, for instance,
3 on two occasions the investigating officer at no time
4 contacted me. How an investigation can take place without
5 you being contacted amazes me. I have had no right of
6 reply when people have put forward information about me.
7 I have not been treated fairly or with natural justice, and
8 I feel that they are never going to acknowledge that what
9 happened to me or [CJE] and the other cadets was wrong.

10

11 Q. And you feel that treatment of you was in relation to
12 your role as a support person for [CJE]?

13 A. Most definitely.

14

15 Q. Now, you have prepared some words additional to your
16 statement that you would like to read. Could you please
17 read those words?

18 A. "The AAFC provided a lot for me when I was an active
19 member. For the last 17 years of my life, I have tried to
20 act in accordance with the code of conduct and displayed
21 values in everyday life consistent with the morals and
22 ethics I was taught at cadets. From the moment I began my
23 support of [CJE], I firmly believed that what I was doing
24 was the right thing in order to protect her and make things
25 better.

26

27 As a staff member, having parents give you their
28 children to look after is a privilege and that privilege
29 should not be abused. I could have backed down in my fight
30 with the AAFC and ADF but I chose not to and I have
31 continued my support of [CJE] until this day and continue
32 to fight to ensure what happened to us doesn't happen to
33 another cadet or staff member.

34

35 Other staff members discussed with me about the
36 courage to stick to my guns and not accept what the AAFC
37 have attempted to make me feel, that I am in the wrong.
38 I will not stop until the AAFC acknowledge their
39 wrongdoings and fix everything that they have broken. I am
40 very concerned and aware that the vast majority of staff
41 members will not go to the lengths that I have gone in
42 order to protect a cadet's best interests and, therefore,
43 what has happened to these cadets will happen again; but
44 the next time they will not have someone to stand up for
45 them and protect them.

46

47 I have not heard from the AAFC in over a year. It is

1 evident that they have no consideration or insight into the
2 harm they continue to cause by not adequately acknowledging
3 or dealing with the issues and complaints regarding this
4 matter. Their ongoing silence and negligence in these
5 matters simply highlights their inability to act with
6 integrity, professionalism and compassion. If they cannot
7 resolve matters with staff or handle matters involving
8 child sex abuse, why do parents continue to allow them to
9 look after their children."

10
11 Q. Now, in your statement you make some recommendations
12 to the Commission, and I understand you have one further
13 recommendation which you would like to read out?

14 A. Yes. "The ADF Cadet branches should be independent of
15 AAFC or ADFC members. Cadet Branch should be able to order
16 the AAFC to do things. It became glaringly apparent
17 throughout the last three years that the Air Force has no
18 ability to control the actions or outcomes of senior staff
19 within the AAFC. Currently, AAFC staff work as civilian
20 staff at Cadet Branch Air Force, which creates integrity
21 concerns relating to privacy, especially when dealing with
22 sensitive and private matters."

23
24 Q. Finally, is there anything else you would like to say
25 following your involvement in this matter?

26 A. I think that what the Royal Commission is doing is
27 a really important thing. However, I am concerned that we
28 haven't necessarily focused on the culture of the AAFC and
29 the culture in Defence.

30
31 If - well, not "if". A child has died because of what
32 the AAFC or AIRTC did, back over a decade ago. If that
33 hasn't compelled the AAFC or ADF to get their act together
34 and to make these changes, I am really concerned that no
35 matter what you suggest, it is not going to compel us
36 either. It has to do with the culture in cadets. You can
37 have all the policies and procedures and rules written
38 down, but that doesn't mean that we are taking them
39 seriously, and I say "we", as the Royal "we", as a staff
40 member. You know, it is the culture in cadets that is the
41 problem, and that is what needs to be changed.

42
43 MR HAMMOND: Thank you, Ms [CJF]. Thank you, your Honour.

44
45 THE CHAIR: Does anyone else have any questions?
46 Mr Stewart?
47

1 MR STEWART: Just one question, your Honour.

2

3 <EXAMINATION BY MR STEWART:

4

5 MR STEWART: Q. Are you able to say what you mean when
6 you say the culture, specifically? What about the culture?

7 A. There is a bad culture in cadets. Although there are
8 policies in place, we simply refer to them as red tape.
9 Although there are policies protecting children, we think
10 of them as a joke. You know, we don't take much seriously.
11 Although things can be in writing, that doesn't mean that's
12 what we are doing. It doesn't come across.

13

14 So even when this matter was going to court and there
15 was a police investigation, the fact that staff members are
16 gossiping about the children involved is a disgrace, and
17 not only gossiping, but then, further - sorry. We attended
18 two promotion courses after the investigation went to
19 police and on both courses, [CJE] was targeted by other
20 staff members on that course and they were gossiping, they
21 were - they would say little jokes and - it was disgusting.
22 What can I say? And no matter what I did, I couldn't stop
23 them from doing it and I couldn't protect her enough,
24 because the AAFC doesn't care. They didn't enforce their
25 code of conduct to protect her and to protect the other
26 cadets. They just said, "Gossip happens and that's the
27 reality." Well, you have a code of conduct, how about you
28 start enforcing some of your policies, when we have direct
29 instances of where staff are breaching it?

30

31 MR STEWART: Thank you.

32

33 THE CHAIR: Q. How do you see change being brought to
34 the culture? What do you think is required for there to be
35 change?

36 A. I think the change not only needs to start at the top,
37 but needs to go all the way to the bottom. It's the old
38 boys' club or, you know, a job for your mate.

39

40 From what I've seen over the last 17 years in cadets,
41 everyone that was trying to do something good or trying to
42 put in better practices has now been bullied and
43 back-stabbed out of the organisation. I have not paraded
44 in two years. I haven't been contacted in one year. And
45 why? Because I stood up for a child, and that's what the
46 organisation is all about. You need to get those people at
47 the top to have better attitudes, and that needs to filter

1 down. And if the people at the bottom don't have the
2 attitude, then, please, walk out that door.
3
4 Q. Have you said these things to those in command in the
5 institution?
6 A. I don't feel that any of my complaints were taken
7 seriously or that they even maybe read them or understood
8 what I was trying to say. I did meet with the commander
9 in December 2014. He then made no further communication
10 with me, and there was no resolution to the complaint.
11
12 Q. When you say you spoke with him, have you talked with
13 him or others about the culture of the organisation?
14 A. I'm not sure if I used the term "culture", but that
15 would be the underlying feeling of what I am trying to get
16 at in my complaints.
17
18 Q. And are there people within the organisation who you
19 have spoken to who share your views?
20 A. Regarding culture?
21
22 Q. Yes.
23 A. Yes.
24
25 Q. And they are still inside the organisation, they are
26 still active?
27 A. Yes. But, as I received a phone call the other day,
28 although I've stuck to my guns and I'm here today, a lot of
29 those other staff are not going to speak up and they are
30 not going to fight, because even what my commanding officer
31 said to me, the moment I took on [CJE] and supporting her,
32 "If you take on this battle, you are not going to be in
33 cadets", and that's what has occurred.
34
35 THE CHAIR: Yes.
36
37 MR STEWART: Nothing further, your Honour.
38
39 THE CHAIR: Does anyone else have any questions arising
40 from that?
41
42 MR HAMMOND: No, thank you.
43
44 THE CHAIR: Thank you, [CJF], that concludes your
45 evidence. Thank you, you are excused.
46
47 THE WITNESS: Thank you, your Honour.

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<THE WITNESS WITHDREW

MR STEWART: Your Honour, I call Sharon O'Donnell.

<SHARON LEE O'DONNELL, sworn: [12.30pm]

<EXAMINATION BY MR STEWART:

MR STEWART: Q. Ms O'Donnell, will you state your full names and occupation?

A. Sharon Lee O'Donnell. With cadets, I'm currently instructor with international activities.

Q. And you otherwise are a public servant; is that right?

A. That's correct.

Q. Do you have a copy of your statement dated 9 June 2016, prepared for the Royal Commission?

A. I have that in front of me, yes.

Q. Do you confirm that that statement is true and correct?

A. Yes.

MR STEWART: I tender it, your Honour.

**EXHIBIT #40-035 STATEMENT OF SHARON LEE O'DONNELL
DATED 9/06/2016**

MR STEWART: Q. As I understand it, Ms O'Donnell, you are a volunteer with the AAFC; is that right?

A. Correct.

Q. You joined the organisation in 2003 as a civilian volunteer?

A. That's correct. I went as a parent, because my children were - well, my daughter at that time was a cadet.

Q. And you became a uniformed officer on 1 October 2005?

A. Correct.

Q. In your volunteer service, you have undertaken the following roles: firstly, as a squadron leader; is that right?

A. Originally I came in as an ACW. At that time we were classed as airmen, and then I worked my way up to the rank

1 of corporal, and then I went to Officer Selection Board and
2 became a pilot officer. I went through to flying officer,
3 was offered the role of - well, I applied for the role of
4 staff officer, what was then ground training; became, then,
5 staff officer training, and the rank of squadron leader is
6 positional. The highest rank, otherwise, is flight
7 lieutenant AAFC, which is my current rank.

8
9 Q. And you have held that since 1 December 2015?

10 A. Correct.

11
12 Q. And "ACW" that you mentioned, that's an aircraftwoman;
13 is that right?

14 A. Correct.

15
16 Q. These roles, as I understand it, have throughout this
17 time been volunteer and part-time roles - you have
18 a full-time job elsewhere; is that right?

19 A. Correct.

20
21 Q. Would you explain the difference between being
22 a civilian volunteer and being a uniformed officer within
23 the Australian Air Force Cadets?

24 A. In my - I can only count on, like, myself. Currently,
25 before staff can go into uniform they have to do three to
26 six months - it ends up being, by the time the application
27 process goes through - it ends up being at least a minimum
28 of six months as a civilian. The reason they changed that
29 was so that - because they had a lot of people come into
30 uniform and then decide they didn't like - I don't know
31 what part of the AAFC, but they didn't like being in the
32 AAFC and then they left. So they changed it from
33 headquarters branch, so that they come in for three to six
34 months, or three months before they start their uniform
35 process, application process; as I said, a minimum of six
36 months as a civilian before they go into uniform. That
37 gives them that time frame to decide if they - what they
38 have volunteered for is what they actually like to do, and
39 then they continue going into uniform.

40
41 Q. Am I to understand that you have continued as
42 a uniformed volunteer within the cadets subsequent to your
43 daughter no longer being a cadet?

44 A. Correct. I had my son go through for 12 months as
45 well and then I've continued from there.

46
47 Q. I would like to refer to tab 421. It will come up on

1 the screen. This is the document which you refer to as
2 annexure A to your statement.

3 A. Yes.

4

5 Q. As I understand it, these are the responsibilities
6 assigned to the different roles that you have held in the
7 cadets; is that right?

8 A. That's correct, in the brackets after the actual role.

9

10 Q. Now, can you just explain, at which rank and/or role
11 did you become a uniformed member?

12 A. Do you mind if I look at my paper version, because the
13 bottom of that is cut off?

14

15 Q. No, of course not. We can just scroll that so we can
16 see more of it.

17 A. Okay. So the ranks were at the very bottom of that,
18 where I started off, as you said, as an aircraftwoman, ACW.
19 And you will see the relative years that will actually go
20 with the positions that are on there.

21

22 Staff officer training was in 2013, when I took on the
23 official role of staff officer, then ground training, and
24 I held that position for just over two years.

25

26 Q. But am I to understand that even there where it has
27 "Aircraftwoman AAFC" --

28 A. 2005, yes.

29

30 Q. -- 1 October 2005, by then you were uniformed?

31 A. Correct.

32

33 Q. In September 2012, I understand from this document
34 that you had the role of assistant training officer,
35 squadron training at Number 3 Wing; is that right?

36 A. Yes. Sometimes, though, those positions will show up,
37 because we need access to CadetOne. So in that role,
38 there, where I was staff officer assistant training, that
39 was just to give me CadetOne access. My actual roles were
40 staff officer staff training, and then I went on to be the
41 staff officer ground training.

42

43 Q. You will have to tell us what CadetOne is?

44 A. Sorry, CadetOne is the electronic system, which is an
45 approval system for activities; also allows you to put in
46 personal details, which the squadrons can see, and if it is
47 at headquarters level you can see other staff and cadet

1 personal details within the actual system within the whole
2 wing. So 3 Wing New South Wales and ACT.
3
4 Q. So just to clarify, in September 2012 you were a staff
5 officer; is that right?
6 A. September 2012?
7
8 Q. Yes.
9 A. It would have been, yes, in the - June 2013 I was then
10 staff officer ground training. I actually had a month
11 prior to that, that I stood in, while the current SOGT was
12 on leave.
13
14 Q. I am sorry, Ms O'Donnell, that's not at all clear to
15 me. I'm just trying to establish the simple point: what
16 role did you have in September 2012?
17 A. I was a flying officer in September 2012 and I was
18 training officer staff.
19
20 Q. And that training officer staff - that's not a rank,
21 that's a role - is that right - a position?
22 A. That's a role, yes.
23
24 Q. Which has attached to it responsibilities?
25 A. For organising the staff training; that's correct.
26
27 Q. And is that attached to the wing as opposed --
28 A. 3 Wing headquarters, yes.
29
30 Q. So it is not within a squadron; it is at the
31 headquarters?
32 A. Correct.
33
34 Q. Your rank at that time - I think you said flying
35 officer?
36 A. Correct.
37
38 Q. But if one has a look at the "Promotional History"
39 part at the bottom of that page, it would seem to indicate
40 you were promoted to flying officer in December 2012?
41 A. Yes. So I was pilot officer and then flying officer
42 when I was promoted, yes.
43
44 Q. So in September you were pilot officer?
45 A. Highly likely, based on the history, yes.
46
47 Q. With that rank and in that position of responsibility,

1 you attended, as I understand it, the General Service
2 Training course at the Williamtown RAAF Base in September
3 2012; is that right?

4 A. I attended the GST but not in that role, just as
5 a staff member on the course to assist.
6

7 Q. So can you explain that further? In other words, give
8 substance to what was your role or responsibility on that
9 course?

10 A. On the role - sorry, my role on the GST in the
11 September 2012 was just to be a staff member, female staff
12 member, to assist the staff with the running of the course
13 as required by the then detachment commander.
14

15 Q. And that assistance of running the course, did that
16 include actual instruction, in other words, teaching or
17 instructing cadets?

18 A. Not teaching, no, because not specific teaching was
19 done. We escorted cadets around in different areas to
20 visit on the base or different sections off the base, so
21 depending on what was in the training program or what
22 squadrons they were visiting on the base, we would assist
23 with escorting them around there.
24

25 Q. So it was a role, then, which was supervisory?

26 A. Correct.
27

28 Q. And was there some rank or hierarchy structure amongst
29 the staff members who were assisting on that course?

30 A. Yes, there's always a detachment commander, which is
31 the overall officer in charge of that course; there's
32 a detachment warrant officer, which is for discipline, for
33 obviously making sure that their morale was high and to
34 make sure their uniforms, et cetera, were worn correctly;
35 and then the majority of the other staff were there in
36 a supervisory role or they were in the admin role,
37 depending on what they were - what position they were
38 required on when they got there.
39

40 Q. So if some issue or problem arose or came to your
41 attention and you were not able to deal with it yourself,
42 or didn't deal with it yourself, you would escalate it
43 to one of those --

44 A. The detachment commander.
45

46 Q. To the detachment commander or perhaps the detachment
47 warrant officer?

1 A. Depends on what the situation was. If it was as
2 simple as, you know, a cadet not wearing their uniform
3 correctly or something like that, then, yes, it would go to
4 the detachment warrant officer, but if it was of a serious
5 nature, it would go to the detachment commander.
6
7 Q. Who was the detachment commander on that course?
8 A. I think - without me looking at the system, because
9 I couldn't - I can't recall - I think it was Adrian Miller,
10 but I can't - I couldn't tell you for certain.
11
12 Q. Adrian Miller? Is that the name you gave?
13 A. Correct.
14
15 Q. Was he attached to a particular squadron or to the --
16 A. To a squadron.
17
18 Q. And which squadron was that?
19 A. 33 - I'm trying to think of it now. 33 - it was one
20 of the South Coast squadrons.
21
22 Q. South Coast of New South Wales?
23 A. 338, I think it was.
24
25 Q. And aside from the detachment commander and the
26 detachment warrant officer, how many other staff members
27 were attending that course?
28 A. Generally, they have about eight to 10, depending on
29 the numbers of cadets that they have on the course.
30
31 Q. And so this course fitted within that general
32 practice, did it, of eight to 10?
33 A. Yes.
34
35 Q. Now, you speak in paragraph 9 of your statement about
36 there being zero tolerance in your squadron with regard to
37 any sexual relationships, consensual or otherwise, between
38 officers or instructors of cadets and cadets, as well as
39 between cadets and cadets. You refer there, I take it,
40 specifically to your experience in your squadron; is that
41 right?
42 A. Not in my squadron; that's what is taught in the Staff
43 Initial Program and what was previously the Staff Initial
44 Course, that there was zero tolerance with staff having any
45 relationship with cadets.
46
47 Q. Yes, I understand that that's taught, that there

1 should be zero tolerance, but addressing the question of
2 practice, whether there was zero tolerance, I take it you
3 can speak with respect to your own squadron and,
4 presumably, the squadron that your children attended; would
5 that be right?

6 A. That's correct.

7

8 Q. So is your evidence that within that squadron there
9 was zero tolerance on this issue?

10 A. That was definitely - as I said, that's what was
11 notified to all of the cadets and all staff at the
12 squadron, and then when I moved to the wing, when we did
13 our staff training and also when we did our refreshers in
14 the wing.

15

16 Q. You will appreciate, Ms O'Donnell, that I'm seeking to
17 draw a distinction between what the rules were and what the
18 practice was with regard to the enforcement of the rules.
19 I can accept the rules said zero tolerance. I am
20 addressing the question of whether those rules were
21 enforced?

22 A. In my experience, yes, they were enforced.

23

24 Q. And that would be your experience in your squadron; is
25 that right?

26 A. In my experience, whenever I've been faced with - when
27 I say "faced with", been notified that anything has
28 happened in the squadron that I was in, then, yes.

29

30 THE CHAIR: Q. Sorry, you mean if there was a complaint,
31 then --

32 A. If I was aware of a complaint, there was - it was
33 always dealt with, but I've only ever come across this
34 complaint, the reason that I'm here, in relation to this,
35 that has gone further. In the squadron, I've never had an
36 issue as large as this that I've had to deal with.

37

38 Q. I think you are actually being asked a different
39 question, and that is whether, although there are rules,
40 they are obeyed?

41 A. In my experience --

42

43 Q. Because we have evidence that they are not, you see?

44 A. Yes, I understand that. In my experience, other than
45 this one case that I'm aware of in the squadron, it has
46 always been that, yes, they have been obeyed and always, if
47 a complaint of any bullying or something like that has come

1 at a smaller level, it was dealt with at that level, with
2 the perpetrators, et cetera. So - I mean, that's basically
3 all I can say on that. There is no tolerance on bullying
4 and the kids are told so and the staff are told so, in the
5 squadron and at wing level.

6

7 Q. Of particular concern to this Royal Commission is the
8 sexual abuse of children.

9 A. Mmm.

10

11 Q. You understand that?

12 A. Yes.

13

14 Q. Are the rules about fraternising or having sexual
15 activity with children, members of the various
16 establishments - are they obeyed?

17 A. Other than - again, I can only speak on my experience.
18 Other than this, what I was requested to investigate,
19 I haven't had any other issues, so I have to say yes, in my
20 experience, yes, they have, from what I am aware of.

21

22 Q. It's an environment where there is a high risk that
23 the rules won't be obeyed, isn't it?

24 A. Correct.

25

26 Q. And do you think that for that reason special care
27 needs to be taken?

28 A. Well, of course it does, definitely.

29

30 Q. Do you think it is?

31 A. I think everything is in place that - and, again,
32 I can only speak in my training, that the emphasis is on
33 what is required to be done and how staff are meant to
34 behave and, in my experience, other than this situation,
35 I haven't had seen any that have betrayed that zero
36 tolerance.

37

38 MR STEWART: Q. Did you hear the evidence of [CJG]?

39 A. Yes.

40

41 Q. And so you will have heard - and this is at
42 paragraph 26 of her statement - that she said that in her
43 squadron, which was 310 squadron, there were policies
44 prohibiting relationships between cadets and AAFC staff,
45 though they were never enforced. She said:

46

47 *I know firsthand of an incident where an*

1 *instructor had sex with a cadet student and*
2 *no-one from the AAFC did anything about it.*
3 *If there was any action taken it certainly*
4 *wasn't made public to set any sort of*
5 *example.*
6

7 And you have heard other evidence along similar lines. Is
8 it the case that that has not been your experience?

9 A. I can only say what has come across in my squadron
10 that I was in at the time. I hadn't experienced any of
11 that. When I went to headquarters, the first experience
12 that I had had of that is this investigation that [CJG] was
13 involved with, where I had to do the initial investigation.
14 So I can't comment on any other history, because I'm not
15 aware of any other history, other than, obviously,
16 Ellie Tibble, which is part of our training, as an example.
17

18 Q. In particular, I want to take you to the evidence of
19 [CJJ] - and you heard that evidence, I take it?

20 A. I have read it.
21

22 Q. [CJJ] gave evidence here yesterday. Have you just
23 read her evidence as opposed to heard her give the
24 evidence?

25 A. Correct.
26

27 Q. Did you read it in transcript or from her statement?

28 A. Both.
29

30 Q. Perhaps it is easiest dealt with from the statement.
31 If we could go to [CJJ]'s statement, that's at tab 25 of
32 the statements bundle, at paragraph 14. So you would have
33 read in her statement and on the transcript how [CJJ] gave
34 evidence of her having witnessed Adams sending sexual text
35 messages or exchanging sexual text messages with [CJE], and
36 then that she reported that to you on that course. What is
37 your response to that?

38 A. I can't recall that occurring. I'm not saying it
39 didn't. I can't recall that occurring on that GST.
40

41 Q. That would be a pretty significant matter to have
42 occurred, would it not?

43 A. That's correct, and those sorts of things I would
44 have - on my history and the things that I know I do, if
45 that was reported to me, I would have, one, written it
46 down; two, reported it to the detachment commander.
47 I can't recall that occurring, being brought to my

1 attention, I mean.
2
3 Q. That matter, a cadet instructor exchanging sexualised
4 text messages with a cadet, that's a very serious matter,
5 isn't it?
6 A. Definitely.
7
8 Q. And you say you would have written it down. What are
9 you referring to - write it down in --
10 A. If I was informed that there was an allegation,
11 I would have written that allegation down and what I was
12 told and reported it to the detachment commander.
13
14 Q. Report it had orally or in writing?
15 A. It would have been reported orally.
16
17 Q. And you say you have no --
18 A. Recollection.
19
20 Q. -- recollection of that?
21 A. Correct.
22
23 Q. You would also have read or seen [CJG]'s evidence,
24 where she said that [CJJ] had told her that she had
25 reported Adams' inappropriate relationship with [CJE] to
26 you. Do you recall that evidence?
27 A. No.
28
29 Q. In other words, [CJJ] herself has given evidence --
30
31 THE CHAIR: I think we need to give her the precise
32 evidence.
33
34 MR STEWART: That's at transcript 19769, line 43.
35
36 Q. So just to orientate this, this is during the evidence
37 of [CJG]. With reference to the list of pseudonyms next to
38 you, you know who that is, do you?
39 A. Yes.
40
41 Q. She said that [CJJ] - and you know who that is
42 a reference to, I take it?
43 A. Correct.
44
45 Q. -- who was an AAFC ranked adult instructor in
46 310 Squadron, was also at this course. The course she is
47 talking about is the September 2012 - I beg your pardon,

1 she is talking about the June course at Wagga.

2 A. Mmm-hmm.

3

4 Q. Were you on that course?

5 A. No.

6

7 Q. With reference to something that happened on that
8 course, which was the relationship or interaction that
9 Adams was having with female cadets, you will see then she
10 says:

11

12 *She told me that she had witnessed Adams*
13 *alone with female cadets on the course.*

14 *She raised her concerns about what she*
15 *thought was an inappropriate relationship*
16 *between [CJE] and Adams. She told me she*
17 *had reported her concerns to her superior,*
18 *Sharon O'Donnell. [CJJ] didn't ask me and*
19 *I didn't tell her about Adams's advances*
20 *towards me.*

21

22 Firstly, were you in some position of rank or
23 responsibility in relation to [CJJ]?

24 A. First, I wasn't on the June 2012 activity; I was
25 definitely on the September 2012 GST. From memory, [CJJ]
26 was an ACW at that point in time - from memory. So I was
27 an officer, so, yes, I was a higher-ranking personnel to
28 her.

29

30 Q. And you remember that she was on that course in
31 September with you at Williamstown?

32 A. Correct. Correct.

33

34 Q. And then perhaps her evidence specifically from the
35 transcript is at 19797, line 24. She is dealing with the
36 September course at Williamstown RAAF Base. You will see
37 that at line 24 the question is, "Now, actually on that
38 course, you observed, as I understand" - and I referred to
39 paragraph 14 of her statement and I said to her, "can you
40 explain what it is that you observed?", and then she set
41 out in relation to the texting.

42

43 Then if we can look over the page, in particular at
44 line 12, so this is at transcript 19798, line 12 onwards,
45 I said:

46

47 *So what did you do about what you observed?*

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And she said - this is [CJJ]:

I had quite an intensive fight with him for about half an hour. I actually sent all the cadets to bed and then I had a fight with him about it, and he refused to - absolutely just refused against it to say that it ever happened, so I went ahead and spoke to Sharon O'Donnell, who was my superior for the course, and told her what had happened.

And then I asked a further question - you can read it there - and her answer was:

She --

that's you --

was just an officer that I felt comfortable with talking with.

And we can scroll up. At line 29 I asked her more broadly what was your responsibility, did she know, and she gives an answer and also says she knew you from your having done the Gold Duke of Edinburgh with her many years ago. Starting with that, you have known [CJJ] for many years; is that right?

A. Since she was a cadet; that's correct. When I say "known", I've been involved with her with the Duke of Ed, but other than that I haven't had any involvement with her until different activities.

Q. Can you help us any further, having now read the transcript again --

A. I still can't recall a conversation.

Q. Adams was one of the staff members on this course; is that right?

A. Correct.

Q. And what were your observations of Adams on the course?

A. The only time I saw Adams was, one, when he was either on the parade ground or when he was giving the demonstration over in the fire, because he was a fireman in

1 the RAAF, and he organised over at the - with the firies to
2 give a demonstration and a tour of the fire area. That's
3 the only time. And he seemed quite professional, from what
4 I knew of him; and on the January promotion course, again,
5 what I saw of him, he was quite professional in his manner
6 as the detachment warrant officer. And they were the only
7 times that I was involved with him. Obviously, there were
8 other things in the background that I wasn't aware of at
9 the time, but - that I'm aware of now, but at those times,
10 I can only say what I saw of him on the front, and that he
11 appeared quite professional in his duty at the time.

12
13 Q. Now, is it the case on courses like that that the
14 staff members attending attend at the mess when a meal is
15 being taken by the cadets?

16 A. The duty staff generally will be at the same mess with
17 the cadets, yes.

18
19 Q. And by "the duty staff", do you mean all the staff who
20 are supervising on that course - the eight to 10 of them?

21 A. Not necessarily, no. There is a duty roster that is
22 done up where there are duty staff, a duty officer and
23 a duty staff member, and generally they are the ones that
24 are in the mess with the cadets. The others go to their
25 respective messes.

26
27 Q. What are the respective messes?

28 A. Officers' mess or the sergeants' mess.

29
30 Q. And so were you in the mess where the cadets took
31 their meals at any time on that course, to your memory,
32 with Adams?

33 A. I couldn't recall if it was with Adams, no. If I was
34 rostered on I would be definitely in the mess with the
35 cadets.

36
37 THE CHAIR: Mr Stewart, I think we might take the luncheon
38 adjournment now.

39
40 **LUNCHEON ADJOURNMENT**

41
42 MR STEWART: Q. Ms O'Donnell, you were on the January
43 2013 promotions course at RAAF Wagga Wagga; is that right?

44 A. Correct.

45
46 Q. You had an instructor or supervisor role on that
47 course; is that right?

1 A. Correct.
2
3 Q. How many staff were on the course?
4 A. I couldn't tell you exactly. There's normally,
5 depending on the courses, there's about --
6
7 Q. Eight to 10 you said previously?
8 A. No, on GST there's only eight to 10. On a promotions
9 course there's a lot more because there's a lot more roles
10 set out in relation to that. So there can be, you know, 15
11 to 20 staff.
12
13 Q. Christopher Adams was one of them?
14 A. Correct.
15
16 Q. Did you have any interaction with him on that course?
17 A. Only to do with when we had the field craft activity.
18 Other than that, no, I was only involved with my own
19 course.
20
21 Q. What was your role in particular on that promotions
22 course?
23 A. I was a course commander for the seniors course - one
24 of the seniors courses.
25
26 Q. Who was the ranking officer on that course?
27 A. What do you mean, the detachment commander?
28
29 Q. If on a promotions course that's the most senior
30 officer, then yes?
31 A. Yes. The detachment commander I think at that time
32 was Doug De Cean.
33
34 Q. Can you give us the surname again?
35 A. Doug De Cean.
36
37 Q. How do you spell it?
38 A. D-E C-E-A-N.
39
40 Q. Thank you. That's the course on which you understand
41 Adams was predatory in relation to some of the female
42 cadets; is that right?
43 A. So I was informed, yes.
44
45 Q. You are familiar, of course, with the evidence of
46 [CJE] and [CJG] in relation to Adams on that course?
47 A. Correct.

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Q. That occurred when you, amongst others, of course, were in a position of trust and responsibility in relation to the cadets on the course?

A. All staff were in that position.

Q. In effect, the parents of the cadets on that course had entrusted their children to the staff who were on the course?

A. As they do with all activities with the AAFC, yes.

Q. Did you know that Adams was flirting with female cadets on the course?

A. I had no idea.

Q. Having heard the evidence, and looking back now, do you accept that you should have known?

A. No. It was not obvious to me. As I said, I was only involved with him on a professional capacity and the only interaction I had with him was either on the final parade or the march out at the end, or at what they call the field craft activity. Other than that, I was only involved with my course.

Q. [CJJ] had seen his conduct over a period of time - that's Adams' conduct - and had been, herself, put on notice with regard to his intentions. That conduct included taking some of the cadets off in his car, how he performed on the exercise field or parade ground, and various other things. You heard that evidence. Do you not accept that, had you been keeping a proper lookout, you, too, would have seen those things, those warning signs?

A. In relation to that, what are you specifically asking? Like, again, I can only say I was involved with my course only, which was the senior NCO course at that given time, that's cadets going for sergeant.

Q. When you weren't actually instructing on the course you, nevertheless, held a supervisory position in relation to that camp; in other words, not just during the teaching parts of it?

A. If I was on duty - if I was rostered on duty; otherwise, I was prepping for the next day, for the course itself.

Q. So, looking back on it, do you not have anything to say about your responsibility and anything you might have

1 done differently?

2 A. I did what I had to do on that course which was, at
3 that time, a course commander. That was my role on that
4 course.

5

6 THE CHAIR: Q. Tell me this: we discussed before lunch
7 that the environment, children with adults in this
8 structured environment where there's promotion and command,
9 creates its own risks, which aren't risks that are present
10 in all of the rest of the community; do you agree?

11 A. I would - well, again, it's very hard to say in
12 relation to that. Yes, they're at risk, but then so are
13 kids that go to school and so are kids, as we all know, in
14 the general community. So are they at a higher risk? I'd
15 say no higher risk than they are if they are at a school.
16 They are still in the same - a similar type of environment.

17

18 Q. Do you think that's right when the school structure
19 doesn't create the relationships of obedience, rank,
20 promotion and residential activities in its normal
21 environment which, of course, are different to the cadet
22 arrangements that you're part of. Do you think it's right
23 to compare it just with a school?

24 A. I'm just saying in general, they all have their
25 differences, by all means, and yes, we have a rank
26 structure, but that doesn't mean that the supervisory role
27 should be any different to that of a teacher and a student,
28 for example. The trust and the power, as such, that a
29 teacher and a student are put in is no different to an
30 instructor or officer of cadets and a cadet.

31

32 Q. Then do you as an officer, and with your fellow
33 officers, regularly meet to discuss how you should ensure
34 the safety of the children in your care?

35 A. In relation to - I work in a wing, so we parade on a
36 Tuesday night. No, I wouldn't say we have meetings in
37 relation to that. On the Squadron level, we used to meet
38 on a regular basis, and when I say "regular", a monthly
39 basis, to discuss activities and, you know, as to how, if
40 someone was being mentored, how to go through briefings and
41 the training that all staff are given, and I can say only
42 in the environment that I've been in the staff training and
43 training officer staff, is that they've all been trained
44 and informed of the reporting and trying to identify if
45 there are any issues - that is, any breaches of those
46 trusts.

47

1 Q. They may be trained, but are these issues constantly
2 put in front of those who have responsibility inside the
3 cadets?
4 A. Can I get you to clarify a bit further from that, sir?
5
6 Q. Yes. Is it front of mind that these are risk
7 situations for children? Do you, who have command
8 positions, talk about those risks? Are you reminded of
9 those risks? In other words, is the culture of the
10 organisation one which identifies the risks that are
11 created by the institution itself?
12 A. I'd have to say yes. We don't have regular meetings
13 but, yes, when we have the briefings at the beginning of
14 every activity, everyone is identified - is meant to
15 identify, and I can only speak for myself when I give my
16 briefings, that's one thing that I do state and we go
17 through the behavioural policy at the beginning of every
18 activity.
19
20 Q. When you say you go through the behavioural policy at
21 the beginning of every activity, what does that include in
22 relation to the relationship between cadets and other
23 cadets or cadets and people in positions of responsibility?
24 A. That's to notify them as per the cadet behavioural
25 policy that there is not to be a relationship between staff
26 and cadets.
27
28 In the training situations that I run, I stress to
29 them and give examples. We use the Eleanore Tibble, as
30 I said earlier, as an example, to notify there is to be no
31 relationship, regardless of age or gender, with staff and
32 cadets.
33
34 Q. Well, you've heard evidence that --
35 A. I'm aware that it happens, sir, that has happened.
36
37 Q. You've heard evidence that the culture is one where
38 those commands are ignored?
39 A. Again, I can only speak in what I personally have
40 experienced, and I haven't seen that happening in the
41 culture that I've experienced.
42
43 Q. Do you accept that it could happen in the cadets?
44 A. Yes.
45
46 Q. When you say "yes" to that, why is it that you think
47 it could happen in the cadets?

1 A. If you've got anyone that, in general, whether it be
2 in cadets or scouts or whatever, is in a position that
3 they, I suppose, want to take advantage of children,
4 regardless of whether they're cadets, scouts, students,
5 then unless you can see the actual - unless someone reports
6 something that they've seen or you actually see it
7 yourself, there's nothing that - I mean, how are you going
8 to identify it? Because it's not always obvious, if you
9 understand what I'm saying.

10
11 Q. Given the risks that are involved and given the
12 evidence we have, what do you suggest we should say to the
13 cadets as a whole?

14 A. As a whole, look, I've been looking at the behavioural
15 policy, the cadet behavioural policy, and I think there's a
16 little gap in there where it states that cadets are to
17 notify if they're uncomfortable - you know, I'd have to
18 look at the exact wording of the section - regarding sexual
19 harassment. There's a little bit of a gap, I think, in
20 between from where they're 16 to when they do the ATP, that
21 other than - you've got a 17-year-old cadet, for example,
22 and it says for you to report anything that is
23 uncomfortable that they - that maybe consensual or not. If
24 they're 16 and under, and then when they get to the ATP,
25 they're told of their obligations of 18 and over, but
26 there's a bit of a gap in the middle in the behavioural
27 policy that doesn't tell a 16-and-a-half to a
28 17-and-a-half-year-old exactly where they stand.

29
30 Q. You realise that a 12- or 13-year-old, 14-year-old or
31 15-year-old, who becomes involved with someone in their
32 20s, which of course is --

33 A. Not legal.

34
35 Q. -- you know about and obviously can happen --

36 A. Mmm.

37
38 Q. -- and the environment of the cadets is a place where
39 that risk is enhanced, by reason of its structure, the
40 child in that situation, I'm sure you'll appreciate, will
41 have great difficulty telling anyone, when they become
42 involved in a situation they can't handle, because of the
43 pressures that are involved in being part of the
44 organisation. Do you understand?

45 A. Yes.

46
47 Q. What do you, as an officer, with a position of

1 responsibility, do, apart from just telling people or
2 giving them a written instruction, to ensure that children
3 know there is a safe place they can go to tell if they get
4 into those sorts of difficulties?

5 A. Well, basically, what we always tell the cadets, that
6 they can approach any staff member or another senior cadet
7 if they're, you know, concerned or troubled. They're also
8 given a card if they have any issues relating to, one,
9 safety for themselves or others, or any, obviously,
10 workplace health and safety issues as well.

11
12 So they're encouraged - I mean, obviously with
13 evidence that has been given from some of the survivors,
14 there has been pressure put on them not to say anything,
15 but we encourage, as best we can, for them to speak up so
16 that we can identify and assist the cadets in any way if
17 this occurs.

18
19 Q. If it is someone in a command role, whatever the role
20 might be, who is the abuser, it would be very hard for a
21 child to report to someone else in the same command
22 structure, wouldn't it?

23 A. I haven't been in that position, so I couldn't tell
24 you exactly. I assume it would be difficult for the child
25 if they've got pressure put on them from another
26 instructor.

27
28 Q. Yes. What could be done about that?

29 A. I haven't thought too much about that, sir.

30
31 MR STEWART: If your Honour please.

32
33 Q. I want to move on and deal with the initial assessment
34 report or quick assessment that you did in this case. We
35 will start by taking a look at tab 37, if it can be brought
36 up. You will see that that's an email from Wayne Laycock
37 to, I take it, you; is that right?

38 A. That was to myself and Darren Banfield, yes, X0 South.

39
40 Q. On 29 May 2013, if we can scroll it further, please,
41 it says, "SOGT". That's you?

42 A. That was my role at the time, yes.

43
44 Q. And that stands for?

45 A. "Staff Officer Ground Training".

46
47 Q. And "XOS" is the executive --

1 A. "Executive Officer South".
2
3 Q. And that was --
4 A. Darren Banfield.
5
6 Q. -- Darren Banfield. It was for information to the XO
7 and to Flight Lieutenant Hargreaves - that's the
8 psychologist; is that right?
9 A. Correct.
10
11 Q. And Sharon, and then it goes on. This is, in essence,
12 your instruction to conduct an initial assessment, is that
13 correct?
14 A. Correct.
15
16 Q. That is an initial assessment, as it says in the first
17 paragraph, with respect to the attached complaint by
18 Cadet Sergeant [CJQ] of 318 Squadron. And the attached
19 was, in fact, the record of what [CJQ] had told his
20 commanding officer; is that right?
21 A. Correct.
22
23 Q. You will see the attachments listed on that email, if
24 we go up to the heading again. There's an attachment
25 there, the second one, "Record of Conversation - 22
26 May 13.pdf". Do you see that?
27 A. Yes.
28
29 Q. Could I just show you tab 33. You will see that this
30 says:
31
32 *The following has been brought to my*
33 *attention on 22 May at 1840hrs.*
34
35 *CSGT [CJQ] approached me with a concern ...*
36
37 And so it goes on. Do you recognise that as what you were
38 given, as it were, for the basis for your quick assessment?
39 A. Yes.
40
41 Q. Can we go back to where we were, tab 37. In the
42 second paragraph it says:
43
44 *I have attached a number of emails*
45 *respecting the reporting of this matter to*
46 *ADF.*
47

1 And then it says:

2
3 *As indicated in his email, DGCADETS-AF*
4 *quite rightly identifies that a support*
5 *person needs to be appointed to provide*
6 *support to CWOFF [CJE]. Could you identify*
7 *such a support person and advise me so*
8 *I can formally appoint them.*
9

10 Firstly, would that be usual within protocol or procedures
11 for the person conducting the initial assessment also to be
12 responsible for identifying a support person?

13 A. I wouldn't give them a support person but they were
14 offered to - they could nominate who they wanted as a
15 support person.
16

17 Q. I'm asking a slightly different question, and that is,
18 you were tasked with doing a quick assessment, which is
19 essentially a quick investigation; is that right?

20 A. Correct.
21

22 Q. You were also tasked with identifying an appropriate
23 support person as per the sentence that I've just read out.
24 Is that, to your knowledge, in accordance with the protocol
25 or procedure, that the same person who is responsible for
26 the investigation is also responsible for identifying an
27 appropriate support person?

28 A. I don't - as I said to you, yes, they need a support
29 person, but it doesn't state for me to assign them a
30 support person. It states that they need to have a support
31 person.
32

33 Q. And then it goes on and says you're to make contact
34 with Darren Banfield, who is appointed to mentor you in
35 this inquiry. I understand that's because you hadn't done
36 one of these quick assessments previously; is that right?

37 A. Correct.
38

39 Q. There is a process that's set out, or was set out at
40 that time, to guide you in doing such an assessment; is
41 that right?

42 A. Correct.
43

44 Q. Yes. In the next paragraph it asks that you provide a
45 plan of action or you prepare a plan of action and then:

46
47 *... would you please provide a written*

1 *report to me --*

2

3 that's Laycock --

4

5 *advising of that plan.*

6

7 In this particular instance, did you prepare such a plan
8 and provide it to Laycock?

9 A. It was provided to Darren Banfield, and we spoke to
10 Darren Banfield and there was a - I can't remember if there
11 was an email that went to Wayne Laycock at that point or
12 not.

13

14 Q. And he approved it?

15 A. Darren, yes.

16

17 Q. You will have seen what's referred to as a complaint
18 by Cadet Sergeant [CJQ] was made to his commanding officer
19 on 22 May.

20 A. Mmm-hmm.

21

22 Q. So a week earlier. So it has taken a week before
23 Wayne Laycock has appointed you. Are you able to explain
24 the delay of that week?

25 A. No. I didn't even know about it until I received the
26 email from the OC at that time.

27

28 Q. And subsequently you haven't discovered as to why
29 there was that delay?

30 A. No.

31

32 Q. Then at tab 39 there's a record of what you did, if we
33 can show you that. This is, as I understand it, your notes
34 of your investigation; is that right?

35 A. Correct.

36

37 Q. If we can look at some parts of it, you started off on
38 4 June at 1900 and, if I understand this correctly, you
39 called Matt McCarthy, the Commanding Officer of 302
40 Squadron; is that right?

41 A. Yes.

42

43 Q. You notified him that an allegation had been made
44 regarding Cadet Warrant Officer [CJE]; is that right?

45 A. Correct.

46

47 Q. You then requested from him information with regard to

1 her relationship with her parents, in particular, you were
2 wanting to know who was listed as next of kin so you knew
3 who to contact; is that correct?
4 A. That's correct, because the system said "other
5 relative", and I didn't know whether it was a cousin,
6 mother, father, because it had no names on there at all.
7
8 Q. Now, I take it that this note doesn't purport to be a
9 verbatim transcript of what transpired. It is your
10 shorthand of each of the conversations; is that right?
11 A. Correct.
12
13 Q. Are you able to say whether you advised McCarthy of
14 more than what's written there - in other words, more than
15 that an allegation had been made regarding Cadet Warrant
16 Officer [CJE]?
17 A. I didn't go into detail. I just went there was an
18 allegation made that there was a sexual relationship
19 between a staff member and a cadet. That was all the
20 information I basically gave him.
21
22 Q. I take it you heard the criticism by [CJF] earlier in
23 her evidence that the commanding officer, McCarthy, had not
24 been informed. What is your response to that?
25 A. I can only tell you what I told him on that initial
26 phone call, and that was very brief information to say
27 exactly what I've just told you then.
28
29 Q. Then it says at 1909 you called - I take it [CJO] is
30 [CJE]'s mother; is that right?
31 A. That's correct.
32
33 Q. You spoke to her and told her briefly the situation as
34 recorded there, I take it, and she stated that [CJE] was
35 with her father and gave a mobile number for you to phone,
36 of the father; is that right?
37 A. Correct.
38
39 Q. Then at 1914 you called the father, [CJP]; is that
40 right?
41 A. Correct.
42
43 Q. And you spoke to him; is that right?
44 A. Correct.
45
46 Q. He called [CJE] to the phone and you asked her to
47 place it on speaker phone; is that right?

1 A. Yes, she was apparently on a different phone or was -
2 he was speaking to her on a different phone. At that time,
3 he asked her to come home - I don't know where she was, but
4 obviously not far away - and then she came on to the phone.

5
6 Q. Did you consider - and I'm not suggesting necessarily
7 that this should have been done differently; I'm just
8 examining how it was done and why it was done in this way,
9 and from there we can talk about whether it might have been
10 done differently. Did you consider whether to make, as it
11 were, cold calls in this way was the right or best way of
12 doing it, or whether a personal meeting might have been a
13 better way?

14 A. Hard call to make at that point in time, because we
15 had to speak to the parents to notify them what was going
16 on before we spoke to the cadet, and they needed to be
17 present in some format at that point in time when we spoke
18 to the cadet.

19
20 Q. In speaking to the cadets in this case, what was it
21 primarily that you were wanting to achieve? What were you
22 trying to get out of call?

23 A. Just to find out if they did have any relationship,
24 sexual or otherwise, with a staff member, male staff
25 member, at that time.

26
27 Q. Did you give consideration as to whether you should
28 contact the cadet first and then the staff member, Adams,
29 as you did, in that order, or whether perhaps you should do
30 it the other way around?

31 A. It depends on when we can get on to the actual person
32 and I was at headquarters that night when we made the
33 calls.

34
35 Q. You phoned Adams next, at 1923; is that right?
36 A. Correct.

37
38 Q. So there was no issue on this occasion as to whom you
39 could get hold of first, was there?

40 A. Not at this point, no.

41
42 Q. So you presumably, with or without a lot of thought -
43 you can clarify - decided you would contact the cadet first
44 and then the staff member?

45 A. Well, the parent first, correct.

46
47 Q. And then the staff member?

1 A. Mmm.
2
3 Q. Yes. I'm just trying to get at that: did you give
4 that order of calls any particular thought or
5 consideration?
6 A. Not necessarily, no.
7
8 Q. As we know, Adams denied it?
9 A. Correct.
10
11 Q. Then, I suppose, you would have had to then phone the
12 cadet or speak to the cadet, but had he admitted it, that
13 may have changed the way in which you dealt with it with
14 the cadet, would it?
15 A. No, because regardless of whether the staff member
16 denied it or not, in these types of allegations the staff -
17 like, it's - the cadet is the one that we're looking at,
18 and if the cadet has said it's happened, then we have to
19 look at it that it has happened, and that is what has
20 happened in this investigation.
21
22 Q. If the staff member had said it had happened, you
23 would equally accept that it had happened?
24 A. Yes - well, yes, if they said that. At this point,
25 though, he never did.
26
27 Q. Well, when you say, "The cadet is the one we have to
28 look at", in what way? Are you regarding both the cadet
29 and the staff member as being equally in breach of your
30 policy?
31 A. No. The staff member is in a position of power.
32
33 Q. Later that evening, at 2022 hours, you recall that
34 [CJE] phoned to notify you with regard to a support person,
35 but also - I will leave that there, then. The next day,
36 5 June, it goes on, and you record some further
37 conversations that took place, or a further conversation.
38 Then was your next step in the investigation to speak to
39 [CJQ]?
40 A. Yes.
41
42 Q. You did that and you say here "ROC" - I take it
43 that's a record of conversation, is it?
44 A. Correct.
45
46 Q. And you've supplied that separately. That's at
47 tab 40. We need not go to that. If we go over the page,

1 at 2045, so this is on 13 June, you spoke with [CJE] and
2 you asked her what her initial response was to the
3 allegation. Was this again a telephone conversation or was
4 this now the meeting?

5 A. Correct.

6

7 Q. A telephone conversation?

8 A. Correct.

9

10 Q. She was quiet, so you asked her the question, "Did you
11 have sex with a staff member?" She responded, "Yes." And
12 so it goes on. In the third line there it is recorded that
13 you'd asked if another party was involved to which she
14 responded:

15

16 *Not at the time but on another occasion.*

17

18 And then you asked,

19

20 *Did you send a Facebook message to anyone*
21 *recently?*

22

23 She said, "No", but she sent one to [CJG] just after the
24 promotion course. At this stage in your inquiry, you've
25 had [CJQ] tell you what he had been told by [CJE], and now
26 you've had [CJE] fess up to it, basically, tell you, "Yes,
27 it happened." Was there need to go further for the initial
28 assessment?

29 A. No, I sent off the initial assessment notifying that
30 my suggestion was to suspend the person and that we needed
31 to look into it further, make it into a full investigation.
32 That was sent off that evening on the 14th.

33

34 Q. What I've just dealt with was on the 13th at 2045?

35 A. Say again?

36

37 Q. What I've just dealt with, the call at 2045, was on
38 the 13th. You then went on and made various further calls,
39 and on so on, the 14th and 15th; is that right?

40 A. The 14th was just to check on the welfare, to see how
41 they were going, and then the initial assessment was sent
42 off at that point in time. Then, because it was referred
43 on then to Darren, who was my mentor, he just asked me to
44 make a call to see if there was anything else from the
45 other party that was named and that's where the
46 conversation from the 15th went.

47

1 Q. So that was after your initial assessment had been
2 done?

3 A. Had been submitted, that's correct.
4

5 Q. You followed up in relation to [CJG]?

6 A. Mmm-hmm.
7

8 Q. For what purpose?

9 A. Because I was asked to find out, after the referral
10 from [CJE] - let me get it right - of naming [CJG], that -
11 as I said, Darren asked me to give a call to see if, again,
12 there was a "yes" or a "no" from her, to follow up, so that
13 we could then include that, or he could include that, in
14 the full investigation.
15

16 Q. Your actual minute of your quick assessment is at
17 tab 42. You reference three documents there. The third of
18 them is the AAFC Interim Policy Manual. It's got some
19 numbers and so on, "Part 2, Chapter 7 POLMAN." That was
20 the governing chapter at that time for quick assessments;
21 is that right?

22 A. That's right.
23

24 Q. We don't need to go to it, but that's at tab 421A.
25 You set out various matters on the first page. I don't
26 need to take you to those. Could we go over the page. You
27 concluded at 6:
28

29 *My assessment of the matter has determined*
30 *that suitable evidence exists through the*
31 *statement from CWOFF [CJE] and the*
32 *supported Facebook commentary that there is*
33 *a high likelihood that this incident*
34 *occurred.*
35

36 And "this incident" being the one you were asked to
37 investigate, which was that it was alleged that Adams and
38 [CJE] had engaged in sexual intercourse during the January
39 2013 promotion course. And then in 9 you recommend that
40 the matter be escalated to full inquiry process and you
41 also recommend that Adams be suspended pending further
42 inquiries into the matter. That recommendation was
43 accepted, wasn't it?

44 A. Correct.
45

46 Q. You mentioned earlier in answer to questions to
47 his Honour and, indeed, you mentioned in your evidence

1 before lunch also, the Eleanore Tibble incident and that
2 that is very much present in the minds of the cadets in
3 this area. To your mind, what are the lessons to be learnt
4 from that incident?
5 A. The same as what's taught now, that the cadets aren't
6 the fault at any point in this because they're under -
7 well, they have instructors - officers and instructors -
8 that are supposed to be there looking after them. At no
9 point they are at fault if anything like this occurs.
10
11 Q. And so they're not the ones to be blamed?
12 A. Correct.
13
14 Q. And so the lesson from the Tibble incident -
15 I shouldn't refer to it as an "incident", the Tibble
16 tragedy - is that Eleanore Tibble was blamed, or certainly
17 felt blamed, and that should never be allowed to happen
18 again; is that right?
19 A. Correct.
20
21 Q. Anything else in particular?
22 A. Sorry, give me a bit more --
23
24 Q. Any other lessons in particular that come to your mind
25 arising out of the Eleanore Tibble tragedy?
26 A. I think - well, as far as I'm aware, the majority or
27 if not all of the suggestions from the Eleanore Tibble have
28 been implemented.
29
30 Q. When you did your quick assessment investigation and
31 then prepared the report, did you give any consideration to
32 the question of [CJE]'s age at the time?
33 A. That was irrelevant because she was a cadet.
34
35 Q. It's not irrelevant, you'll appreciate, to the
36 question of the possible applicability of the special care
37 provisions?
38 A. Yes, but what I was saying was it was irrelevant in
39 the sense that she was a cadet, hence the full inquiry. So
40 regardless of whether she was 17 or whether she was - 15,
41 obviously, would be an illegal issue, but at 17 she's still
42 a cadet, so it wouldn't matter if she was 17 or 19, as a
43 cadet, she's a cadet, and she, again, has an instructor
44 that has taken advantage of the situation.
45
46 Q. I accept all of that of course. I'm getting to a
47 slightly different point. You knew from the information

1 supplied to you that she had been 17 at the time; is that
2 right?
3 A. Yes.
4
5 Q. Did you apply your mind at all or did it occur to you
6 at all, that that might have implications for whether or
7 not a criminal offence had been committed here in addition
8 to it being a breach of the AAFC rules?
9 A. Yes.
10
11 Q. That did occur to you at the time?
12 A. Yes.
13
14 Q. From which I take it you were aware at some level or
15 other about the special care provisions that apply in New
16 South Wales?
17 A. Yes.
18
19 Q. Did you apply your mind then to whether or not you
20 should recommend a reference to the police, a referral to
21 the police?
22 A. At this point in time, because I was in a mentorship,
23 that went to Darren, and within two days, I think it was,
24 it was referred to the police.
25
26 Q. Yes. That I know. I'm not suggesting it should have
27 been referred to the police at your stage, I'm just trying
28 to understand what happened. Did you consider whether you
29 yourself should recommend that it be referred to the police
30 or was that just a matter that you left for those to whom
31 you were reporting?
32 A. It is something that I could have done but, as I say,
33 because I was in the mentor role, I was getting instruction
34 on what I was doing step by step along the way for this
35 initial assessment.
36
37 Q. As I understand it, you had no particular role in the
38 matter thereafter, after having done the initial
39 assessment. It seems that you were appointed to assist
40 Darren Banfield to then do a full investigation but that
41 was then suspended. Am I right?
42 A. Correct.
43
44 Q. You were not involved in any formal capacity after
45 that; is that right?
46 A. After I did the initial couple of phone calls to [CJG]
47 and parent --

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Q. That was on 15 June?

A. Correct - and then to the psych to make sure that she followed up, then I had nothing more to do with it, the investigation, from there.

Q. There is just one last thing I must put to you and to ask for your response. If we can see [CJG]'s statement at paragraph 65. You recall who [CJG] is?

A. Yes.

Q. She says in 64:

During 2014 various charges were laid against Adams in relation to [CJE], me and the other girl.

Then she says:

Around that time, I was on an AAFC Abseiling Course. O'Donnell who was also present at the course pulled me aside in the presence of another male staff member, who I had never met and, to my knowledge, had no idea I was involved in the Adams matter. In front of this male staff member, she said, "I saw what is on the news; are you feeling okay?" I felt really uncomfortable that she was asking me about this, especially in front of this staff member. I told her to go away and walked away.

A. I was detachment commander on that activity. Her CO at the time was on the activity as well and he was the one who said to me that it was in the news and he suggested I - because I didn't know it was in the news, and suggested that I check on her welfare. From memory, if she said it was a different staff member - but my memory says that it was he that was with me at that point of time and we were checking on her, and she said, "I didn't want to talk about it", like, she didn't want to talk about it, and she walked away. Later on I checked on her again and she said she was fine and she didn't want to talk about it at all, so I left it at that point in time and said if she wanted to speak about it or needed support, that I was there if she needed it.

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MR STEWART: Thank you. No further questions, your Honour.

THE CHAIR: Are there any other questions?

<EXAMINATION BY MR O'BRIEN:

MR O'BRIEN: Q. O'Brien is my name and I represent [CJG]. I just want to take you back to an answer you gave to his Honour. It is recorded in the transcript at 19865. It relates to this policy of no relationships between cadets and other cadets or staff. You were asked this by his Honour:

Q. When you say you go through the behavioural policy at the beginning of every activity, what does that include in relation to the relationship between cadets and other cadets or cadets and people in positions of responsibility?

Do you remember being asked that by his Honour a moment ago?

A. Yes.

Q. You said:

That's to notify them as per the cadet behavioural policy that there is not to be a relationship between staff and cadets.

You said:

In the training situations that I run, I stress to them and give examples. We use the Eleanore Tibble, as I said earlier, as an example, to notify there is to be no relationship, regardless of age or gender, with staff and cadets.

Do you remember giving that evidence?

A. Yes.

Q. I want to know from you, if I can inquire, how do you use the Eleanore Tibble tragedy as an example of that policy?

1 A. As zero tolerance between a staff - a relationship
2 between a staff member and a cadet.

3
4 Q. But isn't that tragedy really a better example of the
5 woeful approach that the AAFC had in relation to dealing
6 with the young girl who had been, at that stage, suspected
7 of being in a relationship with a staff member?

8 A. That's not the part of the training that we're
9 referring to. We're trying to stress here - I mean, that
10 might be relative in other sections for the - you know, if
11 they're in a command position as to how to handle things,
12 but most of these staff in the training are new staff,
13 within 12 months. Very rarely are they ones that are
14 already in a position of a commanding position. So,
15 therefore, they're told zero tolerance and no relationships
16 with staff and cadets, it's not tolerated, and, therefore,
17 it has to be reported up the chain of command if anything
18 is noticed.

19
20 Q. Okay, but where does that tragedy fit into that
21 policy?

22 A. The relationship between a staff member and a cadet.

23
24 Q. I'm struggling to see how you could show that that's
25 an example of the policy. Can you tell us what you'd say
26 in a training environment where you're making this
27 illustration by way of using this particular example?

28 A. Well, if you're telling them zero tolerance in a
29 staff/cadet relationship and then you use the example with
30 Eleanore, her tragedy, where she has ended up getting the
31 blame and it's no blame to the cadets, the onus is on the
32 staff member to be able to, in a position of power - to
33 take the lead and not start a relationship, not continue a
34 relationship, whatever it may be.

35
36 Q. Are you talking to the staff or are you talking the
37 cadets in that example?

38 A. Staff.

39
40 Q. Okay.

41 A. In a staff training situation.

42
43 Q. Okay. I want to touch very briefly on some of the
44 matters that Mr Stewart has covered, but I don't want to
45 traverse old ground. He has asked you about the
46 conversations that you had over the telephone with my
47 client and with [CJE]. When you took this referral and you

1 were instructed to undertake these inquiries, you were told
2 that you had travel allowance available to you?

3 A. No.

4

5 Q. I think in --

6 A. You mean here or in --

7

8 Q. No, could we have a look at tab 37, please. Tab 37
9 has been referred to. If you go to the bottom of that
10 document, you see:

11

12 *Approval is given for any travel you, and*
13 *if required, SQNLDR(AAFC) Banfield may need*
14 *to undertake to complete this inquiry.*
15 *Should you need to travel please complete*
16 *the travel form and forward direct to me.*

17

18 Do you see that?

19 A. Yes.

20

21 Q. It seems to be contemplated that you would go and
22 visit these young girls rather than cold-call them, as it
23 has been put to you earlier?

24 A. I could only follow the guidance I was given. And as
25 I said before, to the gentleman before, this was the first
26 time I'd done that and I was being mentored and I followed
27 the guidance I was provided.

28

29 Q. Do you accept now that making the telephone call and
30 asking them in the manner in which you did was, in
31 hindsight, a less-sensitive approach than visiting them in
32 person?

33 A. If I was having to do it now, I have more experience,
34 so, therefore, I would probably do it a bit differently,
35 yes.

36

37 Q. That was an error in judgment, wasn't it?

38 A. I won't say "yes" or "no" to that because, as I said
39 to you, I was following the guidance I had at that time.
40 I hadn't done anything like that before.

41

42 Q. Following this idea that the cadets were not to blame
43 for any relationship that had been suggested between them
44 and staff, it seems to be noteworthy that in your
45 statement, which mirrors those file notes that you've made
46 in relation to these telephone calls, you never pointed out
47 in the telephone calls to these girls that they were not to

1 blame, did you?
2 A. I can show a copy of - and I followed this nearly to
3 the letter in my diary - the exact wording, because I went
4 through that with Darren Banfield and I made changes on
5 here when I spoke to Darren Banfield, and because I hadn't
6 done anything like this before, I nearly did that in, like,
7 rote as to what was written in my diary.
8
9 Q. Is it your evidence that you did tell them that
10 they're not to blame; to the effect that the fault was not
11 at their door in relation to what you were suggesting to
12 them had occurred?
13 A. Would you like my exact wording?
14
15 Q. I'm asking you if that's the case. Did you say that
16 to them?
17 A. I can provide my exact wording if you'd like me to.
18
19 Q. Just answer the question: is it "yes" or "no"? Did
20 you do that?
21 A. I said there was no judgment on any party at this
22 point until further investigation.
23
24 Q. I'm going to ask you to read that in a minute.
25 A. Yes.
26
27 Q. Do you accept from me, having studied your notes that
28 have been typed up from those 4th and 13th June 2013
29 conversations, that you have not noted in there --
30 A. Correct.
31
32 Q. -- that they're not to blame, words to that effect?
33 A. There's no wording in there, that's correct.
34
35 Q. All right. Well, I do invite you now to read what you
36 said if you wish?
37 A. Yes. I stated that "There's been an allegation made
38 that on the January promotion course you had a sexual
39 encounter with a male staff member. I'm required to make
40 you aware of this allegation. However, no judgment will be
41 made until further investigation has been completed."
42 I also stated that, "You are entitled to a support person
43 if this investigation proceeds further and you will be
44 given adequate time and opportunity to respond to the
45 allegation."
46
47 Q. So you told them it's an allegation?

1 A. It was an allegation, yes.
2
3 Q. I suggest to you that the way in which you have spoken
4 to these children on this occasion is entirely
5 accusatorial; you've accused them?
6 A. I don't believe so.
7
8 Q. And the manner of that language you've just read from
9 your diary suggests as much?
10 A. I don't think there was an accusation there. There
11 was an allegation that they were involved in a sexual
12 encounter.
13
14 THE CHAIR: Q. I think, Mrs O'Donnell, what's being put
15 to you when you have the conjunction "there's an
16 investigation" and "no judgment is being made", in the
17 context of an allegation that the child has had a sexual
18 relationship, that sounds very like you are being asked to
19 investigate their conduct and make a judgment, ultimately,
20 about the child's conduct. Do you understand that?
21 A. Yes.
22
23 Q. Is that the way we should understand what you said?
24 A. I don't believe so. I understand what you're saying
25 but, no, I don't believe so.
26
27 Q. Can you look at it again? Could you look at the words
28 again?
29 A. Yes.
30
31 Q. Can you put yourself on the other end of the phone,
32 with a young girl receiving those words, you don't think
33 they would interpret that as you saying, "I have an
34 allegation against you that you have misbehaved. I'm not
35 passing judgment at the moment, the matter has to be
36 investigated."
37 A. I didn't say "against you" at any point. I just said
38 "There has been an allegation made that on the course an
39 encounter occurred with a male staff member."
40
41 Q. I don't think you quite said that.
42 A. The exact words were, "There has been an allegation
43 made that on the January promotion course you had a sexual
44 encounter with a male staff member".
45
46 THE CHAIR: Very well.
47

1 MR O'BRIEN: Q. So you seem to be implying, when
2 his Honour asked you those questions clarifying my earlier,
3 clumsier question, that you would use those same words
4 again if directed to undertake this same sort of
5 investigation?
6 A. As I said earlier, I now have more experience and no,
7 I wouldn't.
8
9 Q. And the reason you wouldn't is because, as his Honour
10 points out, it suggests that they're under investigation,
11 doesn't it, when you use those words?
12 A. Oh, well, at that point in time I would have said no.
13
14 Q. I'm suggesting to you now, today, having a look at it
15 and knowing what you know about what these girls
16 experienced, you would accept that it appears --
17 A. That I would reword it slightly, yes.
18
19 Q. And that what you've said to them would have, in their
20 mind, appeared to be the case, that they're under
21 investigation?
22 A. It may have at that point in time, but they were
23 notified by myself that at no point were they at fault.
24
25 THE CHAIR: Q. What would you say today, instead of
26 those words? What would you say?
27 A. I wouldn't say anything off the top of my head. I'd
28 have to write it down so I could actually see and reword it
29 and say it over in my head myself, but it wouldn't be that
30 exact wording.
31
32 Q. Why not? What's wrong, as you now see it, with those
33 words?
34 A. Well, you just told me, sir, that it's sounding like
35 they are at fault, and that was never meant to be any
36 intention at any point in time.
37
38 MR O'BRIEN: Nothing further, thank you.
39
40 THE WITNESS: Thank you.
41
42 THE CHAIR: Q. When you were asked to carry out this
43 preliminary investigation, did it occur to you that the
44 circumstances may have been, rather than just having sex,
45 there may have been a sexual assault committed?
46 A. I was not aware of anything like that at that point in
47 time.

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Q. You were not aware of it. Did you think about it?

A. There was a possibility, yes.

Q. Did you contemplate that when you used the words that you used, you may, in fact, be inflicting very serious trauma upon someone who had suffered a sexual assault?

A. Probably to the inexperience that I had at that time, no, because what I'd written there, as I said, I went through with my mentor at the time.

Q. What do you think about that now?

A. As I said to the gentleman before, I would reword it.

Q. Who was your mentor?

A. Squadron Leader Banfield.

<EXAMINATION BY MS THOMPSON:

MS THOMPSON: Q. Did Laycock know that you had no experience, at the time he appointed you by that email?

A. He would have, yes.

Q. Did he tell you that he was giving you a mentor, Mr Darren Banfield, to assist you to carry out this interim assessment?

A. It was in the email, yes.

Q. Did you think Mr Banfield had had experience in investigating a sexual assault claim or sexual abuse claim?

A. I'm not sure in that nature but I know he has done other investigations, yes.

Q. What investigations were they?

A. Different complaints on things with AAFC. I don't know specifics because that's not something we talk about, as to what the complaints are.

Q. So if I tell you that in his statement he says he hasn't been trained - no formal training in conducting investigations; he had had experience of bullying and harassment involving several members, staff members from the squadron, and a claim of assault, does that tally with your understanding of the extent of his experience?

A. I just know he has been in the organisation longer than me and has had a lot more experience than what I have.

1 Q. Did he ever say to you, "I have had experience
2 investigating a sexual abuse case before"?
3 A. No.
4
5 Q. Did you ask him what his experience was in that
6 regard?
7 A. No. I took the OC's request for him to be my mentor
8 at value.
9
10 Q. When you spoke to Banfield, did he direct you to some
11 manuals for guidance?
12 A. To the policy manual, yes.
13
14 Q. You went and read those?
15 A. Yes.
16
17 Q. Did you have any discussion with him about the
18 contents of what you read?
19 A. Yes, we had several phone calls.
20
21 Q. So at the time you made the phone calls to [CJE] and
22 [CJG], you'd had these discussions?
23 A. Yes.
24
25 Q. Squadron Leader Banfield didn't object to you making a
26 cold call to [CJE] or [CJG]?
27 A. That's correct.
28
29 Q. You rang the squadron commander, McCarthy, before
30 making contact with [CJE] and her family --
31 A. Correct.
32
33 Q. -- her mother and father. Did it occur to you or did
34 you give any consideration to involving McCarthy, as the
35 squadron commander, in the discussion, the first discussion
36 you had with [CJE]?
37 A. I only gave him the detail as to what the
38 investigation was in relation to and who the relative was.
39
40 Q. In your role at that time, you were associated with
41 HQ?
42 A. Correct.
43
44 Q. And HQ's involvement with cadets arises out of things
45 like the general training camps and other events?
46 A. It depends on what role you're in, yes.
47

1 Q. They go for two or three weeks?
2 A. Promotion courses go for three weeks and GSTs go
3 generally for a week.
4
5 Q. Squadron commanders, on the other hand, would see
6 cadets weekly at parade?
7 A. Yes.
8
9 Q. So would it be fair to say a squadron commander would
10 have more knowledge and understanding and contact with a
11 cadet than someone from HQ?
12 A. Yes, but when I spoke to Matt McCarthy, the CO at that
13 time, and asked him who the other relative was, he notified
14 me that he wasn't aware of what the family situation was.
15
16 Q. I understand, but my questions really go to did you
17 give consideration that having him at the time you made
18 contact would be a good idea?
19 A. With my lack of experience, no, at that given time.
20
21 Q. And that was not suggested to you either by Flight
22 Lieutenant Banfield?
23 A. Squadron Leader Banfield, no, and
24 Flight Lieutenant McCarthy, no.
25
26 Q. Did you ever give any consideration to meeting with
27 [CJE] and her parents face to face?
28 A. I'd have to say no. Initially, no. There was an
29 appointment made, but I was taken out of the loop at that
30 point.
31
32 Q. But for the very first instance of breaking this news
33 to them, you gave no consideration to having a face-to-face
34 meeting with the parents and including [CJE]?
35 A. Yes, I wouldn't necessarily say consideration, but
36 obviously, no, I made the phone call.
37
38 Q. At the time you made the phone call, did you ask if it
39 was an appropriate time to talk?
40 A. With the mother, with the father?
41
42 Q. Let's start --
43 A. Not necessarily.
44
45 Q. -- with the mother?
46 A. I just stated this was the - "This is the allegation."
47 I didn't start the call with "Is this an appropriate time

1 to call", at that point in time, no.
2
3 Q. If you made that call again today, would you think it
4 appropriate to say that you had a sensitive matter to raise
5 and was it an appropriate time to discuss that matter?
6 A. Yes.
7
8 Q. You would do that now?
9 A. Yes.
10
11 Q. And you would do that for the father --
12 A. Yes.
13
14 Q. -- of [CJE] as well?
15 A. Yes.
16
17 Q. And [CJE] herself?
18 A. Yes.
19
20 Q. Could I go back to some questions and answers you gave
21 in terms of the risk factor that faces cadets in the
22 environment that they are in. Do you see yourself having a
23 proactive role as well as a reactive role when someone
24 reports an incident or an event that they're uncomfortable
25 with, or even sexual abuse?
26 A. I think definitely a proactive role, to either report
27 it to whoever is appropriate or, depending on what the
28 situation is, reporting it to the appropriate authorities.
29
30 Q. All right. Leaving aside that someone has reported
31 something to you and you have a chain of command to report
32 up, what proactive steps do you take when you are attending
33 a general services training or the other type of activity
34 that's arranged, the events - what sort of proactive steps
35 do you take as a senior officer when you're attending one
36 of these camps or events, promotional events?
37 A. First of all, I have to say I've only been a junior
38 officer on any of these camps previously. The highest rank
39 going on any of these camps was flying officer. When I've
40 been on any of the camps since I've been in a senior role,
41 I haven't been on any of those camps, other than
42 international activities.
43
44 Q. In that more junior role, as you describe it, do you
45 speak to cadets about how they find instructors?
46 A. Say that again?
47

1 Q. Do you have any general conversations with cadets,
2 outside of the formal setting of training, as to how
3 they're going with particular instructors, how they're
4 finding them?
5 A. Not necessarily, unless they've approached me and
6 notified me that there's an issue or I can see there's some
7 sort of conflict there, but if I see there's a conflict,
8 I will approach them and find out, but that has very rarely
9 happened in my situation. I haven't seen any major
10 conflicts with any cadet and/or instructor.
11
12 Q. In terms of the other instructors, you mix with them
13 while you're on the camp or the event: do you have any
14 general discussions with them about how things are going,
15 or if they have any concerns about any of the other
16 instructors?
17 A. Depending on what role I'm in, yes.
18
19 Q. You do?
20 A. On the promotion course I didn't. I was only involved
21 with the staff on my course and the other senior NCO
22 course.
23
24 Q. Is there any formal evaluation done at the end of a
25 camp or an event of the instructors and their performance?
26 A. The detachment commander generally does that, yes.
27
28 Q. What do they rely on to do that - their observations
29 or what other people tell them?
30 A. Well, they don't have, generally, direct contact the
31 majority of the time. They rely on their chief
32 instructors, the detachment staff, other detachment staff,
33 for feedback to them.
34
35 Q. How well did you know Adams, Chris Adams?
36 A. I'd only met him twice, on the two different courses.
37
38 Q. Does it concern you now that others have reported
39 behaviour - both cadets and other people in the role of
40 instructor have reported some concerns about how he
41 appeared, his flirtatious behaviour, the fact he was always
42 joking with female cadets - does it concern you that you
43 were weren't aware of this?
44 A. Yes, well, I'm concerned that no-one appeared to have
45 been very aware of it.
46
47 Q. I don't know if the evidence supports that last

1 statement. Do you think there's adequate training given to
2 instructors when they attend these camps in terms of how
3 they are to report the behaviour of fellow instructors?
4 A. On the actual camps no training is given on how they
5 need to report going up the chain. It's given at the
6 squadrons. It's implied in the squadrons and when they do
7 their staff training - that's where they're notified that
8 they need to report up the chain of command if there are
9 any issues.

10

11 MS THOMPSON: I have no further questions, thank you,
12 your Honour.

13

14 THE CHAIR: Yes. Anyone else? Mr Stewart?

15

16 MR STEWART: Just one matter that has come to my
17 attention.

18

19 <EXAMINATION BY MR STEWART:

20

21 MR STEWART: Q. You said, as I understand it from your
22 evidence before lunch, that this Adams incident was the
23 only experience you'd had of allegations being made about
24 an instructor having an inappropriate relationship with a
25 cadet?

26 A. Yes, other than the training, like I say, we were
27 notified of the Eleanore Tibble case.

28

29 Q. Yes. Is it not the case that you joined the squadron
30 at Glenbrook in 2005-2006?

31

32 A. Correct.

33

34 Q. Is it not the case that issues arose there about a
35 male staff member having inappropriate relationships with
36 cadets and it was reported to the police?

37

38 A. May have, but I wasn't aware of it.

39

40 Q. You didn't know about that?

41

42 A. No.

43

44 MR STEWART: Nothing further, your Honour.

45

46 THE CHAIR: Yes, thank you, that concludes your evidence.
47 You're excused.

48

49 THE WITNESS: Thank you, sir.

50

1 <THE WITNESS WITHDREW

2

3 MR STEWART: Your Honour, I call Darren Banfield.

4

5 MS McLEOD: Just while Mr Banfield is being called, your
6 Honour, there is one matter to follow up from yesterday, if
7 I may. There was an issue raised about [CJE]'s
8 counselling. I can indicate to the Commission - and I've
9 mentioned this to Ms Thompson - that all payments in
10 respect of [CJE]'s counselling were paid some time ago and
11 there is no outstanding issue so far as Defence is
12 concerned.

13

14 THE CHAIR: Thank you.

15

16 MR STEWART: The last of those payments, as I understand
17 it, being a matter of months ago.

18

19 MS McLEOD: March.

20

21 MR STEWART: In March of this year.

22

23 <DARREN JOHN BANFIELD, affirmed: [3.12pm]

24

25 <EXAMINATION BY MR STEWART:

26

27 MR STEWART: Q. Mr Banfield, would you state your full
28 names and occupation?

29 A. My name is Darren John Banfield. I'm currently
30 employed as a public servant in the Australian Government.

31

32 Q. Mr Banfield, do you have available to you a copy of
33 your statement dated 14 June 2016, which you prepared for
34 the Royal Commission?

35 A. Yes, I do.

36

37 Q. Do you confirm that that statement is true and
38 correct?

39 A. That is a true and correct statement, correct.

40

41 MR STEWART: I tender the statement, your Honour.

42

43 **EXHIBIT #40-036 STATEMENT OF DARREN JOHN BANFIELD**
44 **DATED 14/06/2016**

45

46 MR STEWART: Q. You are a squadron leader of the
47 Australian Air Force Cadets; is that correct?

1 A. That's correct.
2
3 Q. You are the Executive Officer for the Southern Region;
4 is that right?
5 A. That's correct.
6
7 Q. You've held that position since 1 January 2011?
8 A. Yes, I have.
9
10 Q. I understand that you commit approximately three hours
11 per week attending to AAFC issues; is that right?
12 A. Yes, that's right, that's a notional three hours a
13 week. My time commitment is probably beyond that, but the
14 three-hour-week pertains to an allowance that we receive as
15 a return for our service.
16
17 Q. As a squadron leader, is that a rank or a role?
18 A. It's a rank that you obtain via an appointment system.
19 So the maximum rank for officers generally in the AAFC is
20 flight lieutenant, and for particular roles that you may
21 apply for and be successful, there are rank provisions
22 beyond flight lieutenant.
23
24 Q. When you refer to the southern region of which you're
25 the executive officer, can you explain what that is?
26 A. The southern region - a number of units that now total
27 eight south of Sydney metropolitan, so starting at
28 Wollongong and going all the way down to the Victorian
29 border and as far west as Griffith. There are eight
30 squadrons that report in an operational sense to me.
31
32 Q. So that southern region, is that the same or different
33 from a wing?
34 A. It's part of a wing. The wing is broken into four
35 geographic regions, of which I represent the south, and
36 that's for command and control purposes. It's a large
37 wing.
38
39 Q. So is that then the southern region within 3 Wing?
40 A. That's correct, southern region forms part of 3 Wing.
41
42 Q. And the 308 Squadron, is that within your region?
43 A. No, it is not.
44
45 Q. And the 302 Squadron, is that within your region?
46 A. No, it is not.
47

1 Q. The 310 Squadron?
2 A. No, it is not.
3
4 Q. I mention those because they are Adams' squadron,
5 [CJE]'s squadron and [CJJ]'s squadron, as I understand.
6 You yourself were an Air Force Cadet from 13 years of age
7 until 18; is that right?
8 A. That's correct.
9
10 Q. And you've been an adult staff member of the AAFC or
11 its predecessor, the Air Training Corps, since 1994; is
12 that right?
13 A. That's right.
14
15 Q. As at May 2013, can you explain the relationship
16 between 3 Wing and 308 Squadron and, in particular, how you
17 related to that at that time, May 2013?
18 A. May 2013? 308 Squadron, I believe, is part of the
19 northern area and I have no direct relationship with that
20 unit.
21
22 Q. At that time Wayne Laycock was known to you,
23 I understand?
24 A. Yes, he was the Officer Commanding of 3 Wing.
25
26 Q. So he was Officer Commanding, 3 Wing. You, as
27 executive officer of the southern region, how did that put
28 you in relation to Laycock? Were you immediately below him
29 in rank and responsibility or was there someone else in
30 between you?
31 A. I directly reported to Wayne Laycock.
32
33 Q. So in a particular region, like the southern region,
34 is the executive officer the highest ranking or responsible
35 position within the region?
36 A. Yes, it is.
37
38 Q. So I take it, then, also reporting to Wayne Laycock
39 were executive officers of the other regions within 3 Wing?
40 A. That's correct.
41
42 Q. You are familiar, of course, with the initial
43 assessment report and the request for an initial assessment
44 report in May of 2013 concerning the Chris Adams matter?
45 A. Yes, I am.
46
47 Q. In your paragraph 14 you say that on 28 May you

1 received information from the Officer Commanding 3 Wing,
2 that's Laycock, with regard to an allegation that there had
3 been a sexual relationship between a cadet instructor and a
4 cadet during a January training camp. You're aware, I take
5 it, that that information had in fact been brought forward
6 by [CJQ] to his commanding officer about a week before, on
7 22 May. Are you aware of that?

8 A. Yes, I am aware of that.

9
10 Q. Are you able to explain - do you have any knowledge -
11 as to why there was a delay of approximately a week between
12 the information coming forward and Sharon O'Donnell being
13 appointed to do an initial assessment?

14 A. No, I don't know what the delay was. The matter was
15 reported to me to assist Sharon O'Donnell on 28 May.

16
17 Q. As I understand it, essentially, you and Laycock
18 between you decided that an IAR must be conducted; is that
19 right?

20 A. That's correct.

21
22 Q. Between you, you decided that O'Donnell should be
23 appointed to conduct it but under your mentorship; is that
24 right?

25 A. That's correct.

26
27 Q. I'll ask that you be shown tab 35 of the bundle. You
28 will see this is an email from Laycock to Ken Given and
29 it's copied to various people. First of all, who was
30 Ken Given at that time?

31 A. He would have been the Commander of the Australian Air
32 Force Cadets at the time, so Wayne Laycock's superior.

33
34 Q. And where in the "cc" line on the right-hand side it
35 says "XO", that's you, I take it?

36 A. Maybe not. That might have been the executive officer
37 for the metropolitan area, who also had the title of the
38 wing executive officer, so that may not be me.

39
40 Q. Looking at this email, are you able to say whether
41 this email came to you either in that form or as part of a
42 chain of other emails?

43 A. No, I can't say.

44
45 Q. Would you look at tab 37, which will be shown to you.
46 This is the email from Wayne Laycock on 29 May appointing
47 Sharon O'Donnell to do the initial assessment. Are you

1 familiar with this email?

2 A. Yes, I am.

3

4 Q. You will see that there are a lot of attachments to
5 the email. Do you see that?

6 A. Yes, I do.

7

8 Q. You will see it also says in the email, in the second
9 paragraph:

10

11 *I have attached a number of emails*
12 *respecting the reporting of this matter to*
13 *ADF.*

14

15 Firstly, the email we're looking at now, 29 May - that did
16 come to you; am I right?

17 A. Yes, that's correct.

18

19 Q. And so where it says "XOS" at the top, that's because
20 it's being addressed to you; is that right?

21 A. That's correct, that's directed to me as a recipient.

22

23 Q. That's "executive officer", does the "S" stand for --

24 A. "S" stands for "south", that's correct.

25

26 Q. If I show you tab 38, that seems to me to be the
27 emails that are referred to and were sent with tab 37. Can
28 I ask that those be scrolled through and shown to you and
29 you can answer this question whether those are the emails
30 that were furnished, if you're able to say? If we keep
31 going to the next page, you'll see there is the same email
32 I showed you earlier, a bit further on. That's the one
33 that's coming up.

34 A. Yes, indeed.

35

36 Q. Is this an email you received at or about the time
37 that O'Donnell was appointed to do the initial assessment?
38 You're nodding. I take it the answer is "yes"?

39 A. Yes, I received the message from Wayne Laycock to
40 which this was attached, yes.

41

42 Q. You will see that in the third line of the substantive
43 paragraph, it says:

44

45 *On 22 May 13 [Cadet Sergeant] [CJQ],*
46 *318 Squadron reported to his*
47 *[commanding officer] that he had earlier*

1 *received a message through his Facebook*
2 *account from a [Cadet Warrant Officer]*
3 *[CJE] --*

4
5 and some numbers are given --

6
7 *of 302 Squadron (17 old)*

8
9 Do you see it was recorded there that [CJE] was said to be
10 17 at the time of the incident that's alleged? Do you see
11 that?

12 A. Yes, it states that.

13
14 Q. At that time, did you give any consideration to the
15 possible criminal law implication of that?

16 A. No, I did not.

17
18 Q. Did you give any consideration to the possibility that
19 this allegation with regard to sex having occurred or
20 sexual activities having occurred with a staff member may
21 not have been consensual?

22 A. No, I did not.

23
24 Q. And the criminal consequences of that?

25 A. No.

26
27 Q. You and Laycock decided, as we've canvassed already,
28 that an initial or quick assessment should be done. Was
29 any consideration given by the two of you to whether the
30 matter shouldn't immediately be referred to the police? In
31 other words, on the basis of the information you already
32 had?

33 A. At the time, the intention was to ensure that the
34 claim that we had from [CJQ] could be validated and was
35 deemed to be accurate.

36
37 Q. So I take it the answer is "no" - at that time you
38 didn't give any consideration to reporting to the police?

39 A. No.

40
41 Q. O'Donnell, who was appointed, was, as she gave
42 evidence earlier, a civilian volunteer in the AAFC with the
43 rank of squadron leader and the role of staff officer
44 training. You were aware of that, I take it?

45 A. I was aware of Sharon's role in the organisation and
46 her rank, yes.

47

1 Q. And her relative inexperience in conducting any form
2 of inquiry; is that right?
3 A. That's right.
4
5 Q. It is because of that that you undertook to mentor
6 O'Donnell in the process; is that right?
7 A. That's correct.
8
9 Q. Why, in particular, was O'Donnell chosen for this role
10 as opposed to perhaps someone else and, in particular,
11 someone who might have had more experience in the area?
12 A. There were two reasons to that. Firstly,
13 Sharon O'Donnell was a female and the matter pertained to
14 an allegation between males and females, particularly
15 female cadets, so myself and Mr Laycock felt it appropriate
16 to have a female involved in the process; and, secondly,
17 there were some senior officers like myself who had done
18 other investigations and we needed to ensure that we could
19 train up some of our newer staff to be able to conduct
20 investigations.
21
22 Q. O'Donnell says that you referred her to the POLMAN
23 chapter 7 for guidance on the process: is that correct?
24 A. That's correct.
25
26 Q. She also said that you approved her investigation
27 plan; is that right?
28 A. That's right.
29
30 Q. As I understand it, she developed some wording to be
31 used by her to guide her in what she said when she made the
32 telephone call to [CJE]?
33 A. That's correct.
34
35 Q. You, as it were, okayed that wording; is that right?
36 A. Sharon and I developed an initial script, because at
37 this point the allegations put forward were, I guess, at
38 the initial advice stage, and I assisted Sharon in
39 developing an opening statement that she could make to the
40 parties that she was about to call.
41
42 Q. Did you hear her evidence a little while ago when she
43 read out from her notes as to what that opening statement
44 was?
45 A. Yes, I heard that.
46
47 Q. Do you accept that that is the opening statement that

1 was prepared between the two of you?
2 A. That's the statement that she gave.
3
4 Q. And that included her saying that "an allegation has
5 been made" and that "no judgment will be made until further
6 investigation is completed and you will be given adequate
7 time to respond." Do you accept that that implies to the
8 person hearing it that no judgment will be made in respect
9 of them; that there's some suggestion that they have been
10 involved in misconduct?
11 A. Yes, I understand that from the way it was presented,
12 yes.
13
14 Q. You do accept that?
15 A. Yes, I do.
16
17 Q. Are you aware that that was one of the major issues in
18 the Eleanore Tibble case, that Eleanore Tibble was perhaps
19 more clearly but, nevertheless, made to feel that she was
20 the one in trouble for what had happened between her and a
21 staff member?
22 A. Yes, I understand.
23
24 Q. So do you accept that greater care needs to be taken
25 to ensure that in these situations where an adult staff
26 member is said to have been engaged in an inappropriate
27 relationship with a cadet member, that the cadet member is
28 not made to feel that they are the ones at fault?
29 A. Absolutely not, and I did take some time with Sharon
30 to explain to her the nature of the introductory call and
31 to make best efforts to not make her feel that way. I was
32 quite insistent that the phone call encouraged support and
33 welfare for the people involved, specifically to ensure
34 that she did not feel - make anybody feel responsible for
35 their actions but the call itself at this point was an
36 advice that we were commencing a more in-depth process.
37
38 THE CHAIR: Q. Mr Banfield, I'm not sure I'm
39 understanding. The words that she used, as I understand
40 it, were agreed with you; is that right?
41 A. That's correct, your Honour.
42
43 Q. Do you accept that those words were wrong, they
44 shouldn't have been used?
45 A. On reflection, your Honour, no, they should not.
46
47 Q. That's in the context where, as I understand it, as

1 between all of you, there was a conscious recognition of
2 not repeating past mistakes; correct?

3 A. Yes, that's right, your Honour.
4

5 Q. What went wrong?

6 A. I guess the formation of the conversation with the
7 tyranny of distance between myself and Sharon and the time
8 that we had didn't allow for it to be as thoughtful as
9 perhaps it could have been. Hearing it today, this
10 afternoon, most definitely, it sounded more harsh than it
11 should have been.
12

13 Q. It could suggest a mindset amongst all of you that
14 still existed at the time that this conversation was being
15 prepared, do you understand?

16 A. Yes, I understand.
17

18 Q. Would it be right to conclude that there was a mindset
19 that hadn't moved on from the earlier mistakes?

20 A. Your Honour, I think the mindset had moved on.
21 I don't believe that the statement now was very well
22 worded, or the phone call was well worded, but most
23 definitely, the welfare of the individual was paramount and
24 I believe that Sharon understood that and most definitely
25 I did.
26

27 Q. But you don't protect the welfare of someone against
28 whom you are making an assertion that there's an allegation
29 against them that needs investigation, do you?

30 A. No, but I guess the way the phone call was intended to
31 be was an advice of a process to examine whether something
32 had actually occurred and this was the initial contact we'd
33 had with the folks involved, so at this point, certainly,
34 there was no intention to make the survivors feel any worse
35 or any - or implicated. It was an advisory call to -
36 effectively, it was going to establish a face to face, more
37 appropriate location for a conversation to be had.
38

39 Q. I appreciate what you were intending to do, but the
40 fact that you used words which were inappropriate, indeed,
41 wrong, would suggest that you perhaps didn't understand
42 what you actually were doing. Do you follow me?

43 A. Yes, I do, and as an unintended outcome, we've
44 contributed to the situation, I understand.
45

46 MR STEWART: Q. I want to show you something in
47 contrast, Mr Banfield. At tab 42A is the email that

1 Matthew McCarthy, [CJE]'s commanding officer, sent to her a
2 couple of weeks later. You will see there he says in the
3 first paragraph from the second sentence:
4

5 *I want to reassure you that you will always*
6 *have my full confidence and support, and*
7 *I am not disappointed in you.*
8

9 And then he goes on in the second paragraph:
10

11 *I understand you blame yourself but you are*
12 *completely blameless and there will be no*
13 *repercussions from the AAFC or from me of*
14 *any kind whatsoever. In time you will come*
15 *to understand he --*
16

17 That is a reference to Adams --
18

19 *is completely responsible for what has*
20 *happened, not you. You are not at fault.*
21

22 You appreciate how that stands in very stark contrast to
23 the words that you and Sharon O'Donnell prepared?
24

25 A. Yes, I do.
26

27 Q. You accept that something along these lines would have
28 been far more appropriate?
29

30 A. Absolutely.
31

32 Q. You would have heard me asking Sharon O'Donnell about
33 the order of phone calls, why it is that [CJE] was called
34 first rather than Adams. Is that something you gave
35 particular consideration to?
36

37 A. No, I did not.
38

39 Q. Because if Adams had - and we know, as it turns out,
40 he didn't - admitted the wrongdoing in the phone call to
41 him then things might have been able to be handled very
42 differently with [CJE]; is that not so?
43

44 A. Yes, they could have.
45

46 Q. Did you give any consideration to how [CJE] should be
47 spoken to, by which I mean by telephone as what occurred or
48 perhaps in a one-on-one meeting?
49

50 A. Yes, absolutely. The welfare of [CJE] was paramount
51 to me and most definitely to Sharon. The preferred
52 communication would have been done face to face. However,
53

1 with the nature of the allegation put forward, we had a
2 desire to progress more quickly, so with our geographic
3 locations in front of us, we made a consideration to
4 conduct the initial communication via phone and that's the
5 nature of the briefing to Sharon O'Donnell and also to
6 ensure that when that phone call was made, to ensure that a
7 welfare person, a support person, ordinarily, who would be
8 the parent, was involved.

9
10 Q. If geography was an issue that suggests that
11 consideration should have been given to appointing someone
12 to do this inquiry who was closer to where [CJE] was?

13 A. At this point the process was a quick assessment, so
14 we hadn't actually moved to what we call an inquiry and the
15 quick assessment process was or is designed to determine
16 whether there's a suitable basis of evidence to progress to
17 a more formal arrangement to which we would then travel and
18 conduct face-to-face interviews where a time attribution
19 would be greater.

20
21 Q. I would like to refer you to [CJE]'s statement,
22 paragraph 63, it is the last paragraph in her statement.
23 I will read it in the meanwhile. It will come up in a
24 moment. The second sentence says:

25
26 *It is not acceptable that an unknown person*
27 *from headquarters calls to talk to parents*
28 *and cadets about sensitive allegations.*
29 *I cannot emphasise the damage this caused*
30 *me. A report of this type should be a face*
31 *to face conversation.*

32
33 I take it it implied there also a face-to-face conversation
34 with someone she knows:

35
36 *There should be effective communication*
37 *about the steps from that point and*
38 *continual communication throughout.*

39
40 What do you say about that?

41 A. I think that's a very reasonable comment.

42
43 Q. We know the outcome of the quick assessment and we
44 looked at the report earlier and O'Donnell found that there
45 was a high likelihood that the incident had occurred.

46 I take it you concurred in that?

47 A. Yes, I did.

1
2 Q. She recommended a full inquiry. I take it you
3 concurred in that?
4 A. Correct.
5
6 Q. She recommended that Adams be suspended pending
7 further inquiries and I take it you supported that as well?
8 A. Yes, I did.
9
10 Q. The following day, as we understood from her evidence,
11 she then also followed up on the question of [CJG]. Was
12 that under your direction as well?
13 A. That's correct. The quick assessment had determined
14 that there was further involvement from other parties.
15
16 Q. And so it was on your direction that that should be
17 followed up as well; is that right?
18 A. In consultation with Wayne Laycock.
19
20 Q. Yes. It was then learnt, I think later that day, when
21 [CJG] phoned back, that Adams had been involved in sexual
22 activity with her as well?
23 A. That's correct.
24
25 Q. At that stage did you consider the question of
26 reporting to the police?
27 A. Yes, I did.
28
29 Q. What exactly did you consider and conclude?
30 A. I had a conversation with Wayne Laycock around the
31 significance of the events and the fact that there was a
32 number of females now involved and that we should
33 absolutely give consideration to our reporting requirements
34 to the NSW Police.
35
36 Q. What came of that?
37 A. I believe that Wayne made that report.
38
39 Q. I can follow that up with Air Commodore Green in due
40 course, because he was involved in that, but it is the case
41 that you were not actually involved then in reporting to
42 the police; is that right?
43 A. No, I did not. I reported up my command chain that
44 I felt that the matter needed to be reported and that was
45 via a phone call. It was a conversation with Wayne Laycock
46 and then he took that action himself via his own means.
47

1 Q. Yes. He also suspended Adams; is that right?
2 A. That's correct.
3
4 Q. And if we take a look at tab 43, I take it that that
5 email came to you, given it has your name across the top
6 and one of the addressees as XOS; is that right?
7 A. That's right.
8
9 Q. That was the email to Adams advising him of his
10 suspension and that you would conduct an investigation with
11 the assistance of Squadron Leader O'Donnell; is that right?
12 A. That's right.
13
14 Q. Then there were also terms of reference to that
15 investigation; is that right?
16 A. That's right.
17
18 Q. I show you tab 46. You will see this is an email from
19 Ken Given to Wayne Laycock. It is in response to the one
20 below that, if we could just go down. Are we to understand
21 this is now Wayne Laycock reporting up the chain now to
22 I think you said he was - what was the right word - the
23 Commander of AAFC?
24 A. Yes, that's right.
25
26 Q. That's Ken Given; is that right?
27 A. That's correct.
28
29 Q. Yes. Then you commenced your formal assessment, as it
30 were. Could we take a look at tab 43A. This is your
31 appointment email from Laycock. You have been appointed to
32 conduct an investigation into an complaint of an
33 inappropriate sexual relationship by Leading Aircraftman
34 Christopher Adams of 308 Squadron:
35
36 *I have attached your terms of reference*
37 *(TOR) for this investigation. SQNLDR(AAFC)*
38 *Sharon O'Donnell ... is to assist you in*
39 *this investigation.*
40
41 Then over the page are the terms of reference. You will
42 see two documents are referenced. Are we to understand
43 that you were to undertake this investigation under the
44 terms of that Interim POLMAN, Part 2, Chapter 7 and 10?
45 A. That's correct.
46
47 Q. Then you will see in paragraph 2 there were two things

1 that you were to investigate to determine whether there was
2 sufficient evidence to support the following issues raised
3 in Reference A. Firstly, did LAC Adams have an
4 inappropriate relationship with Cadet Warrant Officer
5 [CJE], and secondly, did Adams have any other inappropriate
6 relationship with cadets at the January promotion course
7 held at RAAF Wagga Wagga. I take it that (b) was to cover
8 the [CJG] information you had received; is that right?

9 A. That's correct.

10
11 Q. Can I take you to tab 49. Am I understanding this
12 correctly, that this is your note of conversations you had
13 pursuant to this formal assessment or formal investigation
14 you were undertaking?

15 A. Yes, that's correct, they are my records of
16 conversation.

17
18 Q. It sets out who you spoke to. As in the case of
19 O'Donnell, am I right in understanding that this is an
20 abbreviation or precis of these calls?

21 A. That's right. They were my notes that I took at the
22 time I made the calls.

23
24 Q. All right. And then in particular, on the next page,
25 which was still on Monday, 17 June 2013, as I understand
26 it, the last phone call there is 2110 to [CJ0]; that's
27 [CJE]'s mother, is that right?

28 A. Yes, that's correct.

29
30 Q. And it says:

31
32 *(Five minutes) (inbound)*

33
34 I take it she called you; is that right?

35 A. That's correct.

36
37 Q. And you provided advice to her that the matter will be
38 referred to the police. You also checked on the welfare of
39 [CJE]. I take it you stated that there would be no
40 requirement to meet on Friday as until the matter is
41 investigated by the police, you cannot continue with your
42 inquiry:

43
44 *[CJ0] expressed concern that the matter*
45 *will stall in the hands of Police and that*
46 *this might impact [CJE]'s state of mind and*
47 *approach to the HSC. She is worried about*

1 *time lag and no quick result.*

2
3 Are we to understand that it was late on 17 June that you
4 came to know that, one, the matter was referred to the
5 police, and two, that you should not continue with your
6 inquiry?

7 A. Wayne and I had a conversation around that time that
8 he intended to report, so Wayne Laycock, and that once the
9 matter was handed to police, that we were unable to proceed
10 with the matter internally.

11
12 Q. I think it is at tab 58. On the following day, you
13 acknowledge to Laycock receipt of the message and the
14 enclosed instruction to cease further investigation of the
15 matter. You say you've got all the records that are
16 available, and so on; is that right?

17 A. That's correct.

18
19 Q. You say there in the third paragraph:

20
21 *I will continue to maintain contact with*
22 *the parties involved, both complainants and*
23 *respondent, in the interests of ensuring*
24 *their welfare and support networks are in*
25 *place and actively providing assistance to*
26 *those involved.*

27
28 I just want to understand it - none of [CJE], [CJG] or
29 Adams were in squadrons or attached to squadrons within
30 your southern region; is that right?

31 A. That's correct.

32
33 Q. Why is it that you saw yourself or took upon yourself
34 some continuing support role?

35 A. I felt that I had established a rapport with the
36 individuals and their families at that point and that
37 I felt a responsibility to ensure that the welfare of all
38 parties was maintained.

39
40 Q. You were geographically far away from all of them, is
41 that not so?

42 A. Yes, I was, but I conducted my business via phone and
43 I felt that I had a reasonable interpretation of the
44 conversations at the time and if I felt a need to travel
45 then I would have.

46
47 THE CHAIR: Q. Can I understand this then - in your

1 statement you record the fact that on 25 June - this is
2 paragraph 51 - Laycock requested that you encourage [CJE]
3 to report to the police and of course that happened at
4 about that time. And then three days later, as
5 I understand it, you recorded in paragraph 53 that you were
6 instructed by the Director-General to cease any support
7 role with [CJE] and her family.

8 A. That's correct, your Honour.

9
10 Q. Do you know why it was that, having come this far, and
11 [CJE] being encouraged to go to the police, you were being
12 ordered to cease any support?

13 A. No, not directly I don't.

14
15 Q. Did you appreciate at the time that going to the
16 police and then the whole process, the police process, that
17 if there was to be a prosecution, the prosecution would be
18 a very difficult process for [CJE]?

19 A. Absolutely, and Wayne Laycock and I had actually
20 discussed the fact that going to the police would be quite
21 a significant event for the young ladies involved.

22
23 Q. Did you say to Laycock, "This can't be the right time
24 to cease any support"?

25 A. I was under instruction, your Honour, on the 28th to
26 not communicate with [CJE].

27
28 Q. But you weren't told why?

29 A. No. No, I was not.

30
31 Q. Did it trouble you that you were being told not to?

32 A. No. I must say that I was in contact with the other
33 parties involved and I guess I would have had a question at
34 the time, but no, I was aware that Air Commodore Green had
35 appointed a permanent Air Force female staff member to take
36 carriage of welfare and to be honest, I think that was
37 actually a good decision.

38
39 Q. Did you say to the family or to [CJE], "Look, I'm
40 bowing out now, it's going over to someone else"?

41 A. I don't recall. No, I don't recall. I did my best up
42 until that date to maintain a proactive and open dialogue
43 with the family. I did acknowledge that [CJE]'s family
44 were distressed at the speed at which the matter had
45 progressed. It was difficult when we handed the matter to
46 the NSW Police because they had their own processes and
47 timelines to follow and we can't control those and I don't

1 know why several, a couple of days later that I was
2 instructed to stop, no, but, like I say, I was very
3 comfortable that in that same piece of correspondence a
4 female permanent staff member of the Air Force was
5 assigned. I thought that was actually quite appropriate in
6 the circumstances.

7
8 MR STEWART: Q. That was Jacqueline Hatch; is that right?

9 A. That's right.

10
11 Q. She continued in that role for quite some time and
12 then eventually someone else took over from her; is that
13 right?

14 A. I don't know what happened beyond Jac Hatch. I was
15 only involved with her during I guess a handover phase,
16 around 28 June, and then I didn't take any sort of carriage
17 after that.

18
19 Q. Were you aware where she was based physically?

20 A. I understood she was based in Canberra.

21
22 Q. So no better off than you in terms of geographic
23 proximity?

24 A. Proximity, no, but time availability, much better
25 than I.

26
27 Q. Because she was full-time in the Air Force?

28 A. Correct. She was tasked for that role and I was
29 obviously conflicting my time with my daytime job.

30
31 Q. Subsequently, further allegations emerged, by which
32 I mean allegations of Adams and other cadets; is that
33 right?

34 A. Yes, that's correct.

35
36 Q. Could I ask that you be shown tab 67. You will see
37 that this is a document dated 20 June 2013. We will get to
38 the end of it shortly, that's where the date is, but this
39 was, as I understand it, prepared by you as an update to
40 further information that had been provided; is that right?

41 A. That's correct.

42
43 Q. We can see really a summary of that on the second
44 page, paragraph 9, where you write:

45 *In summary the females now named in this*
46 *matter are as follows, I have identified in*
47

1 *the listing how they have been named in*
2 *this matter;*

3
4 *Those whom have provided an admission that*
5 *an incident occurred*

6
7 That is [CJE] at 302 Squadron, [CJG] at 310 Squadron and
8 [CJH] at 308 Squadron, and then:

9
10 *The following cadets were named by [CJS] as*
11 *potentially having inappropriate contact*
12 *with ... [Adams] ...*

13
14 And then three others were named at two different
15 squadrons:

16
17 *Also during the initial call with ... [CJG]*
18 *she identified the female below as someone*
19 *who had inappropriate contact during AAFC*
20 *detachments;*

21
22 And someone else is named. You will see by their birth
23 years, that are still reflected there, that they were all
24 much the same age, born between 1994 and 1996. Do you see
25 that?

26 A. Yes, I do.

27
28 Q. That I take it was of considerable concern to you that
29 it appeared that Adams had been let loose in this way?

30 A. Yes, it was of great concern to me.

31
32 Q. What was the purpose then of this minute?

33 A. The purpose was as per the opening subject line, was
34 to provide my direct superior with advice formally that he
35 could then distribute, as he required, up through Air Force
36 as to the situation as it was on that particular date.

37
38 Q. In paragraph 13, right near the end, you'll see you
39 also express a concern there that the matter has now
40 reached significant proportions. You were concerned about
41 your ability to maintain a suitable level of
42 confidentiality and control of the information:

43
44 *With this matter now fully exposed at*
45 *308 Squadron it will most likely begin to*
46 *circulate the social media network and as*
47 *such more and more people will gain*

1 *knowledge. Based on this we may need to*
2 *seek assistance from Defence as to how best*
3 *to manage potential approaches for*
4 *information from others, be they parents or*
5 *even media as to this matter.*

6
7 To your knowledge what then became of that?

8 A. I don't know what action Mr Laycock took on that
9 paragraph at the time. As it stated, I felt that the
10 people at 308, the staff and cadets at 308 Squadron were
11 involved in a significant event and with social media being
12 so prevalent then and now, I felt that that needed to be
13 addressed and that was why I highlighted in this message
14 acknowledging that it would be forwarded up the command
15 chain.

16
17 Q. And these additional allegations that had come forward
18 and which we saw summarised a moment ago in paragraph 9,
19 were those then passed on to the police?

20 A. I don't know.

21
22 Q. That was above you, was it?

23 A. I don't know whether they were forwarded to police.

24
25 Q. Your investigation, of course, had been suspended by
26 now because the police were investigating the [CJE] and
27 [CJG] matters. Does that mean you didn't investigate these
28 other allegations any further as well?

29 A. No, I did not.

30
31 Q. At tab 87, if you can be shown that, this is now the
32 following day, 21 June, and I understand that you are
33 writing to [CJE]; is that correct?

34 A. Yes, that's correct, yes.

35
36 Q. And you say, "Letter of Introduction and Advice on
37 Commencement of Investigation". One doesn't have to go any
38 further. Do you accept that that's somewhat confusing
39 where you've actually - your investigation, you were
40 appointed some days earlier. It has been suspended because
41 it has been referred to the police, but you write an email
42 saying you're advising on the commencement of an
43 investigation?

44 A. That's very badly worded.

45
46 Q. I suggest it gets worse. Take a look at paragraph 1.
47 You say:

1
2 *This email has been prepared as an*
3 *introduction of myself as the investigating*
4 *officer into your allegation of misconduct*
5 *and unacceptable behaviour of ... Adams.*
6

7 Of course, you make it clear there that the unacceptable
8 behaviour is of Adams, so that's obviously positive:
9

10 *I have been appointed by Officer Commanding*
11 *3 Wing ... per reference A to conduct an*
12 *investigation into this matter.*
13

14 So far you're communicating there's an investigation
15 underway; is that right?

16 A. That's correct.
17

18 Q. Then at paragraph 6 you eventually get to the point:
19

20 *As I explained in my phone call, my role*
21 *during the Police investigation will be to*
22 *monitor your welfare and provide you with*
23 *as much support throughout this process as*
24 *I can. I will also keep you advised ...*
25

26 I beg your pardon, it is in paragraph 4. In the second
27 sentence you say:
28

29 *As this is the case ...*
30

31 In other words, referred to the police:
32

33 *... I cannot make any further inquiries*
34 *relating to the investigation until such*
35 *time as the Police finalise their*
36 *investigation.*
37

38 One of [CJE]'s complaints is, you would have heard, one of
39 confusion, not knowing what's going on. You would accept
40 that this email didn't really help?

41 A. No, not at all. The subject line is entirely
42 misleading.
43

44 Q. The opening paragraph also says, "I am conducting an
45 investigation", and four paragraphs later it says, "I am
46 not going to conduct an investigation any further".
47

47 A. Mmm.

1
2 MR STEWART: I have no further questions, your Honour.
3
4 THE CHAIR: Does anyone else have any questions?
5
6 MR HAMMOND: I have a few.
7
8 THE CHAIR: What do you mean by "a few"?
9
10 MR HAMMOND: Perhaps half a dozen.
11
12 THE CHAIR: Does anyone else have any questions? How long
13 will you be?
14
15 MS THOMPSON: I would think no more than five minutes.
16
17 MR HAMMOND: I would be about the same.
18
19 THE CHAIR: Anyone else? We will complete the witness.
20 Thank you.
21
22 **<EXAMINATION BY MR HAMMOND:**
23
24 MR HAMMOND: Q. Mr Banfield, could I direct you to
25 paragraph 49 of your statement, please. You make a
26 reference there to receiving an email from Mr McCarthy in
27 relation to a report he'd received from [CJF] in relation
28 to gossiping within the wing. Do you recall that?
29 A. Yes, I do.
30
31 Q. I wonder if you could please be directed to tab 116,
32 which is a copy of that email. Could you just scroll down
33 to the bottom email there which is sent from Mr McCarthy.
34 That's an email that's sent on 23 June to you and
35 Mr Laycock and can you see it's carbon copied to [CJF]?
36 A. Yes.
37
38 Q. You would agree that [CJF] was included in this email
39 chain? Could we scroll upwards. Can you see that [CJF] is
40 included in this email chain regarding this concern about
41 gossip within the wing?
42 A. Yes.
43
44 Q. Do you agree that it was appropriate for [CJF] to
45 raise these concerns with her commanding officer?
46 A. Yes, it was.
47

1 Q. I wonder, please, if you could be directed to
2 paragraph 52 of your statement. Three days later, on
3 27 June, you received an email from [CJF]. That email
4 included the same recipients as the email chain we've just
5 had regard to. Do you accept that?
6 A. Yes, I do.
7
8 Q. That was an email from [CJF] regarding her earlier
9 complaint about the gossiping and whether or not anything
10 was going to be done about that. Do you recall that?
11 A. Yes, it was a follow-up email.
12
13 Q. In the four days in between 23 June and 27 June
14 nothing much had happened in relation to that complaint of
15 the gossiping, had it?
16 A. In fact, the matter was handled at the local unit of
17 the person that was involved.
18
19 Q. Handled by whom?
20 A. The commanding officer of that squadron.
21
22 Q. Do you remember speaking to [CJF] directly?
23 A. No, I did not speak to [CJF].
24
25 Q. I wonder if you could be directed to [CJF]'s
26 statement, please, at paragraph 60.
27 A. My apologies. Actually, I believe I may have actually
28 got a phone call from [CJF].
29
30 Q. Do you remember telling her that gossip was a part of
31 life and that you couldn't control it?
32 A. That wasn't the wording that I used. I can understand
33 why that interpretation was drawn, but I explained to [CJF]
34 that social media and the cadet group were actively talking
35 about the matter and it would be difficult for me to in
36 some way stop the conversations that were likely to be had.
37
38 Q. When you received the email on 27 June, you
39 considered, as [CJE]'s support person, it was appropriate
40 for [CJF] to raise that concern with you that in her
41 perception nothing had been done over the previous four
42 days?
43 A. It was reasonable to raise that, yes.
44
45 Q. Do you know if the complaint of this gossiping was
46 ever resolved to the satisfaction of [CJE] or [CJF]?
47 A. No, I don't know whether it was resolved to their

1 satisfaction.

2

3 Q. You never responded to that second email, did you?

4 A. No, I did not.

5

6 Q. As far as you know, Mr Laycock didn't?

7 A. As far as I know.

8

9 MR HAMMOND: Thank you, your Honour.

10

11 THE CHAIR: Q. Was the gossiping against the code of
12 conduct?

13 A. I don't know, your Honour, whether it was against the
14 code of conduct. I think it was young people having active
15 discussions about an issue that was very topical at the
16 time.

17

18 Q. No, no, no, if they were gossiping, let's assume they
19 were gossiping, was that against the code of conduct?

20 A. Yes, it would be construed that it could be, yes.

21

22 Q. And then presumably, when there's a breach of the code
23 of conduct taking place, it is the responsibility of those
24 in command to do something about it?

25 A. Indeed. Indeed.

26

27 Q. Did you do anything about it?

28 A. In this instance, I made a phone call to the
29 commanding officer of the person that was referenced in the
30 complaint and he had dealt with the matter quite
31 appropriately because he had come across the situation as
32 well locally and he'd actually dealt with it around
33 22 June.

34

35 Q. By doing that?

36 A. I understood that he conducted a formal counselling
37 with this particular person.

38

39 THE CHAIR: Yes.

40

41 <EXAMINATION BY MS THOMPSON:

42

43 MS THOMPSON: Q. It is the case, isn't it, that the
44 complaint about the gossiping was first made by [CJE] in
45 July 2013?

46

47 MS McLEOD: Could I ask my learned friend to identify

1 herself?

2

3 MS THOMPSON: Yes.

4

5 Q. My name is Thompson. I appear in the interests of
6 [CJE]. I apologise for not saying that at the beginning.
7 It is the case, is it not, that in late July 2013, you
8 first received a complaint from [CJE] about the gossiping?

9 A. Yes, correct.

10

11 Q. And did you do anything in response to that first
12 notification by [CJE]?

13 A. I was obviously concerned that conversations were
14 being had. Beyond that, I tried to give some reassurance
15 to the person, to [CJE], that we would do our best. I was
16 hopeful that my staffing colleagues would do their best, if
17 they overheard such conversations, to stop them.

18

19 Q. In your statement, at paragraph 54, you state that the
20 final contact you had with [CJE] was an email you received
21 from her on 30 August 2013?

22 A. That's right.

23

24 Q. Was that a follow-up email from [CJE] seeking
25 information about what was being done about her complaint?

26 A. [CJE] had raised a matter with me that I understood or
27 I recall occurred on a camp in July related to a staff
28 member on that particular camp. When that call was made to
29 me by [CJE], I did some preliminary inquiries to the
30 individual that was claimed against. However, at that time
31 I was still under an instruction from the Director-General
32 of Air Force Cadets not to engage with [CJE].

33

34 Q. I just want to take you back to the reasons you gave
35 after the appointment of O'Donnell to conduct the initial
36 assessment. You gave two reasons - and correct me if
37 I haven't put this correctly - (a) that she was female and
38 (b) there was a desire to train up some of the newer staff?

39 A. That's correct.

40

41 Q. Do you think it would have been a good idea, given the
42 seriousness of what was being investigated, that a person
43 who had not received any formal training or had any
44 experience would for her very first investigation be given
45 such a serious matter? Do you think that was reasonable?

46 A. Her instructions and the process was was to conduct an
47 initial assessment to determine whether there was a basis

1 for us to continue on to a more formal inquiry about the
2 allegations, so I believe that she was an appropriate
3 person to conduct an initial series of inquiries as to
4 whether there was suitable evidence to progress the matter
5 more formally.

6
7 Q. I take it from your answer you think it's perfectly
8 acceptable that a person without training or experience for
9 their first investigation is given a matter as serious as
10 this one?

11 A. In hindsight, no. The matter, as we know it now, is
12 very significant and I'm not dismissing at the time it
13 wasn't. However, her briefing was to determine whether we
14 had suitable evidence to progress it any further.

15
16 Q. Wouldn't commonsense tell you that when you're
17 training a person up, you do it in small steps and you
18 start with the more simple matters for investigation until
19 they have some experience and move on to more complex
20 investigations?

21 A. Indeed it would.

22
23 Q. But it didn't happen. Can I ask is the process for
24 this interim assessment for cadets, for a matter involving
25 a cadet, the same for serving ADF personnel? Is it the
26 same process that's followed or is there a different
27 process if you know you're dealing with a cadet?

28 A. I can't comment on ADF processes. I only have
29 visibility of our own and I felt that we followed it as
30 closely as we could.

31
32 Q. You have been asked questions about why it was a cold
33 call made rather than face to face. As I understand it, in
34 retrospect, you now accept that that was not an appropriate
35 course of action to take?

36 A. I accept that.

37
38 Q. Yes. You accept also [CJE]'s evidence that on
39 receiving that call, her reaction was one of shame and
40 embarrassment and caused her great concern about her
41 reputation. She felt it had been ruined and that the
42 subsequent events of the gossip that was being passed
43 around only enhanced those feelings. Do you accept that?

44 A. Yes, I do.

45
46 MS THOMPSON: I have no further questions, your Honour.

47

1 THE CHAIR: Mr Stewart, do you have any questions?
2
3 MR STEWART: I have nothing further, your Honour.
4
5 THE CHAIR: Thank you, Mr Banfield, that concludes your
6 evidence and you're excused.
7
8 THE WITNESS: Thank you, your Honour.
9
10 <THE WITNESS WITHDREW
11
12 THE CHAIR: 10 o'clock in the morning?
13
14 MR STEWART: As your Honour pleases.
15
16 THE CHAIR: We will adjourn until 10.
17
18 **AT 4.10PM THE COMMISSION WAS ADJOURNED TO WEDNESDAY,**
19 **29 JUNE 2016 AT 10.00AM**
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