

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

**Public Hearing - Case Study 40
(Day 196)**

Hearing Room 1, Level 17,
Governor Macquarie Tower
Farrer Place, Sydney Court

On Wednesday, 29 June 2016 at 10am

Before:

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

Counsel Assisting: Mr Angus Stewart SC

1 THE CHAIR: Yes, Mr Stewart?

2

3 MR STEWART: Your Honour, before I call the next witness,
4 Air Commodore Green, I just wish to indicate, primarily for
5 the benefit of my friends at the Bar table, that what
6 I intend after the evidence of Air Commodore Green is to
7 call a witness who has not previously been scheduled to be
8 called, and that is former Wing Commander Watson who in
9 August 2000, at the time of the Eleanore Tibble events, was
10 the Chief of Air Force's representative in Tasmania and the
11 liaison officer between Air Force and the cadets and had
12 involvement in the Eleanore Tibble events. My intention is
13 to call him after Air Commodore Green. In the meanwhile,
14 I then call Dennis Graham Green.

15

16 <DENNIS GRAHAM GREEN, sworn: [10.06am]

17

18 <EXAMINATION BY MR STEWART:

19

20 MR STEWART: Q. Air Commodore, will you state your full
21 names, please?

22 A. Dennis Graham Green.

23

24 Q. Your occupation?

25 A. Air Force Reserve.

26

27 Q. Do you have available to you a copy of your witness
28 statement, prepared for the Royal Commission, dated 16 June
29 2016?

30 A. I do.

31

32 Q. I believe that there are some amendments you wish to
33 make to that statement; is that right?

34 A. Yes.

35

36 Q. The first, as I understand it, is at paragraph 43, and
37 you wish to insert certain words. That paragraph reads
38 "I became aware via a phone conversation some time that
39 day" and you wish to insert "or the next day", is that
40 correct?

41 A. Correct.

42

43 Q. The next amendment is at paragraph 108; is that right?

44 A. Yes.

45

46 Q. In particular, at page 20 of the statement, at the top
47 of page 20 - 108 is a long paragraph. Right at the top of

1 the page, I understand that you wish to delete from where
2 it starts in the middle of the first line, "One of the
3 female cadets", through to the end of that subparagraph; in
4 other words, delete the words:

5
6 *One of the female cadets was a general*
7 *service drill instructor for the Cadet*
8 *Junior Non Commissioned Officer Promotion*
9 *Course. The other female cadet was an*
10 *Instructor on the Cadet Senior*
11 *Non Commissioned Officer Promotion Course.*

12
13 Delete those sentences; is that right?

14 A. That's correct.

15
16 Q. The penultimate change is in paragraph 217, as I
17 understand it, on page 42. You have a date there, "On
18 7 August 2013", that should be 2014; is that correct? Is
19 that the change?

20 A. In paragraph 217 it was to correct the Ringtail
21 references.

22
23 Q. I see, sorry. I'm misreading the handwriting here.
24 So there is a Ringtail reference, the first one in the
25 first line "DEF", et cetera. The last four digits are to
26 be replaced with the digits 0802; is that correct?

27 A. Yes.

28
29 Q. In the next Ringtail reference, which is the first
30 reference in the next line, the last four digits are to be
31 replaced with the digits 1421; is that correct?

32 A. Yes.

33
34 Q. And then at paragraph 239 there's a reference to an
35 annexure, as I read it, "DI" and that should be "DJ"; is
36 that correct?

37 A. Yes.

38
39 Q. Subject to those corrections, do you confirm the
40 statement is true and correct?

41 A. Yes.

42
43 Q. As I understand it, you are presently an air commodore
44 in the Royal Australian Air Force Reserve; is that correct?

45 A. Yes.

46
47 Q. You're also currently an officer of cadets in the

1 Australian Air Force Cadets with the rank of flight
2 lieutenant; is that right?

3 A. Yes.

4

5 Q. As a member of the RAAF Reserve, you were appointed
6 Director-General, Cadets, Air Force for the period 30 June
7 2011 to 16 February 2014; is that right?

8 A. Yes.

9

10 Q. That position is responsible, through the Deputy Chief
11 of Air Force to the Chief of Air Force for administering
12 AAFC across Australia; is that correct?

13 A. Yes.

14

15 Q. I understand also that you retired after 38 years'
16 service in the permanent full-time Air Force on 31 March
17 2011; is that right?

18 A. Yes.

19

20 Q. You have been a member of the RAAF Reserve from
21 1 April 2011 to the present?

22 A. Yes.

23

24 Q. I would like to refer you to paragraph 21 of your
25 statement, which will be brought up on the screen. It is
26 at page 3. You say there:

27

28 *As Director-General Cadets-Air Force*
29 *2011-2014 ...*

30

31 That would have been starting in --

32 A. Excuse me, counsel, the screen here is not working.

33

34 Q. That's no good at all. That will be fixed presently.

35 A. Thank you.

36

37 Q. If you find it easier to refer, in any event, to the
38 hard copy statement that you have before you, that's also
39 fine. You say there that as Director-General of Cadets Air
40 Force you became aware that the training of executives in
41 the AAFC was deficient in that there was a mountain of
42 policy which most staff did not have the time, or take the
43 time, to read. You go on and make a few further points in
44 the next sentence and then in the final sentence you say:

45

46 *The cases which were reaching my desk could*
47 *often be characterised by a lack of*

1 *procedural fairness, and failure to follow*
2 *the promulgated policies.*

3
4 From that, I understand, you decided things had to change;
5 is that right?

6 A. Yes.

7
8 Q. And briefly put, what is it that you sought to do to
9 change that?

10 A. I had an ex-Air Force wing commander who was wing
11 commander of the Air Force Reserve and a wing commander in
12 the Air Force Cadets - I rang him and asked him to prepare
13 a training package for executives in the organisation which
14 would bring their skills up to the required standard.

15
16 Q. And then I take it steps were taken to deliver that
17 training package around the country?

18 A. Yes. The training package ended up being four modules
19 which AAFC staff could do in their own time, the first
20 three, electronically, and the last one was a residential
21 program which was run by that wing commander who had
22 designed the course and I attended three of those as an
23 observer/assistant facilitator/guidance mentor.

24
25 Q. Whilst, of course, you ended your term as
26 Director-General Cadets-Air Force in February of 2014, more
27 than two years ago now, you've continued to be involved in
28 the AAFC itself; is that right?

29 A. Yes.

30
31 Q. And at what level has your involvement continued?

32 A. I was just a staff member, a flight lieutenant in the
33 AAFC working inside a squadron.

34
35 Q. So at your local squadron, effectively?

36 A. Yes.

37
38 Q. In that position you have access, I take it, to the
39 current policies and procedures that govern the AAFC?

40 A. Yes, and particularly implementation.

41
42 Q. You're aware, I take it, that there are policy
43 documents that are set at the level of the Australian
44 Defence Force Cadets across all three service
45 organisations?

46 A. Yes.

47

1 Q. And you're aware also that within the AAFC there are,
2 if I can use this word, replica policies specific for the
3 organisation?

4 A. No, they're not replica.
5

6 Q. You've picked me out on my use of the word. What word
7 would you use, or words?

8 A. They're implementation policies. The Defence Force
9 policy is Canberra-centric. It is a direction to the
10 people in Canberra. While it has application to the AAFC
11 staff, there's very little in those documents that they
12 could actually use to apply. The key elements of it that
13 they need to use to apply are included in the Air Force
14 Manual of Management, Air Force Cadet Manual of Management.
15

16 Q. There is an Air Force Cadet Manual of Management and
17 there's also a YOUTHPOLMAN which is in the process of
18 development but certain chapters of it have been completed
19 and apply; is that right?

20 A. Yes, but, again, there's - if you're a teenager and
21 you read the Youth Policy Manual you would close it
22 instantly, because it isn't teenager friendly. That's why
23 we've got the Manual of Management.
24

25 Q. Would the same judgment not apply with respect to the
26 Manual of Management?

27 A. It's used more regularly than the Youth Policy Manual.
28

29 Q. Hardly friendly to anyone except possibly lawyers with
30 a particular fine eye for subclauses?

31 A. I think you'll find it's a much more practical
32 document and it has with it standing instructions which a
33 AAFC staff member can pick up and use. It has typically
34 got checklists and "to do" guidance.
35

36 Q. It is the position, isn't it, just to take one
37 example, that there's an ADFC behaviour policy as well as
38 an AAFC behaviour policy; is that right?

39 A. They've got different titles, the effect of them is
40 identical.
41

42 Q. What I'm suggesting to you is whilst things, I grant
43 you, have improved since you instituted what you instituted
44 that you referred to in paragraph 21, it is still the case,
45 isn't it, that there's a mountain of policy which most
46 people don't have the time or take the time to read, would
47 you agree with that?

1 A. There is a mountain of policy in Defence.

2

3 Q. And it is pretty impenetrable, isn't it?

4 A. The Manual of Management is designed as an e-document
5 and every clause has a link with the reference words, so if
6 any member wants to look up the meaning of a particular
7 section, they can get it instantly. So it's designed to be
8 user friendly by someone who is an infrequent user. The
9 intent is that we don't expect that people will be sitting
10 there avidly reading it; we expect that when they have an
11 issue, that they will go to that document and read the
12 applicable section.

13

14 Q. If I'm an infrequent user and I use the Manual of
15 Management in the way in which you've indicated, how am
16 I to understand the role that the YOUTHPOLMAN plays
17 relevant to what I'm reading in the Manual of Management?

18 A. For a AAFC staff member they don't need to know that.
19 The Director-General of Air Force Cadets puts all the
20 applicable information that they need to use in the
21 document for the AAFC.

22

23 Q. Do they know that they don't need to know the
24 YOUTHPOLMAN?

25 A. I think most of the AAFC staff have probably never
26 heard of the YOUTHPOLMAN.

27

28 Q. In paragraph 24 you say that:

29

30 *While a participant in the Executive*
31 *Development Program in 2014, I was invited*
32 *by the facilitator to lead an impromptu*
33 *discussion about the handling of*
34 *inappropriate relationships by AAFC staff*
35 *members with cadets.*

36

37 You say you drew examples from your experience as
38 Director-General Cadets-Air Force and built on the lessons
39 from the tragedy of AAFC Cadet Sergeant Ellie Tibble.

40

41 Firstly, before I get to Ellie Tibble, what are the
42 examples that you drew on, the examples of your experience
43 that you drew on, on the question of handling of
44 inappropriate relationships by AAFC staff and cadets?

45 A. I began the scenario with the simple statement, "A
46 cadet has walked in to you and said, 'Can I have a word
47 with you?' and the cadet then divulges that they've had a

1 sexual relationship with a member of staff. What are your
2 actions?" So that's the starting point of the scenario.

3
4 Q. Is that scenario one that you drew from your
5 experience as Director-General Cadets? In other words, you
6 had had to deal with a scenario like that?

7 A. I considered, from having been Director-General
8 Cadets, that the AAFC executives needed to understand the
9 thought pattern and logic and how to act in that situation.
10 There was a deficiency in their knowledge.

11
12 THE CHAIR: Q. Do you expect that many of these young
13 people would actually come in and say that, as opposed to
14 finding out by some rumour or other means?

15 A. It really didn't vary with the scenario, it's how they
16 found out, and the key part on that first instance is that
17 because people jump to solutioneering, your Honour, the
18 intent is for them to stop right upfront and say, "Does
19 that young person have a support person in the room?", and
20 then you move from there. Now, how the information comes,
21 whether it is secondhand, thirdhand - but we have had that
22 sort of instance happen.

23
24 Q. There is a big difference between someone coming to
25 you and saying, "I've had a sexual relationship" and one of
26 your people, for the first time, meeting with a person who
27 may have had a sexual relationship in order to understand
28 whether that was the case?

29 A. Absolutely, your Honour.

30
31 Q. Do you deal with both scenarios in your --

32 A. I didn't in this instance.

33
34 Q. In fact, the second one is the more likely one, isn't
35 it?

36 A. Sorry, could you repeat --

37
38 Q. The second one is more likely, when the person doesn't
39 come to you and say, "I've had a relationship"?

40 A. The intent is for this discussion to lead to what do
41 you do with that. So the starting point - I think we would
42 probably cross over during the activity of discussing the
43 scenario of the things that you want to bring out, your
44 Honour.

45
46 Q. The very first question you ask is important when a
47 third party has brought the information to you, rather than

1 the individual, isn't it?
2 A. Yes. The scenario that I was posing was to just start
3 with getting them to check that they've got support and
4 emphasising the importance of support from the outset.

5
6 MR STEWART: Q. Air Commodore, you reference also the
7 Ellie Tibble tragedy. What are the lessons you draw from
8 that, the lessons for the AAFC?

9 A. The most important one is clearly that the cadet is
10 not in the wrong. The next part of it is that it is really
11 important to provide demonstrable ongoing support for all
12 the parties that are involved in the activity.

13
14 Q. Any other lessons that come to mind to you out of that
15 tragedy?

16 A. Well, clearly, for me, also, there's a requirement to
17 make sure that the parents are involved at the outset -
18 parent or guardian.

19
20 Q. Would you agree another one might be to move quickly?
21 A. Oh, yes.

22
23 Q. Yes. Any others?
24 A. They're the key ones that come to mind.

25
26 Q. Going back to your paragraph 24, having spoken about
27 the experience you drew on, you say:

28
29 *I was very surprised about the initial*
30 *reactions of a number of AAFC course*
31 *participants to my scenario where a cadet*
32 *reported to them about an inappropriate*
33 *relationship with a staff member.*

34
35 Then critically, you say:

36
37 *Their proposed actions included action*
38 *against the cadet for a Code of Conduct*
39 *violation.*

40
41 As you've said, that was one of the key problems in the
42 Tibble case, wasn't it?

43 A. That was - I was surprised that staff even had that
44 thought in their head.

45
46 Q. It is now some 11 or more years later, you found that
47 staff were still responding in that way?

1 A. Yes.

2

3 Q. You identify, as I understand it, that that's clearly
4 wrong?

5 A. Yes.

6

7 Q. And that the anti-fraternisation or no fraternisation
8 rule, if I can refer to it as that, is directed to protect
9 the cadets; is that right?

10 A. Absolutely.

11

12 Q. So if this was a common response in the organisation
13 in that period you're talking about - in fact, you're
14 talking about the executive development program in 2014,
15 that's just two years ago - what has been done to fix that?

16 A. I subsequently talked directly with all of the AAFC
17 senior leadership team and let them know about that, so
18 that they could be informed and act on it, and the
19 facilitator now includes that - that course is compulsory
20 for appointments for all people in the AAFC going into
21 senior appointments and he now includes the scenario and
22 that discussion to get across that emphatic view that the
23 cadet is not in the wrong.

24

25 Q. Do you subscribe to the view that the policies and
26 materials made available in the organisation to cadets and
27 instructors and officers should make that clear?

28 A. Absolutely. The key part is training and that's where
29 we're delivering and getting that message through to every
30 appointee so they understand the message.

31

32 Q. The point that I'm making goes slightly further, it is
33 that it must be clear in the documents, not just in the
34 training that's delivered orally?

35 A. Yes.

36

37 Q. In paragraph 32 of your statement - you refer to some
38 training that you undertook in 2014 in the previous
39 paragraphs and you say:

40

41 *My recollection is that none of the above*
42 *training I received related to special care*
43 *provisions applicable to Officers and*
44 *Instructors of cadets. None of the*
45 *training I received related to criminal*
46 *sanctions applicable to persons involved in*
47 *child sexual abuse. I do not recall any of*

1 *the above training I received preparing me*
2 *for how to deal with reports of allegations*
3 *about child sexual abuse.*
4

5 I take it that those matters that you identify as having
6 not been present you identify also as deficiencies in the
7 training; is that right?

8 A. Yes.

9
10 Q. Did you pass that on or do anything to pass on your
11 insight and ensure that those deficiencies are addressed?

12 A. Those deficiencies I've identified in the writing of
13 this document.

14
15 Q. The writing of, sorry, which document?

16 A. This statement.

17
18 Q. This statement. Yes, I see. In the preparation of
19 this statement you've identified in your own mind these
20 deficiencies?

21 A. Yes.

22
23 Q. Yes. So, to your knowledge, they haven't yet been
24 fixed?

25 A. I'm not aware of it.

26
27 Q. I show you tab 36 of the bundle. It should come up on
28 your screen. In particular, the middle email there is an
29 email from Ken Given and it's to you and a Group Captain
30 Murray Spittle and copied to some other people. I'll
31 clarify at the outset who these individuals are. What was
32 Ken Given's role at that time?

33 A. Ken Given was the operational commander of the AAFC.

34
35 Q. So he had, as it were, a parallel position to yours;
36 is that right?

37 A. No, he is responsible for all of the AAFC day-to-day
38 operations and activities.

39
40 Q. Yes, and you, as Director-General, at that time had,
41 as I understand it - correct me if I am wrong - a parallel
42 responsibility but for different things, to do with the
43 administration and so on?

44 A. I'm in the administer area; he's in the area of
45 dealing with all of the AAFC activities and their command
46 chain. So they're very much self-contained for most of
47 their activities.

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Q. Yes. Group Captain Murray Spittle - who was he?

A. He was my deputy.

Q. The Deputy Director-General. On 29 May 2013, was this your first notification of the Chris Adams saga?

A. Yes, it is.

Q. Through this "hot issues brief" that's referred to in this email?

A. Yes.

Q. Is that right?

A. Yes.

Q. If one has a look then at the email further down, which is the one that was being forwarded, you'll see it is from Wayne Laycock, he was the commanding officer at the relevant squadron. You will be familiar with what was reported there with regard to [CJQ] having said that there had been a sexual relationship between [CJE] and Chris Adams. In particular, you will see that it is identified that [CJE] was 17 years old. Do you see that?

A. Yes.

Q. That's at the top of the next page, if we could just scroll slightly further. On receiving this hot issues brief, what did you consider your role and responsibility was in relation to this matter?

A. There are a couple of aspects. Immediately, once I got the email and read it, I responded later that day with the email at the top of page 1 of that document, and my response was,

As the cadet is under 18 the parent(s) of cadet will be become involved.

Q. I am sorry to interrupt you for a second. Could we just be shown the first email in the chain. Yes, there it is. Continue, please?

A. And:

If not already appointed, a staff support person should be appointed to provide demonstrable ongoing support to the cadet. We must not repeat Tibble.

1 After the parents have been involved please
2 advise their response asap so that I can
3 keep [Air Force Headquarters] informed.
4

5 Q. We see your response there but just going back to my
6 question: as Director-General what did you perceive your
7 powers and/or responsibility to be in relation to this
8 matter?

9 A. The AAFC processes at that point were that they
10 commenced an initial assessment report, and that was
11 entirely appropriate to commence, and my responsibility was
12 to pass information to the office of Air Force Headquarters
13 and Deputy Chief and Chief of Air Force and ensure that
14 they were informed that we had that report.
15

16 Q. When you say in this email "We must not repeat
17 Tibble", of course in a sense in the email you identify two
18 points that you say arise out of Tibble: one is that the
19 parents must be involved; and the other one is that there
20 must be ongoing demonstrable, as you've put it, support; is
21 that right?

22 A. Yes.
23

24 Q. You don't identify in this email at all the first
25 point, the first lesson you identified as having emerged
26 from the Tibble matter, which is that the cadet is not to
27 blame?

28 A. No, I didn't.
29

30 Q. You heard the evidence yesterday, I take it, from
31 Ms O'Donnell and Mr Banfield with regard to how they
32 handled the quick assessment. Did you hear that?

33 A. Yes.
34

35 Q. You would have heard what Ms O'Donnell said in her
36 telephone conversation to [CJE]?

37 A. Yes.
38

39 Q. Is it not the case that if you had made that point
40 clear at this stage, which is to say if you'd made it clear
41 that the cadet must not be put in a position where she
42 might feel that she's to blame, things might have been
43 handled differently in the quick assessment?

44 A. With hindsight, that would have been a great thing to
45 have put in there. To me that was an assumption. It would
46 have been really good to have put that assumption in that
47 email.

1
2 Q. Because this email, of course - underpinning it is the
3 assumption that someone is going to talk to [CJE]; is that
4 not so?
5 A. Say again?
6
7 Q. There's an underlying assumption in this email that
8 there's going to be some sort of process whereby someone
9 from the organisation will speak to [CJE]?
10 A. Yes.
11
12 Q. And that's why you say "make sure the parents are
13 involved and ensure there's ongoing support"; is that
14 right?
15 A. Yes.
16
17 Q. But that's consistent also with a process which seeks
18 in some way to put blame on [CJE]?
19 A. I certainly didn't have any intent of putting blame on
20 [CJE] or anyone else at that particular point. It's a
21 clear part of the training that the executives undergo at
22 the wing commander level, for Wing Commander Laycock, and
23 he should have been under no illusion that the cadet was
24 not to blame.
25
26 Q. This is, of course, in 2013, which is the year before
27 the training experience you spoke about a little earlier
28 where you found that many of the people involved in the
29 training responded in a way indicating they would take
30 action against or blame the cadet?
31 A. Yes. I would classify it - they're a different level
32 of people, different experience level. The people
33 undergoing that course were more junior. Laycock certainly
34 knew that the cadet was not to blame.
35
36 Q. Yes, that was his evidence yesterday. At this stage,
37 do you give any consideration to whether a criminal offence
38 had been committed?
39 A. No.
40
41 Q. Or as to whether the police should be informed?
42 A. No.
43
44 Q. Could I take you back to your statement at
45 paragraphs 44 and 45, at the foot of page 5. You say there
46 with reference to this time period we're referring to:
47

1 My view at the time was that it was
2 entirely appropriate to conduct an IAR at
3 the lowest appropriate level [being 3 Wing
4 Headquarters] to determine if the
5 third party allegation had some basis.
6

7 You go on to say:

8
9 No AAFC Investigator Officer has authority
10 to compel AAFC members to make a response
11 to any questions.
12

13 And so on. I'll perhaps come to some of those other
14 aspects. Do you still have the view that that was the
15 appropriate level at which the IAR should be handled?
16 A. There's two parts to that. The investigation of
17 incidents should be done at the lowest possible level.
18 There's clearly some learning to be done out of all of
19 these incidents, and for the AAFC - they are volunteers,
20 they're mums and dads that come along and work three hours
21 a week. They're not full-time staff members. We expect
22 professional standards from them. We hold them to account
23 as guardians or looking after the children of others.
24

25 After this event, and having heard the testimony here,
26 it's very clear to me that there needs to be improvement in
27 standard investigations in the AAFC. That's the first
28 thing. The second aspect of it is that in most wings, or
29 let's go back to the squadron level, where you meet on a
30 weekly basis, where something comes up: most people at a
31 squadron level will never, ever hear of - have a personal
32 experience of a cadet in this situation. Some of the wings
33 in Australia - and a wing is located basically in each
34 State - some of the wings have never ever had a reportable
35 sexual offence type thing, so their experience level is
36 going to be really, really low.
37

38 From the experience here this week, it's clear to me
39 that we need to have - when this sort of thing comes up,
40 you need specialists. We can't expect people who are doing
41 three hours a week to get the required training, knowledge
42 and experience to deal with sexual abuse cases.
43

44 Q. There are competing imperatives, aren't there: on the
45 one hand you need people who can deal with it with
46 professionalism and who have specialist skills and
47 experience; and on the other hand, you want the person who

1 is interviewing a vulnerable cadet to be someone whom they
2 know and have had some experience of. Would that be right?
3 A. And that's why the - from Air Force, we don't get
4 involved in the cadet investigations because the adult
5 staff in the AAFC are used to dealing with teenagers. For
6 me in my Defence role, except for the AAFC, I've not been
7 involved in dealing with teenagers and providing support
8 and also dealing with parents. So the AAFC have that as a
9 core activity, that they routinely deal with teenagers and
10 their parents.

11
12 So for the majority of incidents, they are well
13 equipped to deal with those. But for this sort of thing
14 it's very clear that even if we had a training course, the
15 frequency and use of their knowledge would be so infrequent
16 that it would be wasted. We need to have specialists that
17 provide that assistance from an Air Force capacity: that's
18 my personal view.

19
20 Q. Moving on a bit, of course, you were aware that Adams
21 was himself a member of RAAF; is that right?

22 A. Yes. There are probably only, of all of AAFC staff,
23 1500 of them, there's probably under 100 that are also in
24 the Air Force or Navy or Army.

25
26 Q. Is that a guess or are you, in your mind, referencing
27 some figures you've actually seen?

28 A. They are the order of accuracy I recall from when I
29 was the Director-General. That figure might be different
30 now, but it's a low number of people that work in the Air
31 Force Cadets that are also in one of the services or in one
32 of the reserves. The majority of staff are civilians, mums
33 and dads.

34
35 Q. When an allegation is made, such as in this case, and
36 the alleged wrongdoer is an employee and full-time serving
37 member of RAAF, that raises special issues because of the
38 interrelationship between the AAFC and the Air Force. What
39 should have been done about that - in other words, about
40 his employment, the position of his employment in the
41 service?

42 A. There are two aspects of that. For the Air Force side
43 of things, it's like he had - any other AAFC staffer is
44 employed by someone, and so for the normal AAFC staff
45 member what they do in their other employment is not an
46 issue. For us, because Adams was in the Air Force, his
47 suspension prohibited him, as a AAFC member, having any

1 interaction with cadets or any cadet activities. So that
2 was done by Laycock, and it didn't matter where he worked,
3 he had no further interaction with cadets or cadet
4 activities. The fact that he was in the Air Force was
5 incidental.
6

7 In terms of Adams' Air Force work, we don't work a
8 double jeopardy system, so we have to allow due process to
9 go through. I notified Adams' commanding officer of the
10 issue and once I knew that the allegation had some basis,
11 I called Squadron Leader King, who was the acting
12 commanding officer, and notified her, only so that she
13 would be aware that there was an investigation on, and for
14 the welfare of Adams, not for her to take any action at
15 that stage because it's purely an allegation that's going
16 to be investigated, and I notified her that it had been
17 passed to the police.
18

19 Q. Leaving aside the question of punitive action, a
20 slightly different issue arises, though, for the Air Force
21 as employer, and that's the question of child safety within
22 the circumstances of his employment?

23 A. He would not, as a normal course of his action, be
24 dealing with teenagers. He had an immediate prohibition on
25 dealing with AAFC staff members.
26

27 Q. But, leaving the particular circumstances of Adams
28 aside, the circumstances of his employment, I take it you
29 would expect that the commanding officer of someone in the
30 Air Force who is subject to these allegations would at
31 least apply their mind to the question of child safety
32 within the circumstances of his responsibilities and
33 service?

34 A. His normal role is a fireman and he doesn't deal - his
35 normal role isn't dealing with teenagers.
36

37 Q. But the question I'm asking is: you would expect his
38 commanding officer to apply his or her mind to that
39 question?

40 A. Yes.
41

42 Q. What his role is and is there any child safety issue
43 that arises in relation to that?

44 A. Yes, and subsequent to all of this, there has been a
45 VCDF directive relating to child sex which would have
46 application in this situation.
47

1 Q. It wasn't until some time later that the question of
2 reporting to the police was raised. Do you recall that?

3 A. Yes, after we had confirmation of the incident, that
4 there was a basis to the allegation, Adams was suspended by
5 Laycock and that next day the issue of him being 17 and
6 reporting to police was raised.

7

8 Q. Of her being 17. You said "of him being 17". Of her
9 being 17, I take it you mean?

10 A. Pardon?

11

12 Q. You said "the issue of him being 17 and reporting to
13 the police was raised". I take it you meant to say "the
14 issue of her being 17" - he was in his 20s?

15 A. Oh, yes. Yes.

16

17 Q. Can we look at tab 50, the email in the middle of the
18 page, the first page as it comes up. You don't have to
19 look at the chain. The chain beneath that is what you've
20 just referred to with Laycock raising the question of
21 reporting to the police. But that's you on 17 June, as
22 I take it, to Daryll Topp saying that this incident should
23 be referred to the civil police for further investigation.
24 I beg your pardon, that's Daryll Topp to you, and you
25 agreed with that, as I understand it?

26 A. Yes. There was an intermediate email that you've
27 skipped over where he was provided information to report -
28 first to report to me that there was a hot issue brief and
29 the details of the outcome of the incident, the initial
30 assessment report. In it, Laycock had raised the question
31 that he recalled the legislation, and the application of
32 that - in his email he posed the question as to whether it
33 would have application in this instance.

34

35 Q. In fact, the email where you support it is the top
36 email, you say:

37

38 *Based on AFHQ legal advice below you should*
39 *refer the Adams matter to NSW Police.*

40

41 That was the position you took?

42 A. Yes. As soon as I got that email - I was only a cc to
43 the email - I immediately referred it to Topp on my staff.
44 That was I think a Monday morning, and referred to Topp in
45 the morning saying that I wanted to talk to Commander Given
46 later that day and legal advice was sought and given and
47 the legal advice was not emphatic, but the recommendation

1 was that it should be referred to the police for a
2 decision. And so I sent the email at the top of that page
3 to them at that stage, which was a direction that the
4 investigation was to cease and the matter was to go to the
5 police.

6
7 Q. I take it you heard one of the criticisms that was
8 made by [CJE] - that's the young woman involved in the
9 first of the incidents that came to light - that the
10 process was confusing as to what was happening in the cadet
11 investigation, police investigation and so on. Did you
12 hear her evidence about that?

13 A. I don't recall that specifically, but, you know, go
14 ahead.

15
16 Q. Of course in your own mind, I suppose, it was quite
17 clear: there was a quick assessment, then there was a
18 decision on a full investigation; almost at the same time
19 or very shortly thereafter there was a decision that it
20 should be referred to the police and that full
21 investigation should cease; is that right?

22 A. Yes. The email came - was issued by Laycock to Given
23 on the Sunday; it came to me on the Monday morning, and
24 that email there is later that day, one o'clock, to cease
25 the investigation. So it was hours.

26
27 Q. So once the investigation was ceased, how did you see
28 it? Was it continuing in any form at all?

29 A. Not at all.

30
31 Q. And the role of Squadron Leader Banfield, whom you had
32 appointed to investigate and then ceased the investigation,
33 what was his role?

34 A. I didn't appoint him. Laycock appointed him. Laycock
35 had appointed Banfield to do the investigation.

36
37 Q. I'll come to that in a minute. That may raise another
38 confusion.

39 A. Yes.

40
41 Q. So what was his role, in any event, once it was
42 ceased?

43 A. At that particular point Laycock assigned him as the
44 primary support person.

45
46 Q. I would like to take you to tab 96. This is an email
47 from you, I take it, to Wayne Laycock. It is a draft,

1 actually. Is it intended to be a draft to be sent by
2 Laycock to Mrs [CJ0], that's [CJE]'s mother?

3 A. To give your Honour the scenario of what was happening
4 here, [CJ0] had rung through to Air Force Headquarters and
5 made a complaint to the director coordination about a
6 number of issues, and so in response to that, I consulted
7 on how we should best proceed and I prepared a draft script
8 for Laycock to use in making a telephone call that day with
9 [CJ0]. So that's what this represents here.

10
11 Q. You will see the point that I'm getting at. It is in
12 the third paragraph. It says:

13
14 *I appointed Squadron Leader --*

15
16 That's obviously Laycock intended to be the speaker there?

17 A. Yes.

18
19 Q. --

20
21 *Darren Banfield to lead the Investigation*
22 *process and I understand he has been in*
23 *regular contact with you and your daughter.*

24
25 A. Yes.

26
27 Q. But, of course, at this stage there was no
28 investigation process and he has been in contact with [CJ0]
29 and [CJE] not as investigator but as support person
30 appointed by Laycock?

31 A. Yes, he's the support person at this point.

32
33 Q. So do you see the difficulty of the confusion that
34 arises when [CJ0] and or [CJE] are advised of this, as to
35 whether there is an investigation or isn't an
36 investigation?

37 A. I didn't see the confusion. In my mind it was very
38 clear that the investigation had ceased and Banfield was in
39 a support role.

40
41 Q. I accept, as I said earlier, that it is clear in your
42 mind, and it is clear when we look at the documents that
43 that would have been clear in your mind and others who were
44 party to those decisions, but here what we're looking at is
45 a script that you approved of what was to be said to
46 Mr [CJ0], and it includes that Squadron Leader Darren
47 Banfield has been appointed to lead the investigation

1 process, and continuing the same sentence:

2

3 *... and I understand he has been in regular*
4 *contact with you and your daughter.*

5

6 That suggests that there's an ongoing investigation?

7 A. I accept that that could cause confusion.

8

9 Q. It is true, of course, that much further down in the
10 script it says that the investigation has been suspended,
11 but you would accept that there's still real potential for
12 confusion in the minds of people who don't know the process
13 and who are also in the heat of it, suffering some emotion
14 and possibly trauma?

15 A. Certainly. I would hope that they get the clear
16 message later on in that document that the investigation
17 has been passed to the police and the AAFC investigation
18 has ceased.

19

20 Q. Moving on a bit in time, you then became involved in
21 really pushing the police to act, because their
22 investigation was taking some time; is that right?

23 A. It wasn't just taking some time. When I talked with
24 the police, they advised me that they would not be taking
25 any action, and that was on the basis that a consensual
26 relationship had been alleged to occur between a
27 23-year-old and a 17-year-old, and they were basically not
28 interested in proceeding.

29

30 Q. So to paraphrase it, in a sense, they didn't, at that
31 stage, see that this was within the special care
32 provisions - in other words, that the relationship between
33 Adams and [CJE] was one that was caught by that provision
34 in the Criminal Code?

35 A. To my knowledge, this was actually a precedent setting
36 case of special care. Special care is very straightforward
37 in the school environment. For a volunteer organisation
38 outside the school environment, this was not very clear at
39 all, and that started right from Laycock's first email
40 about the application of this where [CJE] was a member of
41 directing staff on the promotion course, where the
42 relationship had occurred, and from the police perspective,
43 a consensual relationship between two young people - they
44 were not at all interested and, you're right, I was
45 emphatic in trying to push them and give them all the
46 information I could that we wanted Adams to be charged.

47

1 Q. There's a lot of correspondence and documentation
2 dealing with that issue and it speaks for itself. I'm not
3 going to take you through it. I will pick up one or two
4 aspects of it. Could I show you tab 132. You will see
5 that this is an email in July 2013 from you to Group
6 Captain Barbara Courtney and Wing Commander Catherine
7 Wallis, and it is copied to your deputy and also to
8 Squadron Leader Jacqueline Hatch, who was [CJE]'s support
9 contact at that time. Can you just inform us what roles
10 were Barbara Courtney and Catherine Wallis performing?

11 A. Barbara Courtney was the Director Coordination Air
12 Force in Air Force Headquarters, so she was the conduit of
13 all the information on major issues and management of the
14 Air Force Headquarters into the Deputy Chief and Chief of
15 Air Force. Then Wing Commander Catherine Wallis was the
16 Air Force Headquarters legal officer.

17
18 Q. You set out in the background what the police have
19 informed you and essentially, in a lot more detail, what is
20 the back story to what you precised for us a few moments
21 ago in your evidence. I would like to take you to a
22 slightly different aspect of it on the second page under
23 the heading "Way ahead". Do you see you identify two
24 options, two possibilities really. One is that the police
25 proceed to build a case for DPP consideration, no action
26 required by AAFC or Air Force at this time; then the other
27 option is that police decide to take no action.

28
29 Focusing then on that option, you say if there's no
30 further information provided to police they may not
31 proceed. Then you say:

32
33 *The AAFC will complete its investigation*
34 *process which is currently on hold ...*
35

36 From that I understand that Banfield's investigation would
37 then be reinstated and would have to continue; is that
38 right?

39 A. Yes. The intent was that if the police decided they
40 would not act, which was, in that early stage, likely, that
41 we would then re-launch our investigation.

42
43 Q. And that would be then to consider or, as you put it,
44 show cause for termination from the AAFC for Adams; is that
45 right?

46 A. Yes. We would go through a due process and end up
47 with a show cause for termination.

1
2 Q. And then at the foot of the page, under the heading
3 "Further considerations", you come back to the point we
4 discussed a moment ago, which is under point 2, you say:

5
6 *Defence consider action against LAC Adams.*
7 *This is a unique situation where*
8 *Christopher Adams is a member of the AAFC*
9 *and the RAAF. If NSW Police do not*
10 *proceed, it will be possible to portray*
11 *Air Force as a safe harbour for people*
12 *committing the alleged actions of LAC Adams*
13 *if there is no action taken by Air Force.*

14
15 Over the page you say:

16
17 *I therefore recommend [Air Force*
18 *Headquarters] legal staff provide advice*
19 *about any action which might be taken*
20 *against LAC Adams ...*

21
22 and so on. Clearly, you saw that as an important aspect to
23 pursue?

24 A. Absolutely. I wanted him out of the Air Force.

25
26 Q. So it wasn't just a case of another employer - if he
27 had been employed at a bank, or whatever - that it was
28 beyond your interest?

29 A. Sorry? Say that again?

30
31 Q. The fact that he was employed by the Air Force meant
32 that it was of special interest to you. It is not as
33 though he had some other outside employment?

34 A. Yes. His behaviour was untenable for the Air Force as
35 well as untenable for the AAFC. Therefore, Air Force
36 action - we were waiting for the court process to proceed.

37
38 Q. Am I to understand - perhaps it is best done in this
39 way. Can I take you to tab 169?

40 A. You've skipped past my letter to the Wagga Wagga
41 police, which actually is quite informative in this area.
42 That's document 977, Ringtail number.

43
44 Q. Air commodore, I've skip probably 50 documents because
45 if I went to them all we would be here for weeks and weeks.

46 A. Okay. In that document I point out that we were very
47 limited on what we could do under the Defence Force

1 Disciplinary Act at that particular time. There are now in
2 place administrative procedures. I was trying to make it
3 clear to the police from my conversations that they
4 couldn't rely on us dealing with this in an Air Force
5 sense; we wanted civil action.
6

7 Q. That takes me to the tab I was showing you, 169, which
8 is on the screen. This is an email from you to the
9 detective or, in any event, police officer who was dealing
10 with this; is that right?

11 A. Yes. I sent him a number of emails with documents.
12

13 Q. Yes. Included in the documents you sent here you'll
14 see number 3, a "Certificate of completion, Safeguarding
15 Children Awareness Package", also referred to as "SCAP".
16 What was the purpose of sending that to the police officer?

17 A. It was part of the evidence package, that Adams was
18 aware of the rules and procedures and he had clearly broken
19 those, and we were really fighting hard to get the police
20 to take this as a duty of care likened to a school teacher.
21 So a number of my emails actually talked about, to the
22 police, saying that the responsibility of Adams was very
23 similar to a teacher and a student and we wanted them to
24 take action.
25

26 Q. Further down, if we can just scroll down, you will see
27 something else you sent was the course results for the
28 subject "Society & Legal" for the January SIC. Do you see
29 that?

30 A. Yes.
31

32 Q. Why in particular was the Society & Legal course
33 singled out?

34 A. That's an old course that predates my time. I don't
35 have a detailed knowledge of that, but the content of that
36 was about relationships between staff and cadets and the
37 legal responsibilities, as I understand it.
38

39 Q. So of the various courses that are taken by
40 instructors and officers of cadets - and I've seen
41 documents showing there are many different subjects, as you
42 would expect - it is within this course, Society & Legal,
43 that one finds the content that's delivered with regard to
44 unacceptable relationships between cadets and staff members
45 or instructors?

46 A. Yes, that was one element. That training has now been
47 replaced by the Staff Induction Course, and if you refer

1 back to my statement, I list the subjects which I actually
2 completed when I became a flight lieutenant (AAFC) with the
3 subjects as they're currently titled.
4

5 Q. We know, of course, from the documents that Adams
6 subsequently resigned from the AAFC; is that right?

7 A. Yes.
8

9 Q. Do you know what became of his position in RAAF?

10 A. Actually, I don't. My assumption is that his
11 conviction would have resulted in a dismissal from the Air
12 Force. Perhaps Air Commodore Delahunty might know the
13 detail of that.
14

15 Q. You're aware, of course, that one of the issues that
16 has arisen in this case study is the question of welfare
17 support for the cadets concerned - that's chiefly [CJE] and
18 [CJG] - and also for their families. Now, there's probably
19 a whole volume here of documents that deal with that, and
20 it mostly speaks your itself. What I'll ask you to do, for
21 those who don't have access to the documents, is just
22 explain what was done from your perspective? What do you
23 understand was done on that question, the question of
24 welfare for the cadets and their families?

25 A. 3 Wing is fortunate, it is one of the few wings that
26 actually has a staff member in the AAFC who is a clinical
27 psychologist with the New South Wales Education Department,
28 specialising in child suicide, so she was our first point
29 of call to provide support to all parties involved, all the
30 young females, and also to Adams. So that was an initial
31 check to see how they were going.
32

33 We then provided detailed information on the services
34 that could be provided within the community, and that was
35 on one of the emails that you showed earlier that had a
36 list of community mental health service providers that
37 could be used. In the case of [CJO] and [CJE], they were
38 dissatisfied with the support that was provided and they
39 asked to have private psychological assistance provided.
40

41 The Defence rules that we have for the AAFC made no
42 provision for that sort of support for [CJE] as a member of
43 the AAFC, and certainly there was no coverage for [CJO],
44 the mother of [CJE]. So when that issue was raised to me,
45 I consulted with the Air Force senior medical officer and
46 told her that I intended to provide the support because it
47 was the right thing to do, even though there was no

1 provision, no authority for me to do it, and so that
2 support, private psychological support, was provided
3 immediately and with an agreement that we would pay for
4 that, and in this particular request, [CJE] had been
5 asked - the mother of [CJE] had asked for the assistance
6 for her daughter and she'd asked for it for herself and for
7 [CJE]'s father, and I agreed to provide that.

8
9 Q. In the final part of your statement you deal with some
10 general matters of your experience as Director-General and
11 I just want to take you to a couple of those, starting at
12 paragraph 248. You will see in that paragraph you say that
13 in addition to the Adams case, there were other cases that
14 you were made aware of - two where there were allegations
15 of inappropriate relationships between staff and cadets
16 which did not involve criminal behaviour and several where
17 there were allegations of inappropriate relationships
18 between cadets and staff that could involve criminal
19 behaviour. That's obviously in the slightly less than
20 three years that you were Director-General; is that right?

21 A. Yes.

22
23 Q. Without going into the details of each of those cases,
24 can you tell us what the outcomes were? What was the
25 resolution?

26 A. In the instances where there was non-criminal
27 behaviour, basically that involved a civilian staff member
28 with a cadet generally over the age of 18, and there may
29 have been one under the age of 18, but it was in
30 Queensland, and Queensland law is very different to New
31 South Wales: it is not a criminal offence, there's no
32 special care provision. So in that particular - in both of
33 those cases, the staff member - as a civilian member, we
34 can instantly dismiss. We wanted to have good records on
35 this so they were given a show cause for dismissal and left
36 the AAFC as a result.

37
38 Q. What about the cadets in those two cases? Was any
39 action taken against them?

40 A. No, not that I'm aware of. That was one of the things
41 that I worked very hard on in the AAFC, that fraternisation
42 is normal for teenagers and we just don't allow it inside
43 the AAFC, and it was educating the AAFC members, the staff,
44 that there was an easy answer to use the code of conduct to
45 dismiss a cadet from the AAFC for fraternisation, and
46 I posed to them very directly that, in one particular case,
47 just as I took over as Director-General, two teenagers had

1 been found in bed on a camp together, and I was told that
2 they had left the AAFC and my question to them was, "What
3 support have you provided them?", and it was a question
4 that they were not prepared for because dismissal was easy,
5 administratively easy. It's thinking about the fact that
6 these teenagers - and typically they're more senior people,
7 16, 17, 18 - have been in the organisation for some number
8 of years, have positions of responsibility - for them to be
9 asked to leave the organisation that they love is a shock
10 and pain, and for them to be going home to their parents to
11 say, "I'm leaving the AAFC" and explain that is also a
12 problem. So my very direct message to the staff members
13 involved is, "What support are you providing for those
14 people?"
15

16 Q. You'll appreciate that I'm directing my question
17 specifically to the question of relationships between staff
18 and cadets as opposed to cadets and cadets. In the two
19 instances you've referred to here, you answered, as
20 I understood it, that to the best of your knowledge, there
21 was no action taken against the cadets; is that right?

22 A. That's correct.
23

24 Q. To your knowledge, did they remain in their positions
25 in their squadrons?

26 A. Both of those incidents were happening as I was
27 leaving the Director-General position. I'm not familiar
28 with the detail of the outcomes of those, but my clear
29 understanding, as we were - as they were coming to light,
30 was there was no question of action against the cadets.
31

32 Q. You say you then go on and you say:

33
34 *... and several cases where there are*
35 *allegations of inappropriate relationships*
36 *between cadets that could involve criminal*
37 *behaviour.*
38

39 I take it you mean cadets and cadets as opposed to staff
40 and cadets?

41 A. Yes, and that's one of the biggest changes that I've
42 seen in recent times. We now have our teenagers that are
43 very sexually aware, they have their mobile device, they
44 can download pornography and other sexually explicit
45 material, and teenagers now are grooming teenagers, and
46 we're not prepared for that situation. The training
47 doesn't - we assume that someone is going to be an adult

1 that's going to do the wrong thing, so we actually have had
2 a case where a teenaged cadet groomed another teenaged
3 cadet and it went to the court and there was a conviction
4 involved.

5
6 Q. It raises the way the cadets are structured, where you
7 have essentially teenagers from 13 through to 18 all being
8 cadets but in a hierarchical relationship, one to the
9 other, with your rank structure and so on, and away on
10 residential camps - that raises special risks, doesn't it?

11 A. It does.

12
13 Q. It is quite different to an ordinary school
14 environment, would you agree?

15 A. Yes. The big issue is that now we can have physical
16 barriers - you know, females on one floor, males on another
17 floor - but with their electronic devices they bypass all
18 of those barriers, and so they can groom and send sexually
19 explicit texts and photographs across boundaries, and
20 that's a real issue that I've seen. I give behavioural
21 policy training for cadets now and at the end of it I talk
22 about this sort of stuff, the issues of sending sexually
23 explicit material and grooming, that it can have lifetime
24 implications, and I ask them, "What information do you get
25 about this at school?" The presentation covers bullying
26 and harassment, and they've all got that at school, but
27 100 per cent of the people say they don't get that at
28 school and so they just don't understand the implications
29 of what they're doing for sending and receiving that sort
30 of information and the grooming aspects of it as well. We
31 don't - our education system does not help our teenagers.

32
33 Q. Moving on a little in your statement to near the end,
34 under your heading "Personal concerns about current
35 protection of children, laws, systems, policies and
36 procedures" at page 51, paragraph 261.1, at the top of the
37 next page, you say:

38
39 *As the Commission is aware, the legislation*
40 *across the States and Territories related*
41 *to protection of child abuse is not*
42 *consistent. These variations in Working*
43 *With Children Checks make it difficult to*
44 *deliver a nationally consistent safe*
45 *environment for the training and care of*
46 *young people, especially when members of*
47 *the organisation travel across State and*

1 *Territory boarders as part of their youth*
2 *development activities.*

3
4 As Mr Devereux said yesterday morning, of course, in a
5 Federation that is something that one might have. But
6 I take it what you're saying here is, to the extent that
7 uniformity can be achieved, that would be a very positive
8 and helpful thing; is that right?

9 A. Oh, it's essential. You can't have organisations
10 where you have people moving between States and them
11 wondering about the rules - what are the rules in that
12 particular State. South Australia, for example, doesn't
13 require a Working With Children Check unless you're working
14 with special needs children. The differences between
15 Queensland and New South Wales are stark in regards to
16 special care. If Adams had committed this offence in
17 Queensland, he would not have been reported to the police,
18 he would not have got a conviction. He would have been
19 free - the best I could have done is terminate him from the
20 AAFC and he would have then been - had no blot on his
21 working with children card and could have gone to another
22 organisation - Navy Cadets, Army Cadets, Scouts - and
23 repeated the same offence. To my mind, that's absolutely
24 unacceptable for our protection of children.

25
26 THE CHAIR: Q. The Commission has reported in relation
27 to Working With Children Checks - are you aware of that?

28 A. Yes.

29
30 Q. We've made the same point and we keep on making it.
31 What have you done or what has the Air Force or, indeed,
32 have the cadets done to urge governments to address the
33 problem and fix it?

34 A. I have not done anything on that. That's a good
35 point, your Honour. I'm sure those listening that have
36 positions of responsibility for this - I would love to --

37
38 Q. I hope so, because it is an organisation like yours
39 that makes the position crystal clear, because you're
40 operating on the national landscape?

41 A. Yes.

42
43 Q. I mean, there are many others who do as well, but
44 you're well placed to speak directly to government about
45 what is a national disgrace.

46 A. Mmm.

47

1 Q. We need it fixed.
2 A. I agree absolutely, your Honour, and if I could add,
3 your Honour, the Oakley case is symptomatic of a further
4 problem with this, that because of privacy rules we're
5 between a rock and a hard place for dealing with that sort
6 of incident. So we have another allegation and Oakley
7 exercised his right to silence and has left our
8 organisation. There is an unresolved allegation. It won't
9 show up on a police check, it won't show up on a Working
10 With Children Check. We need a system to share that
11 information. I can't share that information with Navy
12 Cadets, I can't share it with Army Cadets, I can't share it
13 with Scouts, and we need a simple database that says
14 'unresolved allegation', full stop, and that just acts as a
15 red card and no organisation touches that individual until
16 they resolve the allegation. But that's the issue that
17 we've got at the moment, that we've had one individual who
18 I'm aware of that moved from Navy, to Army, to Air Force in
19 reserve-type capacity, and in each organisation he had an
20 allegation of something happening and left before anything
21 could be done about it. He was smart because he targeted
22 people over 18, or there wasn't a criminal case for it, and
23 so these predators are able to hop from organisation to
24 organisation because our system doesn't allow us to share
25 that information.

26
27 MR STEWART: Your Honour, I omitted to tender Air
28 Commodore Green's statement.

29
30 THE CHAIR: I'll mark it exhibit 40-037.

31
32 **EXHIBIT #40-037 STATEMENT OF AIR COMMODORE DENNIS GREEN**
33 **DATED 16/06/2016**

34
35 MR STEWART: I have no further questions for this witness,
36 your Honour.

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

39
40 **<EXAMINATION BY MS THOMPSON:**

41
42 MS THOMPSON: Q. My name is Thompson and I represent the
43 interests of [CJE]. I just want to explore with you the
44 role of the investigation into the Adams matter. There are
45 two parts here: there's the actual investigation itself,
46 which we know was ultimately taken up by the NSW Police and
47 the AAFC investigation halted. It never progressed further

1 than that; is that right?

2 A. That's correct.

3

4 Q. Would you agree that there would be some benefit in
5 the AAFC conducting its own investigation into matters that
6 the police investigation may not cover?

7 A. No.

8

9 Q. Well, what do you say about an investigation that
10 focused on screening processes within the AAFC, both for
11 persons joining it and particularly for those people who
12 put their hand up to work on promotion camps and other
13 services training camps?

14 A. The screening processes that we have at the moment
15 involve doing a police check for every individual. We have
16 a Working With Children Check for every individual that's
17 applicable to the legislation. So I hold New South Wales
18 and ACT Working With Children Checks. So we go through
19 that process. Then we go through interviews and referees,
20 and so we get all the best available information to us.

21

22 In the case of Adams, he had come through the
23 organisation as a cadet himself. There was no record of
24 him ever having a previous offence, and so the screening
25 process that you refer to, I think, would be - how we would
26 have picked it up I'm not sure, to pick it up beforehand.

27

28 The key for me is management while you're on the
29 activity, and so when I go on an activity I'm looking for
30 trouble and so if I see something, I'll bring it to
31 someone's attention and nip it in the bud before anything
32 can take off. It's really difficult, though, with the
33 electronic mechanisms, that they can bypass physical
34 barriers.

35

36 Q. I will just go to each one of those matters you've
37 just raised because I have some interest in exploring this.
38 The facts show that Adams commenced grooming of [CJE] when
39 she was 15 years old, when she first attended an activity
40 in 2011. At that point, he was joined to her Facebook
41 page - she's not sure whether it was her invitation or his.
42 This is in her statement at paragraphs 13 down to 16. When
43 she was 16, in July 2012, she attended a senior promotions
44 course. Adams was there again, and again they
45 communicated. So we have not just an offence that occurs
46 in January 2013; we really have an offence that starts with
47 a child of 15 years old who is being groomed by a senior

1 person for a period of time before an actual sexual
2 relationship takes place. Do you accept that?

3 A. Yes.

4

5 Q. But it is a criminal activity, still, isn't it --

6 A. Yes.

7

8 Q. -- for an adult to groom a child --

9 A. Yes.

10

11 Q. -- of 15 years?

12 A. Yes.

13

14 Q. So I'm just trying to understand why you are satisfied
15 with the screening processes in place and would not be
16 interested in looking at how they may be improved further
17 to detect this type of activity?

18 A. I didn't say that. Any screening process can be
19 improved and I'm very happy to consider aspects of that.

20

21 Can I just give you some information about what we've
22 done with the social media policy, which is fundamental to
23 what you're talking about? In just my last few days as the
24 Director-General we issued the new social media policy with
25 a training package to go to every cadet. It was required
26 that every cadet see that package. Part of that training
27 package - it caused a furore because it actually said that
28 one-to-one relationships on electronic media were
29 unacceptable, and people said, "We can't do business that
30 way." Well, you can, and we directed that if you were
31 having personal contact with a cadet, as a staff member -
32 and this went to the cadets as well - there had to be two
33 adults in the room, so that when someone was in Facebook,
34 we said that there has to be two staff members
35 administering that particular area.

36

37 I get a lot of direct emails and texts from cadets,
38 and they should not be surprised that when I respond,
39 there's someone else cc-ed to that response. That's my
40 protection, that I can't be seen to be grooming. That's
41 the behaviour standard that we expect. And if our cadets
42 know that right up front, which is part of their training
43 and induction - and it's certainly what I give to them -
44 that they shouldn't be having one-to-one communications,
45 that nips it in the bud. So that the best thing that could
46 have happened early in the piece is a response from a cadet
47 to a person and include another staff member or another

1 cadet in the response, and that becomes the protection
2 mechanism.

3
4 Q. When was that social media policy introduced?

5 A. I issued it on 11 February 2013.

6
7 Q. At the time [CJE] --

8 A. And that's Ringtail number DEF.02.0021.003.0162.

9
10 MS THOMPSON: Is this an appropriate time, your Honour?

11
12 THE CHAIR: Yes, we will take the short adjournment.

13
14 **SHORT ADJOURNMENT**

15
16 THE CHAIR: Yes, Ms Thompson?

17
18 MS THOMPSON: Q. Commodore, just before the break
19 I asked you a question as to when social media policy was
20 introduced and you indicated on 11 February 2013. Do you
21 still maintain it was 2013 or --

22 A. Yes, I've got a copy of that in front of me. The
23 initial issue was 11 February 2013.

24
25 Q. 2013. That postdates, of course, the incidents that
26 took place in January, in Wagga, involving [CJE] and [CJG]?

27 A. I was not aware of those incidents at that time.

28
29 Q. No, you got notice on 29 May 2013. But am I to take
30 it before that policy was released - was there anything,
31 any policy or direction given about social media?

32 A. I don't recall. I think this was the first time that
33 we'd actually done it. I could be corrected on that, but
34 that's - this was certainly the first time that we'd we put
35 it into the Manual of Management format.

36
37 Q. You raised in your statement a number of difficulties
38 that modern technology poses - between cadets and
39 instructors - being able to monitor the types of
40 relationships that can develop on these camps. Have you
41 considered or are you aware of anyone else in the AAFC
42 considering that parents be given a copy of the social
43 media policy?

44 A. I haven't considered the social media policy going to
45 parents. We certainly provide a copy of the code of
46 conduct to parents.

1 Q. They're provided with a code of conduct. Would it be
2 helpful, given the use made by the younger generation of
3 social media, that, in broad terms, if not the precise
4 policy, parents were also advised that they should keep a
5 lookout for any extensive messaging or inappropriate use of
6 social media?

7 A. Yes, I think anything that can be done to educate
8 young people about the dangers of it would be valuable.
9

10 Q. I want to go back to the value of investigating or the
11 AAFC continuing its investigation, either after the police
12 investigation had finished or in parallel with it. We've
13 talked about screening processes. What about the training
14 given to staff instructors on camps about reporting
15 behaviour of other instructors and their relationships or
16 friendships with cadets?

17 A. As part of the staff induction training course all
18 staff are trained to what the standard is and that if they
19 are concerned, they have two options: of addressing it
20 directly with the person involved, and often that can nip
21 it in the bud because that person might not realise that
22 what they're doing has a perception that it is
23 inappropriate, and that can be sufficient; if they've got a
24 problem - and I've had this on a camp myself, I went to the
25 detachment commander and said, "You need to do a general
26 broadcast to remind everyone about the standard."
27

28 Q. There would be friendships, no doubt, between staff
29 instructors and they may be reluctant to report a fellow
30 staff instructors. Is there any way they can anonymously
31 report any concern about an instructor's behaviour on a
32 camp?

33 A. Well, they could, if they wanted to, slip a note under
34 the door or something, but the reality is that, you know,
35 you would expect them to actually go and talk with
36 someone - the practice that we have is talk with someone
37 that you feel comfortable with.
38

39 Q. Take a promotions camp, is there any one person who is
40 monitoring instructors for appropriate behaviour in
41 compliance with the code?

42 A. I see it as the duty of all staff, and particular
43 responsibility rests with the detachment commander. So in
44 the example that I had in January last year when I observed
45 behaviours that I thought were starting to become
46 fraternisation, I took it to the detachment commander so
47 that he then had a meeting of all staff, reminded them that

1 some of the behaviours had the perception that they were
2 starting to fraternise and they should cease, and they did.

3
4 Q. On the evidence of [CJE] one of the issues was that
5 after this abuse had been reported and she attended another
6 camp, there was a gossiping - she overheard gossiping and
7 she raised this as an issue, about the breach of privacy.
8 In your statement you also refer to the need for privacy
9 and protection, and in the letter that went out to [CJO],
10 that is reinforced, that you are on the lookout for cadets'
11 welfare and protection when a matter like this is reported.
12 What steps, if any, have changed from the time [CJE]
13 experienced that in July 2013 to now, to protect the
14 privacy of the cadet?

15 A. I'm not aware of any explicit action on that. I know
16 that for the actions that we do when we're having an
17 incident they're managed closely, and that's why at one
18 stage the commanding officer of a squadron wasn't aware
19 that there was an investigation going on to a staff member
20 at that particular time, because it was very close-held.
21 So what you don't want to do is get information that
22 pollutes or disrupts the investigation. So it is more than
23 just privacy; it is the effectiveness of the investigation
24 process.

25
26 The reality is that you're with 7,500 teenagers who
27 are on Facebook, 1500 staff all on Facebook and other
28 electronic media, and your ability to control information
29 is approximately zero.

30
31 Q. Have you personally, or anyone else that you're aware
32 of, looked at any technological solution to the use of
33 social media while cadets are on a camp, such as filters?

34 A. No, I haven't.

35
36 Q. Is that something that you would possibly consider?

37 A. I'm not sure how we would do that and what it would
38 actually stop. It's more than social media. It's just the
39 sending of texts. In Adams' case, on my understanding,
40 there were hundreds of texts involved, so I'm not sure that
41 that would be really practical.

42
43 Q. There are two more things. Adams, after he resigned
44 from the AAFC, stayed on, as we know, in the RAAF. Where
45 he was posted, would there have been families residing at
46 that base and a child care centre there?

47 A. Listen, on that question, when Adams was - my

1 presumption is that he has left the Air Force. I didn't
2 check during the break; I should have. My presumption is
3 that he left the Air Force with a show cause process. Best
4 ask Air Commodore Delahunty, who follows me.
5

6 Q. Certainly, thank you. The last area - one of the
7 issues that arose for [CJE]'s family, for her mother and
8 her stepfather of 16 years, was counselling support and
9 payment of those counselling fees over that period of time.
10 It appears there wasn't a definite policy, but being either
11 a guardian or a step-parent, even though you may have been
12 a long-term guardian or step-parent, that doesn't seem to
13 have been taken into account when determining whether a
14 payment is justified. Is this something you have knowledge
15 of or would I be better to direct that to someone else?

16 A. There are a couple of things behind that question.
17 First of all, when a cadet joins the AAFC they define who
18 their parent or guardian was. In this particular case, the
19 defined guardian was [CJE]'s father and our information,
20 that I had, was that [CJE] was living with her father, and
21 so in the letter that I wrote to [CJO] I wrote:
22

23 *My understanding is that your daughter*
24 *normally resides with her father who is her*
25 *legal guardian. As --*
26

27 And I'll read redact the name --
28

29 *is not the legal guardian of [CJE], I do*
30 *not consider the Air Force should fund*
31 *future professional counselling or*
32 *psychological services for him. For any*
33 *future ...*
34

35 In context here, we had received a bill which was for [CJO]
36 and her new husband and, to reduce the stress, I paid that
37 bill - authorised payment of that bill immediately. Again,
38 I emphasise there was no authorisation or authority for me
39 to pay for counselling for [CJE]'s parents at all. So
40 I then wrote:
41

42 *For any future funding of counselling*
43 *services for [the new husband], approval*
44 *must be requested prior to the provision of*
45 *any counselling. This request would need*
46 *to include evidence that Mr [REDACTED] is*
47 *directly responsible for providing*

1 *full-time support to [CJE].*
2

3 So they were my understandings and basically I was putting
4 it down that if the circumstances of my understanding were
5 wrong, then I was very happy for them to come back and
6 correct me about the parenting arrangements. We have lots
7 of single-parent families in the organisation and under
8 normal circumstances we only deal with whoever is listed as
9 the parent or guardian. In this particular case, [CJE]
10 used as her support person the mother, and we respected
11 that and used that, and so I put in place Squadron Leader
12 Jacqueline Hatch to provide support on an ongoing basis for
13 [CJE], her father and her mother.

14
15 MS THOMPSON: Thank you. I have no further questions.
16

17 <EXAMINATION BY MS DAVID:
18

19 MS DAVID: Q. Thank you. My name is David and I appear
20 for Susan Campbell, the mother of Eleanore Tibble, as you
21 know. I have just a couple of questions. You have
22 indicated quite clearly in your statement, paragraph 50,
23 that you have learned a lot, in terms of policy, from the
24 very tragic case of Ms Tibble. I just want to ask you,
25 just one example, in relation to the time frames, and one
26 of the big issues here was that this young woman was left -
27 it was unknown to her what was going on and she had a
28 period of time where she thought the worst, notwithstanding
29 there were directives to ensure that she was not discharged
30 and things were reinstated in that case. What do you do
31 now or what sort of policy recommendations have you put in
32 place to ensure that there is that? I know you've talked
33 about it must be done quickly, but just to understand a in
34 a little bit more detail?

35 A. In this particular instance, I provided in the letter
36 or the draft script that I used for Laycock to talk with
37 the mother to assure her directly that there was no
38 inference of wrongdoing on behalf of [CJE] and that support
39 would be ongoing.
40

41 Q. Just in terms of to keep people informed of the time
42 frame, so that people are not left - in the case of
43 Eleanore Tibble, notwithstanding there had been directives
44 to keep her informed, she hadn't been and she was really
45 waiting the outcome or some response to her letter
46 questioning to review the file. What is done to ensure
47 that doesn't happen in the future, that people are not left

1 in wonderment about the process?

2 A. If you look at how we tracked on this process,
3 generally, even though I was notionally working three days
4 a week as a Director-General, responses were within hours.

5

6 Q. Just another aspect that perhaps comes from the Tibble
7 case. The situation with the face-to-face - I think in the
8 Stunden Report, document 1, at paragraph 70, it refers to
9 the issue of face-to-face. In this particular case, it was
10 slightly different from the situation with [CJE] and [CJG]
11 in terms of the sequencing of events. They received a cold
12 phone call, the young women in the case you were involved
13 with, but in this particular case it really emphasised the
14 importance of that face-to-face contact when initiating and
15 continuing a process. Do you agree with that?

16 A. Yes, absolutely. The document is not in front of
17 me --

18

19 Q. It is at paragraph 70 of that, Ringtail 0015 of that
20 document.

21 A. Yes. I agree absolutely that - the benefit of
22 face-to-face. In this particular case, the premise that we
23 used people to do this particular investigation that are
24 part-timers, that have got a full-time job and then are
25 doing this outside their working hours, that's where I said
26 we need to be able to provide assistance from Air Force on
27 doing that, and if you do that with that sort of resource,
28 then you can provide timeliness and face-to-face.

29

30 Q. You would agree that based on the experience in the
31 Tibble case, it cut across a number of aspects: the
32 failure to have face-to-face meetings with Ms Tibble meant
33 that the senior officers didn't really know who they were
34 dealing with, as a person. Do you agree with that?

35 A. Yes. I wasn't part of that --

36

37 Q. No, I appreciate that.

38 A. But I agree with the concept. My understanding from
39 what went on in that particular phase of it is that they
40 were in the process of arranging face-to-face and they
41 found out, via the telephone call, that there was
42 confirmation from [CJE] of a relationship and so the
43 face-to-face didn't then happen.

44

45 Q. Just coming back to the Tibble case, another confusion
46 in this case by not conducting a timely, proper, if I could
47 say, judicious-style interview - there was a lot of

1 confusion in the Tibble case which affected not only
2 Ms Tibble but also her mother. I'm not sure whether you're
3 aware, but there was a suggestion that she was almost - if
4 you read through some of the materials and findings at the
5 time, there's almost a suggestion that she was complicit in
6 somehow allowing some kind of inappropriate relationship
7 between Mr Harper and her daughter. That was quite a theme
8 of some of the communications within the reporting and
9 management of that particular case.

10 A. Yes, and in this particular instance I had Squadron
11 Leader Hatch from my staff to actually make sure that that
12 didn't happen.

13
14 Q. Yes. I appreciate that you have acknowledged that
15 there were some serious lessons to be learned. One of them
16 that you did acknowledge, that Ms Campbell is particularly
17 interested in wanting to further understand how the cadets
18 go about dealing with this issue, and that is when people
19 leave - for example, in this particular case, it was
20 devastating to Ms Tibble, clearly. She was clearly a
21 high-achieving young woman who thought the cadets were a
22 very big part of her life and brought to her, obviously, a
23 devastating emotional response upon being dealt with in the
24 way that she was, but just in relation to that, what
25 measures are actually in place to ensure that termination
26 does not cause, or the prospect of a termination does not
27 cause, such devastating effects? How do you deal with it
28 in a sensitive manner to avoid that? You've acknowledged
29 the importance of it.

30 A. Yes. My personal view is providing the right sort of
31 support for this sort of instance and, clearly, we don't
32 have that professional experience of dealing with people
33 who've gone through the experience of their trust being
34 betrayed by an adult staff member. To my knowledge, you
35 know, we certainly haven't got that in the AAFC and I'm not
36 sure whether we've actually got it in Air Force at the
37 moment, but certainly not for dealing with minors.

38
39 Q. One of the other aspects to try to understand, and
40 there was reference to it, is the lack of definition "of
41 fraternisation", in the Stunden Report. There has been
42 some attempt to redefine that, I have observed. Just to
43 understand that - and that is, as I understand it now,
44 referred to under the behaviour guidelines; is that
45 correct?

46 A. Yes, there's a very explicit policy.

47

1 Q. I think it is document 37. Just in relation to that,
2 the definition of "fraternisation":

3
4 *For the purposes of the policy,*
5 *inappropriate fraternisation includes:*
6 *(a) voluntary sexual or intimate relations*
7 *between personnel;*
8 *(b) a close and exclusive emotional*
9 *relationship involving public displays of*
10 *affection or private intimacy;*

11
12 Is that correct?

13 A. Yes.

14
15 Q. The next one is:

16
17 *(c) a relationship which involves or gives*
18 *the appearance of involving partiality,*
19 *preferential treatment or improper use of*
20 *rank; and*
21 *(d) the public expression of intimate*
22 *relations between personnel.*

23
24 I just want to try to understand how you could ensure that
25 young cadets actually understand what that means in a
26 practical sense and also what that might mean to their
27 parents?

28 A. Okay. There are a couple of aspects there. Firstly,
29 with the teenagers we discuss very explicitly what is
30 acceptable behaviour and what is unacceptable behaviour,
31 and we go through examples. We talk about when you can
32 touch and when you cannot touch. So the policy actually
33 has that explicitly stated and so, typically, the staff and
34 cadets would talk about that and actually go through some
35 demonstrations, so to speak, so it's practical and in the
36 minds of the teenagers.

37
38 Q. I just want to give you an example, and it's drawn
39 really from Eleanore Tibble's case, and to ask what a young
40 cadet might make of what to do and also what a parent of a
41 cadet might think was appropriate. I don't know whether
42 you're aware, but in this particular case, Matthew Harper,
43 the instructor involved in that particular case, had moved
44 from Darwin, as had Eleanore Tibble and her mother. So
45 they had a common interest. So that started some sort of
46 communication between the family in addition to Ms Tibble.
47 Then Mr Harper said to Susan Campbell, having recognised

1 that young Eleanore Tibble was living 45 kilometres from
2 Anglesea Barracks, that she assured the mother that he was
3 a taxi driver and he would look after her if ever she
4 needed to stay late in the city or missed a bus or needed a
5 lift. So he took on that role. They had dinner on a few
6 occasions. In this particular case, it was sadly
7 misinterpreted as some kind of - as Ms Campbell giving her
8 stamp of approval, almost, to an inappropriate
9 relationship. By having dinner, Ms Campbell's approach
10 might be that she was getting to know the person with whom
11 her child was involved. So how do you draw a line as to
12 whether that's an inappropriate relationship? In this
13 case, the suggestion was that even that formed an
14 inappropriate relationship. What would you say to that
15 situation now?

16 A. That sort of behaviour should be ringing alarm bells
17 immediately and I would see as being prohibited. To give
18 an example on that, when we're on camps, the working area
19 is often a couple of kilometres from the accommodation
20 area, and so sometimes staff are driving and the cadets are
21 marching back, and if you've got a cadet that's got an
22 injury, then, clearly, you want to get them back to the
23 block without them exacerbating their injury. So a staff
24 member may elect to drive them. But our very simple
25 procedure is two staff or two cadets, and so the
26 expectation is that under no circumstances are you going to
27 put yourself in a one-to-one relationship with a cadet, and
28 in the context where it's outside of a AAFC activity, where
29 you're going for dinner, again that's prohibited. We
30 consider the direction for AAFC with cadets is 24/7. They
31 can't turn on the relationship while they're on a cadet
32 activity and then have something outside. That isn't in
33 the spirit of having a distant relationship which is
34 entirely professional.

35
36 THE CHAIR: Q. The issue has arisen in other contexts,
37 particularly schools, that organisations such as yours may
38 not have done enough to tell the parents what the rules
39 are. Do you now do enough to ensure that the parents know
40 what the rules are?

41 A. Yes. That's a good question, your Honour. There are
42 a couple of aspects of that. When we have cadets [*sic*]
43 come along to their recruit night with their prospective
44 cadet, we talk about - we sell the organisation, obviously,
45 but part of that is that we say, "When we're having an
46 approved activity, you will get in your computer an email
47 which is a form which details the approval for that

1 activity", which the parent must sign, otherwise the cadet
2 is not allowed to attend. That approval has the start time
3 and the finish time, and my plea to the parents is always,
4 "Please come at the nominated finish time to pick up your
5 child."
6

7 So the incident that was talked about where people
8 went off shooting and then went to a party afterwards, we
9 make it very explicit to the parents on that recruit night
10 that, "Our activity, our risk assessment and our
11 supervision of your child is for that defined purpose", and
12 if we decide to have a social activity - and sometimes we
13 might - one, there wouldn't be alcohol, but it will again
14 have an approval form that the parent has to sign and we
15 tell the parents, "If your child comes to you and says,
16 'I'm doing a cadet thing tonight', you should ask them for
17 the activity approval form because if there's no activity
18 approval form, there is no supervision or responsibility
19 from us.
20

21 Q. I understand that but what about the
22 non-fraternisation rule and everything that goes with that,
23 are the parents sufficiently educated to understand what
24 your organisation lays down as the rules?

25 A. Yes, your Honour. On 1 February 2014 I issued the
26 behaviour policy for the AAFC. It's document
27 DEF.02.0021.003.0152. That code of conduct is now
28 identical for cadets and for staff and at paragraph 3 on
29 that document, it says:
30

31 *An Officer or Instructor must not have or*
32 *attempt to have or cultivate an intimate*
33 *relationship with a cadet.*
34

35 That document is signed by a cadet when they join the
36 organisation and the witness to that is the parent or
37 guardian. So we are providing that to the parents and
38 guardians the day they join our organisation.
39

40 Q. That's an intimate relationship. What about
41 one-on-one activities and so on, the process that might
42 lead to an intimate relationship. Are the parents aware of
43 those rules?

44 A. I couldn't guarantee that, your Honour.
45

46 Q. You see, that's where we've had instances breaking
47 down in schools, where parents have not been aware of the

1 school rules about children not going to teachers' places
2 and vice versa and so on. It is an important message,
3 isn't it, to get through?

4 A. It would be worthwhile including that in our
5 induction.

6
7 Q. And not only in induction; it is something that needs,
8 probably, reminders, isn't it?

9 A. Absolutely and that sentence that I read out should be
10 part of our annual behaviour policy.

11
12 MS DAVID: Q. As you would appreciate, the circumstances
13 in this case, Ms Campbell not having known, really, about
14 those policies, was thinking in a positive way that it was
15 a person who had some similar interests, in the terms of
16 she and Mr Harper - I'm not talking about Eleanore and
17 Mr Harper - but she knew the person and so it gave her a
18 level of comfort. Now, I know there are other issues
19 relating to that. But just for example, would it be a
20 breach of policy if this man simply brought her home the
21 45 kilometres because, as a matter of convenience, for
22 example, he lived in the neighbourhood? That's a
23 one-on-one, but is that inappropriate behaviour? This is
24 where it's very difficult for people to understand.

25 A. I would regard that as prohibited.

26
27 Q. You would regard that as prohibited?

28 A. Absolutely.

29
30 Q. Even though they were living near each other, it was a
31 significant distance --

32 A. Yes. If there are three people in the car, okay; if
33 there are two people in the car, no.

34
35 THE CHAIR: Q. And the parents should know that, as far
36 as you're concerned, that's prohibited?

37 A. Absolutely, yes.

38
39 MS DAVID: Q. The other aspect of that, looking at other
40 side, for example, in this situation where this young woman
41 lived 45 kilometres from the place where she was doing the
42 parades, if, for example, she had taken a lift with a young
43 person who was drinking and had gone home and there had
44 been an accident or something terrible had happened to her,
45 what is then the duty of care of the cadets to ensure that
46 she does get home safely? This is where it is difficult.
47 On the one hand, one might see that a simple driving of a

1 young person home 45 kilometres is not particularly
2 inappropriate, and it may give rise to a failure of duty of
3 care if that was the only convenient way that she could get
4 home. So how do you reconcile some of those issues?

5 A. In my mind, you've crossed the line. Once you get
6 one-on-one, whether that's in a physical sense or
7 electronically, you've crossed the line.
8

9 Q. In this situation I'm not suggesting there were no
10 other alternatives - that hasn't been explored - for
11 Eleanore Tibble to get home, but that was one of the
12 reasons that from time to time he drove her home. In this
13 situation, if there was no real alternative for her to
14 continue with her Cadets, for example, because transport
15 became an issue because there was no other way, what would
16 the Cadet Corps do to assist her in those circumstances?
17 Would they assist in those circumstances, assist her to get
18 to training?

19 A. Not normally because that would be a responsibility of
20 the parent or guardian. In a couple of country areas, that
21 I'm aware of, in Queensland a bus is provided, but again,
22 that is used where there's multiple people in the vehicle
23 and so your protection is to have two staff members or two
24 cadets involved.
25

26 Q. I know his Honour has raised it, but what steps are
27 taken to ensure that there is an induction for the parents
28 that they are well aware of these and I'm sorry if I've
29 missed it, if you've said it, but just to be clear?

30 A. Yes. That was the - the information - we have a
31 parent information night when the cadets first come and we
32 explain our management system and our duty of care
33 responsibilities.
34

35 Q. Just to understand the duty of care, is it your
36 position that it finishes when they are at the actual area
37 where they're parading or presenting themselves?

38 A. We have a positive handover, so if the parents turn up
39 an hour late, one of the staff members is standing there
40 waiting for the parents to arrive. We don't leave the
41 cadets on their own devices by themselves at the end of an
42 activity.
43

44 MS DAVID: I have nothing further, thank you.
45
46
47

1 <EXAMINATION BY MS GLEESON:

2

3 MS GLEESON: Q. My name is Gleeson and I act for
4 Mr Oakley. I just have a few questions about the evidence
5 you gave in respect of him.

6 A. Yes.

7

8 Q. It is right, isn't it, that you weren't personally
9 involved in any investigation of the complaint that was
10 made by Mr Aaron Symonds; is that right?

11 A. That's correct.

12

13 Q. You became aware of that issue simply as part of your
14 ongoing involvement with the AAFC?

15 A. By attendance here at the Royal Commission.

16

17 Q. Your only basis for any conclusions is the evidence
18 that you've heard at the Royal Commission?

19 A. Yes.

20

21 Q. You don't have any knowledge yourself about the manner
22 in which the investigation by the AAFC at the time
23 proceeded?

24 A. No.

25

26 Q. You don't have any knowledge of the timing in which
27 Mr Oakley resigned from the AAFC?

28 A. No, I don't.

29

30 MS GLEESON: I have no further questions. Thank you.

31

32 THE CHAIR: Ms McLeod?

33

34 <EXAMINATION BY MS McLEOD:

35

36 MS McLEOD: Q. Thank you, Mr Green. With my learned
37 friend just now you mentioned the code of conduct and some
38 provisions of the code of conduct in relation to attempting
39 to have intimate relations with cadets. Are the parents
40 asked to sign the code of conduct document as well?

41 A. Yes.

42

43 Q. Instructors are asked to sign the code of conduct
44 document?

45 A. Yes, for the instructors it's compulsory.

46

47 Q. And cadets are asked also to sign the code of conduct

1 document?
2 A. Yes, applicants must sign the code of conduct to join.
3
4 Q. Thank you. And just one point of clarification --
5
6 THE CHAIR: Q. When you say parents are asked to sign
7 the code of conduct, what's involved?
8 A. Your Honour, the code of conduct has the parents - if
9 the applicant to join our organisation is under 18, the
10 parent witnesses that their child is signing the code of
11 conduct as they apply to join the organisation.
12
13 MS McLEOD: For example, behind tab 360, your Honour,
14 there's a document that is a statement of commitment to
15 compliance by cadets that is co-signed by the parent or
16 guardian.
17
18 THE CHAIR: All right.
19
20 Q. The parent signs the child's document as the witness?
21 A. Yes. So we want - in particular, in my mind, when we
22 were drafting this, I want the parents to see that
23 prohibition on relationships.
24
25 THE CHAIR: On intimate relationships, yes.
26
27 MS McLEOD: A point of clarification arising from the
28 questions, your Honour. Mr Adams was suspended from the
29 Air Force on 22 May 2014 and his plea of guilty prompted a
30 show cause notice, so prior to his sentencing. If your
31 Honour pleases.
32
33 THE CHAIR: Yes, Mr Stewart?
34
35 MR STEWART: I have nothing further for this witness,
36 your Honour.
37
38 THE CHAIR: Q. Yes, thank you, that concludes your
39 evidence and you're excused.
40 A. Thank you, your Honour.
41
42 **<THE WITNESS WITHDREW**
43
44 MR STEWART: Your Honour, I call Dale Watson.
45
46
47

1 <DALE BERNARD ROY WATSON, sworn: [12.33pm]

2

3 <EXAMINATION BY MR STEWART:

4

5 MR STEWART: Q. Would you state your full names and
6 occupation, Mr Watson?

7 A. My full name is Dale Bernard Roy Watson and I'm a
8 retired Air Force officer.

9

10 Q. When did you retire?

11 A. From full-time service in August 2010 and from reserve
12 service in August last year.

13

14 Q. How long did you serve full-time in the Air Force?

15 A. I joined full-time in 1988 until 2010, so 22 years.

16

17 Q. What was your position in the Air Force in August of
18 2000?

19 A. In August 2000 I was posted to Hobart as the senior
20 Air Force officer, Tasmania, and as part of that job I was
21 the regional liaison officer with the Air Training Corps.

22

23 Q. And the Air Training Corps was the predecessor or
24 previous name for what we now know as the Australian Air
25 Force Cadets; is that right?

26 A. Yes, that's correct.

27

28 Q. In those positions that you mentioned, senior
29 Air Force officer for Tasmania and the liaison officer
30 with - I'll refer to it for ease of reference as "the
31 cadets" - the cadets, what was your role or responsibility
32 in relation to the cadets?

33 A. My main job was in a support role. I had no direct
34 command. I was not involved in the chain of command.
35 I managed funding that the cadets received. I sought
36 support from external agencies for cadet activities. Yes.

37

38 Q. Did you have any chain of command authority in respect
39 of the cadets?

40 A. I was the Chief of Air Force representative in
41 Tasmania and as such I was concerned - my concern with
42 cadets was ensuring that Air Force policies were followed
43 and as I said, you know, I was there to support them from
44 a - obtaining resources to support their activities.

45

46 Q. With regard to matters covered by Air Force policy,
47 would you regard yourself to have had an advisory function

1 with regard to cadets?

2 A. I would have expected, yes, that that would happen
3 and, in fact, it did happen on all sorts of occasions. For
4 example, finance matters, I think I know where we're going.
5 In relation to behavioural matters, I would have been
6 expected to provide advice, if called upon, to the cadets.

7

8 Q. You became involved - if I can leave it at that level
9 now - in the Eleanore Tibble matter following the
10 resignation of Leading Aircraftman Harper and you became
11 involved in that, I take it, in those positions that you
12 referred to, senior air force officer in Tasmania and
13 liaison officer for cadets?

14 A. Yes.

15

16 Q. What was your role then in becoming involved in that?
17 Was it in order to advise the cadets as to what should be
18 done or not done?

19 A. Yes, and also to keep Chief of Air Force Office
20 informed of what was happening and also the Directorate of
21 Reserves Air Force which had responsibility for Air Force
22 cadets.

23

24 Q. You've explained at that time what that responsibility
25 was, that is, the director of reserves. Is it the
26 Directorate of Reserves you mentioned or director of
27 reserves?

28 A. It's the Directorate of Reserves which has a director.

29

30 Q. What was their role or responsibility with regard to
31 cadets in Tasmania?

32 A. The CO of the Air Training Corps squadron, he reported
33 to the director of reserves, that was his chain of command,
34 and --

35

36 Q. And that was Wing Commander Carroll James; is that
37 correct?

38 A. Yes, that's correct, he was the CO of the squadron.

39

40 Q. Who at the Directorate of Reserves would he have
41 reported to?

42 A. Okay. The director, the actual director is a
43 group captain. However, as I recall, that directorate
44 separated into at least two sub-functions of which there
45 was a Deputy Director of Reserves Air Force and a
46 Deputy Director of Cadets and it was to the Deputy Director
47 of Cadets that the CO would have reported to.

1
2 Q. Was that Wing Commander Lydia Stevens?
3 A. That's correct.
4
5 Q. I'd like to show you tab 1 of the tender bundle at
6 page 5. This is in the Stunden Report. I am looking at
7 the first paragraph, paragraph 16, and that list of names,
8 just identify who these people are. The first one is
9 obviously you. That's your rank at that time, I take it
10 from there, was Wing Commander; is that right?
11 A. Yes, that's correct.
12
13 Q. That number that is reflected there, I take it that
14 indicates you were in the Air Force as opposed to only in
15 the Air Force Cadets, as some of the other were?
16 A. The 063646?
17
18 Q. Yes.
19 A. That's my service number and I'm an Air Force member,
20 not an Air Cadet member.
21
22 Q. Yes. It is a while back now and these abbreviations,
23 no doubt, change all the time, but are you able to
24 enlighten us, what is SECPOLO?
25 A. Yes. That's my category and I'm the security police
26 officer.
27
28 Q. And SAFOT/RLO?
29 A. "SAFOT" is Senior Air Force Officer Tasmania and RLO
30 is a Regional Liaison Officer
31
32 Q. And then the next name is Wing Commander
33 Lydia Stevens. She also has a force number. That shows us
34 at least she was in the Air Force; is that right?
35 A. Yes, that's right. That number is actually not quite
36 correct. Rather than "0" it should have been an "L".
37
38 Q. Never mind that for now. The "NURS", what does that
39 stand for?
40 A. She was a nursing officer.
41
42 Q. And the DDRPC?
43 A. Well, it's deputy director and I'm not sure what RPC
44 means now. I can't - it's probably "Reserve Policy" -
45 I'm not sure.
46
47 Q. The next one, Flight Officer B Smith, who was he,

1 where did he fit in, or she?
2 A. Okay. From (c) to (f), all of these members are
3 members of the Air Training Corps, they are not part of the
4 Air Force as such. Smith, I believe that he was - he was
5 one of the officers within 1 Flight, but I don't - he
6 wasn't the flight commander, the next person at (d) was the
7 flight commander. He was a member of that squadron, the
8 Air Training Corps squadron.

9
10 Q. And looking at the last one, Wing Commander Air
11 Training Corps Carroll James, just to reiterate, what was
12 his position?

13 A. He was the commanding officer of the Tasmanian Air
14 Training Corps squadron.

15
16 Q. Some months after the death of Eleanore Tibble, you
17 were interviewed by - I forget his rank - Stunden; is that
18 correct?

19 A. Yes, that's correct.

20
21 Q. You have been shown a document, as I understand it,
22 which is Group Captain Stunden's interview notes with you
23 and with others; is that right?

24 A. Yes, I've seen those.

25
26 MR STEWART: I show you the document and I tender it. It
27 is interview notes of Group Captain Stunden.

28
29 THE CHAIR: We will make the document exhibit 40-038.

30
31 **EXHIBIT #40-038 INTERVIEW NOTES OF GROUP CAPTAIN STUNDEN**

32
33 MR STEWART: Q. You've had an opportunity this morning
34 to look at Stunden's notes with respect to the interview
35 with you is concerned; is that right?

36 A. Yes, I have.

37
38 Q. Was that the first time you'd seen this document?

39 A. No. I - well, I'm being pedantic here. A copy of
40 these notes was emailed to me last night and I printed them
41 out this morning and read them on the plane up from Hobart.

42
43 Q. So you didn't see them back in 2000 or 2001?

44 A. No. No.

45
46 Q. No. Having had an opportunity to look through them,
47 do you accept that they are accurate insofar as they record

1 what it is that you said to Group Captain Stunden?
2 A. There's just a couple of concerns that I've got. Bear
3 in mind this was 15 years ago. I saw one note there
4 somewhere where he - oh, yes. It is under the answer to
5 the question, "Would you tell me about the matter?", at the
6 bottom of page 1, and there's - halfway into that paragraph
7 the flight commander said that:

8
9 *... Harper claimed that the parents thought*
10 *the relationship a good thing, inferring*
11 *that the girl was a "wild girl" and that he*
12 *was a steadying influence.*

13
14 I don't recall using the language "a wild girl".

15
16 Q. All right. Any other respects?

17 A. No, I think I'm happy with the - I'm reasonably happy
18 with the accuracy of these notes.

19
20 Q. Now, it's, of course, some considerable number of
21 years since you've had to apply your mind to the events at
22 that time; is that right?

23 A. Yes.

24
25 Q. And you would accept that some three or four months
26 after the events, when you spoke to Stunden, your memory of
27 what had occurred would be better than it is now?

28 A. Absolutely.

29
30 Q. In remembering back as to the events that took place
31 at that time, I take it you're reminded usefully by what's
32 recorded in these notes?

33 A. Yes.

34
35 Q. You came to know of the resignation of
36 Leading Aircraftman Harper by having been informed of that
37 by James, as recorded in the paragraph you've just referred
38 to; is that right?

39 A. Yes. Yes, I was.

40
41 Q. Looking at the top of page 2, it is recorded there
42 that you foresaw a number of problems how to respond to the
43 situation:

44
45 *... what are Air Force obligations with*
46 *regard to an adult in a sexual relationship*
47 *with a female minor.*

1
2 Just to stop there, James informed you that it was a sexual
3 relationship; is that right?
4 A. That's correct.
5
6 Q. And that became later a critical point for you when
7 you learnt actually that there was no evidence to support
8 that?
9 A. Later?
10
11 Q. Later, yes.
12 A. Yes, but at the time when he came and - when he
13 informed me of Harper's I'll call it a confession to his
14 flight commander, James informed me that it was a sexual
15 relationship.
16
17 Q. And that was on 16 August and it wasn't until
18 10 November that you learnt to the contrary; is that right?
19 A. Yes. Having read the papers that Wing Commander James
20 had concerning this matter, I'd formed the view that this
21 was not a sexual relationship.
22
23 Q. You saw those papers for the first time on
24 10 November; is that right?
25 A. That's correct.
26
27 Q. On 16 August, when he informed you of the matters that
28 are recorded here in the bit we've just looked at, you
29 didn't see the papers at that stage, am I right?
30 A. Yes, that's correct.
31
32 THE CHAIR: Q. When you say you were informed it was a
33 sexual relationship, what were you told?
34 A. Wing Commander James told me that there was a problem
35 within that particular flight, that LAC Harper had spoken
36 to his flight commander, informed the flight commander that
37 he'd been having a sexual - he'd had a sexual relationship
38 with a female member of the - a female cadet and that that
39 relationship was with the consent of the parents. And the
40 other thing of note, your Honour, was the fact that Harper
41 would not divulge the name of the female cadet.
42
43 Q. You had information that Harper had confessed to a
44 sexual relationship, sought to explain it as having a
45 consensual context?
46 A. Yes.
47

1 Q. That's the extent of the information you had, is it?
2 A. Yes. Well, a consensual relationship not only with
3 the female but with the consent of the parents as well.
4
5 Q. Yes, with the consent of the parents.
6 A. Now, that triggered some things for me and --
7
8 Q. What did it trigger for you?
9 A. I can't remember what the policy was at the time, but
10 what I intended to do was that once the female had been
11 identified, was that that was a matter that should be
12 reported to the civil police and - yes, I felt that that
13 was an obligation that Air Force had on a matter such as
14 that.
15
16 Q. Were you told how old the girl was?
17 A. I have no specific recall of that, but, you know, just
18 thinking back, I'm sure that the girl would not have been
19 in a position where she was old enough to consent.
20
21 Q. What you had was information of a potential criminal
22 offence committed by the person --
23 A. An adult.
24
25 Q. -- in the cadets?
26 A. Yes.
27
28 THE CHAIR: Yes.
29
30 MR STEWART: Q. Back to where we were on page 2, in the
31 third line, it is recorded you therefore told James to
32 endeavour to identify the female cadet; is that right?
33 A. Yes.
34
35 Q. Yes. And then you consulted with Wing Commander
36 Stevens - and you've explained her position earlier - but
37 the problem was no identification of the female, no
38 identification at that stage; is that right?
39 A. It says that. I can't recall that but I'm sure that
40 that's what would have happened, because I would have been
41 talking to as many people as I could on this.
42
43 Q. When did you learn the identity of the cadet?
44 A. On 10 November.
45
46 Q. Yes. Is that also when you learnt that some discharge
47 process had commenced against her?

1 A. Yes.
2
3 Q. Against the cadet?
4 A. Yes.
5
6 Q. Yes. If we look at the foot of the page --
7 A. Sorry, which page?
8
9 Q. The foot of that page, page 2, the same page, but just
10 before I come to that, could I just go back to where I was.
11 You said that the cadet should be identified. For what
12 purpose was that? In your mind for what purpose were you
13 seeking to have her identity established?
14 A. Okay. The information that I had was that this was a
15 consensual relationship. My view was that the parents
16 needed - once we'd identified who the cadet was there had
17 to be a meeting with the cadet and also the parents and
18 I would have informed them, this is what I was going to do
19 was to inform them, regardless of whether it was with
20 consent or not, that I intended to report the matter to the
21 civil authorities.
22
23 Q. Any other purpose in identifying her?
24 A. Oh --
25
26 Q. What about, at that stage, did you have in mind that
27 there would be some consequence for her within the cadet
28 organisation?
29 A. Oh, I see. This was contrary - behaviour of that type
30 was contrary to policy at the time and that would lead to
31 the cadet being discharged. You know, there are other
32 things. You know, I've got in here, I know, I've just
33 recalled it now, about the efficiency of the squadron as
34 well, that was another matter that was of concern for me,
35 and by "efficiency" I'm talking about, you know, what
36 example this sets to the other cadets, what are we doing
37 about this sort of thing and are we condoning it.
38
39 THE CHAIR: Q. Mr Watson, did you appreciate that you
40 had responsibility for children?
41 A. In a general sense, yes.
42
43 Q. But in a specific sense you then had a responsibility
44 for a child, didn't you?
45 A. Well, it just goes. I accept that I would have had
46 responsibility for, as far as Air Force is concerned, to
47 the children.

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Q. And when the circumstance was put before you, I understand, do I, that your first reaction was the child has to be discharged from the cadets?

A. Well, no, not necessarily. We've got to find out, establish what the facts are. I've only got one side of this at this stage but the matter has to be dealt with.

Q. Irrespective of the facts, why was it that the child would be discharged?

A. Well, within Air Force - within the Air Training Corps policy fraternisation is a matter which is not condoned.

Q. I understand that, but you were dealing now with an adult who, if the information was correct, seduced a child, weren't you?

A. No, I don't necessarily agree with that, your Honour, just thinking about that now, in the sense that I understand the relationship difference in age and, you know, if the cadet was a willing participant in whatever the activity is, sure, the adult should have known a lot better and should not have behaved that way and --

Q. But you've got an adult who is in a position of authority in an organisation which has the care and responsibility for children and you're prepared to say, are you, that the child has contributed to the arrangement?

A. The context in which I was informed of this was the fact that there was a sexual relationship, it was with the consent of the parents, so that's what I'm faced with.

Q. Even if you're given information that it was with the consent of the parents, the fact of the matter still is an adult seduced a child; correct?

A. Yes, absolutely.

Q. Why would it ever enter your head to blame the child?

A. All I can say, your Honour, is that we endeavoured - I endeavoured to ascertain the name - who the cadet was. In hindsight, I can see, you know, perhaps there was blame going to be apportioned, but subsequently, when I found out the full facts, that wasn't the view that I formed.

Q. When you say you found out the full facts, the fact that was taken away was that there wasn't a sexual relationship; isn't that right?

A. Yes.

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Q. But if that fact had remained, as far as you were concerned, the child carried blame and should be discharged; correct?

A. Yes.

Q. Do you think that was right?

A. Yes.

Q. Today do you think that's right?

A. I'm not sure about that, but look, it would depend on the circumstances, but, you know, the policy seemed to me to be quite clear, that fraternisation between the members is not condoned.

Q. And you didn't pause to think whether or not that literally applied when it was one of the adult members of the organisation who had seduced a child, that didn't cross your mind?

A. Well, yes, I'm sure it did, but there's nothing more I can say on this except that the course of action that I took I thought was the appropriate course of action. What we needed to do was to identify who the child was and from there my intention was for the parents and the child to be spoken to, to be interviewed.

MR STEWART: Q. Do you not see it, Mr Watson, as being a central purpose of the no fraternisation rule that it is to protect the children cadets from the predatory behaviour of adult instructors?

A. Yes, I certainly accept that.

Q. Because if one accepts that then one must conclude, surely, that in a situation such as this the child is not to blame?

A. I can - I can - I see that.

THE CHAIR: Mr Stewart, I think we might take lunch.

LUNCHEON ADJOURNMENT

MR STEWART: Q. Thank you, your Honour. Mr Watson, if you can be shown page 3 of that document, which was 40-038, that we were looking at when we adjourned, the second paragraph, or the first main paragraph. This is just to recap. Coming from the bottom of the previous page, dealing with the 10 November meeting when James spoke to

1 you, and this is before he showed you the documents, you
2 will see halfway down the page you come to deal with the
3 documents, and it is recorded there that you wanted to
4 consider the situation. And then it is recorded that you
5 were not uncomfortable with discharge, on your
6 understanding that the relationship was sexual, regardless
7 of when it occurred. Now, just stopping there, are we to
8 understand, on the information you had at that stage,
9 before you had read the documents, you thought it was
10 a sexual relationship, so you, in effect, supported the
11 discharge, is that right, the discharge of the cadet?
12 A. Yes.

13
14 Q. Then you go on in that sentence to say, or, rather, it
15 goes on to say, that you saw the relationship at the time
16 as a gross breach of trust between the staff and cadets.
17 What it really was was a breach of trust by the staff
18 member; would you agree?
19 A. Yes.

20
21 Q. It's not a breach of trust by the cadet?
22 A. No, I don't necessarily agree with that. I know we're
23 dealing with children, a young female, in this instance,
24 but, you know, I take - it's possible for a female to - not
25 only a female, for a young person to knowingly consent to
26 or participate in such a relationship.

27
28 Q. I accept you didn't know then that her age was 15, but
29 we know now she was 15 and he was 30.
30 A. Mmm.

31
32 Q. Surely, that changes your view?
33 A. Well, in the sense that a 29-year-old or a 30-year-old
34 should know - should not - is capable of making decisions
35 of not going down that sort of line.
36

37 Q. Well, more than that. Within the organisational
38 hierarchy he is in a position of authority over her; is
39 that not so?
40 A. He was certainly an instructor there, yes.

41
42 Q. And she was half his age?
43 A. Yes.

44
45 Q. She was of an age that was, in fact, below the age of
46 sexual consent in Tasmania at the time?
47 A. Yes.

1
2 Q. How can it possibly be justified to think that she was
3 to blame in that situation?
4 A. She's not solely to blame.
5
6 Q. Even at all?
7 A. Just hang on. This is hypothetical in the sense that
8 I'm - it was certainly supposed to be a sexual
9 relationship. If the girl had been taken advantage of,
10 fine, you know, that needs to be taken into consideration.
11
12 THE CHAIR: Q. Look, Mr Watson, don't you understand
13 that when a 15-year-old girl is in an organisation like the
14 one that the cadets involves and a 30-year-old makes
15 grooming approaches, although the 15-year-old may well
16 consent to what happens, the fact of the matter is that she
17 is in a seriously disadvantaged position to be able to
18 resist; do you understand that?
19 A. I understand your words, yes, your Honour.
20
21 Q. You don't understand the concept?
22 A. Yes - no, I see the concept, but I think what - in any
23 circumstance, I think what you are trying - what you are
24 trying - what you are saying to me is that a young person
25 is incapable of resisting.
26
27 Q. May be incapable of resisting.
28 A. Yeah, may be incapable.
29
30 Q. In circumstances where the blame for the breach of the
31 rules rests with the adult, not the child.
32 A. In certain circumstances - under certain
33 circumstances, I'm sure that could apply.
34
35 Q. Even in what you might see as a consensual
36 relationship, the blame will, nevertheless, be the blame of
37 the adult who carries the responsibility for it not to
38 happen, doesn't he?
39 A. Absolutely. Overwhelmingly - I - it depends on the
40 circumstances as to where the blame lies. Certainly,
41 I would see that the adult - I don't see any excuse
42 whatsoever for an adult, but for the junior, for the young
43 person, the child, I say that they are quite capable of
44 making decisions and in the context in which I'm dealing
45 with here, I understood that all of this was happening with
46 the parent's consent, the child's parent's consent.
47

1 Q. Why does that have anything to do with it?
2 A. Well, I - well, certainly in my - if a parent - if the
3 child is quite happy for this situation to occur and it is
4 with the consent and encouragement of the family, I would
5 think that that's a bit different to a girl who is being
6 suborned by a male in isolation.
7
8 MR STEWART: Q. We now know, of course, that those facts
9 were wrong, but even if they had been right, would that not
10 suggest, actually, that you should perhaps be stepping in
11 to protect her from her family?
12 A. Me? Me stepping in to protect her from the family?
13
14 Q. By you I meant actually the organisation.
15 A. I'm not sure how far the organisation goes, but what
16 I can say is that if my understanding from the briefing
17 that I had in August was in fact correct, I would have
18 every obligation to report this to the authorities, which
19 is what, you know, my intention was.
20
21 Q. And part of your thinking in reporting to the
22 authorities is so that the child protection authorities --
23 A. Absolutely.
24
25 Q. -- can step in and protect --
26 A. Absolutely.
27
28 Q. -- and protect her if need be?
29 A. Absolutely.
30
31 Q. Which supports the view that it would be entirely
32 wrong, on the information you had, to presuppose that the
33 cadet had any fault in it?
34 A. I'm sorry, you will have to run that past me again.
35
36 Q. If you took the view that you had to report to the
37 child protection authorities because they may have to take
38 action to protect the cadet --
39 A. Yes.
40
41 Q. -- then on what possible basis could you have thought,
42 on the information you had, that the cadet was at fault?
43 A. I'm not in - I was not in control of all of the facts.
44 These are things that are going through my mind, of action
45 that I may have to take.
46
47 Q. In any event, you then took time to consider your

1 position, which included reading through the documentation;
2 is that right?
3 A. Yes.
4
5 Q. And from that you concluded there was nothing to
6 support what you had been told weeks previously, that it
7 was a sexual relationship; is that right?
8 A. Nothing to support from a sexual relationship, yes.
9
10 Q. Yes, that specifically. And if we look, then, at the
11 top of the next page, page 4, you then concluded - this is
12 in the second line - that there were therefore insufficient
13 grounds to support a discharge; is that right?
14 A. Yes.
15
16 Q. That's because the sexual relationship aspect had been
17 removed; is that right?
18 A. Yes.
19
20 Q. Then what occurred, as recorded in the next three
21 sentences, is that because James had already started
22 a process and had instructed staff to discharge the cadet,
23 between you and he, you agreed to consult with
24 Lydia Stevens; is that right?
25 A. Yes, that's correct. And this is the first time
26 I became aware that the cadet had been identified, and it
27 was the first time I'd seen any papers on the matter.
28
29 Q. Well, by "the first time" you mean earlier that day?
30 A. Yes - oh --
31
32 Q. On 10 November?
33 A. Yes.
34
35 Q. Because you had --
36 A. My recollection - sorry. My recollection is that this
37 happened on Friday night, after we'd arrived in Canberra,
38 when it was brought to my attention, and having read those
39 papers - and I read the papers there and then - you know,
40 I took the view that it did not - there was no evidence
41 there pointing to a sexual relationship.
42
43 Q. Yes, but in those papers was her identity as well?
44 A. Yes.
45
46 Q. Yes, absolutely. And so then it wasn't until another
47 two days later that you and he - that's you and James - had

1 the discussion with Stevens that is recorded in the next
2 paragraph. Do you see that?
3 A. Yes, that's correct.
4
5 Q. And then you and Stevens took the view that there were
6 insufficient grounds for discharge and that the discharge
7 process should be stopped; am I right?
8 A. Yes.
9
10 Q. And you told that to James?
11 A. Yes, as did Stevens.
12
13 Q. And between the two of you, you directed him to stop
14 and reverse that process?
15 A. Yes.
16
17 Q. And he was concerned that he would lose face because
18 he had already told her or given instructions that there
19 should be such a process; is that right?
20 A. Yes, that's correct.
21
22 Q. And so you offered him something of an out; is that
23 right?
24 A. Yes.
25
26 Q. And that is recorded in the paragraph beginning - it's
27 at the bottom of the screen now, if we can scroll it up:
28
29 *Watson provided James with the following*
30 *advice. Get the girl in, advise her that*
31 *you have reconsidered your position and*
32 *have decided not to discharge her. Counsel*
33 *her strongly that her conduct is not what*
34 *is expected, that we are not happy and make*
35 *sure that she understands.*
36
37 Do you accept now that that approach is totally wrong?
38 A. No.
39
40 Q. Do you accept now that the approach that should be
41 taken is to offer her all the support that the organisation
42 can offer her and to reassure her that she is not the party
43 who has done wrong in this instance?
44 A. To advise her that she was not the party at fault -
45 I think that's taking it too far, you know.
46
47 Q. So you disagree?

1 A. Yes.

2

3 Q. I want to show you, in contrast, the approach taken by
4 someone else in a similar situation. It is at tab 42A.
5 I will explain what this is. This is the case of [CJE].
6 I am guessing you don't know the circumstances of that
7 case, am I right?

8 A. I don't think so.

9

10 Q. [CJE] was a 17 year old who was pursued by a 23 year
11 old over a period of time and he was a cadet instructor and
12 they had a sexual relationship and it then came out and
13 there was a process against him. He was ultimately
14 convicted. This is the email of the commanding officer to
15 [CJE] shortly after those facts emerged, the facts of her
16 as a 17-year-old having had a sexual relationship with an
17 instructor, a 20-something-year-old instructor. This is
18 what her commanding officer said to her:

19

20 *Hi [CJE],*

21

22 *[CJF] --*

23

24 that's another cadet. Do you see that in front of you?

25

26 *-- called me this afternoon and told me*
27 *what happened. I want to reassure you that*
28 *you will always have my full confidence and*
29 *support, and I am not disappointed in you.*

30

31 *I understand you blame yourself but you are*
32 *completely blameless and there will be no*
33 *repercussions from the AAFC or from me of*
34 *any kind whatsoever. In time you will come*
35 *to understand he --*

36

37 that's Adams, the instructor --

38

39 *is completely responsible for what has*
40 *happened, not you. You are not at fault.*

41

42 I suggest to you that is the proper supportive, non-blaming
43 approach that should have been taken in the case of
44 Eleanore Tibble.

45 A. Well, again, I can - I've read that. I can only
46 reiterate what I've already - you know, I think I've said
47 this, is that there was no evidence, in my view, to justify

1 the discharge of Eleanore Tibble.
2
3 Q. Yes. You have said that.
4 A. As far as blame and that is concerned, I hadn't --
5
6 Q. Well, that paragraph --
7 A. I don't think I'm talking blame here at all. All I'm
8 saying is that there was no evidence to support the action
9 that was being taken against her.
10
11 Q. It is hard to get away from the word "blame" when you
12 have said that she should be counselled strongly that her
13 conduct is not what is expected, "that we are not happy and
14 make sure that she understands".
15 A. Mmm.
16
17 Q. That's blaming her, isn't it?
18 A. Well, it's certainly informing her of, you know, what
19 our expectations are.
20
21 Q. I just want to get some information from you, if
22 I can, Mr Watson. Can I show you that document at
23 page 0071. It is part of the interview notes with
24 Wing Commander Carroll James. You may be able to help me
25 with some information there. It is exhibit 40-038 that we
26 were looking at earlier.
27 A. Just hold on a moment. I'm having trouble here.
28 I have interview notes with Wing Commander Carroll James.
29
30 Q. Page 3 of those notes.
31 A. And the opening is 17 September '07?
32
33 Q. That's right. In the third paragraph it says, "J",
34 that's James:
35
36 *... received the record of conversation on*
37 *17 Oct 00 and calls DRES's ...*
38
39 I take it that's "Directorate Reserves"; is that right?
40 A. Yes, that's correct.
41
42 Q. --
43
44 *OFFICE for advice as to what action should*
45 *be taken. DDRP ...*
46
47 I take it that's a reference to Stevens; would that be

1 right?
2 A. I think so - yes, because we saw something earlier.
3
4 Q. Yes:
5
6 *... was not available but J spoke to*
7 *CPM ...*
8
9 Do you know who or what that is?
10 A. No. No. I just can't work that one out. I imagine
11 it would be an officer who reports to
12 Wing Commander Stevens.
13
14 MR STEWART: I have no further questions, your Honour.
15
16 THE CHAIR: Does anyone else have any questions?
17
18 **<EXAMINATION BY MS DAVID:**
19
20 MS DAVID: Q. Thank you, Mr Watson. My name is David
21 and I represent Susan Campbell who, as you would know, is
22 the mother of Eleanore Tibble. I have a few questions.
23 Firstly, in relation to Harper, did you take any action at
24 all against Harper?
25 A. Personally, no. The - do you want me to explain?
26
27 Q. Yes.
28 A. My understanding - my recollection is, and having read
29 these notes, I thought Harper was discharged but I think
30 I'm wrong there. I think Harper chose to resign. He was
31 offered the choice of resigning by his flight commander and
32 that's the action that he took.
33
34 Q. But at the time that you became aware of this matter,
35 you were not aware - isn't it your evidence that you did
36 not know that Harper had resigned?
37 A. My recollection is that I did know and when
38 Wing Commander James briefed me on the - the first briefing
39 was that Harper had resigned.
40
41 Q. Can you please have a look at exhibit 40-038.
42 A. Okay, who can help me with that?
43
44 Q. I will just ask, perhaps, if it could be brought up,
45 please, exhibit 40-038. They are the interview notes that
46 you referred to before.
47 A. Yes, I have got it.

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Q. If I could just read what it says:

Harper knew that his actions were contrary to AIRTC policy and he intended to resign.

This is a record of what you had said:

(Watson was not aware/was not told at that stage that Harper had resigned.)

That's down the bottom of that page. Is that an accurate reflection of your knowledge at that time?

A. I'm not trying to split hairs here, but I'm not - I don't recall those precise words and I'm not sure whether those words are being attributed to what I knew or whether this is from the flight commander, which is in the previous sentence, but my recollection is that on the first - on the day that I was briefed - and I've got nothing else to help me here, is that - my recollection is that Harper had resigned.

Q. This seems to be suggesting, doesn't it, that at the time that you, in fact, didn't know he had resigned and so was still available to be interviewed at that time? If you didn't know he had resigned, he was still around and a member of the Corps, wasn't he, the cadets?

A. Well, that's what you are asking. I have just told you, though, that I think - my recollection is that he had resigned and that he was finished, gone.

Q. So what Stunden has reported is not accurate; is that what you are saying?

A. On my recollection - I've just told you what my recollection is and - the shame of this - I thought that I had actually made a statement, but it appears - to Stunden, but it appears that I haven't and - so --

Q. Just coming back to that, are you aware that, in fact, Harper remained, if I could say, available for a period of time after his resignation?

A. No, that's not - that is definitely not my understanding. My understanding is that he was gone and that - and he resigned and that's the way it was.

Q. Did you make any effort to ascertain whether he was available for a further interview to try to clarify what

1 you had learnt?
2 A. Okay. When James informed me of the situation, my
3 recollection is that he confessed, so to speak, that he had
4 had a sexual relationship with a female cadet, but he
5 wouldn't identify who the cadet was.
6
7 Q. But the fact of the matter is you made no steps
8 yourself, or didn't agree with any other person with whom
9 you were trying to - sorry, with any other officer to
10 actually have further communications with Harper, did you?
11 A. No. Well, I certainly didn't, no.
12
13 Q. Did you suggest it to James or to Stevens or to
14 anybody else, or to Kowalik, to pursue this inquiry?
15 A. As I said, the information that I had received from
16 James was that he would not say who the cadet was that was
17 involved, so, you know, I'm not sure what you want me to
18 do, whether I should have then spoken to him or got other
19 people to speak to him to see if they could cajole him into
20 telling us who was involved, but the information I've got
21 is that he would not divulge who the female was.
22
23 Q. There was just an acceptance of that position?
24 A. An acceptance of the position in that he would not
25 disclose --
26
27 Q. That he would not divulge that information?
28 A. Yes.
29
30 Q. So you just accepted that, notwithstanding it was in
31 breach of the policies?
32 A. Yes, but the guy has resigned, you know, so that's the
33 policy issue, as I see it - I think I see --
34
35 Q. In relation to this complaint, did you ever see his
36 actual resignation letter in the course of the inquiry?
37 A. I can't recall.
38
39 Q. So what you have got in that paragraph that is up on
40 the screen is essentially based - it is hearsay, isn't it,
41 from what Kowalik has told you?
42 A. He didn't tell me anything; he told the CO who then
43 briefed me.
44
45 Q. So it is second, third, fourth-hand hearsay?
46 A. Yes.
47

1 Q. And you pursued an inquiry of that nature based upon
2 that information?

3 A. I pursued the inquiry?
4

5 Q. An inquiry was pursued. You didn't seek to change
6 that process, did you, at any time?

7 A. What I asked James to do was to see if we could
8 identify who the female cadet was involved.
9

10 Q. Just coming back, I know Counsel Assisting has asked
11 you this, but were you aware of the evidence that
12 Mrs Campbell gave in these proceedings earlier this week?
13 Have you ever seen her statement or did you look at her
14 evidence, view it?

15 A. Well, it was reported in the press in Hobart and
16 that's all I've seen.
17

18 Q. I just want to point out a couple of pieces of her
19 evidence to you to see whether you were aware. She said:
20

21 *I did not know that the AAFC did not allow*
22 *cadets and instructors to socialise*
23 *together.*
24

25 She also said:
26

27 *At that time, I did not think there was*
28 *anything inappropriate about Eleanore's*
29 *involvement with Harper. I simply saw him*
30 *as assuming the role as a mentor or older*
31 *brother of Eleanore.*
32

33 She then went on to give evidence to say that when she
34 became aware that Harper's intentions with Eleanore were
35 improper, she made it known to him that any relationship
36 with her daughter was inappropriate and out of the
37 question. Now, do you agree that that is in stark contrast
38 to your understanding that this was a parent who was
39 consenting to a sexual relationship with an older man, aged
40 30, from the cadets?

41 A. Yes.
42

43 Q. Stark contrast to that?

44 A. Yes.
45

46 Q. And yet, at no stage did you or anybody else ever seek
47 to make any contact with Mrs Campbell throughout that

1 period of time, did they, over a four-month period?
2 A. I don't believe so; I certainly didn't.
3
4 Q. No. Would you agree that basing an investigation on
5 second, third, fourth-hand hearsay is just completely
6 unacceptable?
7 A. Yes.
8
9 Q. And that in this case it was actually dangerous?
10 A. As it turned out, yes.
11
12 Q. And it's also extremely hurtful, isn't it, that this
13 kind of representation about a person who has never been
14 invited by the cadets to respond, to suggest that she was
15 somehow complicit and consenting to a highly inappropriate
16 sexual relationship between her young daughter and an adult
17 is just really a terrible thing for someone to have to
18 bear, isn't it?
19 A. Yes.
20
21 Q. And isn't it the case - would you agree - that this
22 raises the importance of ensuring that records are taken
23 accurately?
24 A. Absolutely.
25
26 Q. Carefully?
27 A. Yes.
28
29 Q. And that they are recorded?
30 A. Yes.
31
32 Q. To ensure that there is no misunderstanding about what
33 people have been saying?
34 A. Absolutely.
35
36 Q. Yet, in this case, it is really based on a letter
37 written by Harper and then an impression that Kowalik has
38 from his conversation, an informal conversation, and yet,
39 there has been no attempt, even though you were aware that
40 Mrs Campbell was quite upset about the situation through
41 the course of the investigation, no-one ever spoke with her
42 or attempted to give her the opportunity to participate in
43 the process? Do you agree?
44 A. I think your question - are you asking me was
45 Mrs Campbell entitled to be upset at the way that this
46 matter was handled?
47

1 Q. Yes, you would understand that she is entitled to be
2 very upset about that?
3 A. Because she is. I totally agree, I completely agree.
4
5 Q. In terms of procedures, after this were there any
6 procedures brought in place to ensure that any conversation
7 or any investigative process was actually recorded?
8 A. Not by me.
9
10 Q. Because it was fairly dangerous - would you agree that
11 the interview that was conducted with Ms Tibble was also
12 a situation that it is very hard to know exactly what she
13 did say during the course of that interview, when you read
14 it?
15 A. Yes, without having the advantage of seeing what the
16 document was - because I thought Eleanore had written - it
17 was a statement that she had written, but having read these
18 documents, it appears it was in a record of conversation
19 conducted between Kowalik and her, but having read those -
20 that document and with what she said, she expressly stated
21 that she did not have any sexual relations - this is my
22 recollection - she didn't have any sexual relationship with
23 Harper at all. It was a relationship - it just - it was
24 a completely different light on what I thought we were
25 dealing with. And bear in mind, I only came in on this
26 late in relation to the identity of Eleanore.
27
28 Q. You came in it a short time after you were aware of
29 Harper's resignation, or the fact of Harper making this
30 disclosure?
31 A. Yes, but we didn't know who the - who Eleanore was at
32 that time.
33
34 Q. In relation to the record keeping, there's no record
35 of any telephone conversations between Smith and Eleanore,
36 is there?
37 A. I can't answer that; I don't know.
38
39 Q. Again, did you not, in terms of - I mean, it was your
40 role, wasn't it, to ensure that policies were complied
41 with, proper procedure would be complied with in such
42 a situation. Do you agree with that?
43 A. Yes.
44
45 Q. Yet, at no stage was there any effort to record or put
46 in place any procedures to ensure that any conversations
47 were recorded?

1 A. When I became aware that there had been no records of
2 conversation conducted and what have you, notes taken of
3 conversations and what have you, to say I was surprised is
4 an understatement, and I only became aware of this on the
5 day of Eleanore's funeral.

6
7 Q. But you did not yourself then set in place any
8 procedures to ensure that proper records were kept during
9 the course of the investigation?

10 A. No.

11
12 Q. You have said that you were looking at some stage to
13 take this to the civil authorities. Did you have
14 discussions with other personnel about that, in terms of
15 either Kowalik, James or Stevens?

16 A. I'm - according to these notes here, I certainly had
17 a conversation with - I can't remember this, but I had
18 a conversation with Wing Commander Stevens, and also,
19 according to these notes, with a Squadron Leader Timms, who
20 was the equity adviser at Laverton in Melbourne.

21
22 Q. I just want to take you please, again, to
23 exhibit 40-038. It is Ringtail 0052. Do you agree that it
24 says down the middle of the page, in the middle of the
25 middle paragraph:

26
27 *Watson told James that if he was concerned*
28 *about appearances with the FLT (the*
29 *perception of inaction) he could consider*
30 *moving her --*

31
32 as in Eleanore --

33
34 *From her peer group into a new FLT. Watson*
35 *said with this approach - reconsidered his*
36 *position - James would not be losing face.*

37
38 Could you explain that, please?

39 A. Okay. After I had read the documents in Canberra and
40 I took the view that there were insufficient grounds here
41 to warrant Eleanore's discharge, there was concern from
42 James about - well, he didn't accept my interpretation of
43 the documents. That was on the Friday night. On the
44 Sunday afternoon, before we flew back to Tasmania, we had
45 a conversation with Wing Commander Stevens and I put my
46 position to her in Carroll James presence and she agreed
47 with me that there was insufficient grounds and the

1 directive was from her, supported by me, that he needed to
2 reinstate Eleanore.

3
4 James was concerned about - and I have this
5 recollection of these words that he said - that he would
6 lose face by doing this, you know, I sort of - I was
7 surprised at this, but I was trying to come up with
8 a strategy for him in bringing the girl back into the
9 Air Training Corps.

10
11 Q. And with him saving face, is that what you are
12 suggesting? You were assisting him to save face,
13 weren't you?

14 A. I was giving him a strategy that he could adopt.

15
16 Q. Why would you embark on such a position? Why would
17 you hold such a position, to save face in the situation
18 where due process wasn't adhered to, and clearly this young
19 woman needed to be advised that she had done nothing wrong
20 and have things set right? Why would you support
21 a face-saving position of James?

22 A. To get the job done, for him to do the job, to bring
23 her back in.

24
25 Q. Did you report any of this to your superiors, that
26 James was trying to save face at the expense of this young
27 woman?

28 A. His superior, Wing Commander Stevens, was present when
29 this conversation took place. I didn't report it to my
30 superiors at that time.

31
32 Q. It is a case really that the delay was about trying to
33 find some way to save face for these people that had put
34 this young woman in the most terrible position, wasn't it?

35 A. No. I'm not sure what you mean by "the delay". Are
36 you suggesting that - oh, I see, because he hadn't --

37
38 Q. Well, wasn't there a delay? Yes, he hadn't
39 complied with the directive to reinstate?

40 A. Yes, no, no, I accept that, I understand that,
41 I understand what you're saying. I expected that he would
42 bring Eleanore back in within days of returning to Hobart.

43
44 Q. Well, he didn't, and what I'm suggesting to you is
45 that given that you knew his reluctance, by reason of the
46 fact that he wanted to save face, wouldn't that have been
47 something that you or others should have concerned yourself

1 with at that time?

2 A. My recollection is that at the end of that meeting
3 that Carroll James was going to reinstate Eleanore, at the
4 conclusion of that meeting in Canberra on that Sunday.

5

6 Q. But you were aware, by reason of that paragraph, is
7 what I'm suggesting to you, that James was intent on
8 a course of action to discharge Eleanore or force her to
9 show cause, weren't you? You have read the document. You
10 said you read it on the plane.

11 A. Yes, up until the Friday, this is the first time
12 I became aware that they had identified who the female
13 cadet was, and on that day I took the view that there was
14 insufficient evidence to go down that line and that she
15 should be reinstated. On the Sunday we had a meeting with
16 Wing Commander Stevens and I put my position to her. She
17 accepted it and James was given a direction to reinstate
18 her.

19

20 Q. Do you agree that you, together with James and others,
21 appeared to be more interested in looking at procedures to
22 justify your actions against Eleanore Tibble, rather than
23 ensuring that things were set right and there was
24 procedural fairness?

25 A. No. No, I don't.

26

27 Q. But you happily explored all those options, didn't
28 you, to cause Eleanore Tibble to show cause or to shuffle
29 her into another flight?

30 A. No, I didn't. You are asking me and the answer is no.
31 What James was - what I asked him to do back in August was
32 to identify who the cadet was and once the cadet had been
33 identified then he was - my expectation was that he was
34 going to inform me that she had been identified, they knew
35 who she was, and then we would work out what we were going
36 to do.

37

38 Q. In the process of working out what you were trying to
39 do, what I'm suggesting to you is that there was more
40 concern about James saving face than there was for ensuring
41 a very rapid process to reinstate and ensure that
42 Eleanore Tibble was supported?

43 A. No, I don't agree.

44

45 Q. Just to be clear, when you left the cadets was it the
46 case that there are now in place procedures to ensure that
47 all conversations are recorded? Is there such a process?

1 Are there such steps to ensure that records accurately
2 reflect the conversation, that is, verbatim records?
3 A. I have no recollection of that.

4
5 MS DAVID: I have nothing further, thank you, your Honour.

6
7 THE CHAIR: Does anyone else have any questions?
8 Mr Stewart?

9
10 MR STEWART: I have nothing further, your Honour.

11
12 THE CHAIR: Thank you, Mr Watson, that concludes your
13 evidence, you are excused.

14
15 THE WITNESS: Thank you, your Honour.

16
17 **<THE WITNESS WITHDREW**

18
19 MR STEWART: Your Honour, I should report that information
20 available to us indicates that former Wing Commander Lydia
21 Stevens is deceased and that Carroll James is abroad, at
22 this stage we don't know for how long and don't have
23 a means immediately, in any event, of finding out. I call
24 Terrence Delahunty

25
26 **<TERRENCE CHARLES DELAHUNTY, affirmed: [2.45pm]**

27
28 **<EXAMINATION BY MR STEWART:**

29
30 MR STEWART: Q. Air Commodore, would you state your full
31 names and occupation?

32 A. My name is Terrence Charles Delahunty. I'm an active
33 reservist in the Royal Australian Air Force currently in
34 the position of Director-General Cadets Branch Air Force.

35
36 Q. Do you have available to you your statement prepared
37 for the Royal Commission dated 10 June 2016?

38 A. I do.

39
40 Q. Do you confirm that the statement is true and correct?
41 A. Yes.

42
43 MR STEWART: I tender the statement, your Honour.

44
45 **EXHIBIT #40-039 STATEMENT OF TERRENCE CHARLES DELAHUNTY**
46 **DATED 10/06/2016**

47

1 MR STEWART: Q. I understand, sir, that you are an
2 Air Commodore in the Royal Australian Air Force and you
3 served continuously in the active reserve since 2005; is
4 that right?
5 A. That's correct.
6
7 Q. And prior to that, you were a member of the permanent
8 Air Force continuously from 1977 to 2004; is that correct?
9 A. That is correct.
10
11 Q. You commenced your current appointment as
12 Director-General Cadets Air Force with effect from
13 17 February 2014; is that correct?
14 A. That is correct.
15
16 Q. I take it then that you took over from Air Commodore
17 Green --
18 A. That is correct.
19
20 Q. -- from whom we heard earlier today?
21 A. Yes.
22
23 Q. With regard to the structure and responsibility, if
24 I can refer you to paragraph 9 of your statement,
25 I understand from that that the Director-General Cadets Air
26 Force is a staff appointment in Air Force Headquarters and
27 is not a member of the Australian Air Force Cadets
28 organisation itself; is that right?
29 A. That is right.
30
31 Q. And moving on to paragraph 10, your position as
32 Director-General Cadets Air Force, or rather, in that
33 position you have the powers and functions delegated by the
34 Chief of Air Force to administer the AAFC; is that right?
35 A. That is correct.
36
37 Q. And that includes responsibility for the organisation,
38 maintenance, regulation and control of the AAFC and
39 discipline of all personnel within the AAFC; is that right?
40 A. That is correct.
41
42 Q. And in contrast, the operational and daily management
43 of the AAFC is the responsibility of the Commander
44 Australian Air Force Cadets, who is a member of the AAFC,
45 with powers and functions delegated under the appointment
46 of the Chief of Air Force; is that right?
47 A. That is right.

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Q. And that commander of the AAFC is responsive to the Director-General Cadets - Air Force - that's you - to ensure that the AAFC organisation is compliant with Defence policy; is that right?

A. That's right.

Q. And that AAFC activities are planned and executed with the approval of cadets branch for the appropriate expenditure of Commonwealth funds and for Commonwealth insurance cover?

A. That is correct.

Q. When you refer to the cadets branch, can you explain to us just what that is?

A. Cadets branch are the people who work directly for me. There are about 40 staff. They are comprised of permanent Air Force people, reservists and Australian public servants. Whilst probably a third of the staff are with my organisation in Canberra, the majority are located in the states where they can provide direct support to the AAFC units.

Q. Can I ask that you are shown tab 378 of the bundle. It is your charter of responsibilities which is an annexure to your statement. Do you see that there? This is dated 26 February 2014 and signed by Air Vice-Marshal Davies, then Deputy Chief of Air Force. You are obviously familiar with this?

A. Yes, I am.

Q. In the non-military world this would be, I suppose, the equivalent of a job description or --

A. Yes, the statement, job statement.

Q. Yes, job statement. I note there, if one looks under the heading "Results", it provides that you are the steward of the AAFC and you are to set the standard in everything you do, including, and then there are six different headings set out, including at (c), "Providing advice on the delivery of current and future AAFC policy and programs." I take it, of course, that is part of your responsibilities, is it?

A. Yes, it is.

Q. And in providing that advice, who do you provide that to?

1 A. I provide that to the Chief of Air Force through the
2 deputy chief.

3

4 Q. If we can scroll further down, in the next section it
5 says:

6

7 *You are to implement Government, Defence*
8 *and Air Force policy and guidance*
9 *through: ...*

10

11 Do you see where I am?

12

A. Yes, I do.

13

14 Q. And then in paragraph (e) on this occasion:

15

16 *The conduct of efficient and effective*
17 *planning, risk management and resource*
18 *management within a framework of good*
19 *governance, thereby optimising AAFC*
20 *outcomes.*

21

22 From that I am to understand that you are responsible to
23 implement policy and guidance with regard to risk
24 management; is that right?

25

A. That is correct, particularly in the conduct of
26 activities.

27

28 Q. I am sorry, I didn't quite get that. Particularly in
29 the conduct of?

30

A. Activities.

31

32 Q. So that's AAFC activities?

33

A. Activities, yes.

34

35 Q. And so that obviously includes the conduct of AAFC
36 cadets and staff conducting AAFC activities?

37

A. That's correct, yes.

38

39 Q. Now, I want to deal first with the Symonds and Oakley
40 issue. You are familiar with that, of course, what I am
41 referring to?

42

A. Yes, I am.

43

44 Q. You, in a sense, took over the conduct, or some level
45 of responsibility, in relation to this when you replaced
46 Air Commodore Green; is that right?

47

A. That is right.

1
2 Q. So the matter had been going on for a while by the
3 time you became involved?
4 A. Sorry, with regard to Symonds and Oakley?
5
6 Q. Yes.
7 A. No, that happened when - it came to my notice when
8 I had taken over.
9
10 Q. I stand corrected. It was brought to your attention,
11 then, from the executive officer of the relevant wing; is
12 that right?
13 A. That is right. He reported to the commander of the
14 AAFC at the time, Group Captain Ken Given, and made me
15 aware of that.
16
17 Q. Yes, and it came up to you. Perhaps we can look at
18 that at tab 13. You may have been aware of the matter
19 prior to this, but it's just this aspect where I want to
20 pick it up. You will see this is an email from
21 John Devereux who was the executive officer of the wing; is
22 that right?
23 A. Yes, the officer commanding, yes.
24
25 Q. And it is to Ken Given and to you, do you see that?
26 A. Yes, I do.
27
28 Q. On 2 May. And then he gives some background
29 information with regard to various matters on the first
30 page. If we could look over the page, at page 30 on the
31 Ringtail, he then raises what he describes as three matters
32 of note. Do you see that?
33 A. Yes, I do.
34
35 Q. We can look at the second one. He said:
36
37 *We need to give some thought to formally*
38 *promulgating our policy on the interaction*
39 *with outside agencies.*
40
41 This is the interaction with police because he has reported
42 to you that the matter has been reported to police; do you
43 see that?
44 A. Yes, I do.
45
46 Q. And then he asks some questions. He says:
47

1 *Is it - once the matter has been referred*
2 *to an outside agency that we stop?*

3

4 In other words, "stop our investigation"; do you understand
5 that?

6 A. Yes, I do:

7

8 *Or once the outside agency commences an*
9 *investigation, that we stop?*

10

11 Then he goes on:

12

13 *Either way, we should clearly outline our*
14 *policy (the Interim POLMAN and MoM are*
15 *silent on the issue) there may, of course,*
16 *have been reference somewhere in an RI at*
17 *some point.*

18

19 Would that be the right reference, "RI"?

20 A. I think it probably should be an "SI", but --

21

22 Q. What would that be?

23 A. A standing instruction rather than a routine
24 instruction.

25

26 Q. And then in point 3 he says:

27

28 *The chapter on child protection in the*
29 *Manual of Management is listed as "drafting*
30 *not yet commenced".*

31

32 *The chapter on the same topic in the*
33 *Interim POLMAN appears woefully out of date*
34 *and refers to documents due to be created*
35 *which I was unable to find.*

36

37 *Might I respectfully suggest, given the*
38 *current climate of understandable concern*
39 *with respect to institutional child abuse,*
40 *that the child protection chapter needs*
41 *a jolly good nudge along?*

42

43 Is this a valid criticism that he made at that time?

44 A. At that stage I think it was valid. The child
45 protection was in draft. We were waiting, at that time -
46 we knew that the CDF directive - sorry, the VCDF directive
47 on child protection was imminent and that would have

1 informed the completion of our policy. So in the context
2 of where we were in developing policy on child protection,
3 his observation there that there was a gap at that time is
4 true.

5
6 Q. But more than that, he's also making the point that
7 it's hard - if you read it together with what I read under
8 point 2, it is hard to find what the right applicable
9 policy is on any particular matter. Do you see that?

10 A. Yes, and there was child protection - there was some
11 draft, it was accessible, but again, as I stated, it was no
12 use furthering that because we knew we would have to update
13 it with the imminent issue of the VCDF directive.

14
15 THE CHAIR: Q. Can I just pause for a moment? You have
16 been, no doubt, listening to the evidence that has unfolded
17 before us?

18 A. I have, sir.

19
20 Q. I may be wrong but the impression I have is that what
21 has actually happened is that we have a military
22 organisation with the culture that that must necessarily
23 have, the command structure which it must have, centralised
24 orders and procedures, but it's a military organisation
25 which has responsibility for a great many children. Am
26 I right in thinking that the organisation has struggled to
27 put together the appropriate structure, culture, rules and
28 procedures for a military organisation that is in fact
29 responsible for a great many children?

30 A. I think "struggled" is probably an apt description,
31 your Honour, in that it has taken time - it was
32 a deliberate recognition that we had to put that policy in
33 place, but it did take time, and I think John's view, you
34 are right, is indicative of the fact that we were coming to
35 grips with this responsibility.

36
37 Q. How long has the organisation been in existence?

38 A. The AAFC? It's the 75th anniversary this year.

39
40 Q. It has taken a long time, hasn't it?

41 A. Yes, it has.

42
43 MR STEWART: Q. You see, Air Commodore, what I'm
44 suggesting, picking up where I left off, is that the fact
45 that a professor of law - that is John Devereux I'm
46 referring to - was the commanding officer of the wing and
47 he found it difficult to find the applicable provisions

1 with respect to a particular issue, suggests that others in
2 the organisation might be in a pretty hopeless position
3 trying to determine just what applies at any particular
4 time?

5 A. At that time, as I said, there was a gap. If someone
6 did go looking for that information they would have found
7 that chapter on child protection, drafting - it was
8 visible, but I take the point, it was not finished, and
9 I accept that fact, that we were in that position where
10 there was that void in definitive policy, which I may add
11 was filled with the release of that VCDF directive not long
12 after that discussion with John Devereux.

13
14 Q. That was I think later in May, was it, of that year?

15 A. I think it was 2 May, from memory.

16
17 Q. So, in fact, the same day as this email?

18 A. Yes.

19
20 Q. And by happy coincidence.

21 A. Well, happy coincidence, yes, and I remember having
22 that conversation with John, that his observations were
23 correct, but it was serendipitous that on that day the
24 directive did come out.

25
26 Q. It is a process of development of putting these
27 policies into place that has been ongoing over quite
28 a period of time; is that not so?

29 A. That is correct.

30
31 Q. And it is still not quite there?

32 A. Not the complete suite of the youth policy manual, no.
33 There is still a body of work to be done to complete that.

34
35 Q. Returning to this question of Oakley, on receipt of
36 this information that there was a police investigation
37 underway, you then gave the direction that the AAFC
38 investigation with regard to it was to cease; is that
39 right?

40 A. Yes, that's right.

41
42 Q. And in the meanwhile, the position was that Oakley was
43 suspended from the AAFC; is that right?

44 A. That is correct.

45
46 Q. I refer you to tab 24 which is now approximately
47 a year later. There is an email from Murray Spittle. Was

1 he your deputy director?

2 A. Yes, he was.

3

4 Q. It was to a couple of people, including copied to you.
5 Do you see that?

6 A. Yes, I do.

7

8 Q. He says that:

9

10 *ADFIS staff is in contact with the*
11 *Queensland Police Service and subject*
12 *member is still under investigation. There*
13 *is nil time frame mentioned. Therefore,*
14 *please ensure that the member is excluded*
15 *from all AAFC activities and premises until*
16 *further notice.*

17

18 And then:

19

20 *(DCDR: please extend UAL by six months).*

21

22 Now, just to break that down, ADFIS is what?

23 A. The Australian Defence Force Investigative Service.

24

25 Q. Are we to understand that ADFIS were themselves
26 conducting an investigation?

27 A. They wouldn't have been - I don't think they were
28 conducting an investigation. They would have been liaising
29 with the Queensland Police on the status of their
30 investigations.

31

32 Q. In this approximately year or a year and a month that
33 has passed, Oakley has been under suspension the whole time
34 from AAFC; is that right?

35 A. That is correct.

36

37 Q. And then there is this request:

38

39 *... please ensure that the member is*
40 *excluded from all AAFC activities and*
41 *premises until further notice.*

42

43 And there is a reference to "extend the UAL". What is the
44 UAL?

45 A. Okay. When somebody is suspended they are put on an
46 unassigned list.

47

1 Q. An unallotted list?

2 A. I am sorry, an unallotted list, so that they are not -
3 they are still in the AAFC organisation but they don't have
4 any responsibilities and are not involved in the
5 activities.

6

7 Q. A couple of months later - and we can look at that at
8 tab 25, towards the end of the following month, 27 August
9 2015, Group Captain Murray Spittle writes again and he
10 says:

11

I am advised by CO 23SQN ...

12

13
14 Is that the commanding officer of Oakley's squadron?

15

A. Yes, it is:

16

17 *... that FLTLT(AAFC) Oakley is no longer*
18 *under investigation by the*
19 *Queensland Police Service and that nil*
20 *charges are to be preferred against the*
21 *member.*

22

23 I should just go back. 23 Squadron, was that Oakley's
24 squadron within the RAAF or within the AAFC?

25

A. It is his permanent Air Force squadron.

26

27 Q. And so his permanent Air Force commander has advised
28 that he is no longer under investigation by
29 Queensland Police. And then Murray Spittle says:

30

Accordingly, my direction for the member to
32 *be placed on the Unallotted List --*

33

34 that's the UAL we saw before; is that right?

35

A. Yes, it is.

36

37

Q.

38

... is lifted. Please employ the member as
39 *an OOC --*

40

41 is that an officer of cadets?

42

A. Officer of cadets.

43

44

Q.

45

... as you see fit. (The member has been
46 *advised by the CO 23SQN that the case is*
47 *closed.)*

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This was copied to you - do you see that?

A. Yes, I do.

Q. Did you accept that direction by Group Captain Spittle?

A. Yes, I did. Again, he was not charged, so it is open then - when suspension is not a punitive action, it really is to remove the person so that procedural fairness and investigations can take place properly. The fact that then he wasn't charged, he would be taken off that list and reinstated to his prior position.

Q. On the face of it, the police investigation has come to an end and presumably the police have decided not to charge him, but the allegation remains unresolved within the AAFC, doesn't it?

A. Yes, it did.

Q. So that can't be right, can it, that that's the end of the matter - the police are not charging, so now it's all over, he's off the unallotted list and he can be re-employed as an officer of cadets?

A. Well, it may not appear right, but procedurally that's the situation when the charge doesn't take effect. If, indeed, there was, I suppose - you know, if there was evidence to then proceed with an investigation within the AAFC, then that could have been progressed.

THE CHAIR: Q. That's the point, isn't it? It's one thing to have a procedure, but the question is whether the procedure deals with the issues. I mean, the police are one matter. What you are doing in discharge of your responsibility to children is another matter altogether, isn't it?

A. Yes, I understand that.

MR STEWART: Q. You see, there was evidence for an AAFC investigation some more than a year previously, because one had been commenced; is that not so?

A. It had been commenced, but pre-emptive, as I described, because it had been reported to the police for investigation, but you are correct, it had been commenced.

Q. And it had been suspended so as not to interfere with or jeopardise the police investigation; would that be right?

1 A. Correct.
2
3 Q. And now there is no longer a police investigation.
4 Surely, the right position is for the AAFC investigation to
5 then recommence and actually resolve whether there's
6 a basis to these allegations within the AAFC itself?
7 A. That course was open, yes.
8
9 Q. Well, more particularly --
10 A. And --
11
12 Q. -- you will appreciate, of course, because it is
13 elementary, that the police are considering whether
14 a criminal offence has been committed and they are then
15 looking to the Criminal Code applicable in Queensland and
16 standards of proof that are required and so on; you
17 appreciate that?
18 A. Yes, I do.
19
20 Q. Within the AAFC, you would be looking to your own
21 rules, as to whether they have been breached, which may be
22 quite different to the Criminal Code - do you accept that?
23 A. Yes, I do.
24
25 Q. And the standard of proof would be quite different?
26 A. Yes, it would.
27
28 Q. And you would also have at the heart of your concerns
29 the protection of children within your organisation,
30 wouldn't you?
31 A. Yes.
32
33 Q. Because what appears, on the face of it, to have
34 happened here is that once the police dropped the matter,
35 then you and your organisation were content to also just
36 drop it?
37 A. Yes, you are right; we did not proceed with the
38 investigation - sorry, restart that investigation.
39
40 Q. And do you accept that that was wrong?
41 A. In hindsight, yes, we are wrong. It was bad judgment
42 not to proceed.
43
44 Q. And it was bad judgment because until there had been
45 a resolution on the question of these allegations, Oakley
46 was now free, as it is said there, to be employed as an
47 officer of cadets, as his squadron should see fit?

1 A. Yes, that is the direction, yes.
2
3 Q. And that might put him back in a position of
4 instructing cadets, including away on residential camps?
5 A. Yes, you are right, it could have.
6
7 Q. I suggest that you failed in your obligations to run
8 and maintain a child safe organisation in accordance with
9 its policies in that instance?
10 A. I suppose, in hindsight, you could make that
11 assessment.
12
13 Q. You will see Group Captain Murray's electronic
14 signature there where he heartily says, "Cheers, Murray",
15 and then it has its details. Do you see below that it says
16 underlined and in bold "Remember: 'It's all about the
17 kids!'"; do you see that?
18 A. Of course.
19
20 Q. I take it that's an AAFC slogan, is it?
21 A. It is a slogan, I think, that's generic to engender
22 that throughout the whole organisation.
23
24 Q. So what he advised there wasn't all about the kids,
25 was it?
26 A. Well, not in that context, no.
27
28 Q. Now, you say in your statement that Oakley was
29 subsequently given a position in 2 Wing headquarters and he
30 subsequently resigned on 30 January 2016; is that right?
31 A. Yes, that's correct.
32
33 Q. Are you aware what his position is in the Royal
34 Australian Air Force?
35 A. Yes, I do.
36
37 Q. And what is it?
38 A. I understand he's posted at 23 Squadron at Amberley
39 still.
40
41 Q. And so, as far as you are aware, there's been no
42 process there to inquire into these allegations or resolve
43 them?
44 A. The matter is - there is awareness in headquarters Air
45 Force.
46
47 Q. There is awareness of what in headquarters?

1 A. That he was under investigation for the latest
2 allegation, the subject of this hearing.
3
4 Q. That he had been, or are you saying that he is?
5 A. That he is, I think.
6
7 Q. Are you saying that, to your knowledge, the current
8 status is that there is an ongoing investigation within the
9 RAAF?
10 A. I am not sure. I do not know whether it's -
11 I wouldn't classify it as an investigation but there is an
12 awareness of his status.
13
14 Q. Well, what status is that? That there are allegations
15 that have been made that are at this stage not resolved?
16 A. Correct.
17
18 Q. And you are not aware that anything is being done to
19 resolve them?
20 A. Well, the matters that are in headquarters Air Force
21 are the matters raised by - in this hearing, and I think
22 it's pending the finalisation of this hearing, then some
23 action could be taken.
24
25 Q. Is it right that cadet camps are held at RAAF
26 Amberley?
27 A. They are.
28
29 Q. Moving on to the question of policies and training,
30 I take it you expect the information in the AAFC policies
31 and training materials to be correct?
32 A. Well, that's correct. It could be expected that they
33 are under amendment at different stages.
34
35 Q. But you would expect the information conveyed in the
36 policies and in the training materials to be correct; would
37 that be right?
38 A. Yes.
39
40 Q. And you would expect your members - that's both the
41 cadets and the adults - to rely on that information?
42 A. Yes.
43
44 Q. And you would expect your policies and training
45 information to guide the conduct of your members, both
46 cadets and adults; would that be right?
47 A. Yes, that would be correct.

1
2 Q. I refer you to tab 367 in volume 5 of the bundle. You
3 will see this is a manual of training for the AAFC. It is
4 a July 2006 edition; do you see that?
5 A. Yes, I do.
6
7 Q. To your knowledge, is this no longer current?
8 A. I don't - I cannot say whether that is the current
9 edition.
10
11 Q. So you are not sure offhand whether there are
12 subsequent editions?
13 A. No, no.
14
15 Q. In particular, you will see that this is the Trainers'
16 Guide and Course Notes for the Introduction to Societal and
17 Legal; do you see that?
18 A. Yes, I do.
19
20 Q. And that is the course where we are told from other
21 evidence that training about child sexual abuse or child
22 protection issues and relevant criminal provisions is
23 expected to be found; is that right?
24 A. I would expect so, yes.
25
26 Q. You would have heard the evidence of Air Commodore
27 Green earlier that he had sent to the NSW Police the course
28 results of Christopher Adams in this course in Societal and
29 Legal in order to show the police that Adams had done this
30 course, because, as he said, this is the course in which
31 one would expect those matters of child protection and
32 criminal provisions with regard to age of consent and so on
33 to be dealt with; is that right?
34 A. For the instructors, that's right.
35
36 Q. If one takes a look at page 151 in the Ringtail
37 reference, you will see that this is the part of the course
38 that deals with unacceptable behaviour; do you see that?
39 A. Yes, I do.
40
41 Q. Amongst matters of unacceptable behaviour - that is in
42 8.4 in the middle of the screen - are, amongst others,
43 sexual offences; do you see that?
44 A. Yes, I do.
45
46 Q. Are we to understand that the course content is that
47 sexual offences constitute unacceptable behaviour within

1 the AAFC; is that right?

2 A. Yes.

3

4 Q. Would this course manual be one that is generic to the
5 country as a whole or would it be specific to any part of
6 the country?

7 A. This is the training disseminated throughout the
8 country.

9

10 Q. You will see at the foot of that page in respect of
11 sexual offences, in 8.5, it says:

12

13 *A sexual offence is defined as an action*
14 *that is sexual in nature and is carried out*
15 *without the consent of the complainant.*
16 *Please note that all sexual offences are*
17 *classified as criminal offences. There are*
18 *three categories of sexual offence: ...*

19

20 and it goes on over the page. Do you see that? It will
21 come up in a moment. There is indecent behaviour and then
22 there is indecent assault and then at (c):

23

24 *Sexual assault is defined for ADF personnel*
25 *as attempted or actual sexual intercourse*
26 *without consent.*

27

28 You will appreciate immediately that there is nothing in
29 there with regard to the special care provisions; is that
30 right?

31 A. No, not there, no.

32

33 Q. Or about the age of consent, either?

34 A. No, not specifically to the age of consent.

35

36 Q. So, on the face of it, in a jurisdiction where, for
37 example, the age of consent is 16, someone not versed in
38 the law, referencing this, may end up in the position of
39 thinking, well, so long as it is consensual, actual or
40 attempted sexual intercourse with a 15-year-old, provided
41 it is with consent, would be okay?

42 A. I don't - well, it's not specific there. I don't know
43 whether someone would then make that assessment from it,
44 but I accept your point that there is no direction there to
45 address that variance in the States.

46

47 Q. It is misleading, isn't it, with regard to consent,

1 because actually, consent is qualified - there is an age
2 below which even consent is not enough; is that not so?
3 A. Yes. It is covered in policy in other areas, but not
4 in that course, you are correct.

5
6 Q. So you would agree it's deficient?

7 A. On that point, I would agree with you.

8

9 Q. Then the next tab is 367A. While that comes up, you
10 refer to this in your statement at paragraph 25. It is
11 annexure G to your statement, from which I understand this
12 to be the current training materials. You call it the
13 Annual Cadet Behaviour Policy Training, a copy of which
14 annexed and marked "G". These are those slides. Do you
15 recognise them?

16 A. Yes, I do.

17

18 Q. If one goes to page 32, you will see that the top
19 left-hand slide deals with sexual offences and you will see
20 it says:

21

*A sexual offence takes place if:
any sexual activity occurs without consent;*

23

24
25 Fair enough:

26

*any sexual activity occurs with someone
under the age of 16 years, even if they
consent to it.*

28

29
30
31 That, of course, doesn't cover an important part of the
32 picture, does it, and that's the jurisdictions where there
33 are special care provisions that might apply to instructors
34 and cadets?

35 A. No, it doesn't address that specifically for those
36 States that do.

37

38 THE CHAIR: Nor, I think, is it the case that 16 is the
39 age throughout Australia. Am I right in thinking that?

40

41 MR STEWART: I don't want to mislead your Honour by not
42 getting the information exactly right, so I'm just going to
43 give it to you. The legal age for consensual sex is
44 17 years in Tasmania and South Australia, 16 years in the
45 remaining States and Territories, save that in Queensland,
46 the age of consent for anal sex is 18 years.

47

1 Q. So for people in Tasmania and South Australia, this is
2 positively putting them in jeopardy, isn't it, by saying
3 the age of consent is 16 years, when, actually, in those
4 States it is 17 years?

5 A. In those States, I suppose what it is relying on there
6 is that they have that knowledge in that State, but if you
7 look at that presentation as it sits, it doesn't address
8 those differences in those States.

9

10 THE CHAIR: Q. One of the problems with it, leaving
11 aside appropriate behaviour inside the cadets, is that this
12 is information that people would take generally into the
13 community, isn't it?

14 A. Yes - yes, you could say that it could lead there.

15

16 MR STEWART: Q. You see, if this was the course that
17 Chris Adams attended and he was told that sexual activity
18 occurring with someone 16 years or older with their consent
19 is not unlawful, leaving aside the question that it was
20 certainly against AAFC behaviour policy in any event, and
21 leaving aside the predatory nature of it, but at least in
22 this narrow respect, he has been misled as to his liability
23 for criminal prosecution?

24 A. For - well, for criminal prosecution, I suppose. The
25 only thing I would say is that he signed that - he was
26 given instruction and in fact it's under 18 years, the
27 emphasis is on in the AAFC. But I take your point and you
28 are correct, that doesn't give that information about the
29 variance in the different States, and when I look at that
30 now, that is - you could say that's a deficiency in the
31 training.

32

33 Q. Because it is one thing for a young instructor to know
34 that what he is doing wrong is against the AAFC behaviour
35 policy and risks discharge from the AAFC; it is quite
36 a different thing for the conduct he engages in to be
37 risking a gaol term, which is what happened to him.

38 A. Well, yes, I agree with you there.

39

40 Q. Now, of course, I accept that the criminal law in this
41 area is different across States and Territories and it is
42 not entirely straightforward, but my suggestion is that the
43 AAFC should be putting the position a lot more clearly to
44 its staff members and its cadets as to what the provisions
45 of the criminal law are that are relevant in this area. Do
46 you accept that?

47 A. Well, now I do, from the events that have transpired.

1 I would agree there is a need to have that explicit
2 information in the - well, that - particularly in the
3 training work.

4
5 Q. Could I refer you to the AAFC behaviour policy at
6 tab 357. This, you will see in the bottom right-hand
7 corner, is the May 2008 version of this policy. It is
8 chapter 7 of a much bigger suite of policies; is that
9 right?

10 A. Sorry, could you repeat that?

11
12 Q. Do you see in the bottom right-hand corner it says
13 "May 08" - May 2008?

14 A. Mmm-hmm.

15
16 Q. This chapter 7, which is headed "Behaviour Policy", is
17 just part of a broader suite of policies that applied at
18 that time; is that right?

19 A. Yes, that's right.

20
21 Q. Are you able to say whether this is the policy which
22 applies currently or has it been superseded by subsequent
23 policies?

24 A. '08 - I would think there would have been amendments
25 done since then. I don't have it before me.

26
27 Q. I will take you to the Manual of Management Behaviour
28 Policy chapter in a moment, which I understand to be the
29 current one.

30 A. Mmm-hmm.

31
32 Q. But let's deal with this one, and I'm happy to deal
33 with it on the basis that it was May 2008. Can I refer you
34 to Ringtail page 41. At the foot of the page is
35 paragraph 25 under the heading "Sexual Offence". Perhaps
36 it can be enlarged for you. Do you see that it says:

37
38 *A sexual offence is an action that is*
39 *explicitly sexual in nature and which may*
40 *be carried out with or without the consent*
41 *of the complainant. In some cases the law*
42 *regards complainants under 14 years of age*
43 *as being too young to consent to the sexual*
44 *act so any consent that they give is not*
45 *considered lawful consent.*

46
47 It has not been the law in any jurisdiction in Australia

1 since at least 1990, and maybe long before that, I just
2 haven't gone back that far, that the age of consent has
3 been 14 years.

4 A. No, that's the first time I've come across that
5 statement there.

6
7 Q. That's an egregious error, isn't it?

8 A. If indeed that's still current. I haven't got the
9 actual current policy in front of me.

10
11 Q. Never mind - we will come to what is current in a
12 moment, but it is an egregious error in 2008, isn't it?

13 A. Yes.

14
15 Q. And you would expect that to have been corrected some
16 time in the last eight years?

17 A. Yes.

18
19 Q. I refer you to tab 351. You will see that this is the
20 Manual of Management, and it says "SI (PERS) 8-1
21 Behaviour". This is at the top. Then it has an amendment
22 list; do you see that?

23 A. Yes.

24
25 Q. There have been some amendments - July 2014, August
26 2015 and then, most recently, September 2015; do you see
27 that?

28 A. Yes, I do.

29
30 Q. So far as I understand the statements that have been
31 produced on behalf of the AAFC and also the documents, this
32 is the current Manual of Management. Are you able to say
33 whether that's right?

34 A. If it came off the current website, which it appears
35 to, then I would say that's right.

36
37 Q. I don't see a print date on it. I see a time but not
38 a date. In any event, as I understand it, certainly it is
39 since September 2015. I refer you to page 19, Ringtail
40 0019. You will see at the top of the page, under the
41 heading "Sexual Offences", it says:

42
43 *A sexual offence is an action that is*
44 *explicitly sexual in nature, which is*
45 *normally carried out without the consent of*
46 *the complainant. In some cases, for*
47 *example, where the complainant is under 14*

1 *years of age, the law regards them as being*
2 *too young to consent to the sexual act ...*

3
4 and so it goes on. So the same error is there.

5 A. Yes, and I'm surprised that hasn't been corrected.

6
7 Q. More than surprised; I'm assuming you are embarrassed
8 that it hasn't been corrected?

9 A. Well, it is unfortunate, yes.

10
11 Q. It is more than unfortunate. It is a terrible error,
12 isn't it?

13 A. Well, you could describe it as terrible that it has
14 been there for that long and hasn't been corrected.

15
16 Q. I suggest to you, sir, that the AAFC policies are, in
17 certain respects, both misleading and inadequate; do you
18 accept that?

19 A. Well, in that, misleading. As a whole, I would say -
20 well, inaccurate in this case. It's a large suite of
21 documents we are continually trying to update and correct
22 as we go. But I take it that this is a shortcoming that
23 that hasn't been noticed and corrected.

24
25 Q. Well, in the respects I've shown you, it's both
26 misleading, in this one, in respect of the age of consent,
27 and inadequate?

28 A. Yes, it would appear so. I'd be interested now to go
29 back and see the context of why 14 years originated in that
30 document.

31
32 Q. I expect that in your responsibility to give advice on
33 the policies you will be giving advice in these respects,
34 won't you?

35 A. Well, I will correct that. Obviously what has been
36 pointed out is the correction, the variances in consent
37 within the different jurisdictions in Australia, and
38 particularly the accuracy through the documents has to be
39 looked at and corrected.

40
41 Q. And I suggest also that these inaccuracies mean that
42 the organisation has not properly fulfilled its duty of
43 care?

44 A. In the accuracy of the policy, whether it's duty of
45 care or our - if giving correct information is a part of
46 that, and I accept that, then, yes, that has - there is
47 a shortcoming, which needs --

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Q. Do you accept it is not enough just to have a suite of different policies coverings a range of different subject areas and having them available with a click of a mouse, there is an extra step that has to be taken and that's that the policies have to be right and appropriate; is that not so?

A. I accept that.

MR STEWART: No further questions, your Honour.

THE CHAIR: Does anyone else have any questions?

<EXAMINATION BY MS GLEESON:

MS GLEESON: Q. Sir my name is Gleeson, I act for Flight Lieutenant Oakley. Would you agree that most, if not all, of those people who are involved in the AAFC reserves do so in order to assist and to serve their country?

A. Yes, I do.

Q. And that would be the reason why you have been involved on a long-standing basis with the RAAF Reserves?

A. That's correct.

Q. You are aware that Flight Lieutenant Oakley is also a long-standing member of the RAAF Reserves?

A. I understand that he is.

Q. You have given some evidence that there is some awareness within the RAAF of the allegations that have been raised against Flight Lieutenant Oakley?

A. Yes.

Q. And you are aware that an allegation of sexual misconduct involving a child is an extremely serious matter?

A. Of course.

Q. And you would agree that if people within the RAAF were aware that such a person was involved in such crimes, that would be incredibly damaging to that person's reputation?

A. If it was widely known, of course it would, yes.

Q. Even if it was known only within a certain number of people, and those people being the superiors of the

1 particular officer - don't you agree?
2 A. Well, being under investigation and the matter that
3 was reported and known, I think even at a senior level they
4 would have the - well, the knowledge and the experience to
5 hold judgment.
6
7 Q. And if those allegations were more widely known and
8 they weren't true, that would be incredibly devastating for
9 the person involved, wouldn't it?
10 A. If it became widely known, yes.
11
12 Q. And so if such an allegation is raised, leaving aside
13 the obviously more important child protection issues that
14 Mr Stewart has adverted to, would you agree with me that
15 the RAAF has a responsibility to resolve those allegations
16 as soon as possible?
17 A. Well, perhaps not resolve the allegations but to look
18 into the matter and to see if - and take action if
19 necessary.
20
21 Q. Well, you would agree with me that it would be deeply
22 unfair for a person who had those allegations raised
23 against them to have it hanging over their head so that the
24 RAAF can undertake an investigation and resolve that
25 allegation at a time of their choosing?
26 A. Well, potentially. Whether it's unfair in that
27 situation, that would be a no proven guilt proceeding,
28 procedural fairness would be afforded the person while any
29 sort of matter took place.
30
31 Q. But you would agree with me that a person who has had
32 the matter investigated by the Queensland Police, is
33 proceeding on the basis that no civil charges will be
34 brought against them, it would be grossly unfair to them to
35 have to go to the Reserves every day and do their job with
36 some prospect of there being a further investigation at
37 some point in the future?
38 A. I wouldn't agree "unfair". They would be under
39 procedural fairness and they would be given support through
40 that process.
41
42 THE CHAIR: Q. Mr Delahunty, the civil law has a well
43 known saying that justice delayed is justice denied. That
44 applies to any party to any issue. Would the same thing
45 apply in the military?
46 A. Oh, yes, I would agree, and I --
47

1 Q. That's what is being put to you, you see --

2 A. Yes.

3

4 Q. -- that delay, beyond what is reasonably achievable,
5 denies someone a just response.

6 A. If you are saying that the fair thing to do would be
7 to address the matter as soon as practicable, then I'm sure
8 that would be a proper course.

9

10 MS GLEESON: Thank you. Thank you, your Honour, I have no
11 further questions.

12

13 MS McLEOD: I have no questions, your Honour. There is
14 one clarification arising from the questions. Mr Oakley
15 resigned, of course, from the cadets, on 30 January 2016,
16 but his suspension was operative from 24 April 2014. In
17 terms of his involvement with the RAAF, he has been on
18 administrative duties in an office effectively at the
19 Amberley base. It's a restricted area and very unlikely
20 that he would have access to minors in that area.

21

22 THE CHAIR: Thank you.

23

24 <EXAMINATION BY MS DAVID:

25

26 MS DAVID: Q. My name is David and I represent
27 Susan Campbell, the mother of Eleanore Tibble. I have
28 a couple of questions?

29

30

31 Q. Just on the issue of fraternisation, we have heard
32 from Air Commodore Green - I gave an example earlier today,
33 I don't know whether you heard it, in relation to the
34 Tibble case, in the sense that Air Commodore Green said it
35 would be inappropriate, for example, for an instructor to
36 travel in the car to take a young girl home, as one of the
37 cadets. Is that a position that you agree with, that that
38 would constitute fraternisation and inappropriate
39 behaviour?

40

41

42

43

44

45

46

47

Q. Just on that point, in the case of Oakley, wasn't it

1 the case that there was considerable evidence, irrespective
2 of whether one accepted the allegation of sexual
3 impropriety, but there was certainly, would you agree,
4 evidence to suggest that he had been with the young cadet
5 home alone - on numerous occasions they were together
6 alone?
7 A. Yes, so I'm led to believe.
8
9 Q. And would that, of itself, not constitute some
10 behavioural offence?
11 A. Now that would - if that came to light, that would be
12 a breach of the code of conduct.
13
14 Q. It would be fairly obvious, given the other
15 examples --
16 A. Yes.
17
18 Q. -- you would agree?
19 A. Yes.
20
21 Q. The other situation I just want to understand - in
22 this particular case of Tibble you would be aware that
23 Harper resigned after making the disclosure about his
24 having a relationship with Eleanore Tibble. Are you aware
25 of that?
26 A. Yes, I'm aware he resigned.
27
28 Q. What is the process for resignation? Does there need
29 to be an acceptance of a resignation for it to be
30 effective?
31 A. No. If someone resigns, that's their choice, they
32 leave the organisation. There is - what is open is to, as
33 well as resign, and I have done this before, to make it
34 more official than someone walking away, is to terminate
35 them so that it is on record that they have been
36 terminated.
37
38 Q. So that might have been an appropriate thing to do in
39 the case of Harper, would you agree?
40 A. If it was open to the person at the time, they could
41 have taken that action, yes.
42
43 Q. And if somebody does bring forth a letter of
44 resignation, when does it actually have effect? Is it
45 immediate? I'm just trying to be clear on that. When does
46 that --
47 A. From my knowledge, it is effective when they, yes,

1 give that letter of resignation.

2

3 Q. But then you are saying that you could terminate them,
4 so that you could - the records could be changed to reflect
5 that?

6 A. Look, theoretically, they have resigned so you can't
7 terminate them. My view is that I think it should go on
8 record, particularly if someone has resigned in a
9 circumstance like that, that it's good practice to
10 terminate them as well, put that on record.

11

12 Q. In the Stunden Report, which you have probably - I'm
13 sure you would have read at some point?

14 A. I'm not all that familiar with the Stunden Report,
15 that was before my time, but we're all aware of the
16 circumstances of the tragedy so I would be happy to try to
17 answer.

18

19 Q. Just in relation to one matter that came out of the
20 Stunden Report, during the record of the interviews with
21 a number of the staff involved in the process of, if I can
22 put it like that, that complaint, one of them - in fact,
23 Mr Watson, who has given evidence - the record reflects:

24

25 *Had Harper not resigned, there were*
26 *probably no grounds to discharge him.*

27

28 That is, the notes reflect what Watson had said. What is
29 your view about there being grounds to discharge him, given
30 that he had been alone at times with young Eleanore Tibble?
31 Not suggesting that there was any sexual relationship but
32 just on the basis simply of that fraternisation?

33 A. On the basis - again, I don't have knowledge of what
34 the code of conduct was then or if, indeed, it was
35 something which was codified like it is now, but in my
36 view, even in that period, it would have been a serious
37 breach of --

38

39 Q. And what sort of disciplinary action might have flowed
40 from that?

41 A. I think, well, then, he would have been suspended and
42 the course would have taken place of investigation,
43 obviously, if it wasn't a matter - and he would have been
44 made to show cause why he shouldn't be terminated.

45

46 MS DAVID: Thank you.

47

1 MR STEWART: I have nothing further, your Honour.

2

3 THE CHAIR: Thank you, sir. That concludes your evidence.
4 You are excused.

5

6 THE WITNESS: Thank you very much, your Honour.

7

8 <THE WITNESS WITHDREW

9

10 MR STEWART: Your Honour, the next and final witness, at
11 least for now - and I will come to why I qualify it like
12 that - is Vice Admiral Griggs. With your leave, my
13 intention would be to not start his evidence until
14 tomorrow, given the time.

15

16 The qualification was because of the following: what
17 I intend doing is tendering the statements of three
18 witnesses and not calling them. They are the statements
19 of --

20

21 THE CHAIR: Is everyone at the Bar table happy with that
22 course?

23

24 MR STEWART: I will address that right now, your Honour.
25 They are the statements of Jaqueline Hatch and Sean Watson,
26 and I understand everyone is happy with that course. There
27 is also the statement of Joseph Wayne Laycock, and
28 I understand that everyone is happy with that course, but
29 I am not quite certain of that, so this is the opportunity
30 for anyone to state something else.

31

32 THE CHAIR: Does anyone want any of the three persons that
33 Mr Stewart has named called?

34

35 MS McLEOD: Not for our part, your Honour.

36

37 MR STEWART: For completeness, your Honour, I should state
38 that the difficulty with Mr Laycock is that he is abroad.
39 In the normal course, I would have called him because of
40 his long involvement in the case, and so I understand at
41 least for some - but they can speak for themselves - that
42 the reason why they are content that the statement goes in
43 and that we don't call him is because of the practical
44 difficulties that that creates and that if his statement is
45 there but it is untested, unchallenged, they can still make
46 submissions with regard to that.

47

1 MR HAMMOND: Yes, Mr Stewart has fairly summarised my
2 position, your Honour.

3
4 THE CHAIR: Very well.

5
6 MR STEWART: I tender the statements.

7
8 THE CHAIR: The first is the statement of?

9
10 MR STEWART: Jaqueline Hatch, it is at tab 31 of the
11 statements bundle.

12
13 **EXHIBIT #40-040 STATEMENT OF JAQUELENE HATCH**

14
15 MR STEWART: At tab 32 is the statement of Joseph Wayne
16 Laycock dated 31 May 2016.

17
18 **EXHIBIT #40-041 STATEMENT OF JOSEPH WAYNE LAYCOCK**
19 **DATED 31/05/2016**

20
21 MR STEWART: The other is that of Sean Watson at tab 34,
22 dated 16 June 2016.

23
24 **EXHIBIT #40-042 STATEMENT OF SEAN WATSON DATED 16/06/2016**

25
26 MR STEWART: As your Honour pleases.

27
28 THE CHAIR: Nothing else today?

29
30 MR STEWART: No.

31
32 THE CHAIR: We will adjourn until 10 in the morning.

33
34 **AT 3.50PM THE COMMISSION WAS ADJOURNED TO**
35 **THURSDAY, 30 JUNE 2016 AT 10AM**

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