1. Questioning in relation to cross-program interaction

The following is an excerpt from the WorkCover interview with █████████████.

> **WC:** What policy or procedure does the company have with regard to persons interacting between different locations during their shift?
>
> **AB:** Not supposed to do this.
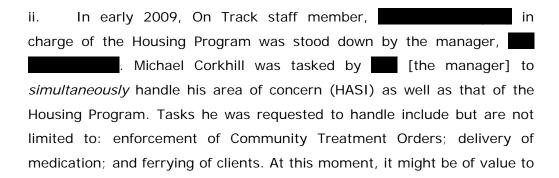>
> **WC:** Is this documented?
>
> **AB:** Yes, either work at the refuge, mandarra, as an outreach or HASI worker. It is not written because you don't do it.

Legend: WC = WorkCover District Co-ordinator, Paul Irwin

                  AB = OnTrack Lismore Manager, ████████████

Cross-program interaction during a work shift is highly common and unavoidable. The following are a small list of examples where this has occurred / still occurs. Validation of these statements can be obtained through interviews with staff or checking documented records at On Track.

    i.   Each Tuesday, as a voluntary activity to encourage interaction of all On Track clients in the Lismore area, a lunch time get together is organised. The day being known as "**Shed Day**". In this event, staff rostered for the various On Track programs would ferry clients, be they under their care for the day or otherwise, to the On Track 24 hour respite residence, Mandarra, located on Ballina Road in Lismore. Staff performing duties across the various programs are encouraged to attend. It is also known that **non**-On Track clients would attend.

    ii.   In early 2009, On Track staff member, ██████████████████ in charge of the Housing Program was stood down by the manager, ████ ██████████. Michael Corkhill was tasked by ████ [the manager] to *simultaneously* handle his area of concern (HASI) as well as that of the Housing Program. Tasks he was requested to handle include but are not limited to: enforcement of Community Treatment Orders; delivery of medication; and ferrying of clients. At this moment, it might be of value to

re-read above, the boxed interview response of the Lismore branch manager.

iii.   ▮▮▮▮▮▮▮▮ on the day of the incident, brought both a <u>Refuge</u> and a <u>HASI</u> client to Tallows beach (date: 27th June 2009). This information was provided to WorkCover in an On Track Community Programs Incident Report as prepared and signed by ▮▮▮▮▮▮▮▮ (CEO On Track Community Programs) on 29 June 2009.

iv.   During the Christmas holiday period, as staff prepare for the Christmas festivities and absences, the shortage of staff requires that staff on duty check on and ensure that the needs of clients across the programs are not neglected. These cross-program interactions are approved by the Lismore manager, ▮▮▮▮▮▮▮.

A note prepared by Michael in December 2008 relating to the handling of clients for Christmas day lunch and the subsequent Christmas / New Year holidays, suggest a high level of cross-program interaction. This note is available on request.

v.   When a staff member calls in sick, a concerted effort is made to locate a replacement for the shift. On the occasion where a replacement cannot be obtained, two alternatives are presented:

   a.   the staff member coming off the shift may be required to remain and fill the vacant shift, effectively working a 24 hour stretch (against OH&S regulations?);

   b.   the shift is left vacant and a staff member rostered on a *different* program asked to check in on clients.

In addition, the response by ▮▮▮▮▮▮▮ [the manager] to the question, "Is this documented?" is indicated with a, **"Yes, ..."** , which is indicative of the procedure being *documented*. This response is then immediately followed by the words "It is ***not written*** because you don't do it". WorkCover NSW may wish to determine how a procedure *is documented* when it is *not written*?

Summary: The statements made by ▮▮▮▮▮▮▮▮ in her interview with WorkCover appears to show a certain degree of discrepancy between reality (as approved by herself) and her recollection of company practice during the WorkCover interview.