# PUBLIC ACCOUNTS COMMITTEE

# FOLLOW-UP OF THE AUDITOR GENERAL'S REPORTS

# TRANSCRIPT OF EVIDENCE TAKEN AT PERTH WEDNESDAY, 7 SEPTEMBER 2011

## **SESSION ONE**

## **Members**

Mr J.C. Kobelke (Chairman)
Mr J.M. Francis (Deputy Chairman)
Mr A. Krsticevic
Ms R. Saffioti
Mr C.J. Tallentire

### Hearing commenced at 9.00 am

#### **BROWN, MR STEPHEN ARTHUR**

Acting Deputy Commissioner, Operations, Western Australia Police, examined:

#### ITALIANO, MR GREGORY JOSEPH

**Executive Director, Western Australia Police, examined:** 

#### **FYFE, MRS MICHELLE LOUISE**

Acting Assistant Commissioner, Specialist Enforcement Operations, Western Australia Police, examined:

#### WARD, MR CRAIG MAXWELL

Assistant Commissioner, Business Technology, Western Australia Police, examined:

#### ANGWIN, MS TRUDI

Assistant Director, Licensing Enforcement Division, Western Australia Police, examined:

#### **DOWNING, MR TIM**

Acting Assistant Director, Business Technology, Western Australia Police, examined:

The CHAIRMAN: On behalf of the Public Accounts Committee, I would like to thank you for your appearance before us today. The Public Accounts Committee regularly follows up with agencies examined by the Auditor General to determine their compliance with the recommendations made in the Auditor General's report. The purpose of this hearing is to assist the committee in establishing the extent to which the Western Australian Police have implemented, or are implementing, the Auditor General's recommendations. At this stage, I would like to introduce myself, John Kobelke, and the other two members here are Rita Saffioti and Chris Tallentire. Another member, Joe Francis, has some other commitments but hopefully he will be here soon.

The Public Accounts Committee is a committee of the Legislative Assembly of the Parliament of Western Australia. This hearing is a formal procedure of the Parliament and therefore commands the same respect given to proceedings in the house itself. Even though the committee is not asking witnesses to provide evidence on oath or affirmation, it is important that you understand that any deliberate misleading of the committee may be regarded as contempt of Parliament. This is a public hearing and Hansard will be making a transcript of the proceedings for the public record. If you refer to any documents during your evidence, it would assist Hansard if you could provide the full title for the record.

Before we proceed to the questions we have for you today, I need to ask you a series of questions. Have you completed the "Details of Witness" form?

The Witnesses: Yes.

**The CHAIRMAN**: Do you understand the notes at the bottom of the form about giving evidence before a parliamentary committee?

The Witnesses: Yes.

**The CHAIRMAN**: Did you receive and read the information for witnesses briefing sheet provided with the "Details of Witness" form today?

The Witnesses: Yes.

**The CHAIRMAN**: Do you have any questions in relation to being a witness at today's hearing?

The Witnesses: No.

The CHAIRMAN: Thank you very much. Now, we obviously are dealing with quite a complicated system, and we will obviously call on your familiarity, but you may have to bear with the fact that we are still trying to come to grips with it. The schematic diagram, which you presented to us, is most appreciated. If I could start by saying, as a brief overview, what is the firearms registry system, particularly in terms of your firearm database. Is it a series of actual physical systems or one system? So, again, just a bit of an overview and also a bit of an understanding of what physically it is and how the components interrelate.

Mr Downing: I am happy to elaborate on that. With reference to the Firearms Solution Overview diagram that you have in front of you, the firearms registry is the front-of-house system that our customer service officers use on a day-to-day basis to administer the firearms business, and that includes licences as well as the firearms themselves. The database, which sits behind that, also supports a number of other functions which are required to administer the firearms business and, importantly, that includes a capacity to exchange information with Australia Post around receiving firearms licence applications. The database, which also sits behind as you can see through the interactions on the right-hand side of that diagram, is responsible for transmitting information to our national law enforcement partners, and also people like the Department of Transport, Department of the Attorney General, and Australia Post, and there is also a third party there called ABnote, who produce the licence cards for us.

**The CHAIRMAN**: How does that interrelate with your TADIS system for operational purposes?

**Mr Downing:** On the left-hand side of that diagram you can see a vertical rectangle there talking about other policing systems, and in the middle of that is a box, which shows that TADIS is central to taking information from the back office system and then presenting that to police officers in the field, and that is either via hand-held or in-car systems.

**The CHAIRMAN**: As an example, does the TADIS system have a fairly full interrogation of your firearms database, or are certain aspects of the database loaded to another system, which is then accessible by TADIS?

**Mr Downing:** TADIS does work in real time. It has a filtered view, it can present whether a firearms licence is held by an individual, and that is particularly important for police officers' safety so that they can know something about the person that they are likely to be dealing with. So of primary importance is to know whether there is a warning against an individual in relation to whether or not they hold a firearms licence.

**The CHAIRMAN**: Is the system operational to the extent that information is always available if it is on your firearms database?

Mr Downing: Correct.

**The CHAIRMAN**: We understand that in September 2008 the infringement function was deactivated. How does that fit within this system and what are the implications of it being deactivated?

**Mr Downing:** The infringement process is part of number a daily processes that are executed against the firearm system, and that daily process is responsible for generating renewals, infringements, and looking at whether firearms need to be transitive in respect of dealers who are disposing firearms et cetera. So the infringement process is part of a daily batch job which is executed, and it was part of that daily batch job which was deactivated in October 2008.

**The CHAIRMAN**: I would like some clarification on which parts were deactivated in terms of what were the implications. Does it mean that that daily batching, which might have information

which could be relevant to an operation, simply would not have come through because that part was deactivated?

**Mr Downing:** I can reassure you that it only related to the infringement processing and that all other information relating to whether or not an individual holds a licence was still maintained in real time and available to the front line through systems like TADIS.

**The CHAIRMAN**: Okay, did that deactivation of the FRS take place during the time when the Auditor General was conducting the audit?

**Ms** Angwin: The deactivation occurred in mid-October 2008 of the infringements only, and the Auditor General's analysis was done in mid-2009 essentially, so that had already occurred.

**The CHAIRMAN**: I want to get clear on this, because the audit took place over quite some months.

Ms Angwin: Yes, so it was off the entire time that the Auditor General's inspection was happening.

**The CHAIRMAN**: Do you know if the Auditor General was made aware of that, or if the people doing the work on the audit were made aware of that?

**Ms Angwin:** I am going on the Auditor General's report at the time and there is some acknowledgement of issues within the system, from my reading of that.

The CHAIRMAN: So we are not clear as to whether or not—

**Ms Angwin:** As you may be aware, it is not detailed in any depth in the Auditor General's report or any response from that.

**The CHAIRMAN**: So you cannot produce a piece of paper that shows that the WA Police actually informed the auditors that it had been deactivated?

Mr Downing: There is some reference from the Auditor General's staff at the time, which acknowledged that the infringement process was not active at the time they were doing the audit. They specifically pointed out the fact that infringements were issued between late September and early October in 2008, and they were ceased at that time. I think that came about in a letter of compliance that the Auditor General provided.

**Ms** Angwin: There certainly is not a focus on that from any of my readings or any of the documentation, but there is minor reference to the fact that it was off at a portion of time.

The CHAIRMAN: We clearly are looking at the recommendations made by that performance audit by the Auditor General. I will just say, as an aside, that we are more open as a committee to saying that some agencies do not necessarily always agree with the recommendations. However, if there is agreement that the recommendations are things that would improve performance, then the role of this committee is to see what steps are taken and how effective implementation is to try and meet the recommendations. I am just putting that in as an aside that we are open to the fact that the Auditor General may not always get it totally right, and that if agencies want to tell us that they have a difference of opinion, then we are open to that. We are working on the basis that WA Police has accepted the recommendations of this performance audit. We are now looking to see what has been done to actually come into line or to try and pickup the recommendations that were made. I am still a bit unclear as to the view that had been formed leading to the recommendations by the audit, which clearly went to issues of infringement, and as to whether or not there simply was some doubt or simply an oversight by the auditors that rather than just seeing some minor difficulties that the actual system had been deactivated. So we do not have a clear view as to what was conveyed to the auditors at that time?

**Ms Angwin:** Sorry, I am just referring to some notes here at the time. Are we able to provide that information subsequent to this —

**The CHAIRMAN**: Can we have chapter and verse as to what information WA Police provided the auditors on the problems associated with the FRS?

Ms Angwin: Yes, we can do that.

**The CHAIRMAN**: Could we then move to what are the recovery steps that have been implemented with respect to re-establishing the FRS?

**Ms Angwin:** Yes, from a technical perspective? Okay, can we get your perspective Craig, and then we can talk from an operational perspective?

Mr Ward: Yes, I think again Tim you are probably better across the timeline issues.

**Mr Downing:** We have produced a timeline, which has helped us in preparing for this meeting today. In there we discussed that there are a number of actions taken from a technology standpoint, which have helped us improve the business around our firearms management. Importantly, and in conjunction with the business, we identified that there was an amount of stabilisation that needed to occur. It was a relatively new system and it was dealing with a very complex part of our business. We needed to form a project to deal specifically with data integrity and performance, making sure that the right information was available to our customer services officers as well as the front line, and that the right advice was being given to the public in respect of their licences. We undertook a stabilisation project. That started —

**The CHAIRMAN**: Do you mind if I stop you there because this is quite technical and I am trying to follow it. What led to the deactivation and, therefore, the stabilisation process? When you talk about the new system, I want to know what is new relevant to what.

**Mr Downing:** The development of the new firearms registry system was focused on decommissioning our mainframe computer platform. That was the genesis of the new system. So bearing in mind what the priority was at that time, as soon as we became aware that there were any questions of data integrity, particularly around addresses, we worked with the business to plan some stabilisation work around that system.

**The CHAIRMAN**: So it was being shifted to a new system because of what was happening with the whole police system?

**Mr Downing:** I think in early 2000 we identified the need to move off our mainframe environment, and that was quite a lengthy program of work. The firearms system was the last system to move off our mainframe platform, and that happened in October 2008.

The CHAIRMAN: Moving off the mainframe platform to—

**Mr Downing:** Contemporary technology; Microsoft-type technology, which is still used today.

**The CHAIRMAN**: Which therefore made your firearms registry somewhat more physically independent did it, compared to the mainframe system?

**Mr Downing:** Totally independent. It allowed us to turn the mainframe off, and that was paramount for the police at the time due to the cost of running that system.

[9.15am]

**The CHAIRMAN**: I think I am back to where you were a few minutes ago in terms of then how you were going through that recovering stabilisation.

**Mr Downing:** Following the switching on of that new system in October 2008 and identifying that there were some questions of integrity and performance, we designed a project to focus specifically on data integrity and performance, and that was about making sure that the right information was delivered to the police officers.

**The CHAIRMAN**: So does this relate to the integrity of the data because of the transition to a new system, or did it show up that there were issues of integrity of the data as it was on the old system?

**Mr Downing:** There was a mixture of both, and certainly to the extent that we were aware of some inconsistencies in the mainframe information. We undertook that data cleansing and fix-up at the time we switched the new system on. I think, what became apparent, particularly around addressing, is that there were some concerns that licence holders may not have received their correspondence at the correct address. We acknowledged that and so we focused specifically on making sure that contact addresses were correct.

**The CHAIRMAN**: So this problem really hit in October 2008, and when did you feel that you were on top of it and had it fixed so that you could be certain that correspondence was going to correct addresses and other outcomes were actually up to the standard that you required?

**Mr Downing:** Significant steps were taken in mid-2009 to reconcile all of the addresses the police use for correspondence with the Department of Transport, and they are our source of truth. So from mid-2009 we were actively taking steps to improve the quality of our addresses with respect to firearms.

**The CHAIRMAN**: And so when was that whole stabilisation project completed to the stage where you believed that the system had integrity?

**Ms** Angwin: The postal addresses in mid-2009 were not necessarily part of the stabilisation project. That did not commence until mid-2010. So really that was cleaning up the postal addresses that impact a number of areas in government agencies and police from using TRELIS. So that was nothing unusual. The difference is that it was particularly impacting on firearms licensees, and that is because there is a much greater proportion of persons with firearms licences in the general population that use postal addresses. That is why we felt the impact, particularly in that instance. So that work in mid-2009 was undertaken and that essentially made us consistent with other levels of police, who perhaps had an incorrect address, and other agencies using TRELIS. At this time, the infringement system was off. So by mid-2009, because of that impact of the incorrect addresses, so to speak, lots of people were not getting their infringements, and subsequently losing their licences and these sorts of issues. During 2009, a few months later than that, there was already a focus on centralising and outsourcing firearms applications through Australia Post, and then into one central point at the licensing enforcement division. That went live in November 2009, and within eight weeks there was significant impact on that system. First of all we had change happening within the firearms industry, and a new process, and we had centralised it and we had outsourced it, and that all occurred on the one day essentially. At that point in time, after about eight weeks, we realised that there were integrity issues within the FRS that had not previously been tested because of the volume that was suddenly coming through that system. At that point in time there was also new management coming into the area and we were looking at the entire business, including infringements. So by January 2010, a couple of months after it went live, we then commenced a series of planning meetings around the integrity of the firearms system and our reliance on that data as well as the infringements system. That is essentially where the repair, I suppose, and the genesis of the stabilisation project came from, which actively then commenced in 2010. There was a few months in planning and deciding on what exactly it was that needed to be fixed and tested, and that concluded in May 2011. So at that point in time both the infringements and the integrity of the firearms registry—we are happy that we have the best integrity that we can get from that system going forward. That does not mean that it is necessarily meeting all of our business needs. The system is as right as it can be at this point in time.

**The CHAIRMAN**: That is because to move to the level that you would like to be at requires the building of a new system.

Ms Angwin: It does.

**The CHAIRMAN**: Perhaps we can come back to that.

So there were some costs given, which were updated and which related to the stabilisation process. Can we get those on the record again as to what the overall cost has been?

**Ms Angwin:** Stabilisation, which also included infringement reactivation and fixing, was around \$720,000. It may have crept towards \$721,000, but essentially it was \$720,000.

**The CHAIRMAN**: So what are the remaining shortcomings or areas of risk with the FRS prior to being able to move towards a brand new system?

**Mr Italiano:** I think to put it in context the original vision around the system that would fit in this particular part of our business was a licensing permit management system. So it was a bigger vision than with firearms; we do security agents, pawnbrokers and other things. Now we do not want to design a system to just fix firearms because we have to transact those other areas, which also exist within the licensing enforcement division. The firearms system, as it currently exists at the moment, is stable, satisfactory and functional, but what it does not do is holistically solve all the problems, the business that LED has to deal with, and we have the prospect, potentially, depending on the parliamentary process, of prostitution being added to that business as well. So we do not want to embark on a tendering process and a procurement process that just fixes firearms. We would want to make sure that we deal with that business holistically, and it is also likely to be the case that that system will need to be capable of issuing infringements not just with respect to firearms but also with respect to prostitution and with respect to perhaps criminal infringement notices, which are also due to arrive soon. Our IT governance model is significantly more mature than that of 2005, when we first started thinking about this system, and we certainly want to make sure that we make a good procurement decision in terms of buying a holistic solution that has a sustainability going forward. So that is where we sit today. Thankfully, after the last budget we are now funded to achieve that outcome and we are in the process of going through the business requirements and making sure we make a good decision about which system we procure going forward. We are fortunate now that we are not procuring that with our backs up against the wall saying that our system is falling over or that there are major problems. It is stable as it currently sits and it is functional as it currently sits, but it does not present a holistic solution to the business.

**The CHAIRMAN**: This is the LIMS—the licensing infringement management system—you are talking about?

**Mr Italiano:** Yes. When we were coming off the mainframe in that era around 2007, the original scope and original vision was that a licensing and permit management system would be delivered, and that is still our intent.

**The CHAIRMAN**: So in terms of that intent, Mr Italiano you said there are a range of other areas that come under licensing as well. Could you give us some idea of the priority that will be given to those various elements in developing this system, or are you just going to build a big shed and then everything will get shoved into it, sort of thing?

Mr Italiano: We had the business governance meeting the other day, which I chaired, which considered how we will procure the new system. There are fundamentally two decisions that we can make about that. One would be to procure no path until we have done every business requirement for every process, and then to go out to the market with a comprehensive set of business requirements, which we would ask the market to respond to. In IT governance terms that is probably plan A. That would minimise risk and it would mean we go out there with a well-understood set of business requirements. In the real world, of course, we have the impending implementation of criminal penalties—infringement notices—which we are keen to implement. They have greater prospects for officer efficiency for the courts, and for dealing with a volume of matter that we currently have to deal with by way of summons and arrest, et cetera. It gives our officers the option of issuing a criminal infringement notice. Now we have to have a system that supports that process. We cannot have our officers writing on bits of paper and shuffling them around offices and not having a track of how that works. So the decision the governance meeting

took after proper consideration for risk and evaluation is to say we will commence the procurement but we will have to have some priority around the infringement issuing capacity for criminal infringement notices in terms of how we procure that.

One of the things that I spoke about in our maturity as a governance of IT is that we now fully understand the architecture of our organisation—we know how things are going to come together. Technology changes very rapidly, as members would probably appreciate, so the way you would get systems to talk to each other four years ago is very different to how you can get it done today. So in terms of managing that risk—understanding our architecture and backing, I guess, and our vendor arrangements, which are very different to that which existed five years ago—we have taken a decision to go to the market early with the functionality around the criminal infringement notice issue based on our business needs, but we also will do so with that end view in point, which we will add those other functionalities as we go. One of the problems we face of course with impending legislation is that we do not yet know when the prostitution legislation will come in. We do not yet fully know what our role might be in that. We do not yet fully know what form it might take. Obviously, that is in the hands of parliament. It is always a challenge in IT when you are dealing with legislation; late amendments can make a fundamental differences to the functionalities of systems. So it is a challenge for us but in our market scan there are a number of systems out there that exist, that deal with these types of issues, so we feel confident that there will be a competitive marketplace for what we are looking for.

**The CHAIRMAN**: So with regard to the updating of your firearms registration system as part of your LIMS, can you give us some idea as to what is the current priority for WA Police? It sounds like the criminal infringement notices is perhaps the number one priority —

**Mr Italiano:** Well, the two systems that are the highest priority for WA Police in terms of new applications are case management for crime, so serious and major case management, and a licensing and permit management system. So what I need to convey is the fact that we are starting licence and permit management with the criminal infringement. That is the start of that project. So that is a subset of that overall delivery. So those are our two major projects. They have the highest priorities for the organisation, and they will be delivered over the course of the next one to two years, depending on how that process unfolds.

**The CHAIRMAN**: So the firearms registration system is a second or third-level priority?

**Mr Italiano:** Within that licensing at the moment, yes it is because we have a functional system that is doing what we need it to do. What I do not have is a system that exists to deal with criminal infringement notices.

**The CHAIRMAN**: And if setting up the system for the criminal infringement notices was delayed or took longer, then obviously the FRS system would have to still sit behind that.

**Mr Italiano:** That is correct, but the acting assistant commissioner will be most unhappy with me if that occurs, and I will be unhappy with the assistant commissioner for business technology, who is over there. So certainly we want to the deliver that in a timely way, but these are the influences that drive your decisions. It is always nice to think you could do things in a very, I guess, purist manner in terms of how you would best like to do things, but there are realities also of having to deal with these other matters.

**Ms R. SAFFIOTI**: Could I just ask a question back to you, Tim or Trudi? You were talking about November 2009 when the three things were happening within the firearms industry. You were centralising and outsourcing, and after about eight weeks you realised that some issues had arisen. Can you give us some practical examples of what actually notified you of the problems that existed?

**Ms Angwin:** Absolutely. I had just joined LED right at that point in time and we went live a couple of weeks later with that system. We anxiously waited for hundreds of applications to pour down that portal from Australia Post into WA Police. These were normal teething problems that you

would have at first at that point in time, and for about a week they did not really come through. There was that normal fixing up point at that time. So that then immediately created a backlog of applications. So that was one teething issue, which was corrected about a fortnight later but had created a fortnight's backlog. What also happened at that point in time is that we had a whole new team centralised and now dealing with these applications and using new systems—the portal system.

[9:30 am]

So there was a compounding range of issues. Within the actual licensing system itself, we found that there were people saying, "But I had this firearm on my licence. It's now coming through without that firearm on my licence. I changed this; I changed that. I disposed of this; I disposed of that", and the integrity of that data was not coming through. It was not what we were seeing as to what people were telling us and certainly what their previous licences were telling us. Once you had centralised and we were having this large amount coming through, we were seeing that. As opposed to it going to up to 200 different police stations, with different police officers using the system and not necessarily getting a global view of what was happening, they might only just be getting a view of their locality, and probably any one person was not seeing a trend. We saw this over that eightweek period, and that took us to about January 2010. We also knew, and had commenced discussions with IT, that the infringement aspect needed to come back into play quite urgently—if that gives you a flavour of what we were dealing with.

**Ms R. SAFFIOTI**: Yes. From mid-2010 to mid this year, you went through the system to try to restore the integrity of the system.

Ms Angwin: We did.

**Ms R. SAFFIOTI**: How did you actually do that? Did you interact with the firearm holders? How did you actually try to restore that integrity?

Ms Angwin: Firearms licensees have been interacting with us quite vocally for some time, so we are very clear of their view. I must say that predominantly the voice of the group was for the first year around the change, so wanting to go to their local police station, talk with Constable Smith, whom they knew, and get the firearm that they wanted. They were very reluctant to any change, and really the first year was around that from them. Interspersed with these queries and frustrations about the integrity of what they were getting, with each person who contacted us, we were rectifying that on a one-on-one basis, so their anxieties were being dealt with in that respect, but, as an agency, we could see a business process issue, which is where we took it to IT. So, yes, the stabilisation was essentially around IT liaising with us as the business area. We were very keen to fix it because of the inundation of complaints that we were getting. So, through there, there was a scoping of the functionality of our business requirements to what the system could cope with, what it was built with, and we essentially went through a process of building in that integrity for every functionality that existed within that system that we could possibly get out of it. There are still some needs.

Mr Italiano: I think perhaps we would all look back in hindsight and say that in terms of managing the business change impacts of the centralisation process, we did not do as good a job as we should have. It is as plain as that. So we centralised a process that had been occurring in a diffuse way across the organisation. The great majority of firearms licence holders are in regional WA. They probably had, to some extent, local level relationships with police et cetera. We still say the centralisation decision was an appropriate one. It has taken an enormous administrative workload off the front counters of police stations and freed up police officer time. It has provided a consistent process and a consistent point by which all these matters are considered, as opposed to the diffuse process that was occurring before, with decisions being made by lots of people at lots of times with varying levels of knowledge and skill about firearms matters. So we stand behind the decision as an organisation. What we failed to do well enough was to understand that the success factor was not

just enabling the applications to be made to Australia Post; the success factor should have been that the centralised business area was adequately ready to undertake that process. It was not. From a system point of view, the system had been functioning well enough in that diffuse environment, but you suddenly put high-volume processing on it in a central area, and it was not adequate to do that. I guess that is the bit that we did not do well enough. We did not think well enough and plan well enough for the business change aspects of centralising that process, and that is the plain and simple truth of the matter. If we had done that—I think if we had our time again, we would have thought through much more the readiness of that business to undertake that.

**Ms R. SAFFIOTI**: Did you do any estimates or analysis of expected savings from front office? We do hear quite a bit, "We centralised. We're hubbing to take pressure off individual stations." Did you do any analysis of expected savings of officer or front office time from centralising?

Mr Italiano: One of the things with police is the majority of the places those licenses are considered. Let me just paint a picture for improving clarity. Say you have a two-officer stationed in Mukinbudin, and they are doing firearms on a Thursday morning for two hours a week. You save nothing by taking firearms off them, because we do not reduce police officers or reduce time. It means those police officers can do traffic, it means they can respond to calls from the community and it means they can undertake crime prevention. The way that this tends to play out for us as an organisation is that it is very much around opportunity cost and police officers undertaking the duties that they are better trained for and we want them to do, as opposed to sitting behind the counter and processing firearms licences. Our motivation was not cash saving. We did not set out on this journey to say, "Well, we're going to save half a million dollars a year", for argument's sake. What we set out to do was achieve two objectives: try and release police officer time at the front line, which is a longstanding, strategic goal of our organisation, whether it is to do with firearms or police clearances or reported traffic crashes, and to centralise the process to lead to a more consistent, transparent process by which all firearms matters are considered. So the goal was not around any financial goal; it was around a service delivery goal and freeing up police officer time.

**Ms R. SAFFIOTI**: This is probably just going more into how it is working currently. For example, if you use the Mukinbudin example, is there an opportunity for those police—I actually was talking to some police around the time of the change, and one of the issues they did raise was that a lot of police know a lot of people; especially in those country towns, they know if someone comes in with an associate, and you may question whether they should have a licence. Is there any feedback or opportunity for local police to feed information back through the centralised system about concerns about associations or other issues that may have arisen?

Mr Italiano: I will allow Trudi to answer that.

Ms Angwin: Every person who applies for a firearm licence, either an original or an additional, we now have also a centralised probity checking area, so they go through a rigorous screening process at each of those times. What we have found through centralisation, which we are quite pleased about, is that we are able to apply quite a high standard of probity checking, and we do that rigorously for every individual who applies, instead of perhaps just going on knowledge of a person over a period of time. In addition to that, police officers right across the state place information on to our centralised systems. When we are doing that probity check, we check all of those systems as a matter of course, so all of that information is fed through. As well as that, and a recent outcome of the stabilisation project and one that was alluded to in the Auditor General's report, we now have a system where every person who has a firearms licence is flagged in our central system, and not just the firearms system, and anything—whether they are charged or there is an incident or, through the courts, a conviction on anything—triggers us a daily report into the firearms system—because they might not be applying for a licence; they have got one—and we get a list of up to 30 or 40 a day. We go into those and check what they are, and if there is anything in there, that would mean that we

need to revoke that person's licence, and we liaise directly with the attending officer, wherever that is across the state, as to the incident type and the nature of that and what occurred.

**Ms R. SAFFIOTI**: Can I ask how many times that has happened, let us say, over the past few months where people's licences have been revoked because something has been flagged, such as a domestic violence issue?

**Mr J.M. FRANCIS**: Yes. I was going to say an AVO or something like that.

Ms Angwin: Yes. I cannot tell you the number offhand. What happens is that, as a matter of course, a number of those may go to court, so a domestic violence issue would be immediate seizure of any firearms anyway until the circumstances are resolved. We revoke licences not just through that flagging process, but through a whole range of others when we are doing that probity check. The most common way that we revoke a licence is where someone with an existing licence, who may have had it for 20 or 30 years, applies for another firearm, and we go into and we do another full probity check on that person and we uncover recent events that have taken place. That then results in us not only declining that new application, but revoking their existing licence and all of their firearms that go with that. It is just one of the information streams, that flagging, into a number of others where we revoke. If we revoke, we do not record separately what came off that tripping. What we usually do is in every instance of that tripping, the one that flags us—in every instance we send every day an email to that officer, wherever they are in the state, and also to their station mail, that we request them to review. We bring that to their attention, even though they can see it, that that person holds a firearms licence, if the incidence of that event would require "Please review their fitness to hold that licence and forward us information if you require a revocation." If that does not come, we may consider revoking ourselves anyway. That is a fairly new flagging, and it adds to the robustness of our probity checking of people.

**Mr C.J. TALLENTIRE**: I just have a question about cost recovery. Does that actually cover the probity checks as well as the actual clerical processing of things?

Ms Angwin: It does, yes. So we cost recover everything in firearms—I will clarify that—everything that we can in firearms security and probity in the licensing enforcement division through annual fees and charges. What we cannot naturally cost recover is police officer time. That comes off the police officer allocation to the agency. So every civilian that we employ in licensing, which is probably 60 per percent of the licensing area, we cost recover, and through a centralised process. The robustness of those processes and the decision making—so not just revocation, but the clarity and consistency of decision making around every category of firearm—has improved over the last two years by virtue of the number, I suppose, that we look at, and where people may have received it in the past through local interaction out across the state. That is also something that is being difficult, I will let you know. Firearms communities are having difficulty with that level of consistency and that level of probity.

Mr C.J. TALLENTIRE: Just sticking with the police officer time —

Ms Angwin: Sure.

**Mr C.J. TALLENTIRE**: — surely that is a major part of those probity checks.

**Ms Angwin**: No; police officers are not doing the probity checks at all. We have well-trained civilians doing that, just like we have intelligence analysts and analysts. What we use the police officers for primarily—and it is only because of legislation that we essentially are using police officers in the licensing enforcement division. The act has not been changed. It still reads in terms of a police officer instead of a police employee. So civilians do fingerprinting; they do intelligence checking, licensing assessment, all the way through.

**Mr C.J. TALLENTIRE**: What about going out to someone's residence and checking that they have got a gun cabinet and things like that?

Ms Angwin: Yes. At the moment we have a mixture of compliance officers and police officers. Those compliance officers are civilians trained in security and firearms exclusively, and they have special constable powers to do that. Again, the only reason for needing special constables is because the act has not yet been changed to say "police employee". To give you a sample of that, our security licensing, which we also manage, and the enforcement of that—that act talks in terms of a police employee. Essentially, that entire area is civilianised because of that, and those civilians also go out and do all of that—a bit like fisheries or other areas. So the needing of a police officer is purely determined at this point in time by the act and the writing of that.

Mr C.J. TALLENTIRE: So you are confident that there is full cost recovery in the licence process.

**Ms Angwin**: It is not full, because we cannot cost recover for all police officers, but cost recovery based on the other elements, yes.

**The CHAIRMAN**: The data you provided to us—I just want to confirm that in WA there are approximately 80 000 firearm licence holders pertaining to about 360 000 licensed firearms.

Ms Angwin: Yes.

**The CHAIRMAN**: So that is correct. And the actual period of the licence: is it the standard 12 months or —

**Ms Angwin**: It is for firearm—for 98 to 99 per cent, all of those licences are for individuals with a firearm, and that is an annual renewal. Of course, what you have in there are several hundred dealers, ammunition collectors—a few of those obscure licences, and they have different elements. Some are for three years. So, yes, but 98.5 per cent of your licence holders are annually renewed.

[9.45 am]

**The CHAIRMAN**: Would you just go through the legal obligations and how you enforce a failure to renew?

Ms Angwin: Yes.

**The CHAIRMAN**: If they fail to renew on the due date, then the licence holder has 12 months.

Ms Angwin: Right.

**The CHAIRMAN**: What is the process in which they can renew when they have gone beyond the time?

**Ms Angwin**: First of all, 28 days before your licence is due, you are sent a renewal. So, 28 days after that date, if you have not renewed on your due date, 28 days later you get a letter from us to say that we intend to infringe you if you do not pay within another 28 days. At the point of 90 days since your licence was due, so three months later, you will be infringed and that is the point where you can have your firearms repossessed.

**The CHAIRMAN**: Is there a penalty attached?

Ms Angwin: Yes. It has just gone up. It was \$421 a few weeks ago and I think fees and charges might have just increased a little. At that point in time you receive an infringement, so you still have an option. What you can do to avoid us seizing your firearms and you going through a whole new process again is pay your renewal and pay your infringement. Some people elect to just pay the renewal and fight the infringement in court; that is fine. Either way at that point in time at 90 days, that is your critical moment. Someone may elect to not pay that renewal and not pay that infringement and we seize their firearms. Up until the 12-month mark from when their licence expired or was due, at any point in time they can go and pay that renewal.

The CHAIRMAN: Plus their infringement?

Ms Angwin: They may want to fight that in court, so that is a different issue, but they can renew their licence and have their firearms at that point in time. At the 12-month mark, that whole process is negated and at that point in time you cannot renew; you are completely and utterly unlicensed. In terms of the layman, you are unlicensed; that is, you cannot have your guns. It does not matter what you try to pay and what you try to do, there is no option other than applying for an original licence at that point in time. There is no reapplication process; it is completely as it is for someone going through an original —

Mr J.M. FRANCIS: Do they get their weapons back?

**Ms Angwin**: If they reapply at that point in time. You have got to remember that by then we have got someone who potentially has been charged with possession of unlicensed firearms because they have not paid their renewal, they have not handed them in, so now you have got an offence in the Firearms Act. So, you are presenting potentially—it is not for me to judge—as a person who is not abiding by the law with firearms, and that tends not to go down well in the probity check!

The CHAIRMAN: So we had a situation where, because people had not renewed their licence in substantial numbers arising out of issues with respect to the notices or the failure to actually receive notices for whatever reason, we had a large number of people who were on that 12 months.

Ms Angwin: Yes, we did.

The CHAIRMAN: And I think it got up to almost 10 000, was it?

**Ms Angwin**: Right. What we had was about 6 500 that had expired unresolved, and that means expired licences and they have still got possession of guns. I will talk in halves because it is easier than actual figures, but around half of them did receive renewal. Everyone received a renewal, but half of them received a renewal and also received infringements, and they were prior to 2008, to anything happening with the system whatsoever. They are just people who did not renew their licence, did not hand their guns in, ignored their infringements and went over the 12 months.

**The CHAIRMAN**: So this is half of the 6 500?

Ms Angwin: Correct. Then there was the other half who, since 2008 when we turned off that infringement system, all received their renewals. There is no doubt about that. But what they did not get was an infringement, so they just did not get infringed. So they not only went for 12 months without renewing their licence, but they did not get an infringement. What we did was thought that in some instances receiving an infringement for those who may be lax in paying any bill may motivate them to go and pay, so we sort of took that into account. That is why the decision was then made to cover all bases, make a regulation change, allow us essentially to allow those people to apply and administratively reinstate their licence—we still do probity in case something has happened—reinstate only those people originally from mid-2008 onwards, just in case it would have been the infringement that motivated them to renew their licence; the benefit of the doubt.

**The CHAIRMAN**: In a sense there was an amnesty, so the clock was stopped and they were given extra time?

**Ms Angwin**: They were and they still are right at the moment. Those people prior to 2008, that 3 000 et cetera, we have given them an amnesty too, and it is really more to motivate them to relicense because we want the guns licensed, or dispose of them and hand them in, and they have been given a 30-day period, which has now elapsed.

**The CHAIRMAN**: That was, I think, on 11 July, was it?

**Ms Angwin**: Yes, it was, and it elapsed mid-August.

**The CHAIRMAN**: So there was a July date. What was the July date then that was set?

**Ms Angwin**: I think it was the sixteenth.

**The CHAIRMAN**: I am sorry, 12 July. I thought it was the end of that 90-day amnesty.

Ms Angwin: I am sorry, yes. The amnesty was moved. We essentially wrote to everyone in April 2011, those whole 6 000 people, and originally gave them 30 days, all of them, to reapply through Australia Post in line with the act, but there was no regulation change. We gave them 60 days to do that. During that time there were discussions between the commissioner and the minister, and discussions around perhaps amending the regulations to enable half of those people to go through a streamlined process, not necessarily through the whole rigmarole again. So, by July that process was in place. The regs had gone through, and we sent out notification to all of those people to say, "You can go through a streamlined process and you have 30 days to do that", which took them to around the fifteenth, mid-August essentially, to do that. Those applications have been streaming in in that regard. Even though mid-August has passed, we are still getting around 30 to 40 a day, so we are essentially not acting on or drawing a line in the sand at that point. We want those people to apply. The legislation runs out early October; it is a 90-day period. That is why we gave them 30 days to motivate them to get it in and gave ourselves 90 days essentially. So, that is what is happening there. Those people prior to mid-2008, who really should have just relicensed or lost their guns, have been given that amnesty as well, that 30 days, and that expired mid-August as well. They have to apply through Australia Post through the original process. In that proportion of people, we are getting about five applications a day from people who are still adhering to that process, and we would like to encourage that. So, we are sort of, I suppose, waiting a few more weeks before we start seizing their firearms.

**The CHAIRMAN**: Of the 6 500, how many have currently not regularised or renewed their licence?

Ms Angwin: About half. The other 4 000—you alluded to 10 000—were people within the 12-month period who could renew at any point in time. We, at the same time in April, sent a letter to every one of those saying, "The infringement system is about to be reactivated. You haven't paid your renewal. You will receive an infringement very shortly. Go and pay it." I am pleased to say they took heed of that because on the date that the infringement system went live, around 650 infringements were issued that day out of a potential 4 000. So, there had been a take-up of that.

Ms R. SAFFIOTI: Just to clarify, as of today how many people do you think remain unlicensed?

**Ms Angwin**: Approximately half of that 6 000; so for that group, yes.

**Ms R. SAFFIOTI**: Yes, because in your notes it says 10 000 persons were unlicensed as at April 2011.

Ms Angwin: Yes.

Ms R. SAFFIOTI: So, that would have included the 6 500.

Ms Angwin: Yes, it does.

Ms R. SAFFIOTI: Plus the other 3 500.

Ms Angwin: Yes.

Ms R. SAFFIOTI: Now we have 3 250, let us say, of the 6 500.

**Ms Angwin**: As of a few days ago for that process, that back-capture process, there are 3 864 that remain outstanding.

**Ms R. SAFFIOTI**: And the other group?

**Ms Angwin**: I am sorry, those are the two groups. I can split the two if you would like; that is, the pre-September and the post-September.

Ms R. SAFFIOTI: Yes.

**Ms Angwin**: So, for the post-September group, out of the 3 500, 1 389 have reapplied.

**The CHAIRMAN**: I am sorry, have reapplied or have not?

**Ms Angwin**: Have reapplied. So obviously we are waiting for—my maths off the top of my head in this setting is not going to work for me!—the other group, which is the pre-2008 group; out of the 3 000, 1 247 have applied. That initial group, 1 389, are coming in at around 40 applications a day at the moment, this week, so they are hurrying to do that; and the other group, about five a day.

Ms R. SAFFIOTI: Just to clarify the number, 3 874 is a subset of the 6 500.

**Ms Angwin**: The 3 864 is the subset of the 6 500.

Ms R. SAFFIOTI: Yes, but there are other thousands of people you just talked about.

Ms Angwin: The 4 000? Ms R. SAFFIOTI: Yes.

**Ms Angwin**: They are the ones who can renew, so they are subject to infringement. Of those, all bar 650 renewed or did something with their guns, destroyed them or whatever, and notified us. The 650, the infringements, then went out and we managed that in our normal infringement way. That is underway, so every day people are infringed just in the normal business process as well.

**The CHAIRMAN**: Those 650 who have not renewed were people within the first 12 months.

**Ms Angwin**: Yes, they were.

**The CHAIRMAN**: So the ones then who took longer than that, how many of those are still outstanding or not renewed?

**Ms Angwin**: Those longer than that, right up to that group, is 3 864. So that 3 864 is the group that had until mid-August to reapply. We gave them a little bit longer.

**The CHAIRMAN**: So with both together there are some 4 500 that have to be renewed?

**Ms Angwin**: We cannot add them together in that way, so those 3 864 need to reapply. The 650 could have renewed. Of those, and I can break down the activity of those 650 and what has happened, if that would help.

The CHAIRMAN: Please.

Ms Angwin: All right; 20 of those people paid their infringement and their renewal and they were okay; 348 we cancelled. When we send someone an infringement, we give them an opportunity to explain any extenuating circumstances. In this instance, the extenuating circumstances, because of the confusion that was going on, particularly with media et cetera around that time, people gave various explanations which led to a high rate of us using discretion and cancelling that infringement at that time. Fifty-eight of those people we are unable to locate, and an alert has been placed on our central information system for every police officer in the state; so that should they come across Bill Smith who has got firearms, we need to get them off him. Twenty have already been sent out to police districts for them to go out and seize the person's firearm and take possession of it and charge them with possessing an unlicensed firearm. We are still doing a static inquiry on 204 of them, trying to locate those people before we decide that we cannot locate them and we put an alert on the police systems to get them. So, we are still looking at other ways of finding those people. Some of those people, we find when we go through Crimtrac nationally, have moved to Queensland or someone else did not notify and all those sorts of things. So a lot of effort is going into resolving those things.

**Ms R. SAFFIOTI**: Can I just follow up? The 3 864 are licence holders. How many guns does that relate to? Have you got those figures?

Ms Angwin: I do not, but typically I can give you a general ratio for licensed people.

Ms R. SAFFIOTI: Yes.

Ms Angwin: It is up to three guns per person per licence. I am sorry, I cannot give you an exact number.

Ms R. SAFFIOTI: So approximately 10 000 firearms.

Ms Angwin: That would be right.

**Ms R. SAFFIOTI**: Just to clarify this, like I said, the note said 10 000 persons were unlicensed as at April 2011.

Ms Angwin: Correct.

**Ms R. SAFFIOTI**: So, the comparable figure—I know the 650 has to be dealt with separately—is about 4 000, as Mr Kobelke just outlined.

Ms Angwin: Yes.

**Mr C.J. TALLENTIRE**: I was just noting that of the 6 500 who received a renewal, 115 did not receive a renewal because of a violence restraining order.

Ms Angwin: Yes.

**Mr C.J. TALLENTIRE**: So, how does that percentage compare with the non-gun-holding population, 1.7 per cent of the population being significantly higher than the non-gun-holding population?

**Ms Angwin**: We could only take that as a question to feedback to you, and I am not sure of our ability to pull that out, but we could look, if that is important to the committee. It is not something that I have at hand.

**Mr C.J. TALLENTIRE**: It is an interesting comment on gun holders, I suppose, so I would like to know that.

**The CHAIRMAN**: So, are you happy to provide that by way of supplementary information?

Mr Italiano: I am sorry, I just seek some clarification of the question.

Mr C.J. TALLENTIRE: We have a figure here that 115 people did not receive a renewal because they have a violence restraining order out against them, and I am wanting to know how that as a percentage—I think it is 1.7 per cent—compares with the mainstream population.

[10.00 am]

**Mr Italiano**: I mean, VROs are a frequently sought process through the courts; we issue them in high volume. I would not be able to provide today just what the general population and percentage is, but it is not hard to work out the number issue divided by the number of people in this state, so we could provide that.

Ms Angwin: I will just caution the interpretation of who they pertain to. Some were for a violence restraining order or other issue. So, in some instances we have seized the guns perhaps while they are going through the renewal process or that is activating them to do that. When that is over, they will get the guns back. A very small proportion of people—and this is part of the other, and I think in there it might have said an administrative issue. At the time of changing from the old system to the new system, off the mainframe and into the new current system, at that point in time if someone for whatever reason had, perhaps because they had gone through that seizure process, come in physically to us at the licensing enforcement division and paid a renewal and we manually overrode the system—because normally it comes in through various payment licensing areas of council offices and those sorts of things—and subsequent to the year after we did not send those people a renewal because we had overridden the system and we were not aware at that point in time that that then stopped anything, you are probably looking at a couple of dozen people—in proportion to 80 000—and we have now rectified, we now have that knowledge. So, I will just let you know that it is not necessarily a core 115, it would have been probably up to half of that group.

**The CHAIRMAN**: Just coming to the roughly 4 000 licence holders and 10 000 unlicensed weapons you currently have, what particular campaign or follow-up will be taking place with those?

I think you are pretty well covered administratively, but I am talking about actually out there in terms of —

**Ms Angwin**: Actively seizing?

**The CHAIRMAN**: — actively talking to people and seizing guns. But you also give some information on the campaign you seem to have going currently, which I will call a campaign, with respect to checking on storage of firearms.

Ms Angwin: Similar to where I alluded that 20 people out of about 650 had already been sent packages from our area, which have already gone out right across the state to districts for seizure and prosecution, that is what will happen to those outstanding people, both those people in the infringement who do not pay, the 650, and also these people. We have now gone past mid-August when they have been given a period of time. In the near future we will be packaging up those outstanding—I am sorry to say, Mr Brown!—3 000 persons and we will be sending packages to districts that they pertain to. When I say packages I mean information files. Those police officers, as per normal business, when someone is in this situation—it is not unusual, this is what firearms do—they go out, they seize those guns off those persons and they generally charge them and prosecute through the courts for possession of unlicensed firearms. Our main aim is to have the firearms licensed and back in safe custody.

The second aspect of that is safe storage. Within the licensing enforcement division, we not only do licensing, through that process, which is what we have essentially focused on today, but we also have an enforcement arm, and their job is to enforce the pawnbroker, second-hand dealer, security agents and the Firearms Act and make sure people are compliant with that. We actively go out and do audits and a range of other operations in all of those industries. One of the things that we do in firearms is that over the last 12 to 18 months we have done audits of corporate firearms holders and we do dealer audits. As I alluded to before, 98 per cent of people with firearms, though, are individuals and we also have to do individual audits. So, we have recently commenced an individuals audit of safe storage of firearms.

**The CHAIRMAN**: How many staff are involved in that audit, and what length of time do you expect it will run for?

Ms Angwin: We will do audits ongoing for safe storage, it is just part of our business regardless. We have had a concerted effort over the last three weeks. We have had 16 additional resources and my usual 10 resources, so about 26 officers and compliance officers have been out on different days involved in that operation. It has been essentially metropolitan Western Australia at this point in time. Around only 40 per cent of firearms holders reside within metro, and about 60 per cent in regional WA, so obviously that will need to be a focus as well. Out of those audits, we attended, in general terms, around 1 000 addresses over that three-week period. We have done around 320 audits, because a number of those people were not necessarily home or it was not suitable, and when it is not suitable at that point in time, unfortunately, we are restrained by the Firearms Act; we cannot demand to see the firearms. It requires us to provide a notice in writing, unless someone says it is convenient and to come on in. We are required to give them a written notice of our intention to inspect their firearms storage and firearms at a reasonable time. There is no set time; generally, we give them that notice then and within 24 hours or thereafter we come back. At that point, if they refuse to allow us to see it, they are charged with not allowing us to do that. So, out of those 320 when we did go in and do the audit, we seized—sorry, I have not got that operation in front of me; I can get the exact figures back to you—but around 187 firearms out of those 320 audits and a significant number of charges—I believe it is up to about 70 —

Mrs Fyfe: It is 76.

**Ms Angwin**: It is 76 charges for failure to provide safe storage of firearms. We were finding them under beds, in cupboards and all sorts of areas, and these were people who have had firearms for a

number of years. There was overall about 20 to 35 per cent, depending on which weekend, of people who had woefully inadequate storage. There was a minor noncompliance and there is the ability to use discretion in them, obviously, all of the time. The Firearms Regulation schedule 4 is very particular about safe storage and people need to comply with that with a firearm. In there, there are things like a 40-millimetre washer as opposed to a 38-millimetre washer; it is all specified. When we are coming across someone with a 38-millimetre washer et cetera, what we are doing is they are not being charged. Discretion is used by the officer at the time. Their firearms are seized until their safe is compliant with the act and then they are returned those firearms.

**The CHAIRMAN**: Can I come to the follow-up though of a smaller number of the 4 000 who may come to the point where you have to seize actual weapons. Is this going to receive any priority in terms of the allocation of resources, because as Ms Angwin already explained, contacting these people at the right time and being able to inspect is a big operation?

Mrs Fyfe: From a specialist enforcement operations portfolio perspective, the compliance audit that Ms Angwin has just described has received resourcing and priority from our portfolio's pool of resources, and I will hand to Mr Brown. When it comes to the normal day-to-day business of sending those intelligence packages out to districts to have firearms seized, I will hand to Mr Brown to speak.

**Mr Brown**: Absolutely, it will receive statewide priority. I sit over both metropolitan and regional Western Australia, crime, the specialist operations portfolio, so we will put together a large operational package and implement it in a relatively short time frame. I think that this is something that we will probably run over one to three months with the numbers that are now known. So, we will have a concerted and structured effort, which will be run from within Mrs Fyfe's portfolio headed by Trudi's division and coordinated, and have a big hit, so we have an intensive focused effect over a short period of time.

Ms Angwin: In answer to your previous question, we have located around the Auditor General's report. At item 15—the hard copy report they put out was not itemised with numbers, but the report that we received as an agency had numbers. So, number 15, "WA Police did not issue licence infringement notices between November 2008 and at the point of their audit to June 2009." That is when they did that. They then number the number of infringements that were sent out in that three-week period that it was operating and the recommendation is that "WA Police should continue to improve the firearms register so that reports and notices, including infringements, are accurate and can be used." As I said, it did not receive any great —

The CHAIRMAN: Yes, sorry, but it does not quite clarify the point, because I have read 15, and I am aware of it, and we have got two different versions of 15 from you in terms of your response, which I think in terms of the answer you have given has to my satisfaction explained the variation in the update column. But the issue there is that the auditor, as you quite rightly pointed out, was aware that WA Police did not issue licence infringements, but there is no record of them actually being informed that the system had been turned off. That was the connection we were trying to find between the fact that the auditor was aware that there were issues and deficiencies, but we do not actually have a record to show that the auditor was directly informed that the system was no longer operational part way through the audit.

**Ms Angwin**: At point 15—and when they come on the date they are there liaising with the licensing enforcement division—they state here that, "We were informed of the decision to suspend the issuing", and then the basis of that information. So we did inform the Auditor General's office at the time of the audit that we had suspended them, and that is what the heading is, that we did not issue them, and it says further down that they were suspended and that they were informed.

The CHAIRMAN: I am obviously working of the summary document.

**Ms Angwin**: I am sorry, this is the Auditor General's report to us asking for our —

**The CHAIRMAN**: Is it possible for us to have a copy of that?

Ms Angwin: Absolutely, I will provide that. And so they acknowledge that they were advised.

The CHAIRMAN: Some brief formalities to close. I thank you very much for the evidence you have given to the committee today; it is most appreciated, as is the way in which we have been presented with such a range of facts over what is a complex area. A transcript of this hearing will be forwarded to you for correction of minor errors. Any such corrections must be made and the transcript returned within 10 days from the date of the letter attached to the transcript. If the transcript is not returned within this period, it will be deemed to be correct. New material cannot be added via these corrections and the sense of your evidence cannot be altered. The undertakings we have received for additional information, if you could please enclose those when the transcript is returned. If you wish to provide additional information or elaborate on any particular points, then it is appropriate that that be included as supplementary information when those transcripts are returned. Again, I thank you very much for assisting us today.

Hearing concluded at 10.12 am