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CORRUPTION AND CRIME COMMISSION

OF WESTERN AUSTRALIA

ACTING COMMISSIONER SCOTT ELLIS]

TRANSCRIPT OF PROCEEDINGS

AT PERTH ON TUESDAY, 17 NOVEMBER 2020, AT 2.12 PM

COUNSEL:

MS NADIA PANTANO

WITNESS: PAUL LEDINGHAM

1 **THE ACTING COMMISSIONER:** Please be seated.
2
3 **LEDINGHAM, PAUL CALLED AT 02.12 PM:**
4
5 **THE ACTING COMMISSIONER:** There's no need for another round
6 of introductions.
7
8 **PANTANO, MS:** Thank you.
9
10 Would you please state your full name?---Paul Daniel
11 Ledingham.
12
13 And are you currently employed?---Yes.
14
15 In what capacity?---The assistant secretary of the WA Prison
16 Officers' Union.
17
18 And how long have you held that role for?---Approximately
19 two-and-a-half years. And just a brief description of what
20 that role entails?---Under our rules, I assist the secretary
21 with the execution of his duties. I deputise for the
22 secretary for periods of leave, and practically I'm also an
23 industrial officer for the union.
24
25 Thank you. And as an industrial officer for the union, what
26 does that entail, what duties?---Representing the interests
27 of our members.
28
29 Okay. And how long have you held that role for as an
30 industrial officer?---I've been with the union coming up to
31 six years total, so the last two-and-a-half years as the
32 assistant secretary.
33
34 Okay, and the previous years as an industrial officer?---
35 That's correct.
36
37 And do you still act on occasion as an industrial officer in
38 your assistant secretarial role?---It is part of the role.
39
40 Okay. And prior to the commencement of your role at the
41 union, what did you do before that?---Previous two positions
42 were with other public sector unions.
43
44 Other public sector unions?---Yes.
45
46 Okay. In what role?---I was an organiser and a community
47 campaign organiser for the CPSU/CSA, and following that for
48 a brief period I was an organiser for the HSUWA, doing - on
49 a fixed-term basis.
50

1 Now, at the West Australian Prison Officers' Union, are you
2 governed by any Code of Conduct or rules or procedures?---
3 We have two sets of rules. We have state and federal rules
4 - all unions or registered training - sorry, registered
5 organisations need to have a set of rules.
6
7 Okay. And what do those rules govern, just generally?---The
8 governance of the union, ensuring elected officials, such as
9 myself, do the right thing with our members' money and do
10 the right thing by members.
11
12 And what's your understanding of what a conflict of interest
13 is?---It's - it's a very broad term, but yeah, it's
14 when - - -
15
16 As it pertains to your role at the union?---I suppose I would
17 not be dealing with - with members who I have a relationship
18 with, or - you know, outside of the - the union
19 official/member relationship, being aware of where
20 perception of conflict might exist, and excusing myself from
21 decision making or representing members where - where that
22 might exist.
23
24 What about in instances where you've got - you may be
25 representing members or - sorry, more than one member, on
26 the one incident where they may have conflicting versions of
27 events?---I would only see that there's a conflict if they
28 are on opposite sides of that issue. We have a process in
29 place where that occurs. If - each of our members, by virtue
30 of the fact that they pay union dues, are entitled to
31 representation from the union, so if we had two members on
32 the opposite side of an issue, they would each get assigned
33 their own industrial officer, and those industrial officers
34 would not talk in relation - about that matter - to each
35 other while the matter was being dealt with.
36
37 And why would it be important that those industrial officers
38 don't talk amongst themselves?---Because each member is
39 entitled to representation on that issue. Just being clear
40 though, that is when the member - it's a member - the member
41 - issue. We don't have the resources to - if a number of
42 members are involved in the same incident or issue, that
43 doesn't necessarily represent a conflict of interest where
44 assisting and representing members through that issue.
45
46 Okay?---It's only when it is member, the member, that there
47 would be a conflict in that case.
48
49 What about confidentiality. What's your understanding of
50 what obligations, if any, you have in relation to
51 confidentiality?---I would have an obligation to the member

1 who is seeking assistance with representation, maintain
2 their call in confidence. I'd have an obligation to that
3 member not to disclose issues pertaining to their situation,
4 or their workplace matter, to others unless I'm authorised
5 to do so.

6

7 Okay. And where would you get that authority from?---From
8 the member.

9

10 Mr Ledingham, the Commission over the last couple of days
11 has heard evidence that the union, particularly the West
12 Australian Prison Officer's Union, does not tolerate
13 criminality in any way. Does that accord with your
14 understanding of what the union does stand for?---That does
15 accord with my understanding; one of the any things the union
16 stands for, yes.

17

18 Okay. And does that accord with your own values of what the
19 union should stand - or should stand for, rather?---Without
20 a doubt.

21

22 Okay. And what do you do in your daily role to demonstrate
23 that criminality will not be tolerated?---I uphold the law
24 myself, I like to think I do. I have a strong set of values
25 and principles. I like to think I exhibit those in my
26 dealings with others. I like to think I act honestly and
27 with integrity in all of my dealings.

28

29 And what about in relation to how you advise members? What
30 do you do in how you advise members that criminality will
31 not be tolerated?---Look, it's not my role to pass judgment
32 on the actions of members. It's my role to represent them
33 and assist them through processes that they're engaged in,
34 and ensure that they are provided with due process. I'm not
35 the judge, juror and executioner, I'm an advocate and
36 representative, and I provide advice to members who seek it.

37

38 Okay. What about in advising members to tell the truth?
39 Would that be advice that you give?---Regularly, yes.

40

41 Would there ever be an occasion where you would say no to -
42 to a member to not be forthcoming?---I cannot think of an
43 instance where that would be appropriate advice to give to
44 a member.

45

46 In your experience, what does the union do, as a whole, to
47 demonstrate that it doesn't tolerate criminality?---We - I
48 think there's an expectation from certain quarters of our
49 membership that we provide legal representation, for things
50 like unfair dismissal, in every instance. We would only
51 provide legal representation or assistance for those things

1 at the end of a disciplinary matter if we believed there's
2 been a miscarriage of justice, if a member has admitted guilt
3 on a serious criminal matter. They can apply for legal
4 representation, but we would not give that for those
5 instances along those lines. It's - we - outside of ensuring
6 a member is afforded due process, we don't support criminal
7 behaviour.

8
9 And you demonstrate that by not providing representation
10 where someone has admitted to criminal conduct? Is that
11 correct?---As I say, aside from assuring that that member is
12 afforded appropriate process, we - we wouldn't go beyond
13 that, and in some instances we - we might suggest to the
14 member that, at certain points of that process, that a
15 resignation would be the best outcome.

16
17 What about in instances where the individual member
18 themselves haven't acknowledged or admitted to criminal
19 conduct, but other members have indicated or advised you
20 that another member may have engaged in criminal conduct,
21 how would you deal with it in that instance?---We're not an
22 oversight agency, we represent members. I don't receive -
23 it's not part of our role to receive reports of criminal
24 behaviour from our members or anyone. I wouldn't accept
25 them, I'd be referring them to the appropriate oversight
26 agencies.

27
28 But in an example, and I appreciate I'm speaking in
29 hypotheticals here, but in an instance where you've got an
30 incident that may have occurred at a prison, and you have
31 members who come to you and advise you that a fellow
32 employee, a fellow prison officer, may have been involved in
33 conduct that may amount to criminal conduct, and you're
34 advising those members, how do you deal with that situation?--
35 --Again, I'm not sure that's ever occurred, but if it was to
36 occur, we would point the concerned member to the appropriate
37 channels. We are not the police, we not the PSC, we are not
38 the CCC, we are the WA Prison Officers' Union.

39
40 Who would you refer them to in that instance?---I think
41 there's references in the Code of Conduct to the Department
42 about the obligations of employees of the Department on
43 reporting of misconduct. I'd be referring them to that, and
44 to follow that. It falls outside of my role.

45
46 Have you ever had a need to advise a member that they needed
47 to report any suspected criminal conduct, or breach of the
48 Code of Conduct?---I cannot think of a circumstance where
49 I've been asked to do such, no.

50

1 Not where you've been asked, but where you've advised a
2 member that, based on information they've told you, you've
3 advised that member to then go and report that suspected
4 breach of the Code?---Look, I have assisted members in the
5 past lodge misconduct reports to the PSC. I've assisted a
6 member in the past lodge a misconduct report to this
7 Commission where I think those actions were appropriate, but
8 as I say, in terms of internal, I can't think of an instance
9 where I've - it's not the sort of thing a member would
10 usually call us with.

11

12 Mm hmm?---They call us for assistance and advice, not to
13 report misconduct. That's not our role.

14

15 What do you consider the union's role to be with the
16 Department? Where do you see the interplay between the two?--
17 --I think we're a stakeholder. Obviously, we represent north
18 of 90 per cent of VSOs, prison officers, senior officers and
19 principal officers who work for the Department of Justice.
20 That's a fairly loud voice. It's a fairly - it's a large
21 responsibility for one organisation to - to carry the voice
22 for such a large group of workers, but historically the
23 Department are aware that that's what we do, we advocate for
24 - for prison officers, and they've engaged with us
25 accordingly. We have lots of structures in place in terms
26 of regular meetings, consultation forums. The Department
27 write to us, generally, when they want to change their ways
28 of doing things that might have an impact on our members, so
29 it's our role to consult. I'm sure that our members'
30 interests are at the forefront.

31

32 And just on that, just to reiterate, you said it's in the
33 interests of your members to consult with the Department?
34 Is that correct?---It's also in the interests of the
35 Department. I would - I would put to you that they should
36 consult with - with their union who represents a very
37 sizeable chunk of their workforce.

38

39 **THE ACTING COMMISSIONER:** Are there obligations to consult
40 relevant industrial instruments?---Yes.

41

42 And that's about, what, industrial changes, in broad terms?--
43 --Yeah, changes that have a significant impact on - the work
44 life of our members.

45

46 **PANTANO, MS:** And when you say there are regular meetings
47 with the Department, who are those regular meetings with?--
48 --The obvious one is the peak consultative committee.
49 Historically, it used to be the Commissioner of Corrective
50 Services who would chair that, and bring who they saw fit to
51 attend. In more recent times, or under the - in the post-

1 MOG world, it's usually an assortment of deputy commissioners
2 and others that the Department sends to meet with
3 representatives of the union, chiefly includes myself, the
4 secretary, president, vice president and other members of
5 our executive team.

6
7 Okay. And how often are those meetings?---They should be
8 monthly.

9
10 Do they occur? Do they still occur, to your knowledge?---
11 Yes.

12
13 And what's the purpose of those meetings?---To work through
14 issues that haven't been able to be resolved at a local
15 level, or work through issues at a peak level. There is -
16 you know, it's a standard meeting. There's an agenda,
17 minutes, action items, outstanding action items, standing
18 agenda items.

19
20 Are PSD involved in those meetings?---Not recently, no. At
21 different times there have been - has been involvement. As
22 I say, it's up to the Department who they bring to the table,
23 but I can't recall the last time there was anyone from PSD
24 attending those meetings.

25
26 And are there - so we've spoken about the relationship
27 broadly with the Department, what about with PSD, the
28 relationship between the union and PSD?---Our industrial
29 officers maintain a professional, cordial relationship with
30 the staff within PSD who helps us to perform our role when
31 we're representing members facing disciplinary matters. I
32 think it's fair to say that in - the relationship has
33 probably changed with the merging of DOTAG and DCS to become
34 DOJ. We're still trying to get our head around structure of
35 DOJ and reporting arrangements. PSD seems to sit outside of
36 Corrections entirely.

37
38 Mm hmm?---We - yeah, so it's - the relationship has changed,
39 but we obviously have - it assists myself and the other -
40 our industrial officers to do best by the members if we
41 maintain a professional relationship.

42
43 And how do you go about maintaining that professional
44 relationship?---Just cordial in our exchanges. It's - I
45 think the Director of Professional Standards invited the
46 industrial team to a morning tea, probably about 12 months
47 ago. We attended.

48
49 Do you have regular meetings like you do with the
50 Department?---No. We used to, but that hasn't occurred for
51 quite some time.

1
2 And why is that?---I'm not sure.
3
4 So when you say it used to occur, who used to attend those
5 meetings?---I remember - and I'm not even sure if they're
6 still with the Department, but I remember meeting with Peter
7 Murdoch - surname Norris, whose first name escapes me.
8
9 Mm hmm?---We would meet semi-regularly, probably every one
10 to two months, to go through active disciplinary matters,
11 just get progress updates, get an understanding of where the
12 Department's sitting, or, you know, what their thinking is,
13 but yeah, those meetings - well, I don't think they have
14 occurred since the Department changed to Department of
15 Justice and changed their structure.
16
17 Right, okay. So since Machinery of Government changes, these
18 meetings haven't occurred?---That's correct.
19
20 Has there been any attempt on PSD's side, to your knowledge,
21 for these - for meetings to occur?---I think - again around
22 12 months ago, I seem to recall that there was an offer, but
23 the - I think the offer was dismissed because the - the - it
24 wasn't - I'm going from memory here, so you'll have to excuse
25 me, but I think it was not to have meetings as they were
26 held previously. I think the idea was to have them more
27 formalised, and we weren't sure if that was appropriate,
28 given the - you know, the dealing with public sector
29 management at disciplinary processes. We didn't see the
30 need for a formal meeting. We didn't see that that would
31 assist in the management of disciplinary matters.
32
33 How did you - so when you say your understanding was they
34 were to be more formal meetings, how were they, to your
35 understanding, going to be more formal than, say, the
36 meetings that you - the PCC meetings that you have, which
37 are minuted, there are agendas, how would those - how were
38 those meetings with PSD going to be more formal than the PCC
39 meetings?---No, I think you've misunderstood my response. I
40 was saying that the intention was for the PSD meetings to be
41 more formal than they had been - - -
42
43 Yes?--- - - - previously, not more formal than the PCC.
44
45 Yes, so - - -?---I think the intention was to hold them like
46 a PCC, have a formal agenda, formal standing orders, if you
47 like, or terms of reference, whereas previously our meetings
48 with investigations or PSD were informal, no - no minutes,
49 no note-taking.
50

1 Right. So, yes, that's - I did understand that's what you
2 meant but so what I'm interested in is you - the union, from
3 what you've said, still attends these PCC meetings which are
4 formalised?---Yep.

5
6 So I'm just curious as to why the difference or why the
7 reluctance of the union to meet with PSD in this, in a
8 similar formalised manner as they did with the PCC?---I'm
9 not sure if there's anything to be gained from a union
10 perspective on behalf of our members to agree to such
11 meetings. We - we already have formal processes. The
12 disciplinary process is clearly outlined in the Public Sector
13 Management Act, so there's nothing to be gained by having a
14 formal meeting to discuss a formal process from the
15 perspective of our members.

16
17 What about relationship building between yourself and PSD,
18 would that be a benefit?---Potentially? Yeah, I - I - I
19 don't know is - is the answer. As I say - - -

20
21 What's your opinion?---My opinion?

22
23 Do you think there would be a benefit in relationship
24 building between the union and PSD?---Potentially? I - I
25 wouldn't know for sure. As I say, myself and the other
26 industrial officers have a - a cordial professional
27 relationship with senior representatives and senior
28 officials within PSD and many of their investigators. I
29 don't know if that can be enhanced or improved, but it is a
30 professional relationship.

31
32 Does the union advise its members - I understand it advises
33 its members on industrial issues but does it also advise
34 members on disciplinary issues?---We assist members through
35 that process. Our industrial officers are well versed in
36 the Public Sector Management Act disciplinary process and
37 they will assist members who are going through that process
38 and help them navigate that process.

39
40 Okay. And PSD, am I correct in saying that they're the body
41 who deal with the disciplinary process from the Department's
42 side?---Yes.

43
44 The Commission has heard evidence of an old way versus a new
45 way of dealing with disciplinary issues. Do you have a view
46 about which way was preferable?---I'm largely only familiar
47 with the disciplinary process through the Public Sector
48 Management Act.

49

1 Okay?---I - I don't have a view because I don't have
2 knowledge or experience with the previous disciplinary
3 process.

4

5 Right. Have you had discussions with anybody about the old
6 versus the new way?---Not to any level that would lead me to
7 form a view or a preference. As I say, I'm well versed and
8 dealing pretty much exclusively with the Public Sector
9 Management Act disciplinary process.

10

11 And in your opinion, do you think the way that the
12 disciplinary process is being dealt with from where you sit
13 is being dealt with in an effective way?---On the whole,
14 yes. I - I think I've raised concerns in relation to a
15 couple of - with PSD directly in relation to their - them
16 using the disciplinary process for matters that I would
17 consider fall well outside of the disciplinary process;
18 grievance-type matters, interpersonal conflict in the
19 workplace. There have been occasions where PSD have - have
20 sort of gone straight to formal disciplinary where there
21 is - the Department has processes to deal with interpersonal
22 conflict or grievance matters in the workplace so I've raised
23 concerns with PSD in relation to that directly. But on the
24 whole, they would be the exception rather than rule. On the
25 whole, I think the process is one that we - we don't have an
26 issue with.

27

28 Again, the Commission's heard evidence over the last few
29 days that the old way, and I appreciate you - your evidence
30 is that you weren't around for that but the old way was there
31 appeared to be much more of a consultative sort of process
32 between the union and, I guess, the old PSD before the MOG,
33 and that consultative approach appeared to work quite well
34 and that that's been one of the criticisms of the new way is
35 that there isn't this consultative approach as much between
36 PSD and the union. So just to go on further from what you've
37 said earlier that you don't see that there's much to be
38 gained from having regular meetings with PSD, do you think
39 now in hearing what I've mentioned to you and I understand
40 I'm putting you on the spot with this but do you see that
41 there could be something to be gained from having a more
42 consultative approach with

43 PSD?---Look, I'm open to the idea. Obviously it wouldn't be
44 my decision, it would be a decision for the secretary or the
45 executive but definitely open to the idea. As I say, given
46 the nature of the work that I do and who I'm answerable to
47 there would need to be a benefit in it for our members. And
48 if - if I could see or be convinced that there would be a
49 benefit for WAPOU members, then I wouldn't be opposed to the
50 idea.

51

1 Can you see any immediate detriment to your members by having
2 open lines of communication with PSD?---No.

3

4 Just while we're on the topics of relationships, what's your
5 understanding of the relationship between the union and the
6 Commissioner or current Commissioner of Corrective
7 Services?---Professional.

8

9 Anything else?---No. I think there's - there's mutual
10 respect there. I think the Commissioner, given his
11 background and experience, has a - an understanding of the
12 role of the union. We have an understanding of his role.
13 But there's - there's a level of mutual respect and we share
14 a professional relationship.

15

16 I want to take you to - shift focus a little bit now and
17 I've asked you some general questions about confidentiality
18 and conflicts of interest. Does the process which you've
19 described, does that change once the union become aware that
20 the CCC are involved in a matter?---If you asked me this
21 question in the first half of this year I would have said I
22 don't know. Thankfully, the CCC don't get involved too much
23 in matters that involve our members. I came back from a
24 period of personal leave in - in mid-August and I had a crash
25 course in the union's role when the CCC get involved in
26 matters.

27

28 Yes? And what was that crash course?---That members who are
29 summonsed to appear before this body cannot talk to anyone
30 but their legal representative, for fear of prosecution under
31 the Act.

32

33 Okay. So what's your understanding if a member comes to you
34 and says that they've been summonsed by the CCC and that
35 they need representation? Is it your understanding - what's
36 your understanding, sorry, about whether - who else you can
37 disclose that fact to? So the fact that the member has been
38 summonsed by the CCC, who do you think you can disclose that
39 to, if anybody?---I might reframe your question to help me
40 answer, answer it, because members shouldn't be disclosing
41 to me that they've been summonsed by the CCC because that
42 would be a breach of section 99. WAPOU members join their
43 union on the understanding that there may be legal
44 representation for workplace matters so they are programmed,
45 if you like, to contact their union if they need a lawyer.
46 I fielded, upon my return from personal leave, a number of
47 phone calls from distressed members who said I need legal
48 representation but I can't tell you why. That was my crash
49 course. I soon learned that the members who I represent, if
50 I was to ask them why potentially I would be getting them in
51 more trouble than they may already be in. So I developed a

1 bit of a script in answering those calls to try and ascertain
2 whether it was a CCC involvement, without discussing the
3 matter, without mentioning summonses, in order to say I
4 understand, I think I know what this is. I will put you in
5 touch with a lawyer who can assist. Do not speak to me about
6 the matter, only speak to your lawyer.

7
8 Okay. So then in those cases where a member or members have
9 disclosed the fact that they had been served with a summons,
10 albeit for the purpose of obtaining legal advice, I'm not
11 suggesting that there was anything untoward in them
12 disclosing that fact to you but what's your understanding
13 then of what use you could make of that information?---Again
14 the way that - my recollection of the conversations, they
15 were handled in such a way that the member was not disclosing
16 that they'd received a summons. And I'll talk you through
17 how that happened because I received in quick succession a
18 number of phone calls from members, some of them very
19 distressed who said, "I need a lawyer but I can't tell you
20 why". So I developed pretty much three questions. Have you
21 received a visit? Have you been given a bit of paper? Are
22 you required to attend a premises in Northbridge in the near
23 future? Now, if their answers were in the affirmative to
24 all those questions I said, "I think I understand this, do
25 not discuss it with me. I'll ensure you get legal
26 representation. You should hear from a lawyer within
27 24 hours." So that's how I navigated that.

28
29 Right?---So there was no disclosure as such, there was no
30 discussion around summonses. But obviously if I'm going to
31 go to that level in discussing it with the - the member at
32 the centre of it or who had received the summons, I'm not
33 then discussing it with others.

34
35 And why not? That may seem like an obvious question but I'm
36 still asking you the question. Why? Wouldn't you then
37 discuss that fact with others?---Because it's potentially in
38 breach of section 99 of the CCM Act.

39
40 Okay. And would you discuss with other members that you
41 were aware that other members may have been contacted by the
42 CCC? Not that they've received a summons but that they had
43 been contacted by the CCC?---I wouldn't be raising that with
44 them myself, no.

45
46 And why, why wouldn't you?---Again for fear of - for fearing
47 of prosecution personally and for fear of getting a member
48 in further hot water.

49
50 And further to that, what about issues around confidentiality
51 of information that that member has provided to you?---That

1 member hasn't provided me personally with - with information,
2 they've only given me the answers to the questions that I
3 need answered to - to refer them on to legal representation.

4
5 Yes. But if they've - if they've given you enough
6 information for you to make an assessment that they may have
7 been contacted by the CCC, do you also think that you have
8 an obligation to keep that information
9 confidential?---Yes, it's not something that I would be
10 disclosing to others. I would be - it's very difficult in
11 a - in a small office when it becomes obvious that a lot of
12 your members have been embroiled in - in something that the
13 CCC have got involved in but all efforts were made to keep
14 a lid on that from - from my perspective, yeah.

15
16 Yes. So is it the case then it wouldn't be appropriate to
17 advise another member that other members may have also been
18 contacted by the CCC?---Thinking back to the conversations
19 I had, I think there was one member who contacted me and
20 advised me of that.

21
22 Right?---But it's not something that I recall disclosing.

23
24 Yes?---I think I provided advice to a member to go home and
25 stop avoiding the fact that you're likely to be receiving a
26 summons. That - I recall providing advice to that nature
27 but it's not - that wasn't me initiating contact and it
28 wasn't me telling him that the CCC are involved.

29
30 Yes?---That was him contacting me and telling me such.

31
32 Right. And I think what we're getting at and I know we're
33 talking around in circles here, Mr Ledingham, but it all I
34 guess culminates in an incident that happened in November
35 2018 of an alleged assault and then alleged subsequent cover-
36 up of that assault and involvement of a particular prison
37 officer and several of those officers were stood down in
38 August of this year which is what you were referring to,
39 stood down by the Department, and then contacted the union
40 for advice prior to any awareness of any CCC involvement and
41 then obviously subsequent to that the CCC then did serve
42 summonses as you have alluded to. I just want to - that -
43 so that's the context in which now I want to ask you some
44 additional questions and show you some exhibits.

45
46 Can I have 0235-3, please?

47
48 You'll see a document come up on the screen in front of you
49 and you'll also hear some audio.

50
51 0235-3^

1
2 START TELEPHONE INTERCEPT:
3
4 Part conversation from 11:14:39 to 11:15:18
5
6 LEDINGHAM: Hello, [REDACTED]?
7
8 [REDACTED]: Hey Paul, how are ya mate?
9
10 LEDINGHAM: Good good. Have you had a visit since we last
11 spoke?
12
13 [REDACTED]: No, not at all.
14
15 LEDINGHAM: Okay. You may get a visit. Uhm so at this stage
16 you know, we we can speak uhm
17
18 [REDACTED]: Yep.
19
20 LEDINGHAM: but the, my understanding is the ah the triple C
21 have visited at least three of the six officers involved uhm
22 so we're expecting them to do the rounds and get to all of
23 them.
24
25 [REDACTED]: Yep.
26
27 LEDINGHAM: What they'll do is uhm put the fear of God into
28 you and tell you that you can't speak to anyone about the
29 matter
30
31 [REDACTED]: Yes.
32
33 LEDINGHAM: other than a lawyer
34
35 [REDACTED]: Yes.
36
37 LEDINGHAM: and they'll say you can't even speak to your
38 union.
39
40 END TELEPHONE INTERCEPT.
41
42 **PANTANO, MS:** And then can I have - it's a follow on from
43 this call - 0235-4, please?
44
45 We've broken the call up into sort of smaller - smaller
46 parts.
47
48 0235-4^
49
50 START TELEPHONE INTERCEPT:
51

1 Part conversation from 11:30:56 to 11:31:14

2

3 LEDINGHAM: Who knows, who knows. But I'd, you know I think
4 it, I'm guessing it's only a matter of time, in fact since
5 we've been talking uhm one of the other members has contacted
6 me looking for a lawyer and is not allowed to discuss it, so
7 she's obviously had a knock on the door as well.

8

9 [REDACTED]: Yeah.

10

11 LEDINGHAM: So, yep. So it's only a matter of time before
12 they knock on your door and find you at home.

13

14 END TELEPHONE INTERCEPT.

15

16 **PANTANO, MS:** So, Mr Ledingham, you'll see there that it
17 was in fact you advising this member that other people had
18 been contacted by the CCC. Why?---As I say, my recollection
19 is that member had contacted me earlier to say that he had
20 - another - another individual who had been summonsed had
21 contacted him. At this stage as I mentioned, I've returned
22 from a period of personal leave and I got a crash course in
23 the - the CCM Act. At this stage I wasn't aware of
24 section 99. I - I'm providing advice to a member that they
25 are likely to be summonsed and once they are summonsed they
26 can't speak to anyone.

27

28 And that's - - -?---So that's my understanding of what I was
29 doing. That's my role as I see it.

30

31 Providing advice to a member that they may be summonsed by
32 the CCC and that once that happens they're not allowed to
33 talk to anyone about it is one thing, but advising that
34 member that three of the six officers involved have also
35 been visited by the CCC is quite another thing. You're
36 disclosing, are you not, confidential information about -
37 albeit you haven't given names but you're disclosing
38 confidential information about three of your members, aren't
39 you?---I'm not sure in that script if you can - I'm not sure
40 what the confidential information is at this stage. I'm not
41 discussing any - - -

42

43 That they've been visited - - -?--- - - - details.

44

45 That they've been visited by the CCC?---Mm. So we had - as
46 you're aware I'd - I was in possession of five suspension
47 letters. Three of the five had subsequently contacted the
48 union because they had been seeking legal representation.
49 At this stage I'm - as I say I'm not - I'm not overly
50 familiar, other than all of those members have informed me
51 that they're not allowed to speak. They've been told that

1 they can't speak to anyone other than a lawyer. So in my
2 mind it - it makes sense that if they've visited three of
3 the five that they're likely to be visiting all five, so I'm
4 advising the member to expect a summons.

5
6 And again I appreciate that but why did you feel the need to
7 let him know that three of his colleagues had already had a
8 visit by the CCC?---This particular member who I hadn't met
9 prior to August, I think it's fair to say that he's - he was
10 very fearful, very paranoid. So I'm - I'm - I'm doing what
11 I think is my role and advising him of the likely process or
12 the likely next step. I'm - - -

13
14 You're advising him of not the next step you're advising him
15 of steps that have already occurred, that being the visit of
16 the CCC - - -?---Well, the next - - -

17
18 - - - to other members?---Sorry. I'm advising him of what
19 - what to expect for him, yes. On the - on the basis that
20 we've got five suspension letters, we've now got three of
21 the five have been summonsed, I would expect a summons. That
22 is the advice I think I've - that you - I provided him in
23 that phone call.

24
25 You've said that the CCC have visited at least three of the
26 six officers involved. Now, is it fair to say, Mr Ledingham,
27 that you knew what this incident was involving to a degree
28 at this point in time?---I knew what was in the suspension
29 letters. The suspension letter referred - cos each of them
30 was very similar to each of the five members, referred to
31 broad - or pending allegations or broad allegations around
32 collusion and a potential assault.
33 That is the extent of the - my understanding of that
34 incident.

35
36 The Commission is aware that prior to this date several of
37 the members involved had already been to the union office
38 and met with some of the union reps, and disclosed a number
39 of details about the incident in November 2018, and that the
40 individual that you're speaking to in this call was at the
41 centre of it. Were you aware of that when you had this
42 conversation with him?---I was aware that a meeting had taken
43 place. As I say, that took place when I was on a period of
44 annual leave - sorry, personal leave.

45
46 Mm hmm?---I - I did not discuss with Andy Smith or Ken Brown
47 what occurred in those meetings. I took the matter over
48 because I'm the industrial officer for Hakea Prison. It's
49 fair to say that the process that I follow when members
50 receive a suspension letter is not to meet with them, it's
51 to assist them respond to the suspension letter, and advise

1 them what to expect as next steps, and that's what I did
2 when I came back from personal leave and took over this
3 matter.

4
5 When you don't meet with them, how do you then get details
6 about what it is they're coming to get advice about?---You
7 don't - from my perspective, under the Public Sector
8 Management Act, for responding to a suspension letter, you
9 don't need those details. The allegations are yet to be
10 put. I have always encouraged members in that instance, and
11 I have done previously, if they've been suspended under the
12 Public Sector Management Act, respond to the suspension
13 letter and wait for the allegations before we discuss,
14 because we need to see what the allegations are.

15
16 I'm finished with that document, thank you. Can I have 0235-
17 5^ please.

18
19 0235-5^

20
21 This is another all with the same person but on a different
22 - later in the call.

23
24 START TELEPHONE INTERCEPT

25
26 Part conversation from 11:35:13 to 11:35:44

27
28 LEDINGHAM: Cause it means this fuckwit who this prisoner

29
30 [REDACTED]: Yes.

31
32 LEDINGHAM: who has who has uhm ah made the allegation can't
33 even name the officer.

34
35 [REDACTED]: Yeah.

36
37 LEDINGHAM: Because I've got no doubt if, you know, I've got
38 not doubt if the Department had information about who did
39 the assault it would have said in the letter to that
40 individual it will be alleged that you assaulted the prisoner
41 and it will be alleged that you were part of collusion to
42 cover up that assault.

43
44 END TELEPHONE INTERCEPT

45
46 **PANTANO, MS:** Then can I have 0235-6^ please. It's just a
47 second part to this call - or rather a fourth part.

48
49 0235-6^

50
51 START TELEPHONE INTERCEPT

1
2 Part conversation from 11:37:03 to 11:37:21
3
4 LEDINGHAM: Look, ah, I
5
6 [REDACTED]: And he's put that in his report
7
8 LEDINGHAM: Yeah as I say, it's an allegation from a prisoner
9
10 [REDACTED]: Yep.
11
12 LEDINGHAM: against six witnesses who are prison officers.
13
14 [REDACTED]: Yep.
15
16 LEDINGHAM: Uhm, no camera footage. The truth will win out
17 uhm but you've gotta go 8 through the process.
18
19 END TELEPHONE INTERCEPT
20
21 **PANTANO, MS:** The Commission has heard in the last few days,
22 and throughout the course of its investigation,
23 Mr Ledingham, that there is a culture within prison officers
24 of covering for each other, and being afraid to call other
25 officers out when they've done the wrong thing for fear of
26 reprisal. Would you agree that, by virtue of the position
27 that a prisoner is in, by virtue of the position that a
28 prison officer - a prison officer is in, that there is an
29 imbalance of power between those two individuals, a
30 prison officer and a prisoner generally?---I would disagree,
31 on the basis that the power balance in prisons, as my
32 understanding, is quite tenuous. The - I've often heard it
33 said that prison officers are in control because the
34 prisoners give them consent to be in control. I - I walked
35 through Greenough Prison while it was still smouldering after
36 the riot two years ago. I've seen how that power balance
37 plays out, so I don't necessarily agree with the proposition
38 as put. It is a tenuous and complicated power balance, is
39 my understanding, in a prison between prison officers and
40 prisoners.
41
42 It is, and taking out obviously occurrences of riots and
43 assaults on prison officers by prisoners, taking out those
44 select incidences, would you agree that, generally speaking,
45 a prison officer would hold more power in a prison
46 environment than a prisoner, by virtue of their positions?--
47 --Yeah, by virtue of the Prisons Act, they do have powers
48 under the Prisons Act.
49
50 Right?---Yes, I would agree.
51

1 In this part of the call where you say, "It's an allegation
2 from a prisoner against six witnesses who are
3 prison officers," what are you suggesting about the fact
4 that you have six versus one?---At this stage, as I
5 mentioned, all I've got is the suspension letters. I've
6 also got five of them, and they all refer broadly, from my
7 recollection, to a pending allegation around collusion and
8 a pending allegation around an assault on a prisoner.

9
10 Mm hmm?---None of them - bearing in mind they were each
11 addressed to each of the individuals, none of them said that
12 you assaulted the prisoner, so that's what I was suggesting.
13 Someone has made an allegation of assault, a prisoner has
14 made an allegation of assault, by the sound of it, but it's
15 not clear from the suspension letters who is the person who
16 has committed the assault, or alleged to have committed the
17 assault.

18
19 Right?---That is what I was referring to. The only materials
20 that I've got are the five suspension letters, and I'm just
21 deducing that from the suspension letters.

22
23 Well, what about the information that you had been provided
24 by either individual officers - sorry, individual
25 prison officers, or Mr Brown and Mr Smith, who had also met
26 with all of the members by this point?---I was not provided
27 with additional information. I deliberately did not seek
28 additional information.

29
30 You were not told - is it your evidence that you were not
31 told anything about what those members had come in and told
32 Mr Brown and Mr Smith?---That is my evidence, because, as I
33 mentioned earlier, how I as the industrial officer deal with
34 suspension letters is not how, in my absence, the suspension
35 letters were dealt with by Mr Smith and Mr Brown.

36
37 Right, but they're handing matters over to you, and they
38 give you any debrief, no information? Is that your
39 evidence?---My evidence is they told me they had met with
40 the officers in groups while I was on leave.

41
42 Yes?---And I said I wouldn't have done that. I don't want
43 to know what took place in those meetings. I will take it
44 from here.

45
46 So is it your evidence that you - at this point you were
47 unaware that there were any discrepancies between what these
48 members had told the other union officials?---At this point
49 I haven't got allegations to discuss with the members. I
50 wouldn't be having conversations, especially when there's a
51 broad allegation of collusion with groups of members.

1 Obviously, that's the - I'm guessing that that's the main
2 reason for the suspension in relation to this disciplinary
3 matter, one of the allegations is collusion, you suspend
4 them so that there's no potential for them to collude within
5 the workplace, that makes sense to me industrially, so I
6 don't want to be party to information that I wouldn't have
7 sought.

8
9 Right, so is it your evidence that Mr Brown and Mr Smith did
10 not tell you any details about their meetings with these
11 members? Is that your evidence?---That is - look, it's my
12 evidence that they met with them.

13
14 Yes?---And they said they met with them in groups.

15
16 Yes?---From memory, I've sort of - was a bit aghast at that
17 and said, "Well, I've seen the suspension letter, I wouldn't
18 have done that. Let me take it from here".

19
20 Mm hmm?---I didn't want to know what was discussed, because
21 at this stage, as the industrial officer, I'm not even sure
22 what the allegations are.

23
24 So not wanting to know and being told are two different
25 things; so I just want to be clear with you about what your
26 evidence is. Is it your evidence that Mr Brown and Mr Smith,
27 other than telling you that they met with members and that
28 they met with some of the members in groups, is it your
29 evidence that they told you nothing more than that?---It is
30 my evidence that I specifically asked them not to tell me
31 any more than that.

32
33 Yes, but what - that is also - - -

34
35 **THE ACTING COMMISSIONER:** And did they comply - - -?---Yes.

36
37 - - - with what you asked them?---Yes. Sorry, if I wasn't
38 being clear, yes. Yeah.

39
40 **PANTANO, MS:** They told you nothing more than what I've
41 just outlined?---No. That's correct.

42
43 Okay. Sorry, you just said that you were told that they met
44 - and in Mr Brown and Mr Smith met the members in groups.
45 What do you mean by groups?---I believe there was - I don't
46 know, I wasn't there, and I didn't unpack this or explore
47 it, but as opposed to individually.

48
49 So more than one at one at one time?---Exactly, and I think
50 that was the evidence they gave yesterday.

51

1 Just one moment. Sorry about that.

2

3 If I can just have that clip back up, just the transcript,
4 0235-6^?

5

6 Mr Ledingham, what was your point in saying - pointing out
7 that there was no camera footage?---It's purely a
8 disciplinary process. Many prisons have CCTV footage, Public
9 Sector Management Act disciplinary process is decided on
10 balance of probabilities. Quite often, the - when the
11 allegation letters are sent, the Department or PSD will
12 indicate that they have footage supporting the allegations.
13 If that's the case, I usually make a time to meet with the
14 industrial officer and the member to view that footage. It
15 is my understanding, given the age of Hakea, that there
16 wouldn't be - wouldn't have been camera footage at that
17 particular prison, so it was purely in reference to the
18 process and around evidence, so evidence in prisons where
19 there is a lot of CCTV available, it's usually presented as
20 part of the disciplinary process. I was just suggesting
21 that, in this instance, that the Department won't have that
22 evidence, so it will be statements and the truth will win
23 out, which is self-evident, I would have thought.

24

25 The Commission again has heard evidence, not only over the
26 last couple of days, or been privy to information throughout
27 its investigation, that there was advice - allegedly, advice
28 provided to many of these member by the union and others
29 that, providing all of the officers stick with what's in
30 their reports, which allegedly wasn't an accurate
31 description of what actually occurred in November 2018, but
32 if everyone stuck to that version, that no one would get in
33 trouble and that the real truth wouldn't come out. I want
34 to put a proposition to you which I'll put to you respond
35 to, where you suggesting here, Mr Ledingham, that, because
36 you've got an allegation from a prisoner who, in the earlier
37 part of the call you referred to as "a fuckwit," against six
38 witnesses who are prison officers, with no camera footage,
39 that the real events of November 2018 won't come out?---Not
40 at all. I think the clue here is the last word. I haven't
41 - I didn't seek information from any of the five members in
42 relation to the incident, and I wouldn't seek that
43 information until such time as they've got allegations to
44 answer. As I mentioned earlier, ■■■■■ was, I think, was
45 - he struck me as someone who was very nervous and very
46 fearful, and he called a lot. What I'm trying to encourage
47 him to do is wait for the allegations, wait for the - you're
48 engaged in a process now. I see it as my role to ensure
49 that our members who are facing disciplinary matters are
50 afforded due process and natural justice, so I deliberately
51 wasn't engaging as much as I could on the issue of what

1 occurred or what didn't occur, until such time as I'd seen
2 the allegations that were being put to, in this case,
3 [REDACTED].

4
5 I'm finished with that document, thank you.

6
7 Again, the Commission is aware of numerous information from
8 various members that their take-away message from the union
9 was that they should stick with their reports, and by
10 sticking with their reports, no one would find out the truth.
11 Are you aware of that advice being provided to them?---Only
12 from what I saw yesterday. That advice did not come from
13 me.

14
15 But are you aware of that advice coming from elsewhere within
16 the union?---Only from what I saw yesterday.

17
18 And when you talk about yesterday, you mean the evidence
19 that was put forward before the Commission, or by the
20 Commission, rather?---Yeah.

21
22 Mr Ledingham, are you aware of a toxic culture amongst
23 prison officers?---No.

24
25 Have you heard it discussed at all?---Only in relation to
26 Fremantle and bygone eras.

27
28 Do you think the union have any role to play in the culture
29 of prison officers?---Not at my level, no. I get paid to
30 assist members. I don't - that doesn't go the other way. I
31 don't have an influence in my role in the culture of prisons
32 and workplaces.

33
34 Why do you say - why don't you think you have a role in the
35 advice that you give and the flow-on effect on the culture
36 within the prison system?---I'm not sure I understand the
37 question.

38
39 I'll rephrase it. Would you agree with the proposition that,
40 based on advice that you may give to a member or members,
41 that that could have a flow-on effect on the culture within
42 the Department?---I think it's a long bow. I provide advice
43 to members going through all sorts of workplace matters. I
44 assist them through processes, I make them aware of their
45 rights. I ensure that due process is followed. I'm not
46 sure how that feeds back into culture within a prison. I
47 don't tell them what to say or how to act. I'm not judge,
48 jury or executioner in my role, so I can't see that assisting
49 an employee with a workplace matter and making them aware of
50 their rights and obligations when they're engaged in
51 processes feeds back into culture.

1
2 On that view, no, but what about if the union was giving
3 advice to members to be distrustful of the disciplinary
4 processes that are currently in place. Could you see how
5 that could feed into a culture of distrust amongst
6 prison officers?---It's a hypothetical question, I - - -

7
8 It is?---And it's not advice I'd give. I've never told
9 anyone to be distrustful of the process. I've told them
10 that you're engaged in a process and it's my job to see you
11 through that process and ensure that due process is followed.

12
13 But if that advice was being given by others, would you agree
14 that that could have the a flow-on effect?---I'm not sure if
15 I can comment on - - -

16
17 Just an opinion, I'm just asking for your opinion?---I'm not
18 aware of that advice being given, and it's not advice I would
19 give, so I don't want to be drawn into a hypothetical that
20 I don't think would occur, if you know what I mean.

21
22 So the Commission has information indicating that advice may
23 have been given by union officials to tell, basically,
24 members to lie, to not come clean about what actually
25 happened in relation to an incident. The Commission has
26 various, numerous, pieces of information which all points to
27 that conclusion. So based on that, is it your - and I'm not
28 suggesting it has necessarily come from you, but from the
29 union. So based on that, is it your opinion - sorry, would
30 you agree that the flow-on effect could be - have an impact
31 on the culture within the prison environment?---Potentially,
32 but I think - I think it's worthwhile to make a distinction.
33 There are paid employees of the union, such as myself, who
34 are paid to give industrial advice, that's our job as
35 industrial officers, and then there are elected
36 representatives, who are not paid for their role, they are
37 paid to be prison officers, and quite often they give advice,
38 and they give advice in good faith, but it's not always
39 consistent with the advice that would come from the paid
40 employees of the union who are paid to give that advice. So
41 there - there is a distinction there. I think it's a really
42 important one. I can only speak for myself and the
43 industrial team at the Prison Officers' Union. It's not
44 advice we would give.

45
46 Are you aware of delegates giving contradictory advice to
47 what you've just described?---I became aware yesterday, yes.

48
49 And how would the union, in your experience, deal with that?--
50 --We do provide delegate training at our regular State
51 Council meetings. I think I'm on the record as making very

1 clear that in - in instances especially involving
2 disciplinary matters we see it as the delegate's role to
3 refer the member directly to the union, and it's not their
4 role to assist or provide industrial advice in relation to
5 disciplinary matters. These are members who pay my wage. I
6 don't have - you know, I can provide advice and I can tell
7 them what I think should occur but they - they will do what
8 they see fit, I don't have any authority over them in that
9 regard. So I - I can't control the advice that unpaid
10 elected representatives at the workplace level are giving to
11 members.

12
13 I appreciate that you're not on the ground and paid union
14 employees are not on the ground with the delegates so are
15 not privy, necessarily, to the advice that's been given but
16 what - what role does the union have in ensuring its
17 delegates are passing on or displaying the ethos of the union
18 and the values of the union?---We provide training to our
19 elected representatives. We ask a lot of them, they - they
20 - we ask them to attend meetings. We spoke earlier about
21 the PCC, at every - every prison or "branch" as we refer
22 them to - refer to them as, we have local versions of that
23 where delegates attend and - and meet regularly with
24 management. So we expect a lot of our delegates, we expect
25 them to provide communication back to the union office. Many
26 of our delegates, unfortunately, in my experience, go above
27 and beyond and think that their - their role goes beyond
28 that so we - we provide training, we provide advice at State
29 Council. But as I mentioned earlier, you know, I'm not their
30 keeper. Quite often delegates see it as their role to go
31 above and beyond.

32
33 **THE ACTING COMMISSIONER:** Are delegates paid while they're
34 attending to union business, under the industrial
35 instruments?---The - there is leave, paid leave to attend
36 union matters. There's the clause in the agreement. But
37 generally delegates are at work. They are workplace
38 delegates, they're getting paid to be on shift and they -
39 they wear two hats in the workplace.

40
41 Okay. So it's not like they clock on and clock off, or clock
42 off and then clock on again once they - - -?---No, not at
43 all. Yeah.

44
45 Thank you.

46
47 **PANTANO, MS:** Mr Ledingham, what's your awareness of the
48 culture when it comes to prison officers standing by fellow
49 prison officers even when there's been an awareness that
50 corrupt or criminal conduct may have been engaged in?---I'm

1 not familiar with that culture. In fact, I have not seen
2 it. I've seen the opposite.

3
4 Sorry, you have not seen or - - -?---I have not seen what
5 you're portraying. I've - I've actually seen the opposite.

6
7 Seen the opposite. The Commission has information indicating
8 that officers feel the threat of being victimised if they
9 stand up and say something, I guess, against the pack or
10 ratting on another officer. What's your awareness of that?--
11 --Don't have any awareness of that.

12
13 You're not aware of it occurring?---No.

14
15 I want to put a number of assertions to you, Mr Ledingham,
16 just out of fairness to you so that you can comment on them.
17 The Commission has information suggesting that relating to
18 this incident union reps have advised members to stick with
19 their reports even when the actual events are different than
20 what has been reported. What do you have to say about that?--
21 --It's not advice I would give, not advice I would support.
22 As I say, the - the members have been drawn into a process.
23 It's my job to ensure that they follow that process, that
24 they're aware of that process and when allegations are put
25 to them that they respond in kind.

26
27 Further, the Commission has information suggesting that
28 relating to this incident union reps have advised that
29 Professional Standards can't prove anything unless someone
30 rolls or changes their story dramatically. What do you to
31 say about that?---I have no comment to that. I'm not party
32 to those conversations. As I say, they're not the
33 conversations I've had with the individuals. In fact, I've
34 said very little to them because of the involvement of this
35 Commission.

36
37 Based on your experience, do you believe there is a culture
38 of officers protecting each other at any cost?---No.

39
40 Commissioner, now might be an appropriate time for a
41 15-minute adjournment.

42
43 **THE ACTING COMMISSIONER:** Certainly.

44
45 We'll adjourn for 15 minutes.

46
47 (THE WITNESS WITHDREW)

48
49 (Short adjournment)

50
51 (TIMESTAMP) / 03.17.04 PM

1 **LEDINGHAM, PAUL RECALLED AT 03.27 PM:**

2
3 **THE ACTING COMMISSIONER:** Please be seated.

4
5 Yes?

6
7 **PANTANO, MS:** Commissioner, I have no further questions of
8 Mr Ledingham but I also ask that he not be released from his
9 summons.

10
11 **THE ACTING COMMISSIONER:** Thank you.

12
13 Mr Yin, do you have any questions?

14
15 **YIN, MR:** No. No, I don't, sir. Only in respect of the
16 non-disclosure order in respect of Mr Ledingham, this is a
17 public hearing but he has a notation on his summons and we're
18 perhaps seeking some clarification about who he can discuss
19 what's happened today with, given it's been broadcast live.

20
21 **THE ACTING COMMISSIONER:** Do you have any submissions?

22
23 **PANTANO, MS:** No, sir. But other than to say that obviously
24 his evidence is - it's normally the part that is - or the
25 main part that's not able to be discussed, particularly in
26 a private hearing, between a witness and others but given
27 that that evidence has been - - -

28
29 **THE ACTING COMMISSIONER:** Yes.

30
31 **PANTANO, MS:** - - - streamed and already out in the public,
32 I see no reason why he can't discuss that with others.

33
34 **THE ACTING COMMISSIONER:** I might point - there is already
35 an order that witnesses are not to discuss their evidence
36 with any other witness until that witness has completed
37 giving his or her evidence.

38
39 Mr Brown and Mr Smith, although they gave some evidence
40 yesterday, have not yet been released so from the
41 Commission's point of view they haven't yet completed their
42 evidence. So that direction stands. You are not to discuss
43 your evidence with any other witnesses until they complete
44 their evidence and that includes Mr Brown and Mr Smith.

45
46 In terms of the evidence that you have given today, the
47 public material, what you've said you may discuss with other
48 people except them. What happened in public I won't put -
49 I won't say "it stays in public" but it is in the public so
50 what you've said today you may discuss with people who
51 weren't witnesses.

1
2 Is that sufficiently clear, or is that sufficiently unclear?
3
4 **YIN, MR:** Yes, it is and I take it it includes the witnesses
5 that are listed on the - on the website to be called this
6 week? Yes.

7
8 **THE ACTING COMMISSIONER:** Yes. Thank you for that.
9

10 So, Mr Ledingham, you're not finally released from your
11 summons either. You are to attend again at the Commission
12 at a time and place to be determined if required to do so.
13 Today your examination is over. You're free to go. Thank
14 you for your evidence.

15
16 (THE WITNESS WITHDREW)
17

18 **THE ACTING COMMISSIONER:** We'll adjourn.
19

20 AT 3.30 PM THE MATTER WAS ADJOURNED ACCORDINGLY

**Certificate Made Under Section 50A of the
*Evidence Act 1906***

The transcript of Paul Ledingham heard on Tuesday,
17 November 2020

was made in good faith and, subject to any qualification referred to below, is correct, accurate and complete transcription of the contents of the recording;

was produced from recordings that were suitable for making an accurate and complete transcript except where otherwise stated in the body of the transcript. Any "indistinct" or "inaudible" or other notations indicating difficulty with the transcription contained within the transcript refers to those parts of the proceedings that could not be accurately transcribed due to speech clarity, recording quality or other factors impacting word intelligibility.

Certified on this 18th day of November 2020 by: Glenda Judge, Sheila Robbshaw, Joshua Stevenson

Full Name: Glenda Judge
Sheila Robbshaw
Joshua Stevenson

Occupation: Transcriber and officer of the Commission under the Corruption, Crime and Misconduct Act 2003 ss 182, 3 who has taken an oath before the Commissioner.

Signature: (Glenda Judge) (Sheila Robbshaw) (Joshua Stevenson)

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