

LTS:DAT

IN THE NEW SOUTH WALES STATE CORONER'S COURT

STATE CORONER O'SULLIVAN

5 MONDAY 26 MAY 2025

**2024/00139002 - BONDI JUNCTION INQUEST**

10 **NON-PUBLICATION ORDERS MADE**

**PART HEARD**

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15 AUDIO VISUAL LINK COMMENCED AT 10.04AM

HER HONOUR: Good morning. Ms Sullivan.

20 SULLIVAN: The first witness is Senior Sergeant William Watt, but before I call Senior Sergeant Watt, can I just attend to one housekeeping matter in the nature of a non-publication order relating to a limited portion of the second statement of Assistant Commissioner McKenna - I'm sorry, of Senior Sergeant Watt. That is at tab 764A of vol 14. I'll just correct that. I withdraw that, it is McKenna. We might attend to that matter at a subsequent point when we've  
25 clarified the status of the statement to which it relates. I call Senior Sergeant William Watt.

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<WILLIAM MUNROE WATT, SWORN(10.05AM)

<EXAMINATION BY MS SULLIVAN

5 Q. Can I have your full name for the record please?

A. William Munroe Watt.

Q. Your rank?

A. Senior Sergeant.

10

Q. When did you attest from the academy?

A. May 2000.

Q. Where are you currently attached?

15

A. I'm currently the coordinator at Operational Safety Training and Governance.

Q. You prepared two statements for the purposes of these proceedings?

A. Yes that's correct.

20

SULLIVAN: The first is dated 29 October 2024. Your Honour that's found at tab 674 of vol 14. The second is dated 23 April 2025 and that is at 764A, vol 14. I tender a copy of that statement that has yet to be included in the brief.

25

HER HONOUR: It's to be included in the brief, thank you.

CALLAN: Can I rise just to note for everyone's benefit in the courtroom and online, there are some non-disclosure orders that your Honour made on 4 May 2025 over aspects of Senior Sergeant Watt's evidence as found in his supplementary statement, for instance at paras 36, 37, 44, and aspects of annexure C and E. In my submission if the parties could be mindful of that because the Court will need to be closed if that terrain is to be canvassed in oral evidence.

35

HER HONOUR: Thank you Ms Callan.

SULLIVAN

40

Q. There is one correction to your second statement, that's so?

A. Yes, that's correct.

Q. We understand that that's at paragraph 73 - I beg your pardon, perhaps that's in relation to the first statement. No, I beg your pardon, it's the second date. The date in 2020 it should be 2021, is that correct?

45

A. Yes that's correct.

Q. Subject to those corrections, your statements are true and correct?

A. Yes that's correct.

50

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Q. Your current role we understand is the coordinator of Operational Safety and Governance. That sits within the Operational Training Safety and Governance Command, correct?

A. Sits within Educational and Operational Safety, yes.

5

Q. Can we call it OTSG for--

A. OSTG.

Q. OSG?

10

A. OSTG.

Q. OSTG?

A. Yes.

15

Q. Doesn't roll off the tongue. OSTG is the command that oversees the delivery and development of training within the New South Wales Police Force, correct?

A. Yes, for non-specialist units.

20

Q. That includes the development and the design of mandatory training?

A. Yes that's correct.

Q. That is the annual training that police are required to undergo?

A. Yes, that's correct.

25

Q. And that includes a mandatory shoot?

A. Yes.

Q. And first aid training?

30

A. Yes.

Q. Other things that the command does is to research new techniques and technology, including having regard to what other jurisdictions are doing internationally?

35

A. Yes that's correct.

Q. What does your role as the coordinator of the Operational Safety and Governance group involve?

40

A. So effectively I function as the second in charge. My jobs include quality assurance for both my own unit's work, and to ensure that training's delivered accordingly. I provide experience and guidance to the other staff within the office, I allocate resources when and where required and essentially conduct a - typically less and less but I'm still involved in the design of a lot of training as well.

45

Q. How long have you been in your current role for?

A. Two years, or just shy of two years substantively.

Q. You've been an operational safety instructor for some 21 years?

50

A. Yes, that's correct.

Q. Your qualifications are set out at pages 1 to 3 of your first statement and there's reference amongst other things to being an ALERRT level 1 instructor. ALERRT is A-L-E-R-R-T. That's right?

5 A. Yes that's correct.

Q. Can you just explain to us what the ALERRT program is?

10 A. So ALERRT is a - effectively started as a cooperative arrangement between law enforcement in Texas and the University of Texas. They've been focused on researching and developing appropriate response strategies to active shooters.

Q. ALERRT is the program that has informed the New South Wales approach to active armed offenders, that's right?

15 A. Yes that's correct.

Q. It was selected because it was endorsed by the FBI and then subsequently picked up by a range of high profile policing jurisdictions like NYPD?

20 A. Yes that's correct.

Q. In summary, the three essential operational goals of AAO training based on the ALERRT program are stop the killing, stop the dying and rapidly evacuate the injured, that's right?

25 A. Yes that's correct.

Q. Can you just give us a brief summary of each of those operational goals?

30 A. So stopping the killing is fairly self-explanatory given that an active armed offender is focused primarily on killing people. The primary role for police is to stop that occurring. Stopping the dying is focused on providing immediate first aid to injured people simply because we are the first operator - or first responders that are in that environment, and simply waiting for somebody else to do the job is not going to be a - not going to result in a successful outcome. And the reality of most injuries suffered by victims in active armed offender incidents are beyond the capacity of anyone bar a surgeon to resolve, so it's  
35 getting them to that surgeon as quickly as we possibly can.

Q. The rapid extrication--

A. Yes.

40 Q. --is the third aspect, all right. Just briefly in terms of the rollout of AAO training in New South Wales, that started in October 2015?

A. Yes that's correct.

Q. Was Lindt the precipitating circumstance in effect?

45 A. Lindt had some degree of effect on it. How much I probably couldn't comment on, but we'd certainly been researching prior to - well prior to Lindt.

Q. That rollout involved a four day mandatory package for all police during the period 2015 to 2018?

50 A. Yes that's correct.

Q. Then there was a second rollout of a two day package during 2018 to 2020?

A. Yes that's correct.

5

Q. There was a further mandatory training program in 2020 to 2021 that focused on tactical emergency casualty care?

A. Yes, it reinforced what had already been taught.

10

Q. Now between 2021 to 2024, no mandatory AAO training was undertaken for operational police who'd already completed the package?

A. Yes that's correct.

15

Q. But it's still taught in the academy for all recruits?

A. Yes.

Q. The 2025 training package commences - for AAO - commences in July this year, is that right?

A. Yes that's correct.

20

Q. What's the main focus of that?

A. The primary focus of the upcoming training is a simplification of tactics on how to move through a building or a location and to clear it, so it's primarily focused on pure tactics than anything else. It's a simplification of a lot of the tactics that we, that we previous employed, designed to make it easier to teach, easier to retain for police while maintaining the appropriate level of protection, while they're - whilst they're undertaking what is a dangerous task.

25

Q. How long will that be? Is that a day or two days?

30

A. So it's sitting at about two and a half hours at the moment and includes some scenario based training.

Q. That will include any enhancements or improvements that you've identified from these proceedings?

35

A. It will be the start of including those. Improving those, rather.

Q. One aspect that emerges as a learning is the need to thoroughly search a victim for all potential wounds including in junctional areas, correct?

A. Absolutely yes.

40

Q. And the need to remove clothing to ensure a thorough search?

A. If it's required, yes.

Q. That will be incorporated?

45

A. It may be possible to incorporate it at this point, given that it's all already designed and we've trained about three quarters of the instructors across the State that are required to deliver it.

Q. Does it include the tactical emergency casualty care component?

50

A. It includes some consideration of it. Essentially it's deliberately set up to

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allow them to practice some of the techniques regarding haemorrhage control.

Q. In the context of that, it wouldn't be that difficult, presumably, to add a couple more points to the presentation to ensure--

5 A. No, it shouldn't--

Q. --that that learning is incorporated?

A. It shouldn't be no.

10 Q. You're a member of the ANZPAA, Australia New Zealand Policing Advisory - I'm not sure what the last A stands for.

A. Agency.

15 Q. Agency, thank you. Working group that consults on the AAO guidelines periodically, correct?

A. Yes, that's correct.

Q. And there's a periodic review for 2025?

20 A. Yes, we've just, just undertaken the initial processes on that, and I believe it's at the point that it's being referred to the commissioners for endorsement.

Q. You're in a position to feed learning from these proceedings into that advisory group?

25 A. Yes.

Q. I'm going to very briefly come to Detective Inspector Amy Scott's use of force on 13 April, but before I do, in short form, the primary focus of police who are responding to an AAO incident is to disable or to stop the offender, correct?

30 A. Yes.

Q. The requirement is to proceed direct to threat, even if you're on your own?

A. Yes, that's correct.

35 Q. That is with a view to stopping the killing?

A. Yes.

40 Q. I can foreshadow to you counsel assisting's submissions, which will no doubt be universally embraced by all parties, that Detective Inspector Scott's use of force was entirely justified and appropriate, firstly. Secondly, that her training had equipped her to deal with the violent and unpredictable scenario that she faced on that day. And thirdly, that she demonstrated extraordinary courage and situational awareness in executing her training and confronting Joel Cauchi in the most stressful of circumstances. And finally, that she acted with exceptional bravery and skill and saved lives. So you can accept that as the submission that will be put.

45  
50 But from the perspective of an Operational Safety Instructor, and someone who's been instrumental in the development of the training, I'd like to give you the opportunity to draw out further matters if you would like?

5 A. I'd agree wholeheartedly with, with what's being said. From a technical perspective, there are a number of other aspects that nobody bar an instructor is likely to key on. Her situational awareness particularly about risk when she's discharging her firearm is well beyond most police that I've ever seen, given the circumstances that was confronting her. She's made decisions which didn't necessarily increase her risk but she's made decisions that put her at a disadvantage, and she made those decisions because of what she perceived to be the risk of safety to members of the public. So there's a number of technical aspects that reinforce what you've already said.

10 Q. In fact, this will be held up, can I suggest, as an exemplary instance of policing internationally?

A. Yes, it already has been.

15 Q. You would have heard Detective Inspector Scott's evidence that in entering the centre, she thought she would die?

A. Yes, that's correct.

20 Q. You've heard that evidence. And the statistics that are cited in your first statement at paragraph 50 indicate that in over 50% of incidents, that is active armed offender incidents, police exchange gunfire with the offender and in just over 20% of incidents, they suffer casualties. That's based on statistics from 2015 reiterated last year in the ALERRT program, is that right?

25 A. Yes, so the, there's been very little shift in the statistics over the years obviously. I think there's a difference of some 400 odd incidents that ALERRT have analysed between 2015 when those figures were, were obtained and now, but essentially the numbers are pretty much the same.

30 Q. So Inspector Scott's fear was well justified?

A. Yes.

Q. In fairness also to first responders, there's heavy scrutiny after the event when a firearm is deployed, correct?

35 A. Absolutely.

Q. I don't need to take you to this, but this appears in one of your slides in your second statement. That's page 96, but this is what is referenced:

40 "The decision to use your firearm rests with you. You are accountable for your actions. If you kill or injure a person when such action is not reasonable, you could face serious criminal charges and civil action."

45 That is the scenario that confronts you if things haven't gone that well and you have discharged your firearm?

A. Yes, absolutely.

Q. So it's a heavy burden that is placed on first responders in an AAO incident, putting themselves in harm's way to protect the public, correct?

50 A. Yes. Yes, that's correct.

Q. And then being closely scrutinised for their exercise of force?

A. Yes.

5 Q. New topic, unless there's anything further you'd like to say in relation to Detective Inspector Scott?

A. Apart from the fact that she's done exactly what she's trained to do and she's done it exceptionally well, no.

10 Q. Thank you. I want to come to the issue of first aid training that's provided in connection with AAO training and also more broadly. But the AAO training we understand enables police, or trains police to provide first aid in a high threat environment, correct?

A. Yes, that's correct.

15 Q. That includes the use of tourniquets, the packing of wounds and the use of chest seals for penetrating injuries?

A. Yes, that's correct.

20 Q. The aim is stabilisation, particularly in connection with severe haemorrhage?

A. Yes, that's correct.

25 Q. That's the nature of the Tactical Emergency Casualty Care principles that were the focus in 2020 and 2021, is that right?

A. So it's been threaded through the entire program from 2015 on.

Q. The mandatory CPR component now also includes tourniquet application?

A. Yes.

30 Q. So that's taught every year?

A. Yes.

35 Q. Police are also taught a pretty crude triage system?

A. Yes.

Q. Is that right?

A. Yes.

40 Q. The two categories are immediate and delayed?

A. Yes.

Q. How does that work?

45 A. So essentially, given the lack of medical training and the lack of sophistication in the medical training we can provide, in 2015 when we first introduced the training, we elected to simplify the categories down to two and keep it as easy for police to make it. So essentially, from an immediate perspective, we actually treat - there's two assessments. There's a triage for treatment and then there is a triage for transportation.

50



From a treatment perspective, we're telling them to look for things they can treat with the limited equipment that they have. So peripheral haemorrhage, particularly severe haemorrhage, they can manage that with tourniquets. Junctional wounds they can manage with wound packing. They're quick, they're simple, they're effective. They can do very little for penetrating trauma to the chest other than perhaps delay the onset of a tension pneumothorax by using a chest seal, and they can do nothing for penetrating trauma to the head.

So they'll - they're taught to focus on what they can treat and treat that, and then effectively conduct a reassessment. So if I've got somebody with penetrating trauma to the chest, while the person with a haemorrhage that I've controlled with a tourniquet is still not a healthy human being and needs medical treatment, I've at least stabilised them, so I would then evacuate the person with penetrating trauma to the chest as a high priority, because there's nothing I can do for them.

Q. In the event of multiple victims, an AAO scenario, police are not trained to start CPR at the outset, but rather to do the triage, conduct the triage, is that the position?

A. Yes, that's correct.

Q. You had the benefit of listening to the emergency physician conclave who gave evidence on Friday, is that right?

A. Yes.

Q. In particular, you heard evidence about the TST, the Ten Second Triage tool?

A. Yes.

Q. From your perspective as a senior police trainer, what are your views about that tool?

A. I think it's an excellent system. I think it's very, very simple to use. I think it generates good characterisation, and I think it's worthwhile investing time and training in.

Q. It gives a very clear sequence for police to follow to triage?

A. Yes.

Q. And will enable police to work with their paramedic colleagues to provide them with situational awareness about the status of patients?

A. Yes.

Q. If you can accept from me that the feedback as set out in an article, in the materials from Dr Cowburn - this is an article from 2025 at tab 14 of electronic item 68 for the benefit of my friends:

"The feedback from emergency service users including police is that it can be used" - that is the TST - "can be used to facilitate the delivery of early lifesaving interventions and casualty prioritisation by responders regardless of their clinical background, so it's easy."

Do you agree?

A. Yeah, I'd agree with that, yes.

5 Q. That's something you would be happy to train police on should it get the imprimatur from on high?

A. Yes, absolutely.

10 Q. Can I ask you about a matter that appears at paragraphs 73 to 74 of your second statement. That is the concept of the Rescue Task Force, and you refer at paragraph 73 to:

15 "In 2021, the New South Wales Police Force conducted an AAO demonstration exercise for both Fire and Rescue NSW and the Ambulance Service."

Can you just speak to what happened on that date?

20 A. So effectively we set up a, an AAO exercise where we still had an active threat, although they were somewhat pinned into a location. We set up a, set up a number of simulated casualties. The first run-through we ran through completely reliant on police bringing casualties to - out for ambulance. The second run-through we actually integrated the paramedics into a Rescue Task Force and therefore were able to inject them into the, into the main location where the casualties were much, much faster.

25 Q. How many police were involved in the Rescue Task Force?

30 A. So the initial entry with the paramedics were escorted by two police officers, bearing in mind there were a number of other police already in the, in the location, either in the crisis side itself, beginning triage, beginning emergency treatment, and a number of other police were tied up notionally containing the offender at a different location.

Q. What rank were those police that were involved?

35 A. We did slightly cook the books, so there was a number of us that filled in for key roles to ensure that we demonstrated appropriately, but we had everything ranging from constables up to myself.

Q. Is, in short, the idea that police will create a bubble around paramedics to protect them in an indirect threat scenario?

40 A. Yes, that's correct.

Q. To be clear, it doesn't contemplate that you would have police take paramedics into what they would term a hot zone, that is where there's an active threat?

45 A. No.

Q. This is a concept that has a traction in the United States, is that right?

A. Yes.

50 Q. What's your understanding about how it operates in the US?

5 A. So essentially the way a Rescue Task Force is designed to function, it's an ad hoc team built around what resources you have arriving. So again, if I'm well resourced, I'll have lots of paramedics turning up, I'll have lots of cops turning up. I can either build multiple teams or I can put big teams in. If I'm in an isolated area and I might have a spare police officer and a single paramedic. Essentially it's designed to form up a specific group who stay together, don't separate, don't do anything. The police manage security on it. Paramedics manage the patient treatment. And you get them into the - get them in to the casualties as quickly as you possibly can.

10 Q. You comment in your statement on the concept of hot, cold and warm zones as you understand them to be used by the New South Wales Ambulance Service?

15 A. Yes.

Q. It's not the case that police will give a direction to ambulance around the zoning of areas?

A. Absolutely not, not in an AAO incident.

20 Q. Ever?

A. So maybe it would be if we're dealing with a chemical spill or something like that, but the reality is when you're starting to look at those jobs, you're probably reliant on Fire and Rescue NSW to make those sort of calls. If you're dealing with a CBR, or CBRN environment, then it's a completely different kettle of fish and that would be - would more likely than not be us.

25 Q. In terms of the Rescue Task Force, are you aware of any literature that analyses the efficacy of that concept in the US or elsewhere?

30 A. So I'm aware ALERRT has done significant research into it. I'm not sure if they've actually published anything on it, and I'm not sure of any specific academic research that's been focused on.

Q. Anything else you'd like to touch on in terms of the Rescue Task Force?

35 A. Given the success they've had with it in the US in getting paramedics to patients and then patients to hospitals quickly with it, I just honestly don't see another model that works more effectively.

Q. And it is akin to what Inspector Simpson and the police that he corralled to protect him effectively enacted?

40 A. Yes, that's effectively what it would be.

Q. Is this right: that you think it would be better to put more structure around a concept like that if you are going to have brave paramedics entering a "warm zone", if that's the reality, you're better to put some clear structure around it?

45 A. Absolutely.

Q. Would it be easy to train all officers of the New South Wales Police Force so they could operate in this manner in the event of AAO, do you think?

50 A. Yeah, it'd be relatively simple.

Q. Now in your second statement at paragraphs 59 to 69, you deal with the issue of the second offender and how the information flowed as between the New South Wales Police Force, New South Wales Ambulance.

5 Assistant Commissioner McKenna will come and speak to that issue tomorrow. But the point that you make at paragraph 65 is that police are required in effect to investigate accounts of a second offender in an active armed offender scenario, is that right?

A. Yes, but with some degree of caution in relation to committing resources to that.

10

Q. Is that particularly so in relation to the rarity of second offenders?

A. Yes.

Q. Can you speak to that issue?

15

A. So the current figures from the US indicate that we're looking at about 97 and a half per cent of incidents are a single offender, and in the two and a half per cent where there is more than one offender, they are colocated, they do not separate, they're basically standing together the whole time.

20

Q. Is that well-known, do you think, amongst your counterpart agencies to your knowledge?

A. Amongst New--

Q. For example, New South Wales Ambulance, Fire and Rescue?

25

A. I - we certainly would've brought it up at that exercise in 2021 but I'm not sure how much research they conduct.

Q. It's fair that if there's a second offender, they will make themselves known very quickly?

30

A. Yes, they will.

Q. We have the benefit of some reflections as to various enhancements and improvements, for example, in relation to Go-bags that police have to deal with traumatic injuries in the event of an AAO and the like set out in your second statement. Are there any further matters you would like to tell her Honour about?

35

A. So essentially we're in the, we're in the process of introducing new body armour, so the body - the - what we're actually carrying and how we're carrying it will be reviewed in light of that to ensure that we've got consistency. The Go-bags will likely end up much heavier from a first-aid perspective, to ensure that we've got more, more ability to deal with penetrating trauma of the chest, but we are somewhat limited by what we can actually do.

40

Q. What an officer can actually carry?

45

A. So what an officer can actually carry and what tools I can give them, they can use safely and effectively.

Q. There's also consideration being given to the introduction of accessories to radios that police carry to assist communication in noisy environments?

50

A. Yes.

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Q. That arises from the deafening alarm at Westfield?

A. Yeah.

5 Q. Is that well advanced?

A. That's a fairly complicated task because it's trying to balance compatibility with equipment, compatibility with future equipment. It's across two separate parts of the organisation. So from an operational safety perspective, I might think something is the best thing ever, but then from a compatibility of  
10 equipment or cost or any number of other factors, they may - it may not be an appropriate solution. So that's us working with the Radio Operations Group, you know, that's relatively - we're trying to find something that's suitable from a tactical perspective first and then we'll go to the Radio Operations Group and go, "Hey, does this work?"

15 Q. Anything further before I sit down?  
A. No.

20 HER HONOUR: There may be some other questions.

CHRYSANTHOU: No questions, thank you, your Honour.

HER HONOUR: Mr Fernandez?

25 FERNANDEZ: I have no questions, your Honour.

ROFF: No questions, your Honour.

30 JORDAN: Yes, just briefly if I may.

<EXAMINATION BY MR JORDAN

35 Q. Good morning, Senior Sergeant. My name is Jordan, I appear for Scentre, the operator of Westfield Bondi Junction.

JORDAN: Could I ask please for paragraph 33 of Senior Sergeant Watt's first statement to be brought up so that he can see it? The first statement, please, thank you. Again, apologies for the lack of notice.

40 Q. Is that large enough to be legible to you?  
A. Yes, certainly is, thank you.

45 Q. In that paragraph 33, you refer, on the basis I think of your own experience, to what you describe as "well-documented perceptual and memory distortions that can occur to people when they're involved in a stressful incident", do you see that?  
A. Yes.

50 Q. You refer there to distortions including time dilation or compression?  
A. Yes.

Q. Auditory blunting or sharpening?

A. Yes.

5 Q. Memory gaps?

A. Yep.

Q. Looming, L-O-O-M-I-N-G?

A. Yes.

10

Q. What is that?

A. So looming's a specific phenomenon that if I perceive something as a threat and it's moving towards me, I'll perceive it moving towards me at a much higher speed. So the best example is if I've got a spider sitting - a huntsman sitting on the side of the floor and somebody's terrified of spiders, they will perceive that spider as running at them as fast as it possibly could. Somebody else may - somebody without that stress or fear element will see it as it is sitting there.

15

20 Q. You also refer there to difficulties in perceiving details that may later seem incredibly obvious?

A. Yes.

Q. Are you also aware that extreme life-threatening stress can affect visual perception?

25

A. Yes.

Q. Including tunnel vision?

A. Yes.

30

Q. Can such extreme stress also affect the speed at which tasks can be performed?

A. Absolutely.

35 FERNANDEZ: I object. These questions are asked in a very general way. Paragraph 33 refers to police officers and police officers' training, to which Senior Sergeant Watt, for all his expertise, claims no expertise. So if there are going to be specific questions about a certain group of people, that needs to be made clear, and then before any answer by Senior Sergeant Watt, he

40 needs to identify any expertise that he can give about any other person other than a police officer.

HER HONOUR: Thank you. I think, Mr Jordan, it's expressed well in this paragraph about the limits on where Senior Sergeant can go with his evidence in that he has no special expertise apart from his own experience and what he knows from police.

45

JORDAN: May I be heard on the objection?

50 HER HONOUR: Yes.

JORDAN: The paragraph begins, "Police officers, like any other person." I'm asking questions based upon that paragraph which is clear in its premise and, with respect, the objection, as it's put, is ill-founded.

5

HER HONOUR: There is also the sentence that correctly is put by Senior Sergeant Watt that, "I can claim no special expertise in relation to these phenomena."

10

JORDAN: With respect, and forgive me for pressing on this, it's clear on the statement that Senior Sergeant Watt is providing inclusive examples of things that he is aware of. "These distortions include". I'm just seeking, in the context of this question, to explore what Senior Sergeant Watt's own knowledge of the other things that he has not included in there might be and that's all I'm seeking to do, but I will move on, I'll move on.

15

HER HONOUR: Thank you.

JORDAN

20

Q. You do refer in your paragraph to you yourself having experienced distortions such as these personally?

A. Yes.

25

Q. Can you tell us a little bit more about your own personal experiences of these sorts of perception and/or memory distortions?

A. So after having an individual make a very serious attempt to stab me, I used OC on him, drew my firearm, transitioned. I issued a number of verbal commands to him that I have absolutely no recollection of saying, despite a fairly good recollection of the rest of the incident. The several other police that were there make it quite clear that I said exactly what they thought I said. I've just got no recollection of that.

30

JORDAN: Those are my questions, thank you.

35

HER HONOUR: Thank you. Mr Casselden?

<EXAMINATION BY MR CASSELDEN

40

Q. Senior Sergeant Watt, can I just go back in time to the earlier evidence you gave this morning about your experience. I don't wish to embarrass you but in the 21 years that you've been an operational safety instructor, have you come before this Court, that is the New South Wales Coroner's Court, to give expert evidence by way of statements or reports?

45

A. Yes, on a number of occasions.

Q. When did you first commence that role?

A. I think it would have been 2013 would have been the first matter.

50

Q. Are you able to say how many expert reports you may have provided to

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this jurisdiction over that 12 year period?

A. I'm sorry, I can't, it's a number.

5 Q. On the whole, have they related to police operations?  
A. Yes.

Q. Critical incidents?  
A. Yes.

10 Q. Stressful incidents?  
A. Yes.

Q. Are you aware of the Active Armed Offender Guidelines for Crowded  
15 Places published by the Australian-New Zealand Counter-Terrorism  
Committee?  
A. Yes, I'm aware of the document.

Q. There's a section within those guidelines under the heading  
20 "Individual Reactions" which says this:  
"An individual's initial reaction to an attack may vary depending on a  
variety of factors including their situational awareness, the reactions  
of those around them, and whether they have rehearsed their  
25 response. Stress and fear will cause different reactions in  
individuals and may diminish their ability to process information and  
make decisions."

Based on your experience, having assessed a number of New South Wales  
Police operations, do you agree with that sentiment?  
30 A. Yes.

Q. It goes on to say this, "Freeze: Temporarily being unable to process  
information or make decisions." Again, based on your eminent experience  
35 assessing police response in stressful incidents, have you yourself observed  
that?  
A. Yes, and in addition to operational ones, I've also observed it when we've  
been conducting suitability assessments on police officers that have been  
identified with operational safety performance issues.

40 Q. Do I take it that we're talking about police officers who have undergone  
significant training?  
A. Yes.

Q. Are you able to explain any other reason as to why perhaps some officers,  
45 when confronted with a particular stressful incident, have not conformed with  
their training?

SULLIVAN: Objection. I think the point that my friend is making is clear; it's in  
the documentation, we have the benefit of this officer's view about the  
50 difficulties with memory and perception based on his experience. I'm not sure



how much further this can ultimately be taken.

5 CASSELDEN: Well, I've pressed the question because I apprehend that what will be said is that we have highly trained officers, and notwithstanding that level and quality of training, have for whatever reason been unable to perform to the expectation consistent with their training.

10 SULLIVAN: But there's a clear distinction between security officers and police, as a starting proposition, and an issue is the nature of the training that has been provided. So it's far from a perfect analogue; it's of limited assistance, in my respectful submission.

15 CASSELDEN: Well, if it's accepted at that level of generality, then we'll deal with it in submissions at the end of the inquest.

HER HONOUR: I think so. Thank you, Mr Casselden.

CASSELDEN: Thank you.

20 Q. I just want to come to one further topic which is around communication. Again, in those times you've come before this Court assessing particular responses by police to stressful critical incidents, has there been any issues in relation to the inadequacy or ineffectiveness of radio communications?

25 A. There's certainly been a number of them where, yeah, it - radio communication hasn't been as effective as it would - as you would hope.

Q. By that, do I take it you're referring to congested radio communications whereby the congestion has caused distorted messaging or unclear messaging?

30 A. Yes, it certainly occurred.

Q. I take it that New South Wales Police, before they test, are given rigorous training in relation to radio protocols?

35 A. Yes, they're given a degree of training.

Q. Doing the best you can, is there a common denominator, so far as you're concerned, that may explain why from time to time there has been those issues around radio communications?

40 A. There's a number of potentially contributing factors. A simple and most obvious one is stress of the person trying to send the message. You can get technical issues whereby multiple people are trying to transmit at the same time and they will effectively blank any transmission. And the simple ability of people to process multiple messages coming over radio from multiple different sources.

45 Q. Is the key, in terms of an answer to the problem, is further training?  
A. That will be a fair, fair assumption, yes.

50 Q. But nobody of course, you can't account for how a particular individual may react in a stressful situation?

LTS:DAT

A. Yeah, that'd be correct.

CASSELDEN: May it please your Honour.

5 HER HONOUR: Thank you. Ms Clarke.

CLARKE: I have no questions, your Honour.

10 HER HONOUR: Mr Chiu?

CHIU: No questions.

HER HONOUR: Can I just go into court 2 please? Any questions?

15 MATHUR: No questions.

FRECKLETON: I have no questions.

20 WILSON: No questions, thank you.

LYNCH: No questions.

HER HONOUR: Thank you. Ms Callan.

25 <EXAMINATION BY MS CALLAN

30 Q. Can I just ask you some questions on one specific topic and that is the Rescue Task Force that you refer to at paragraph 73 of your supplementary statement and you've been asked some further questions in relation to that by counsel assisting. Did you hear or read the transcript of the views expressed by the emergency physicians in their conclave on Friday about a rescue task force?

A. Yes I did.

35 Q. For the record, this is at transcript page 21562(as said) to 1563. Their view about a Rescue Task Force was premised on the idea that the task force was akin to the RAID concept in the French emergency response service, meaning a tactically trained group of clinicians, placed with a police tactical response going into situations of extreme risk. Is that what you are talking about?

40 A. No, not at all.

45 Q. You describe at paragraph 73 of your statement a Rescue Task Force being a specific task focused group which consists of police officers and paramedics. The attached police officers' role is to provide protection for paramedics, who can assess and treat the injured. What sort of training are you suggesting would be involved to get to a stage of enabling the forming as required of a Rescue Task Force in dealing with an AAO situation?

50 A. So from a police training perspective, it's more a case of making sure they're aware of what their task is and that task is their only task.

LTS:DAT

Q. What would that task be?

A. That would be providing security for the paramedics.

Q. Is that something that could be undertaken by general duties police?

5 A. Absolutely, it's designed to be.

Q. Is this the case, that the size and composition of a rescue task for would depend on the nature of the incident, the number of casualties, the risk and the experience of those involved?

10 A. Yes.

Q. The way you describe the concept is the purpose of the police being attached to ambulance officers, to provide that level of protection so as to deal with any risk that might otherwise be a concern when it comes to paramedics attending to the aid of victims?

15

A. Yes that's correct. There's a number of threats that police are - or potential risks that police are going to be aware of that paramedics simply won't be. So IED, or potential IED presence, certainly issues around non-located offenders, and it occurs in about 50% of the time they've either left or they've self-dispatched.

20

So police may be aware of those risk factors. Paramedics aren't trained to identify those sort of risks, we are, so it provides security there, and the idea is the - we need to make it safe enough because to make it completely safe, I have to clear the entire building and that will take considerable time.

25

Q. It's not just about identifying risk, it's also the training and equipment police have to deal with those risks, isn't it?

A. Yes that's correct.

30

Q. That is, police have a range of tactical options including firearms?

A. Yes.

Q. And that is not, to state the obvious, that is different to the training and equipment that paramedics have?

35

A. Yes absolutely.

Q. Does this follow: that the concept would enable police to provide that whilst paramedics are able to focus on delivery of aid being their area of specialisation?

40

A. Yes that's correct.

CALLAN: Thank you, those are my questions.

45 HER HONOUR: Anything arising?

SULLIVAN: Nothing arising, thank you.

LTS:DAT

NO EXAMINATION BY MS CHRYSANTHOU, MR FERNANDEZ, MR ROFF,  
DR FRECKELTON, MR CHIU, MS CLARKE, MR GNECH, MS MATHUR,  
MR PEN, MS ROBB, MR WILSON AND MR LYNCH

5 <THE WITNESS WITHDREW

SULLIVAN: Could we have a five minute break while we organise the next witness?

10 HER HONOUR: Yes certainly.

SHORT ADJOURNMENT

15 HER HONOUR: Mr Murphy.

MURPHY: The next witness is Mr Steve Iloski who is the CEO of the Glad Group of companies and I call Mr Iloski.

LTS:DAT

<STEVE ILOSKI, SWORN(10.57AM)

<EXAMINATION BY MR MURPHY

5 Q. Could you please state your full name?

A. Steve Iloski.

10

15

20

25

HER HONOUR: Thank you.

CASSELDEN: May it please the Court.

30 MURPHY

Q. Could you please state your current occupation?

A. CEO of the Glad Group.

35 Q. You've given three statements in this matter. The first statement dated 25 July 2024, and that's at tab 994 of volume 30. A second statement dated 5 August 2024 which is at tab 995 of volume 30, and a third statement dated 27 April 2025 which is at tab 995C of volume 30, is that correct?

A. Yes.

40

Q. Are there any corrections that you'd like to make to any of those statements?

A. No.

45 Q. Before I begin with your evidence, is there anything that you would like to say at the outset Mr Iloski?

A. Yes, yes please. On behalf of Glad and myself personally, I would like to express my sincere sympathies to the families of the victims as well those injured on that day - terrible day. Reliving such a distressing event through the inquest has no doubt been very challenging. Glad Group lost one of our

50

LTS:DAT

people, Faraz Tahir. I want to recognise his family for the dignity and compassion they have shown throughout this process, thank you.

HER HONOUR

5

Q. Thank you Mr Iloski.

MURPHY

10

Q. Just to give an outline of how your evidence will proceed today, we'll first deal with your professional background. Second, the Glad Group and an overview of the business. We will deal briefly with the events on 13 April 2024. We will then deal with the changes that have been implemented at the Glad Group in response to the events of 13 April. And then deal more generally with your learnings and reflections and recommendations from the tragic events on that day.

15

A. No problem.

20

Q. Turning first to your background, can you please give us a brief overview of your professional experience?

A. So currently the CEO of the Glad Group. Previously I, I was in the security industry. I was working as a security officer. I had - we - I was always mentored and shadowed by experts in, in the security industry within the business, if we had a structure. But it was a bit of a journey for myself and learnings.

25

After, after I finished up as a security officer, I went into account management. I moved, moved over to Victoria where I, I was conducting security and cleaning operations. I was there for three years. I then came back, it was in 2015, and I had a - I was a national operations manager for security for over - just over a year. And then my role changed. I got into more of a strategic overview role in the business. The business just doesn't do security, it does multiple services, cleaning, security, maintenance, guest services, concierge and reference and integrated services.

35

Q. And all of those roles that you have just given evidence in relation to, they were all at the Glad Group?

A. Correct, yes.

40

Q. You've been with the Glad Group since about 2002, is that right?

A. Correct.

Q. Did you have any previous experience prior to 2002, or just professional working life with the Glad Group?

45

A. With the Glad Group, yes.

Q. You've given evidence that the Glad Group is not just security, there's a number of other different components of the business, which we'll come to, but your experience has been across the business?

50

A. Correct.

Q. You briefly mentioned that your initial roles at the Glad Group were working as a security officer, is that right?

A. Just briefly, yes.

5

Q. So that was 2002 until?

A. Two thousand - I think it was eight to, to ten, I think from - nine, sorry, I should say. It was brief. I was, I was just on the job sort of experience learning, understanding the business, yeah, so.

10

Q. In those roles were you responsible for managing any security guards at--

A. No.

Q. Did that work involve working at any Scentre properties or other operators?

15

A. No.

Q. Have you ever had any experience working in a CCTV control room?

A. No.

20

Q. Did your time on the ground in the security guard role involve any delivery of training to security officers?

A. No.

Q. So in terms of your experience, your professional life has been spent at the Glad Group of companies?

25

A. Correct.

Q. That's about 23 years since 2002 you've been at the Glad Group, is that right?

30

A. Correct, yes.

Q. Since June 2023 you've been the Chief Executive Officer of the Glad Group, is that right?

A. Correct, yes.

35

Q. Is it fair to say that you have a good understanding of the security industry, the role of security guards, the skills that they need and the pressures that they face in their role, is that right?

A. Certainly, yes, yes.

40

Q. Moving just to an overview of the Glad business, I understand from your evidence that Glad is a family owned and run company, is that right?

A. Yes.

45

Q. You've already referred to it briefly in your evidence, but Glad does more than just security. Can you explain what services that the Glad Group offers?

A. Yes, so we do cleaning, started off in cleaning. We do security, maintenance, guest services and integrated services.

50

Q. Can you explain to her Honour what integrated services are?

LTS:DAT

A. Your Honour, so it entails particularly in a retail environment, we have everything in-house. Each division has its own structure, so cleaning, security, maintenance and call it our guest services, and we entail those services under one group, and so there is one manager that overseas all the services.

5

Q. So in effect you're providing a bundle of services?

A. Correct, yes.

Q. You've mentioned that cleaning was where Glad started?

10

A. Yes.

Q. Is security a core part of the business? Is it of equal importance with cleaning or where does it - how does it fit within--

15

A. Absolutely, it has its own structure. It has an independent structure, each division has its independent structure and if, if it's a single service it caters to that service, whatever that service may be, security or cleaning, et cetera.

Q. So it's an important part of the Glad business, the security component?

20

A. Absolutely.

Q. I understand from your evidence that the Glad Group employs approximately 2,700 employees, is that right?

A. Correct.

25

Q. Are those employees across the various services that the Glad Group provides?

A. Correct.

Q. Do you know approximately how many are in the security discipline?

30

A. Approximately I would say about a thousand.

Q. In terms of the size of the Glad business, where does it sit in that integrated services sector in terms of employees and its size?

35

A. Sorry, Mr Murphy, are you pertaining to just integrated services or are you talking just in general?

Q. We'll start with security.

A. Yeah.

40

Q. If we can just focus on the security division.

A. Sure, sure.

Q. Where does that sit within the broader security industry in Australia?

45

A. About 40% of our - our size of our business?

Q. Yes.

A. It's medium to large, sorry.

Q. Sorry, I cut you off, in terms of per cent?

50

A. About 40%, yeah.



Q. 40% of the Glad--

A. Of our business is security, yeah.

5 Q. Going back to it being a core component of the business, it's not half the business but it's approximately 40%?

A. Yeah.

10 Q. I'd just like to deal briefly with Glad's previous engagement with the Scentre Group, or Westfield as it was previously known. I understand that Glad previously provided security services to Westfield shopping centres in around 2010, is that right?

A. Yes.

15 Q. Where was that?

A. In WA.

Q. So there wasn't any provision of security services in New South Wales at that time?

20 A. No.

Q. Then we understand from your evidence that around 2016 there was ongoing engagement with Scentre for security and cleaning services, is that right?

25 A. Yes.

Q. Where was that located?

A. Our first security site, sorry?

30 Q. Yes.

A. Penrith.

Q. That extended to other sites in New South Wales?

35 A. Gradually, yes.

Q. And in other States as well?

A. No.

40 Q. As it currently stands, the provision of security services by the Glad Group is just in New South Wales?

A. Correct.

Q. To Scentre?

45 A. Correct, yes.

Q. Since September 2023, the Glad Group has provided security services at Westfield Bondi Junction, is that right?

A. Correct.

50 Q. Were you involved in the tender process to obtain that security contract?

A. Yes.

5 Q. We understand from other evidence that's been given during this inquest that a number of the security guards who were employed by the previous operator left Bondi Junction Westfield after the change in operator of the security services. Is there anything you can provide any information in relation to, on that topic?

10 A. Yeah, sure. The reason being at the time, the previous incumbent, Securecorp had been there for a long time and, and held the contract. A lot of the staff had tenure with the previous organisation, and you tend to find that when staff have long tenure they tend to leave with the provider, and particularly in an industry, there's a shortage of officers at the moment so there's, there's no - there's, there's definitely work for them, so they moved on.

15 Q. Was that something that was told to you or other people within the Glad Group, that's the reason why those people left?

A. Yes. The guards themselves.

20 Q. As it currently stands, where does the Glad Group provide security services for the Scentre Group of companies?

A. There's a couple of - multiple sites at the moment. Bondi, Sydney Westfields, Parramatta, Mount Druitt, Burwood, Hurstville.

25 Q. From the Glad Group's perspective, is the Scentre Group one of your larger clients?

A. Yes.

Q. Is it the most significant client that the Glad Group has?

30 A. One of, yes.

Q. Is that in the security space or across the rest of the business generally?

A. Across, across the business, yes. We've got a few, but Scentre is one of them.

35 Q. In your statement you say that you work closely with Scentre and you align with Scentre's core values; that's the Glad Group?

A. Yes.

Q. At a general level, what does that mean, how does that work?

40 A. I, I just - relationship management and you know, you know, my, my role is just to ensure the relationship with stakeholder management is intact and ensure that if there are any breaches or concerns around the contract, if it does get to me, I, I make sure that at the end, it gets - things are implemented.

45 Q. Just dealing in the period before 13 April 2024, your role is, in relation to the Scentre contract, if you want to call it that, is relationship management role, is that right?

A. That's correct.

50 Q. And issues will only be brought to your attention if they're serious problems

LTS:DAT

with that relationship?

A. Yes, yes.

5 Q. Who is responsible from the Glad perspective of dealing on an operational level with Scentre?

10 A. Yeah, so the operations team, so the security, the security team, the security structure. You met, you met Cameron, Cameron Stuart who - Shaun Luxford was mentioned in some of the, some of the statements, as well as Rod Moolman who is - was at the time the National Operations Manager and counter terrorism.

15 Q. Their role that we've heard from Mr Stuart is dealing with the operational aspects of the contract with Scentre on a day to day basis, so the training, the provision of guards, any issues with the management of guards. That's the remit of those individuals?

A. Yes, yes.

20 Q. And issues in relation to guards training and things of that nature, will they be generally brought to your attention or not brought to your attention?

A. No, no, no.

Q. Only in the most serious of circumstances?

A. Catastrophic, catastrophic. It means breach of contract or concern, yes.

25 Q. We'll deal more with your engagement after the events of 13 April later in your evidence, but your engagement has changed with Scentre necessarily after the events of 13 April?

A. Yes.

30 Q. Is that right?

A. Yes.

35 Q. We've heard much evidence during this inquest about the security guard arrangements at Westfield Bondi Junction and the distinction between core guards and ad hoc guards. Are you able to just give a brief overview for her Honour in your role as CEO what the difference is between those two roles?

40 A. Yeah. So core guards are a - sorry, excuse me - core guards are - we, we are prescribed to a manning level, manning, manning levels that are in the master service agreement, and we ensure that we adhere to those manning levels. They're direct employees. If there are any requests of search capacity or any requirements on short notice, we do have an approved partner that we use, in this instance for Bondi was Falkon, and we, would call upon them on a, on a short-term basis.

45

Q. The manned capacity is dictated by your contract with Scentre?

A. Yes.

50 Q. And those guards will be direct employees of the Glad Group?

A. Correct, yes.

Q. And in circumstances where ad hoc guards are required, or further capacity is required, that's when you'll have regard to subcontractors--

A. Correct.

5

Q. --to obtain the services?

A. Yes.

10 Q. And there was a need at Westfield Bondi Junction, from evidence we've heard, for further guards on 13 April 2024 as a result of the events on 7 October and the security concerns that arose in relation to that?

A. Correct.

15 Q. Is that right?

A. Yes.

20 Q. Turning to the subcontractor arrangements that Glad has at Westfield Bondi Junction, we understand that as of 13 April 2024, Falkon Manpower was an authorised subcontractor of Glad, is that right?

A. Yes.

25 Q. What does it mean to be an authorised subcontractor?

A. We have - we go through - there's a certain process in place from both Glad and Scentre Group, a, a, a contractor framework, which they have to adhere to, so they - we provide - they provide the - all the insurances, compliance, checks. We, we get the relevant information. We do a check on the business ourselves where they go through an onboarding process through our risk and compliance and procurement department. Once they adhere to all those requests, we onboard them and then we provide their documentation to Scentre Group which has, as I said, a framework, and then Scentre Group do their background checks on, on the, on the, on the supplier in question.

30 Q. Did that occur in relation to Falkon?

35 A. We - Falkon already pre, were pre-approved prior to us because they were already onsite with Securecorp, so we, we just - we, we remained with that relationship at the time.

40 Q. That process that you have just given evidence of about the approvals and vetting and then Scentre doing their own due diligence, has that occurred in relation to any other subcontractors at Westfield Bondi Junction?

A. Yes.

45 Q. Who are they, to the best of your knowledge?

A. Our, our contractors?

50

Q. Yes.

A. We've got one more which is PPG Services.

Q. Why is it important to the Glad Group to go through that process of vetting a subcontractor and then having them approved under the contract? Why is

LTS:DAT

that something that's important to your business?

A. It's important because we have to adhere to all legislation requirements, making sure licensing qualifications are all adhered to, even the staff, the appropriate staff are vetted and, and, and that the organisation is a fit and proper organisation.

Q. To not only work with you but also to provide services to the Scentre Group of companies, is that right?

A. Yes, correct, correct.

MURPHY: If we could just bring up the supplier code of conduct which is in Mr Iloski's first statement at tab 994 at page 4?

WITNESS: Sorry, what page was that, sorry?

MURPHY

Q. At page 4 of your first statement. It will come up on the screen.

A. Yep.

Q. This document applies to all of Glad's suppliers, not just security guards?

A. Correct. Correct.

Q. Has any consideration been given to having an individual code of conduct that applies to security guard companies, or further security subcontractors?

A. Not at this stage but we can certainly take it on notice.

Q. In terms of Glad's subcontracting partners, that's dealt with in this document at page 7 which is under the heading "Subcontracting" and I'll just read that out for the benefit of the transcript, that:

"Any supplier directly engaged by Glad Group is known as a 'Tier-1' supplier. Where a Glad Group supplier then subcontracts work out, we refer to that entity as a 'Tier-2' sub-contractor. Glad Group does not accept any sub-contracting of services where we have not provided our express written consent to do so. The use of non-approved sub-contractors is a material breach of this Supplier Code of Conduct, and Glad Group may seek to exercise any right we hold to deal with such breaches."

A. Correct.

Q. That's the position?

A. Correct.

Q. Based on Mr Manzoor, who's the CEO of the Falcon Group - and he'll be giving evidence this afternoon - in his two statements that he has given in this matter, he identifies that GLA2, who was present on 13 April 2024, was an employee of Cogent Security & Services Pty Ltd?

A. Yes.

Q. Have you read that evidence?

A. Yeah, it came to me during this inquest, yes.

5 Q. Were you aware that GLA2 was not an employee of the Falkon Group of companies?

A. No.

10 Q. I take it from that answer that no approval from Falkon had been sought of the Glad Group in relation to GLA2?

A. No.

Q. That is not something that the Glad Group would condone or would want from its subcontracting partners?

15 A. Absolutely not.

Q. Why is that?

20 A. We have, we have - it's a breach of our contract, as well as we adhere to a framework from both our side and from a customer perspective, and we give assurances to Scentre Group that, that that's the provider, that's who's approved, and to ensure who we know who our staff members are.

25 Q. Now that that issue has come to your attention, are there processes that were in place or have been put in place in order to ensure that employees that are provided by Falkon or other subcontractors are in fact employed by those companies?

30 A. Yes, we, we do have a process in place where we, we do random audits, that's part of our MSA agreement. We, we - you know, in this instance, Falkon will, will provide open collaboration to audit staff members, you know, payslips, et cetera, we seek that permission prior to their, their engagement and, and make sure that we, you know, have that opportunity because, yeah, for situations like this.

35 Q. So that is under your contractual terms with the subcontractor; you have a right to conduct audits and obtain information?

A. Yes.

Q. Was that done in relation to Falkon?

40 A. Not during that period. It's spasmodic and it, it's random at times, so at this stage, no, we were just, we hadn't done it at that time.

Q. That time being prior to 13 April?

A. No, no, as in during--

45 Q. As in today?

A. Yeah, yep.

Q. Is that something that may occur?

50 A. Absolutely, yeah.

Q. Have you had, in your experience in the industry, had any engagement with Cogent Security & Services Pty Ltd?

A. No.

5 Q. If I could just turn to the role of guards in the context of the Glad Group and generally within the industry. We understand from your first statement that guards that are employed by the Glad Group or from subcontractors need to have working rights, is that right?

A. Yes, correct.

10

Q. A New South Wales security licence that's valid, is that right?

A. Yes, correct.

Q. And a senior first-aid certificate?

15

A. Yes, correct.

Q. You deal in your third statement with the important role of guards within the Australian security industry but also identify the difference to those guards to police officers. This is taken from your statement, and if there's anything else you'd like to add, please do, but they don't have police powers?

20

A. No.

Q. They're not permitted to carry weapons or other appointments unless they've got appropriate licences in place?

25

A. Correct.

Q. Is it the case that Glad Group employees are not permitted to carry weapons or other appointments at all?

A. Correct.

30

Q. Their role is to observe, report and escalate incidents as they occur?

A. Yes.

Q. Sorry?

35

A. Yes, correct.

Q. They're not trained to engage with offenders, whatever they may be, is that right?

A. Correct.

40

Q. Their role is, in effect, a visible deterrent, to monitor a situation but not, unless the situation is serious, become involved in it?

A. Yes, correct.

45 Q. Your statement deals with a number of previous knife incidents that occurred at Westfield Bondi Junction both before the time in which Glad took over as an operator from Securecorp and one incident that occurred after the time in December 2023, is that right?

A. Yes.

50

Q. Are you aware of any instances of security guards at the Glad Group raising concerns about their safety, including as a result of aggressive behaviour from customers or other people on site?

A. No.

5

Q. Would that be a matter that is raised with you personally or raised with other managers within the business?

A. It, it'd be raised with the operational team, and if it's serious, it'll go to People and Culture.

10

Q. Is that something you would expect to be raised with you on a day-to-day basis or only in the most serious circumstances?

A. If, if safety is of concern, it would be raised to me, yes.

15

Q. If a guard had raised a concern about their own safety, that is something you would expect to be brought to your attention?

A. Yeah, yep, absolutely.

20

Q. Just breaking it up in the two periods, so before 13 April, were there any process or procedures in place that permitted or allowed for the escalation of security concerns by guards prior to 13 April?

A. The - you know, we, we, we, we foster an open collaborative approach at, at, at Glad, it's a family business, you know, and the structure's very clear.

25

If there's an escalation, you know, any concerns, that they're raised from, from, from - in this instance if we use the structure that's in place for Bondi, S1, our account manager, and then up to our account manager is our State manager, then we have our national, if they were - and that escalation continues on, and if it, and if it needs to, gets to me but if that's, if it's critical and really concerning.

30

Q. That is enabled or was enabled prior to 13 April--

A. Yes.

35

Q. --by a safety culture?

A. Yes, absolutely.

40

Q. Has there been any changes to that process after 13 April?

A. Yes, yeah, we've enhanced it a bit more now, we've, we've agreed with Scentre Group with creating a - you know, a committee, a committee through the guards, having, having continuous, open - I mean, it was always open but having that open forum where they can sit down, we can minute it and we have a discussion around any challenges, any concerns. But I, I'd like to stress that Glad has always had an open, collaborative fostered culture around raising and escalating concerns.

45

Q. There's a committee that's now constituted by guards?

A. We haven't finalised it but we're in that progress or in that process.

50

Q. Will that be for each Scentre site or will it be across all of the Scentre sites in New South Wales that Glad is responsible for?



LTS:DAT

A. It'll be across all our, our Scentre, Scentre Group sites, yes.

Q. Who is it intended will sit on that committee?

A. It'd be any guard that wishes to be part of that process.

5

Q. Will there be representatives of management from Glad on that committee?

A. It'll be risk, the risk department and, and People and Culture.

Q. Will there be any representatives from Scentre sitting on that committee?

10

A. This is at this stage an internal, internal meeting but I'm sure we'll raise those concerns to Scentre as, if there are any concerns, we'll raise them.

Q. What's the forum in which those concerns would then subsequently be raised? So if guards raise an issue when this committee is constituted--

15

A. Yep.

Q. --that's of sufficient seriousness--

A. Yes.

20

Q. --to raise with Scentre, what's the mechanism by which it will be raised?

A. It, it'll go to a national, from a national perspective to myself and the national team, Scentre Group, yes.

Q. In terms of your engagement with Scentre, who's your direct counterpart or contact there?

25

A. I either deal with Emily or John.

Q. That's Emily--

A. Emily Hunt, sorry, excuse me, Emily Hunt and, and John Yates.

30

Q. John Yates, thank you.

MURPHY: Your Honour, I'm just about to turn to a separate topic, I'm just conscious of the time and not running for too long, but it may be a convenient time to break now.

35

HER HONOUR: We might do that. Yes, we'll adjourn and resume at 12.

SHORT ADJOURNMENT

40

MURPHY

Q. I'd like to just now touch briefly on the events of 13 April 2024. You acknowledge that the guards that were present at Westfield Bondi Junction faced enormous pressure and it was an unpredictable situation as it unfolded, is that right?

45

A. Absolutely.

Q. If you wouldn't mind just speaking up.

50

A. Sorry. Absolutely.

5 Q. Is it your evidence that a number of those guards exhibited immense bravery on the day, including running into dangerous situations and rendering aid? For example we've heard from Mr Helg who's given evidence that he didn't know if he was going to die or not, is that right?

A. Yes.

10 Q. There's also been evidence from management employees at Glad, Mr Stuart for example, who attended Bondi Junction despite not having a security function and didn't know what type of situation they were going into, is that right?

A. Yes.

15 Q. Your statements in this matter acknowledge that you support the need for a review and through this coronial process, but you also wish to avoid the risks of hindsight turning that review into being too critical, is that right?

A. Yes.

20 Q. Some of the aspects of your third statement that you've given in this matter comment on what occurred on 13 April 2024, is that right?

A. Yes.

25 Q. That includes your views on the control room operator who was present in the control room, or was not present when the incident unfolded but was rostered to the control room on the day, is that right?

A. Yes.

30 Q. That includes your views about whether she adequately performed her job on the day, is that right?

A. Based on the facts yes.

35 Q. You agree that her Honour has had the benefit of hearing from witnesses who were present on the day and have given direct evidence about their experiences, is that right?

A. Yes.

40 Q. You agree that insofar as your evidence comments on what occurred, that's a matter that's better left for submissions, is that right?

A. Absolutely, yes.

Q. Mr Yates has given evidence in this matter. Were you here for Mr Yates' evidence?

A. Yes.

45 Q. He accepts a number of matters in relation to the response which I'm just going to put to you now and if there's anything else you'd like to add or you disagree with them, please let me know.

A. Sure.

50 Q. Mr Yates has said that he accepts that the control room was not occupied

LTS:DAT

at the time of the incident commencing and there was a lost opportunity at that point to immediately start the review of the CCTV footage, do you accept that?

A. Yes.

5 Q. The lack of a control room operator being present in the control room when the incident occurred adversely impacted the timeliness of the response. Do you accept that?

A. Yes, yes.

10 Q. Do you accept that there should always be an appropriately trained security officer in the control room with access to the security systems?

A. Yes.

15 Q. At the time on 13 April, the requirement of having a security officer in the room at all times wasn't made clear in the Scentre and Glad policies that applied, is that right?

A. Yes.

20 Q. Do you agree that the CCTV controller has a critical role in establishing situational awareness during an emergency?

A. Yes.

25 Q. And separate from that, there were failings in the communications on the day, on 13 April, including from the first security guard who reported the incident?

A. Based on what I've read, I obviously wasn't there but just looking at - yes.

30 Q. Do you agree that in the event of an active armed offender incident that there's a need for clear and concise information?

A. Yes.

35 Q. Do you agree, as Mr Yates has, that had there been a greater clarity in the messaging from the first security guard about the active armed offender event at 3:33:33pm, that there would've been a faster response to the emergency from Scentre and Glad employees?

A. Yes.

40 Q. Do you also agree that there were issues with the volume of radio traffic, and the nature of those communications between the security guards present on the day?

A. Based on the facts, yes.

45 Q. Do you accept that there should've been an earlier call to police?

A. I think the intent was there but yeah, obviously was on hold, so yes.

Q. Mr Yates has also accepted that even correctly identifying that the call was made at 3.36 and--

A. Yeah.

50 Q. --was on hold, that that call should've occurred earlier than 3.36?

LTS:DAT

A. Yes.

Q. Do you also accept that the CMEO system should've been activated at an earlier time than it was, which was at 3:39:43?

5 A. Yes.

Q. That should've been immediately after the Chief Warden Mr Gaerlan communicated that the CMEO should be activated, is that right?

10 A. Yes.

Q. Similarly, the activation of the EWIS was too slow, do you accept that?

A. Yes.

15 Q. Do you accept that rather than activating the alarm, the EWIS alarm from the fire control room, it could've been activated from the CCTV control room?

A. Yes.

Q. And that likewise PA announcements could've been made from the control room rather than the fire control room, do you accept that?

20 A. Yes.

Q. Is there anything else that you wanted to say in relation to the response on 13 April 2024 based in your role as CEO of the Glad Group?

25 A. Look, from an operational perspective I can't comment. My evidence - my feedback is based on what I've read. I want to just put out there that I'm extremely proud of the team, you know, and what they achieved that day in trying to save people's lives, you know, putting their lives ahead of the public and I'm, I'm - standing here is a very proud moment for me from the aspect of my team.

30 Q. Moving away from 13 April and the events that occurred on that day and turning to the impact of it and the response to it, you've given evidence in your third statement that it was a stressful incident on the day and it's created lasting effects on operations for the Glad Group, is that right?

35 A. Yes.

Q. What does that involve?

A. Impacts?

40 Q. Yes.

A. Look, you know, not - it's just changed our world as an organisation. We're you know, you know, from our staff, you know, from the business perspective, you know, we - like we understand that this is you know once in a lifetime I think. We've seen only Port Arthur before this, you know, from a mass  
45 casualty perspective and I think, you know, you do your best, you know, asking and being there for your team, for, for the public, for - and trying to support and see the greater good and trying to make - continue moving on and trying to - and as I said, the team's given us that courage.

50 Q. You've also given evidence in your statement that it's been difficult to

attract and maintain staff as a result of the events on 13 April.

5 A. Yes, we have - but we've settled the team now since, since August, we have settled the team. We've had - got a really good team now and very competent and with the new training and enhancements that we've, we've - you know I think that we, we will continue to improve and, and get better.

Q. When you say new team, that's at Westfield Bondi Junction or--

A. Yes, yes.

10 Q. --in the Glad Group?

A. No, Westfield Bondi Junction.

Q. It's the case that some of the staff that were present on 13 April have not returned to work and remain unfit to do so?

15 A. Correct.

Q. And that has of course been part of the impact on operations because those roles needed to be filled?

20 A. Absolutely.

Q. And you continue to support those staff?

25 A. Absolutely, definitely. They're - you know, CR1, CR2, you know, there are a number of, of those staff that are still been - have been affected and we're providing counselling, ensuring that we're trying to help them financially. Any kind of - you know, from a medication perspective, we're trying everything in our power to ensure that those individuals do get back on their feet and, you know, you know, that's our responsibility and my responsibility as a leader to make sure we look after our people and the public so I take that quite serious.

30 Q. This is an ongoing process that's continuing and you're dealing with it as issues arise?

A. Absolutely, yeah, yeah and we've provided - we continue to provide EAP services.

35 Q. Is that something in your role as a CEO that you are personally involved in in terms of the response and dealing with security guards?

40 A. I - not, not fully, not fully my role but I've got People and Culture team that are actively engaging with the staff but I've met each, each victim - sorry, each of the guards that were involved in that - on that day myself. I've given them reassurance that we're here for them and whatever they need we can - there's open dialogue between us and the business, including myself.

Q. Even though you're not formally responsible for it, it's something that's important to you?

45 A. Absolutely.

Q. In terms of the immediate response to the events on 13 April, we understand from your evidence that there were daily debriefs that occurred from 14 April through to 23 April, is that right?

50 A. Yes.

Q. Did you attend all of those meetings?

A. Yes.

5 Q. In the brief of evidence - for the benefit of my friends, there is a copy of  
some of those debrief minutes. We don't need to bring them up but that's at  
tab 1127. Those minutes suggest that you had responsibility for a number of  
actions that were implemented in response to the events of 13 April, in  
10 particular - and we'll deal with the detail of it later in your evidence but there's a  
record of that "SI" - that's a reference to you?

A. Yes.

Q. "Has been coordinating and getting from multiple sources in relation to  
stab-proof or stab-resistant vests".

15 A. Yes.

Q. What was your involvement during those initial meetings in relation to the  
stab-resistant vests?

20 A. So the supply was short. It's not an item that's in real demand and so we  
had to source suppliers that had the appropriate PPEs, stab vests, so I  
sourced vests from multiple locations.

Q. You say they weren't in demand because it's not required under any  
legislation or guidelines that security officers in Australia wear stab-resistant  
25 vests, is that right?

A. That's correct yes.

Q. We'll come to this topic in a bit more detail as we go through your  
evidence. You were involved at the initial stages of procuring stab-resistant  
30 vests for staff at Glad and the subcontractors, is that right?

A. Correct.

Q. Other aspects that emerge from those debrief minutes is that Glad  
instructed Falkon to pay guards who hadn't returned to work, is that right?

35 A. Yes.

Q. What was the thinking behind that?

40 A. You know, security officers live pay check to pay check, you know, we  
understand that. We wanted to make sure they don't have to worry about their  
rent, their groceries, look after their family. A lot of these staff rely on their  
pay checks to - they take money to family - send money overseas to their  
families and, you know, we're, we're here to help them you know particularly in  
a situation like this.

45 Q. That was reflecting it was a very serious incident that had serious impacts  
upon them?

A. Absolutely.

50 Q. There's also a clear focus - dealing with a number of different things at the  
time, media, legal risk, operational issues, that there is a focus that emerges

from those minutes on the wellbeing of staff. Do you agree with that?

A. Absolutely.

5 Q. In the immediate aftermath, in that period where these debriefs were occurring, is there anything else that you'd like to identify for the court that occurred from your perspective?

10 A. Our priority at the time was the welfare of our staff. We needed to make sure, you know, the welfare, we had counselling services, you know, financial, financial aid, you know, that was required for the staff to continue, you know, actively in life in general, checking up on them from the People and Culture perspective. You know we, we had to - when the centre was shut down, we had to make sure that we brought in a whole new team to cross-train and to bring staff into the centre to be ready to open up for the first day, cause it was a crime scene obviously till, till that Friday, so yeah. So a lot going on, a different world for us, but I'm very grateful of the team that supported me through that process.

20 Q. From your perspective as CEO, not being directly involved in the events on 13 April, was that a difficult period?

A. Absolutely yes.

25 Q. Moving now to what has changed at the Glad Group in response to the events on 13 April, in your statement you observe that an incident, that is 13 April 2024 and what occurred serves as a critical learning opportunity and reinforces the need for continuance improvement in terms of training and preparedness. Do you still agree with that?

A. Yes.

30 Q. You also observe in that same statement that at a broad level, that the changes that have been enacted include a refining recruitment and the approach to it?

A. Yes.

35

[REDACTED]

40 Q. Focusing to an issue that we've just touched upon which is the stab-resistant vests, is that a matter that had been considered or raised with you or anyone at Glad prior to the events of 13 April?

A. No.

Q. That's also not to your knowledge with managers or--

45 A. No, absolutely.

Q. We've already noted that they're not required under legislation or any of the guidelines for security guards in Australia?

A. Correct.

50 Q. Are you aware of any other security companies that require or offer guards

stab-resistant vests?

A. It depends on the risk of the centre. Some centres already might have them but it depends on the risk and Bondi was not - it was a low risk centre so it was deemed not to.

5

Q. Is that something you know or you just - you know that other centres have put them in place or are you just speculating?

A. There's - I have some centres that have them but that was previously, yeah.

10

Q. That you're involved in with Glad?

A. Not - as in not me personally but the centre had them, so yes.

Q. In terms of sourcing the stab-resistant vests--

15

A. Yes.

Q. --what was involved in that process from your perspective?

A. Just phone calls and trying to get as many as I could and we were successful, we got about 27 for the day which was, which was quite difficult considering as I said the demand - supply, sorry, wasn't there, and it's something that requires a bit of leeway, six to ten weeks.

20

Q. What has been done since in terms of procurement of stab resistant vests?

A. So now every - all our Scentre Group sites have, have stab-proof vests and we have - now there's a supply in the market per se in itself, a lot of - some of the suppliers that have brought through, there's a lot of variations to the stab-proof vest. Obviously I'm not an expert on that so I can't comment but the supply is there now, so it's a lot easier to procure, you may say, the vests.

25

Q. Acknowledging you're not an expert in relation to the stab-resistant vests and noting your evidence that there's a variety of different vests, what is it that the Glad Group is looking for in terms of the vests that is obtained and been provided with?

A. I'm sorry, Mr Murphy, I wouldn't be able to detail. I just make sure that they're safe, they're covered. We do a risk assessment now. There is a process in place. We had a..(not transcribable)..tell you that. But I'm not specific on the, on the, on the materials or the type myself so I couldn't comment.

30

35

Q. When you say cover, what is it intending to cover in relation to the stab-resistant vests?

A. The front of the chest and the back of - the back - your back, your total back, yeah.

40

Q. So the torso region?

A. Torso, yeah, pretty much, yeah.

45

Q. At paragraph 135 of your third statement, you give evidence that you're involved in the training during the rollout of those stab-resistant vests?

A. Sorry, the bit - which point, which point was that, sorry?

50



Q. Paragraph 145?

A. 145, sorry, I had 35, sorry. Yes.

5 Q. That details that you're involved in training in relation to the rollout of the stab-proof--

A. Not, not training per se, just the, the process, the policy, as in rolling and I'm hearing about it. So more so just making sure that they get rolled out.

10 Q. So responsible for directing the rollout?

A. I, I was in the meeting but People and Culture direct - drive that, drive that element across the site, from a people perspective.

15 Q. You've given evidence that stab-resistant vests have been introduced across all the Scentre sites?

A. Correct.

Q. Has it been introduced at other sites in which Glad operates or is retained as a security contractor?

20 A. Some - we do a risk assessment, a site risk assessment based on the risk, we would have rolled them out and, and in collaboration with the client, we'd have to get approval of course as well.

Q. What does that risk assessment entail from the Glad Group's perspective?

25 A. The risk and compliance team would, would do a risk assessment and consult with People and Culture on, on the site and making sure and deeming, deeming it where it sits on the risk rating, and then they'll talk to the operational team and then we would consult with the customer.

30 Q. Do you know what's involved in that risk assessment?

A. No, I couldn't tell you, I'm sorry.

Q. In terms of the rollout amongst Glad security officers at Scentre sites and the requirement to wear stab-resistant vests--

35 A. Yes.

Q. --are you aware of any resistance or reluctance on the part of staff to wearing those?

40 A. Yeah. Look, like anything in change, there's always some resistance, but I, I can - there - I think, you know, in my statement it says out of our workforce, three have, you know, have injuries and cannot wear them so they've been exempt at this stage, and they've been placed in appropriate, appropriate positions that don't, you know, deem it a risk to their wellbeing and their safety.

45 Q. Is it anticipated that the requirement for Glad security officers and subcontractors to wear stab-resistant vests at Scentre sites will be reconsidered in the future?

A. As in - no, no, it's, it's, it's, it's part of the uniform, may you say.

50 Q. More broadly, do you think there is a place for the guidelines or the

legislative requirements mandating the use of stab-resistant vests amongst all security officers?

A. Yep, absolutely, I'd be supporting of it, yeah, absolutely.

5 Q. That's something you'd be supportive of?

A. Yeah, absolutely.

10 Q. That may require an assessment of the circumstances in which stab-resistant vests are required, for example, there may be higher risk at a shopping centre or a public stadium or a concert, compared, for example, with a commercial office, is that right?

A. Yes. Yes.

15 Q. Turning very briefly to body-worn cameras which we understand that the security staff at Westfield Bondi Junction now wear.

A. Yes.

20 Q. Mr Yates has given evidence in relation to this to the effect of, "It assists with not only the behaviour of the staff and how they conduct themselves but also the potential offender and how they respond." Is there anything else you'd like to say in relation to the use of body-worn video at Westfield Bondi Junction?

25 A. No, it's a great initiative on behalf of Scentre Group. It does, it, it - I seen it - I mean, based on feedback that I received, it does help deescalate a situation.

Q. That's from employees at Westfield Bondi Junction?

A. Yeah, yes, in, in general, yes.

30 Q. There's been a major, if I can summarise, focus on implementing new training programs in response to the events on 13 April by the Glad Group?

A. Yes.

35 Q. If I can just read paragraph 135 of your statement for the transcript, it's that:

40 "Glad training requirements are now consistent for all officers, direct and subcontract officers. This includes completion of the Scentre induction checklist, including counterterrorism awareness, completion of the new Glad security induction program via Glad Academy or Complyflow, includes AAO training modules x 2, consolidated learning pressure testing completed by Rod Moolman, national security training and quality manager, quality checklists also completed by Rod Moolman, national security training and  
45 quality manager, and rehearsal style training which remains under development in consultation with Scentre."

A. Yes.

50 Q. That's the high level overview, is that right?

LTS:DAT

A. Yes, correct.

5 Q. Just dealing with some of the issues that emerge from that and from your statement more generally, Mr Moolman was appointed in August 2024 as the National Security Training and Quality Assurance Manager, is that right?

A. Yes, correct.

Q. That's a dedicated role?

10 A. Correct.

Q. What does that role involve?

15 A. Rod oversees all training framework in relation to security. We have a learning and development department that's separate in the People and Culture team. Rod sits as a separate, separate resource purely dedicated to security.

Q. Does that L&D team focus across the entirety of the Glad business?

A. Yes, correct, yep.

20 Q. Mr Moolman's role is specifically targeted towards security?

A. Correct.

Q. Are you aware if any other similarly sized security providers have a dedicated role in that capacity?

25 A. Not that I'm aware of.

Q. Mr Moolman's role or tasks since his appointment have been focusing on transitioning the existing training programs into online modules, is that right?

30 A. Correct.

Q. You also refer to, at paragraph 157 of your third statement, that there's been a shift in the focus from pure scores or results to comprehension?

A. Absolutely, yes, correct.

35 Q. What does that mean and what are the benefits of that?

40 A. You, you want, you need to ensure that the, the, the candidate exceeds, you know. Just tick and flick is not, is not part of the process. We ensure that they absorb the information and we test that information. It's put under, you know, minimal stress, then, then there's a pressure test, and that pressure test flushes out all aspects under critical, timed approaches, and then, and then he will deem and assess that candidate.

Q. We'll come to the pressure testing, but that occurs prior to that person being deployed as a security officer?

45 A. Correct, yes.

Q. In terms of the mandatory training that Glad security officers now need to undertake, I understand from your evidence that there are seven new online modules that have been developed?

50 A. Correct, yes.

Q. That applies for direct employees and subcontractors?

A. Correct.

5 Q. So in the case of Falkon, for example, anyone who it's proposed is going to be employed by Falkon and work at a Scentre site or with Glad needs to undertake, from a Glad perspective, those new modules?

A. Absolutely, yes.

10 Q. Those modules include a number of different matters including radio usage?

A. Correct.

Q. There are now two modules on active armed offender?

15 A. Correct.

Q. Previously that training wasn't provided by Glad?

20 A. The, the AAO training was provided but it was, it was, it - now it's more enhanced and more comprehensive, it has some aspects of theory and as well as pressure, there's the, the actual scenario and, and there's also principles of understanding AAO and terrorism awareness.

Q. And those modules have been informed by the ANZCTC guidelines?

25 A. Under the guidelines of the ANZCTC, yes, correct.

Q. This is all in addition or prior to the training that's received on the job--

A. Correct, yes.

Q. --including red book audits and other testing?

30 A. Absolutely, we - yes, correct.

Q. Your evidence refers to a program referred to as the Glad Academy?

A. Correct.

35 Q. Are you able to just briefly explain what that involves?

40 A. Yeah, no, absolutely. It's part of our LMS system, our learning management system, sorry, which is governed by L Management, that's the entity. It's, it's the life cycle of all our - it captures - we create content on it for training. We, we capture the, the data on it and then it's rolled out. There's - it provides automation around when the employee's due to do their, do their, sorry, their training, and it escalates to their manager so their manager is aware of when it's due and when, and when it needs to be conducted.

45 Q. So that's an alert, say, for example, in relation to undertaking active armed offender refreshers?

A. Absolutely, yes.

Q. How often are they required?

50 A. There's a - they'll be within the 12 months, they have to complete them, and when you're a new guard, you have to do it in the beginning before you start

your shift, but if you're - during your life cycle of being a Glad employee or, or even a labour hire subcontractor, you would do it on an annual basis for sure.

5 Q. What consequences are there if a guard hasn't completed the training within the 12 month period?

10 A. If, if, if the officer hasn't completed their role - sorry, their training, we would be, we would be escalating - the CSM will be dealing with the, with the employee and ensuring that - why they haven't done that, they have to get reasonable reasons as to why they haven't done it, and if they - that is not good enough, we would be referring them back to People and Culture.

Q. Your evidence also refers to a program which relates to subcontractors, Complyflow, is that right?

15 A. Yes, that's another system.

Q. Does that operate in the same way as the Glad Academy?

A. Correct.

Q. Does it give alerts?

20 A. Yes, absolutely. It, it's a separate system that provide, it's provided for our contract on management, so all - you know, in this instance, Falkon's insurance's contractor requirements master licence, et cetera, we'd be going through - all their personnel are inducted, are, are placed onto the system and they get ongoing alerts on what training needs to be completed.

25 Q. You also in your evidence deal with the fact that Glad has updated a number of its own policies?

A. Yes.

30 Q. So active armed offender policies, policies relating to radio communications, is that right?

A. Correct, yes.

35 Q. You'll be aware from Mr Yates' evidence that Scentre has implemented a new policy in relation to radio communications?

A. Yes.

Q. Glad will work with Scentre to ensure that policy is rolled out at Westfield Bondi Junction and staff receive appropriate training?

40 A. Absolutely.

Q. In circumstances where there is a Glad policy dealing with radio communications and then a client policy, for example--

45 A. Yes.

Q. --the Scentre radio communications policy, how do those two policies interact with one another?

50 A. We, we, we, we provide feedback to, to Scentre, ensuring that it meets the, the requirements, and, and we, we work, we work on that together.

Q. If there are differences in the policies, for example, the Scentre policy has more requirements, that's the policy that you comply with from the client?

5 A. Yeah, it trumps, it trumps, it trumps - you know. Scentre sets a high standard around training and anything that goes in policy and procedure, we, we - you know, we would adopt.

Q. Dealing with the pressure testing that you've just referred to earlier in your evidence, that occurs prior to an officer being permitted to--

10 A. It, it, it approve - it, it - once the officer's done their security inductions, so the seven modules that we, we brought forward were security induction, radio usage and code - sorry, I'm just looking, making sure I get them all right.

Q. Yes, that's okay.

15 A. Situational awareness, conflict management, AAO and hostile reconnaissance. Each module will be completed, and then there's a pressure test on that module, and that individual will go through that journey. And then once, at the end of that journey of that, of those six shifts, the - Rod Moolman, who's the National Training Manager, will conduct an assessment and review the suitability of that individual. If they pass, they have to get 100% on each of  
20 the modules, and once they do, then they deem that employee as appropriate, and then we would, we would put it forward to, to the RSM in Bondi, which is Brad at the - at this stage.

Q. I think you said six shifts during your answer, was that meant to be--

25 A. Yeah, so, yeah, it's too much information for, for one shift. You know, you know, in relation to AAO, you know, example would be done in this introduction, security induction. So AAO and terrorism awareness are principles, basic principles. We would then go deep dive further in, in around the fourth and fifth, their fourth and fifth shift around AAO because it's, it's a  
30 very complex topic and, and, and it certainly needs attention. And back to what you were saying, Mr Murphy, around absorbing information, it's really critical that they understand, you know, their roles and responsibilities in an AAO situation.

35 Q. Where does those shifts occur, are they on site at the--

A. They're on site, yes.

Q. So a guard would be on site at Westfield Bondi Junction?

40 A. Yes, buddied up with, with another experienced officer in, in the initial stages where required. The, the training will be done with either an S - the S2 or the S1. So there are four, four sort of layers between where they go through where they get critiqued or, or reviewed and assessed, S2, S1, our CSM, and then it goes up to Rod, so that's four layers before it goes to Scentre Group.

45 Q. So the S2, S1 and the CSM from the Glad side will conduct training--

A. Yes.

Q. --in an assessment of a prospective guard?

50 A. Yes, correct.

LTS:DAT

Q. And then provided they adequately pass--

A. Yes.

Q. --through that process, they'll then be proposed to Scentre?

5 A. No, no, then it will go to Rod to do a pressure test and to review and ensure  
and deem the officer in question is appropriate to work on at Bondi in this  
instance, and then Rod signs off from an assessment perspective, he will then  
- we will then discuss with the RSM and, and obviously ensure that they meet  
10 Scentre Group's policy and procedure requirements and, and operational  
requirements.

Q. What does that pressure testing involve?

15 A. The scenario, so the - Rod and, and our head of People and Culture, Kiri,  
have created scenarios based on particularly of what's occurred on the day on  
- and, and in this instance, AAO is a bunch of question scenarios that evolves.  
It continues to evolve under pressure, asking this, asking certain items around  
that situation. And it has to - the individual has to be seen to be, you know,  
critical thinking, confident, has, has clear spoken communication and  
20 understands what's happening and, and what is, and what their role is at the  
time of the, of the scenario.

Q. So is it right that the pressure aspect is simulated by putting someone on  
the spot?

A. Yes.

25

Q. And then the situation evolves--

A. Yes.

Q. --and they have to react to that--

30

A. Scenario.

Q. --based on the policies and procedures?

A. Correct, yes. One on one. One on one.

35

Q. Does that pressure testing continue now once a person has started as a  
security officer?

A. Yes.

Q. How often do those pressure testing--

40

A. There are a number of pressure tests that are, that are required in an  
annual - through our training matrix. There's a - that complements our internal  
training as well as the red book training, and that's all entailed 21, there are 21  
courses in general but we've, we've created seven scenarios, of pressure  
testing scenarios so far, and that catalogue will continue to evolve as scenarios  
45 evolve and, and discussions and ideas come through.

Q. Is that something that notifications are received through the Glad Academy  
or Complyflow in terms of alerting managers when a pressure test needs to  
occur?

50

A. Yes.

Q. It may be a slightly separate issue, but your evidence refers to the fact that further work is ongoing with Scentre to enhance rehearsal style training?

A. Yes.

5

Q. What does rehearsal style training involve?

A. It is enacting a full play by play scenario in real life around a situation like April 13th occurred. It coordinates bringing in law enforcement, emergency services - sorry, ambulance, anything that - depending on the scenario. It takes a lot of planning and preparation. It does take time I believe, but yeah.

10

Q. Have any such rehearsal style training occurred since 13 April 2024?

A. Based on the evidence that Mr Yates gave, yes it has, two.

15

Q. Were you involved in that training?

A. No, no I wasn't, sorry.

Q. Did you receive any feedback from any of the Glad employees?

A. Not at this stage, no. No, not at this stage, no.

20

Q. Do you think that rehearsal style training in your words is useful?

A. Yes, of course.

Q. And you've received that feedback from security officers and guards in Glad?

25

A. In past, in the past, yes, yeah.

Q. Do you know if any further rehearsal style training is planned in the future?

A. Not, not at this stage, not - I'm not aware of at the moment, but I'm sure it's happening with the ops team.

30

Q. In relation to changes to the CCTV control room, you've identified in your evidence that there's been changes to the selection process?

A. Yes.

35

Q. How are suitable employees identified, given that it is a high pressure role, we've heard evidence of that?

A. Yes, so we've - I mean, the emphasis around control operators has always been there, around training and suitability and criteria. I think what we've added, we've added a suitability assessment, like a checklist may you say, which is governed by - again by the - by Rod Moolman, our Training Manager. So firstly the individual in question must have worked three months at least onsite at, in this instance Bondi, have a thorough understanding of both Glad's policy procedure and requirements as well as Scentre Group's requirements and have worked an ample amount of shifts onsite.

40

Once that individual is seen as potential, you know, candidate for CCTV and expresses that they wish to do so, obviously we want to make sure the employee has that right of course. Then Rod will sit down and ask a number of questions and, and do sort of an interview style sort of discussion around

50



that suitability of that candidate based - there's a criteria sheet that a bunch of questions. Once they - if they adhere to them and, and Rod deems them as an appropriate candidate, they will consult Scentre Group about that candidate and then we will take feedback from, from Scentre Group about do they deem that individual competent or not.

Q. We might just bring up that suitability assessment which is in your third statement tab 995C at page 122.

A. Sorry Mr Murphy, what page was that again?

Q. Page 122. We'll bring it up on the screen.

A. Yeah, that'd be great, thank you.

Q. 122. This is annexure T. This is the suitability assessment that you were referring to?

A. Yes.

Q. If we could just scroll through that document. That deals with why that person is interested in working in the control room, ready to step into that role?

A. Yes.

Q. If we can just continue through that document. There's a section there referring to a referee input. Is that someone from Glad who will be referee or someone external?

A. Onsite, so S1 or S2.

Q. We can take that down. That now reflects - it is a comprehensive document?

A. Yes, correct.

Q. And it's a more comprehensive process than what was previously in place?

A. Yes.

Q. We also heard evidence that there were issues towards the end of 2023 and early 2024 in relation to recruitment of staff to be the CCTV control room operator. Have those issues now been resolved at Westfield Bondi Junction?

A. Yes.

Q. And there's a sufficient number of appropriately trained staff who have gone through this process or the previous process and are now equipped to respond to an event in an emergency?

A. Yes.

Q. We understand that there's been changes to the CCTV control room procedures and it's been made clear now that there's a requirement that a CCTV room operator be in the control room at all times?

A. Yes.

Q. And that's something that's been made clear to the guards--

A. Yeah.

Q. --at Glad?

A. Yes, correct, yes.

5 Q. It's also identified through notifications in the room?

A. Yes.

Q. There's a clear messaging?

A. Yeah.

10

Q. If we can just get that document up again and go to annexure F which is page 102. I understand from your evidence that this is a pressure testing type training that applies to control room operators, is that right?

A. Correct.

15

Q. That is something that will need to be undertaken and passed by the relevant control room operator, or the proposed control room operator before they're put forward to Scentre?

A. Correct.

20

Q. Again we don't need to go through the content of it, but if we could just scroll through that document. That's a relatively comprehensive document with a number of questions, and they're put to that person by Mr Moolman, is that right?

25

A. Correct.

Q. That's done in that simulated pressure testing environment to try and evoke emotions or evoke stress and to see how they respond?

A. Yes, correct.

30

Q. Mr Moolman will assess how they respond and if they don't respond appropriately what then happens?

35 A. So then if the candidate is not successful, we, we will retrain within a week. If the candidate again fails their criteria of the pressure test, we then escalate to our, to our CSM. The CSM will then make a decision. If they can't make a decision they'll escalate to the People and Culture team to make a final decision.

40 Q. So Mr Moolman is responsible for undertaking the assessments and approving people, and in circumstances where a candidate is unsuccessful, that then diverts to the CSM and then up through the People and Culture, is that right?

A. That's correct.

45 Q. We also understand from Mr Yates' evidence that Scentre has recently introduced a trial for two control room operators at Westfield Bondi Junction?

A. Yes.

Q. Do you have any views on that?

50 A. It's a great, it's a great issue. I haven't, I haven't been down there since the

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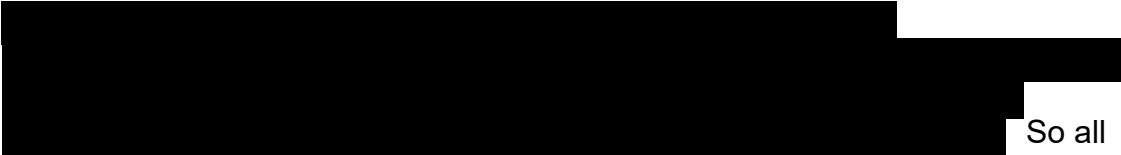
last five weeks of course, but yeah, it's a great issue.

Q. Anything that might be helpful in emergency situations?

5 A. There were supervision prior to, to the two control operators previously, but you know, always a helping hand is great, an extra helping hand, sorry.

Q. Dealing with the topic of guards. I understand from your evidence that there have been difficulties in recruitment due to the location of Westfield Bondi Junction, is that right?

10 A. Yes.

15  So all initiatives that we've tried to take on board to really have - you know, make a workplace of, of choice.

Q. One of the issues that we've heard evidence and opinion evidence from Mr Wilson in relation to is the length of shifts for security control room operators--

A. Yes.

Q. --at Westfield Bondi Junction. Are you aware of any steps or consideration as to the length of those shifts, and re-consideration of the length of those shifts?

25 A. The 12 hour shifts are a standard sort of practice in, in the security industry. It - you know, each of the - the control operator has adequate, we give them adequate breaks, to break up the shift. Given them that opportunity to get on the floor as well, you know, happy to take any feedback on, but like I said, it also allows them to make more money of course as well and that aspect.

Q. So the length of the shifts has been informed in part by the security officers themselves?

35 A. No, the industry itself, yes, it's been the standard practice, yeah.

Q. In relation to your engagement with Scentre since the events of 13 April, I understand that there were - from your evidence and from Mr Yates' evidence, that there were a number of meetings between the Scentre Group and the Glad Group after the events of 13 April, is that right?

40 A. Yes.

Q. What at a high level did those meetings relate to?

45 A. Total review across what, you know, what's learnings and how we can implement new practices, new training, how we can work even closer together in our partnership on improving those and, and obviously enhancing those, those, those requirements, and we meet on a monthly basis, so yeah.

Q. And those meetings are continuing?

50 A. Yes, absolutely.

Q. On a monthly basis?

A. Yes.

5 Q. I understand that a number of - you've said that there was a total review and new practices and procedures and training were implemented. Have all of those matters that were agreed to during those meetings now been implemented?

A. Yes.

10

Q. In relation to Glad's engagement with its subcontractors and namely Falcon--

A. Yes.

15

Q. --we understand from Mr Manzoor's statement that he has given in this matter that he attended a formal review with yourself from Glad on 11 September 2024?

A. Yes.

20

Q. What did that review involve?

A. Look, you know, they're a small organisation and they just came to us, obviously there was - we wanted to make sure they felt supported especially around through the inquest, and secondly, we, we spoke about the new training that was coming through, the induction, the induction training, and as well as the enhanced training that we were working towards. That was the discussion in place at the time.

25

Q. Was there any comments from the representatives from Falcon in relation to that new training or requirements?

30

A. No, they just wanted to understand what was entailing in it.

Q. Were they supportive of--

A. Yes.

35

Q. --the introduction of that?

A. Yes.

Q. I further understand that there are now monthly meetings between Glad and its subcontractors, is that right?

40

A. Yes.

Q. And that includes Falcon?

A. Yes.

45

Q. Do you attend those meetings?

A. No.

Q. Are you able to tell the Court what is involved in those meetings and what the content of them is?

50

A. Yeah, absolutely. In - it can relate to any operational compliance, you

5 know, training, just debriefs in general around what's happening in, in the security environment as well. Obviously there's, there's a lot going on and we want to make sure that they feel comfortable and they know what's going on, and yeah, so that meeting is - we have our head of risk, risk department in there, risk compliance, our procurement team, and our ops, our ops managers.

Q. With what frequency did those meetings used to occur?

10 A. They were scheduled every, every month, but, you know, clashing, clashing of calendars et cetera, sometimes they were missed, but we tried to have them once a month.

Q. And the policy is now is they do occur once a month?

A. Yes, correct, yes.

15 Q. In relation to crowded places and that concept which we've heard throughout this inquest in relation to--

A. Yes.

Q. --Glad has implemented its own crowded places policy, is that right?

20 A. Yes, yes, correct.

MURPHY: If we could just bring up p 68 of tab 995C which is a copy of that policy.

25 Q. That policy acknowledges that Glad is not an operator?

A. Correct.

Q. So in the usual course would not have its own crowded places policy, is that right?

30 A. Correct.

Q. What was the reasoning behind implementing a crowded places policy from the Glad--

35 A. We wanted to, we wanted to elevate capability and obviously support in you know our environment and Scentre Group so we, we've further enhanced it. I would say that that's going above industry standards and in aspects of proving that kind of training, we've had independent consultants review that from the industry and have given that advice and we're now rolling that across, across Scentre Group sites and across our division as well.

40

Q. It's all about taking learnings from the risks that are posed by crowded places and imbedding that within the Glad Group?

A. Correct yes.

45 Q. At page 70 of that - of your statement and of that policy, there's a table which talks about roles and responsibilities, and the third row refers to managers and senior leaders and their responsibilities and it includes raise awareness - this is for managers - "Raise awareness of crowded places strategy obligations", and for senior leaders, "Active involvement in industry associations and security forums with Glad Group supporting client attendance

50

and contributing to information sharing". Are you a senior leader in the context of this document?

A. Yes, I would say so, yes.

5 Q. What has been involved from the Glad perspective in terms of active involvement in industry associations with regards to active armed - or crowded places policies?

10 A. So we - we're now part of SHIELD which is a New South Wales initiative run - we've been invited by all the agencies now and we - there was a conference last year - beginning of this year sometime it was and I didn't go personally. Our Head of Security and Key Accounts went on behalf of the business who runs the security division.

Q. What was the feedback received after that attendance?

15 A. It was really good feedback. It was really vital. It was good information sharing, learnings. Obviously we don't get that opportunity to hear from people of that calibre, so it's great to hear that feedback. It's a great initiative.

Q. Did any other security companies attend that forum to your knowledge?

20 A. I'm not sure to be honest with you.

Q. We've heard evidence from Chief Inspector Green of New South Wales Police that security companies like the Glad Group are generally not invited to the crowded places forums that are conducted by the New South Wales Police, is that right?

25 A. Yes.

Q. Is that something that you think should change?

30 A. I would love the opportunity for organisations like ourselves to be part of the BAG forum. It'd be - give us insight and learnings and that way we also know we can change and tweak our organisation around training and learnings and continue evolving that, that's vital for us.

Q. So there would be some value to be obtained from Glad or others attending those forums?

35 A. Yes absolutely.

Q. You'd welcome that opportunity?

40 A. Absolutely.

Q. Moving now to your reflections and recommendations that are dealt with in your statement and otherwise, your third statement at paragraphs 189 to 193 deal with two proposed recommendations.

45 A. Yes.

Q. The first being a dedicated landline from security control rooms to triple-0 dispatchers and the second being remote CCTV access by law enforcement.

A. Yes.

50 Q. Dealing with the first, the triple-0 dispatch, we know from the evidence that

there appears to have been a delay of approximately six minutes from when CR1 called the emergency services and when her call was connected.

A. Yes.

5 Q. Does your recollection - is it directed towards that issue or could you just expand upon your proposal?

10 A. I think just in general would - you know, particularly in this instance would've been taken a high priority on the call than just being left sitting on, on the - on hold I guess. So from that perspective, knowing it comes from a control room environment, from a security environment, I think you know that would be a concern that the operator would take at a high priority.

Q. Are you aware of whether that technology is currently available in New South Wales?

15 A. I'm not sure.

Q. But it could be something to be explored?

A. Yes, absolutely.

20 Q. The benefit being the control room operator who plays an important role in developing situational awareness and providing information during an incident like this would be able to directly communicate that information to police or other emergency services without delay?

A. Yes.

25

Q. The second proposal relates to remote access to CCTV.

A. Yes.

Q. What does that involve?

30 A. That was in relation to - for the agencies like any - you know, from a New South Wales Police call centre having access to direct lines of CCTV footage of the particular incident. It's probably like a business continuity response I guess, and so that was sort of our idea, potentially an opportunity if there was any way for that to happen.

35

Q. Are you aware if that exists in other shopping centres in New South Wales?

A. Not in New South Wales. Not sure, not sure at this stage.

40 Q. In your statement at paragraph 190, just to refresh your memory in relation to that, you indicate that "Whilst not industry standard" - this is the second sentence - "some shopping centre mall operators within Australia do allow law enforcement to remotely access their CCTV system in real time".

A. I know in Victoria they do.

45 Q. How does that work to the best of your knowledge?

A. I believe there's a certain agency that has a tap into high - a high risk centre and just monitors behaviours.

Q. That could be used in an event such as this, that police could access--

50

A. Yes.

Q. --and live monitor a situation using the centre's infrastructure and cameras?

A. Correct.

5

Q. But you acknowledge in relation to both of those proposals that there may be technological impediments to introducing both of them?

A. Of course.

10

Q. We've heard evidence in this inquest about whether security guards should have more extensive powers or be given access to more or greater implements. That was from Ms Lulu Fatima. Do you have anything to say about whether or not you consider guards should one, have greater powers, or two, have access to if I can call it offensive weapons, so batons or other items?

15

A. As it's been through my statement and multiple statements throughout the inquest, our officers are there to observe, report and escalate. Even SLED have deemed as their whole responsibility. From my perspective, our safety - the safety of our, our people and the public are paramount. I, I want - I don't, I don't think there should be greater powers. I just think that there should be greater training. And an emphasis on training.

20

Q. As well as if you can call them defensive implements, so stab-resistant vests, things like that.

A. Correct yes.

25

Q. But your concern being if greater powers and/or greater equipment are provided, guards might be exposed to more risk, is that right?

A. Correct yes.

30

Q. The final topic before I conclude deals with the concept of escape hide tell.

A. Mm-hmm.

Q. Were you familiar prior to this inquest with that concept?

A. Very briefly yes, very briefly.

35

Q. We've heard evidence from Chief Inspector Green and Mr Goldberg that many people are not aware of escape hide tell. Do you agree with that?

A. Yes.

40

Q. Did you see the video from the United Kingdom that was played during Mr Yates' evidence about run hide tell?

A. Yes.

Q. Had you seen that video prior to--

45

A. No.

Q. Do you think a messaging campaign in those terms of similar could be - would be effective?

A. Yes.

50



Q. You agree it's important to get that messaging out to the public?

A. Yes.

Q. Is that something that will assist the job that security guards do?

5 A. Yes absolutely awareness is a key for it, you know. I think it's - and the video was very powerful and I think it's a clear message and I think something should be advocated for Australia.

10 Q. Are there any other reflections or recommendations that you have on the events of 13 April 2024 that aren't otherwise dealt with in your statement?

A. I just wanted to say that the inquest has been very valuable to go through in aspects of learnings for us as an organisation. I, I really am sorry what's happened on that day. It's heart wrenching, I've got young kids and I know, you know - I know not only kids have - you know, young people were affected but it really hits home. You know, as a leader and, you know, I - you know we've always taken security and safety as paramount particularly in the environments that we deal with.

I think you know it's just enhanced my vision and what - and I - and that ensures that there's continuous focus and that I, I think that - but, you know, in that aspect I think as a leader - any leader should really take that on board. The team did the best they could. I don't think anything would've changed on that day unfortunately. You know, Mr Cauchi was - yeah, his intent was very clear. All I can say I'm very sorry. And I - we take this quite serious for us.

25 Q. Was there anything else that you wanted to say to your team at Glad before you finish?

A. If I may please your Honour, and families please. Your Honour I'd like to acknowledge the extraordinary at heart of the events of 13 April. That day changed lives, it took lives, the cruellest of circumstances. Faraz Tahir was clearly so loved by his family, friends, community and I can confidently say that his loss and his sacrifice have been felt deeply across Glad Group and the entire security industry. I want to recognise his family for the dignity and compassion they have shown throughout this process.

35 My most heartfelt thoughts are also with the families and their loved ones for the five other innocent people whose lives were taken and the remaining victims and witnesses and first responders. Without taking anything away from the profound grief of those who lost someone they loved, it is important to reflect on the courage of a group of individuals who simply went to work that day and were faced with an unimaginable incident that happened so quickly on a normal Saturday afternoon.

45 I want to formally honour the actions of each of these security officers who were on the day on duty at Westfield Bondi on 13 April. To Jerry Helg, our Security Supervisor, you ran towards people in need, you tended to victims, you aided emergency responders, you did your team, your family and Glad Group proud not only on the day but in the difficult days that followed were you continued to be strong support presence for your colleagues.

50

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5 To CR1, I hope that what you take from this inquest is knowledge and that it is - in the terrifying moments when you were faced with an unpredictable fast moving and unimaginable circumstance, you never shied away. We hope you have felt our support standing firmly behind you, especially on the tougher days of this testimony.

10 To Qasim Shah and Tretch Moses, you ran to the aid of victims and provided critical first aid to members of public. You ushered customers to safety, assisted the injured and supported emergency services. You remained on the shopping floor helping people even after hearing gunshots. Your bravery is undeniable.

15 To Ankit, Bulbul, Kane, GLA2, Fahad, Usman and Irshdunnisa, some of you provided critical aid to both Faraz and Taha. Others helped evacuate customers, provided directions to police, enabled them to do their jobs, supported first responders. Many of you stayed late in the evening to assist police, helping secure the centre and provide statements. You each played a vital role.

20 To CR2, you were tremendous support on the day. You returned to work the next morning and personally took on the responsibility of cataloguing, archiving CCTV footage for New South Wales Police, protecting your colleagues from having to relive the trauma of viewing the footage.

25 And to Muhammad Taha who you stood beside Faraz, you faced direct danger with incredible bravery. You were injured during trying to protect others. I said this to you in person and many occasions, but Taha, we owe you our deepest respect and gratitude. Each of you played a role that day that must be  
30 recognised. You respond with the kind of resolve and selflessness that is very best side of our industry. You not only showed courage that day but many showed enormous courage appearing at this inquest. You have demonstrated your dignity, honesty and what we have said here.

35 Throughout this inquest there is no doubt that some testimony has been hard for our team members to read about. We acknowledge that the scrutiny is a necessary part of this process and that the questions raised are important. The inquest is about learning and taking forward actions that prevent anything like this from happening again. We hope that through the evidence present your Honour has seen that while the primary duty of security is to observe,  
40 report and escalate, our officers went beyond that on 13 April.

45 I'd just like to mention also Scentre Group. Thank you for the ongoing support and in our darkest times you've been a great partner, so we thank you for that. Lastly to my team, as CEO of the Glad Group, I'm here today and proud of you, humbled by you and deeply committed to ensuring that your efforts are remembered. I truly want to thank Kiri and Pete who have been by my side throughout - sorry.

50 HER HONOUR

LTS:DAT

Q. Thank you Mr Iloski. Just before we take the adjournment I'll just check to see that there are going to be other questions.

HER HONOUR: There will be.

5

MURPHY: Yes, I think the lunch adjournment, your Honour.

HER HONOUR: We'll take the lunch adjournment and resume at 2 o'clock.

10

LUNCHEON ADJOURNMENT

HER HONOUR: Mr Murphy.

15

MURPHY: There's no further questions from counsel assisting, so other parties may have questions of Mr Iloski.

HER HONOUR: Yes. Mr Fernandez?

20

<EXAMINATION BY MR FERNANDEZ

Q. Mr Iloski, my name is Lester Fernandez.

A. Hi, Mr Fernandez.

25

Q. I act for the family of Faraz Tahir. What I'd like you to know at the outset is that after all the evidence in this inquest, parties are going to be making submissions to her Honour about findings of fact and other findings to do with the evidence at this inquest, do you understand that?

A. Yes.

30

Q. I'm just going to ask you to speak a little bit louder so your answers get picked up?

A. Yeah, sure, yes, yes, sorry.

35

Q. I'm going to tell you what my submissions are going to be about Glad security guards and Falkon security guards so you know where I'm going. The submission I'm going to make to her Honour is, with one exception, the Glad staff and the Falkon staff all acted competently, they were all well trained, they performed to a high standard under pressure. That is the submission I am going to make to her Honour at the end of the evidence, do you understand that?

40

A. Yes.

Q. I said that there's one exception and the exception is CR1, do you understand that?

45

A. (No verbal reply)

Q. I'm not going to be making that submission in relation to CR1, do you understand?

50

A. (No verbal reply)

LTS:DAT

Q. I'm just going to really have to ask you to answer so that your answers are picked up on the transcript?

A. Yes, yes, yes, yeah, yes, sure.

5 Q. What I'm going to do in the questions that I ask you is essentially what you did in your second statement made in these proceedings, which is you went through statements of Glad staff and you made comments on what it was that they did on this day. You recall doing that, don't you?

A. Yes.

10

MURPHY: Just to assist, I believe that's Mr Iloski's third statement in which that occurs.

HER HONOUR: Thank you.

15

FERNANDEZ

Q. Third statement, I do apologise.

A. Yep.

20

Q. You did that in relation to CR2, do you recall doing that?

A. Yes.

Q. You did that in relation to CR1, do you recall that?

25

A. Yes.

Q. You did that in relation to a number of other Glad security staff, is that right?

A. Yes, yes.

30

Q. In my questions I'm going to, in briefer form, take you through some of the statements of Glad security staff and I'm going to ask you to comment on what it was that the staff did at different periods of time, do you understand that?

A. Yes.

35

Q. It's essentially the activity that you've done but I'm just going to focus on some particular things, do you understand?

A. Sure.

40

Q. Yes?

A. Yes, yes.

45

Q. I'm going to start with CR2, and I wonder if his statement could be placed up on the screen please, this is tab 293. What's going to be shown to you is CR2's statement to police of 31 July 2024. You'll recall that in your third statement at paragraph 79 to 91, you said that you reviewed CR2's statements, do you recall that?

A. Yes.

50

Q. If I can ask for paragraph 10 to be brought up, please. At paragraph 10

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what CR2 says is this, "Around 3.35 the same day, I heard a broadcast over our security radio network saying, 'Armed intruder on site. Alpha, alpha, code black'." I'm just going to pause there just for a moment. In a further statement, CR2 clarified that he didn't hear the word "intruder", he heard the word "offender". So the words that CR2 heard were, "Armed offender on site. Alpha, alpha, code black." Can you see that?

A. Yes.

Q. And he went on to say:

"I do not know who made the radio broadcast but I understand Alpha, Alpha, code black, to mean there is a physical altercation and someone has been stabbed."

You can see that?

A. Yes.

Q. That was a correct understanding, wasn't it, by CR2 of the message that he'd been given, do you agree?

A. I wasn't there but if that's what he says.

Q. You were a security guard though weren't you?

A. Many years ago.

Q. Many years ago but you did get your level 1A security licence, is that right?

A. Yes, many years.

Q. Did you work as a security guard yourself?

A. Not in a Scentre Group environment, no.

Q. In another environment?

A. Yes.

Q. For how long?

A. Couple of years but just off and on.

Q. On and off for a few years, you have experience then in use of radios between security guards, codes and messages, is that correct?

A. A lot has changed since then.

Q. Sure. In terms of what's said at paragraph 10, do you agree that what CR2 was doing there was picking up on a message and understanding that message, do you agree with that?

A. Yes.

Q. Could you just scroll up please to paragraph 11. Perhaps we could go to paragraph 11. You can see that after hearing the broadcast, CR2 went straight to the fire control room, placed the EWIS panel on the manual mode and pressed the evacuation alarm alerts. This is why the alarm sound to evacuate could be heard throughout the shopping centre, can you see that?

LTS:DAT

A. Yes.

Q. What CR2 did was he sprang immediately into action, is that correct?

A. Yeah.

5

Q. That's something you would commend him for wouldn't you?

A. Yeah, absolutely.

10 Q. Can we go to paragraph 12 please. What CR2 said is, "I heard twice over the radio from a retail supervisor asking them 'Are you able to locate the POI', person of interest. I heard the controller respond 'No'." You know the controller on this day was CR1, is that correct?

A. Yes.

15 Q. Could we scroll up please to the next paragraph. Paragraph 13, I'll just summarise, "CR2 after hearing that made a decision to leave his location and go to the security control room to locate the person of interest on the CCTV", you can see that?

A. Yeah.

20

Q. Once again a commendable action by CR2, do you agree?

A. Yes.

25 Q. Obviously he'd heard that CR1 was not able to find the person of interest so he decided he was going to try and do that, can you see that?

A. Yes.

30 Q. What is referred to in the statement is what he spoke to CR1 about when he got to the control room. He said in his first statement that he asked CR1 to leave the room, which she did. She's got a note that that's contained in the statement. At paragraph 14 now, what CR2 says is, "I was looking at the CCTV footage in the control room and located the person of interest on level 4." Can you see that?

A. Yes.

35

Q. What he's described in the rest of that statement is very shortly after arriving in the control room he found out where Mr Cauchi was, correct?

A. Yes.

40 Q. You'll notice just in this first statement that there's no mention of anyone else giving him any information to find out Mr Cauchi's location, do you agree with that?

A. Yeah.

45 FERNANDEZ: Could paragraphs 15 and 16 be brought up?

50 Q. You'll see just by way of summary that what CR2 was able to do was using the CCTV cameras, he was able to monitor in real time what was happening when Inspector Scott arrived and what happened between her and Mr Cauchi, is that correct?

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A. Yes.

Q. That's a clear demonstration of his competence isn't it?

A. (No verbal reply)

5

Q. Yes?

A. Yes, yes.

10 CASSELDEN: I rise to raise this matter, which is that we can go through this, we can see what's on the document. This witness is being asked to assume an account. Ultimately it's a matter for submissions, not a matter for this witness, with the greatest respect.

15 HER HONOUR: I think that's right Mr Fernandez. Unless there's something in particular that you want to ask?

20 FERNANDEZ: I do note that Mr Yates gave evidence on a matter of fact in relation to these proceedings, that is how was CR2 able to find people on the screen. That's at p 1317 of the transcript, so it's an exercise we've been through. Your Honour has accepted the evidence. This goes to the level of competence of Glad staff. I'm going to have to ask your Honour to make a finding of fact, because it's going to be an important finding of fact. Was CR2 able to find the location of Joel on his own or with other people? You've heard evidence from what Scentre Group believes. I wish to put these propositions to the CEO of Glad Group, and then I'm going to ask your Honour to take into account the likelihood of CR2 doing what he did, having regard to the training and knowledge that the CEO of Glad Group knows about his staff.

25 30 CASSELDEN: Can I be heard in response your Honour?

HER HONOUR: Yes.

35 CASSELDEN: Firstly, with no disrespect to the witness, he's a CEO. He's not been qualified or sought to be qualified as an expert like Mr Yates. That's a very important distinction to make. Secondly, Mr Fernandez on behalf of his clients cross-examined Mr Yates on this particular topic. Thirdly, as we've heard earlier today in answer to questions from counsel assisting, this witness has no experience in the delivery of training to security officers; secondly, has no experience in the CCTV control room.

40 So to the extent that your Honour was to permit what we submit is an impermissible line of questioning, the weight to which your Honour would attach to any of the evidence elicited from this witness would be marginal at best. It simply cannot help. We don't seek to shut out Mr Fernandez to make submissions at the end of the inquiry as to what facts your Honour should make in relation to this particular issue. But this is not the right witness to do that, with the greatest respect. He does not comment on the competency of anyone in respect of whether or not they could perform the role of a CCTV control room operator.

45 50

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FERNANDEZ: In fact he does at paras 147 to 150, your Honour, of his final statement.

5 CASSELDEN: Please take her Honour to the opinion that's expressed in relation to whether or not he holds an opinion that CR1 was competent in the control room?

10 FERNANDEZ: I can take your Honour to the third statement to para 147 to 150.

HER HONOUR: Thank you.

15 FERNANDEZ: Perhaps it could be brought up on the screen so others can follow? Paragraph 148, Mr Iloski talks about the role of the control room operator. At para 149 Mr Iloski refers to CR1's experience, stating that she had at least 290 hours of experience in the control room as a controller, reflecting a significant level of experience and familiarity with the role, which should not be overlooked. At para 150 what Mr Iloski says is, "Notwithstanding these challenges she was able to function and undertake a number of  
20 important tasks in response to the unfolding high pressured situation." That's where Mr Iloski gives opinions which he asks this Court to accept. And when I get around to it, I'm going to test him on those opinions but--

25 CASSELDEN: They're not opinions, they're matters of fact.

FERNANDEZ: I'm going to test him on those matters of fact then.

30 CASSELDEN: He doesn't express an opinion as to whether or not she was competent to be a control--

HER HONOUR: I think that's right Mr Fernandez. They are matters of fact, how many hours CR1 has spent over these things.

35 FERNANDEZ: He asked your Honour to draw an inference.

HER HONOUR: No. I think just go straight to what you want to put to the witness, Mr Fernandez.

40 MURPHY: Just to assist your Honour, in the following paragraph, para 150--

HER HONOUR: If we could have that up again please?

45 MURPHY: There is a second sentence in that paragraph, 150, is "Notwithstanding those challenges she was able to function and undertake a number of important tasks in response to the unfolding high pressured situation".

HER HONOUR: Well that is an opinion, yes.

50 MURPHY: I also do note that Mr Iloski has acknowledged that a number of



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matters in this statement are better dealt with by submissions. They have been formally withdrawn but he has acknowledged that they are not matters that are appropriately dealt with by way of questions and should be submissions.

5

HER HONOUR: Yes.

FERNANDEZ

10 Q. Mr Iloski, let me put this to you. In CR2's first statement, I'm just going to summarise - I've just taken you to it actually - that can be taken off the screen. In CR2's first statement he made no mention of anyone else and he said he was able to locate the person we know as Mr Cauchi on his own on the CCTV footage.

15

CASSELDEN: I thought your Honour had rejected this line of questioning?

FERNANDEZ: I'm trying to ask a question to move to the fact, to the important issue, if I could--

20

HER HONOUR: What's the fact?

FERNANDEZ: I'm trying to do it, your Honour. I can't do it in one question, I've got to break it down before I can take Mr Iloski to the question. So if I could just put the questions and go to the issue.

25

HER HONOUR: Just one moment. Yes Mr Jordan?

30 JORDAN: The problem is that if you are to extract in isolation propositions from CR2's first statement, it is not a fair reflection of CR2's evidence before this Court, and to do it in isolation and to be asking what are - really I guess Mr Iloski who is not there, who is not necessarily across the body of evidence before this Court, to take those matters in isolation and ask for an opinion from Mr Iloski's perspective is not of any assistance whatsoever. And there is  
35 clearly a body of evidence, a significant body of evidence, which supplements and puts into context the very first statement that CR2 gave very shortly after the appalling incident, and in circumstances where the effects of those incidents were very close, and he himself has given evidence explaining how, with the benefit of some space away, he's been able to reflect and provide  
40 your Honour with a better recollection as to what he can recall.

And it's not just CR2. There is CCTV footage of a control room from which it is possible to perceive what was being seen on screens being used by CR2 at a particular point in time. There is evidence from Mr Tyson Rogers that he was  
45 giving that direction to the control room, and there is evidence of CCTV of Mr Rogers behind Inspector Scott at those times on the radio. So it is entirely artificial to pull out that very first account in those stressful circumstances in isolation and ask this witness to provide an opinion in relation to that.

50 FERNANDEZ: What I was going to do was to take Mr Iloski to CR2's three

statements, and your Honour indicated after an objection was made that that wasn't going to assist your Honour. I understand that. So I'm going to go to the fundamental proposition that I need to go to, but I have to explain to Mr Iloski as a matter of fairness what was said in three statements, and then I'm going to put a proposition to him.

HER HONOUR: There is very little weight that I'll be able to put on the evidence from this witness given his position Mr Fernandez, and it's certainly a matter for submissions.

FERNANDEZ: As your Honour pleases.

Q. Mr Iloski, I'm going to ask for a document to be placed up on the screen, tab 1270. Can you see that this is in particular a blank document but it's a Scentre document called "Site Orientation Checklist", can you see that?  
A. Yes.

Q. Can you see in the very first line it says, "For use at all centres to ensure first time workers (required to be inducted) are orientated to the centre", can you see that?  
A. Yes.

Q. It's part of the service agreement signed between Scentre Group and Glad Group that there be induction of Glad employees when they go to a Scentre Group, is that correct?  
A. Yes.

FERNANDEZ: Thank you. That can be taken off the screen.

Q. Have you ever been shown the operational minutes relating to discussions by Scentre staff and Glad staff including Cameron Stuart about the guards at Glad in the period into the start of 2024? Have you ever seen anything like that?  
A. No.

Q. When you referred to the new mode of training that Glad Group now has, if I'm correct your evidence was what you're more interested in is comprehension, not scores, is that correct?  
A. Yes.

Q. Is that accurate? What you're looking at is people who are prospectively wanting to become security guards, you want them to understand what it is not simply pass a test, is that correct?  
A. Yes.

Q. I want you to imagine a security guard who - who's already been trained as a control room operator, who's asked in a red book audit, what are the two main objectives in an active armed offender situation and that security guard fails that answer, do you understand the question?  
A. I do yes.

Q. It's a very basic piece of information, isn't it?

A. (No verbal reply)

5 Q. What are the two main objectives in an active armed offender situation.  
That's basic isn't it?

A. Sure.

10 Q. If that security guard failed to answer that question properly, what would  
that indicate to you about the security guard's comprehension of their role?

CASSELDEN: I object. It's devoid of context. I mean we're again looking at a  
very isolated issue without the full background in relation to the hypothetical  
15 person, and again I come back to the initial submission I made a moment ago,  
we have here a CEO who is divorced from operational matters, doesn't train  
security officers, deals with the relationship and things only come to him, to  
use his words, when they're catastrophic and we're looking at a breach of a  
contract, how can this assist your Honour with the greatest of respect to my  
learned friend?

20 FERNANDEZ: The problem is this witness has come along and given this  
evidence in this court and he's asking your Honour to accept his evidence and  
he's given evidence about comprehension, so I press the question.

25 HER HONOUR: I think the problem is whether this is the right person to be  
asking that question. I hear what you're saying about comprehension rather  
than scores but we've got a lot of evidence already about the - CR1's progress  
and scores and opinions and I think it is - it's probably a matter for submissions  
at this stage of the evidence.

30 FERNANDEZ: I'll end my examination then but just before I do I'm going to  
make an invitation based on the fact that submissions have been made about  
whether Mr Iloski is the correct witness to give evidence or not. I'm going to  
invite senior counsel for Glad Group to withdraw paras 79 to 91 of Mr Iloski's  
35 statement and to withdraw paras 147 to 150 of Mr Iloski's statement and to  
withdraw para 102 to 103 of Mr Iloski's statements, all of which refer to the  
performance of Glad staff on this day, on the basis of his own objection that it's  
not going to have any weight, I'm going to make the invitation that they be  
withdraw.

40 CASSELDEN: I can indicate to your Honour that I had this very discussion  
with my learned friend last week and that I was quite happy to withdraw  
particular paragraphs. I haven't taken a note in terms of what's just fallen from  
Mr Fernandez's lips but I will take what he said on board and I'm happy not to  
45 press particular paragraphs that go to the issue in relation to the assessment  
by this witness in relation to certain personnel.

HER HONOUR: Yes, thank you Mr Casselden. Then that's a matter for  
submissions.

50

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FERNANDEZ: Those are my questions.

HER HONOUR: Thank you.

5 CHRYSANTHOU: No questions from us.

ROFF: Nothing from me.

10 CALLAN: I have no questions, thank you.

CHIU: No questions.

CLARKE: No questions.

15 JORDAN: We have no questions.

HER HONOUR: In court 2, does anyone have any questions?

20 MATHUR: No, thank you.

FRECKLETON: No, thank you.

WILSON: No, thank you.

25 LYNCH: No, thank you.

HER HONOUR: Anything arising Mr Murphy?

30 MURPHY: I have no questions.

HER HONOUR: I'm sorry Mr Casselden?

CASSELDEN: Nothing arising your Honour.

35 NO EXAMINATION BY MS CHRYSANTHOU, MR ROFF, DR FRECKELTON,  
MR CHIU, MS CALLAN, MR JORDAN, MR CASSELDEN, MS CLARKE,  
MR GNECH, MS MATHUR, MR PEN, MS ROBB, MR WILSON AND  
MR LYNCH

40 <THE WITNESS WITHDREW

MURPHY: The next witness is Mr Murtaza Manzoor, he's the CEO of  
Falkon Manpower.

LTS:DAT

<MURTAZA MANZOOR, SWORN(2.36PM)

[REDACTED]

5

[REDACTED]

[REDACTED]

10

[REDACTED]

[REDACTED]

15

[REDACTED]

[REDACTED]

20

[REDACTED]

[REDACTED]

<EXAMINATION BY MR MURPHY

25

Q. Could you please state your full name for the record?

A. Murtaza Manzoor.

Q. Your current occupation?

30

A. I'm the CEO of Falcon Security - Falcon Manpower Solution, we're trading as Falcon Security.

Q. You've given two statements in this matter, the first dated 10 January 2025 and the second dated 14 April 2025, is that right?

35

A. Yes.

Q. They are at tabs 1581 and 1581A of volume 41. Do you have any changes that you wish to make to any of those statements?

40

A. No.

Q. Those statements are true and correct?

A. Yes. As per my knowledge.

45

Q. I'd like first just to deal with the Falcon business and what it is involved in. I understand that Falcon is a labour supply company, is that right?

A. Yes.

Q. What does that mean?

50

A. We don't have, we don't have our direct contracts of security contracts in Australia. We, we provide manpower to other security companies, whenever

they need any security staff, they request us on ad hoc basis or a permanent basis, depends. So whenever they request we just provide them a competent, licensed security guard as per the law. We check all of their compliances, if they are valid and once every - check - all the checks are done we just hand over that security guard to the company. They then later, whoever the company, in this case it was Glad Security, they do all the trainings - like from that day - from that onwards, they do all the site induction training and they prepare the guard for that specific site.

5  
10 Q. I think you just said in your evidence that it's competent and licensed security guards?

A. Yes.

Q. How do you assess whether a guard is competent?

15 A. If they have got the licence, the licence has been issued by New South Wales licensing authority. A licence is issued to a person who do - who does his security course from approved training institute. Once he's approved - once he complete his training, New South Wales Government issue them the - offer - give him the licence and then the licence means he is capable enough to do the, the security guard duties.

20  
Q. When guards approach Falkon to go on the books as a Falkon employee, is there any other assessment undertaken when you interview those guards, in addition to them being licensed or is them being licensed sufficient?

25 A. No we don't do any other assessments, we only do the basic inductions. Like we tell them our health and safety policies, different policies we go through, Falkon policies like on their induction and obviously they've been taught in their training back in - like as to get the security licence obviously they've been trained. What their duties are, apart from site specific training that we - that even we can't give them because we don't have an access to the site. Whoever our client is, they - like once we hand over, they do all the rest of the trainings, provide the rest of the trainings to the guards.

30  
Q. Does Falkon only provide manpower in the security industry?

35 A. We - at the moment yes but we used to provide cleaners back in the past as well.

Q. So previously you would provide manpower to cleaning operators?

A. Yes.

40  
Q. In a similar model to your security?

A. In a similar model yes.

Q. How many employees does Falkon have?

45 A. It varies because it's all ad hoc work, so it varies time to time but at the moment it's 30 plus.

Q. 30 plus?

A. Yeah.

50

Q. Are those guards directly employed by Falkon?

A. Few - yes, 30 plus I am talking about they are direct guards.

Q. What are the other arrangements? Are there other guards?

5 A. We have other - it depends on the contract we have in place with our clients. There are contracts where we can - because it's more - it's the nature of ad hoc work, so sometimes we get - we get the staff from other secure - like labour hire companies, we grab the staff from them as well.

10 Q. Are they - do they become employees of Falkon or do they remain employed--

A. No, they don't become - no, they remain their employees. We further subcontract - like we call them as Falkon subcontractor. But it all depends on the nature of the contract we have in place.

15

Q. With the ultimate client. We'll come to that issue shortly. Is it a requirement that security guards have first aid training before they can work with Falkon?

20 A. First aid, as per the licence, first aid is valid for three years so we keep, keep an eye on that. If, if it's expiring we advise all the guards to go and do their training because - to refresh their first aid. If the, the deadline approaches and they don't do their refresher, we stop giving them the shift until unless they get their first aid refreshed.

25 Q. Turning to the relationship between Falkon and Glad in respect of Westfield Bondi Junction, we understand that Falkon is an authorised subcontractor of Glad, is that right?

A. Yes.

30 Q. How long has it been an authorised subcontract of Glad?

A. We started back in 2021 and then for - in between for almost eight to nine months we didn't get any work - we did something but then after like eight to nine months we didn't get any work at all and then again I think we started again at Bondi in 2023. 2023 we started again.

35

Q. When you talk about being - from 2021, was that in relation to Westfield Bondi Junction?

A. That was all around different Westfields. Not only specifically Bondi. It was all ad hoc, whenever they require a guard.

40

Q. With the Glad Group?

A. Yes.

45 Q. There's evidence before this inquest that the Glad Group took over the security contractual arrangements at Westfield Bondi Junction from September 2023 onwards.

A. Yes.

50 Q. Was it upon that time that in relation to Westfield Bondi Junction, Glad Group provided ad hoc security to--

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A. To Falkon yeah. At that time we started providing them the security at Bondi.

5 Q. Did you previously provide subcontracting services to the previous operator?

A. Not at Bondi.

Q. You don't know who did?

10 A. No. I don't know.

Q. What was involved in becoming an authorised subcontractor at Westfield Bondi Junction?

15 A. Well, the, the contract with Glad is not specifically to Bondi, it's a general contract. I'm not sure what documents or what - because from our end, we don't need to do anything, it's between Glad and Westfield, they, they get us approved, I'm not involve in that process, I don't know.

Q. You're not involved in that process?

20 A. No.

Q. Would Glad ask you for information that they need to provide to Scentre in your experience or any other--

25 A. Well, if whatever the documents they record, they request us, and then we provide them, but we don't know whom they're providing to, like, it's - yeah, because as per the contract, the current contract, if they require - because obviously everything is more like compliance purposes, like, all the documents they request from us, and being, being the contract surface level agreement between us, obviously we have to provide that compliance, but it's all related to operational, like, the company registration, insurances in place, WorkCover, 30 and all those things, not, apart from that, nothing.

Q. How does the process work where, generally speaking from Falkon's perspective, how much notice do you get about guards that might be required on an ad hoc basis?

35 A. Well, it should be - I can get a call now to provide a guard in next one hour or two hour or four hours, it depends.

Q. In your dealings with Glad in relation to Westfield Bondi Junction, does it tend to be short notice or do you have advanced notice that you--

40 A. Well, as we working, as been working, you know, at Bondi, like, since September 2023, we have a pool of guards, like, who have work once or twice or maybe a week or maybe two weeks or maybe he continued for a month, so we have a pool of guard. Whenever they request us a guard, we go back to that pool of guards and see whoever is available and we send them. It might 45 be a notice of four hours, it might be a notice of - it can be a notice of one week, it depends on the nature of the job.

Q. Do you provide guards at other sites that Glad is responsible for?

50 A. Yes. Yes.



LTS:DAT

Q. Other than Scentre sites?

A. Yes.

5 Q. Do you provide ad hoc guards to the security operators at other Scentre sites that Glad isn't responsible for?

A. Yes.

Q. Do Glad provide the uniforms that staff wear or is that from Falkon?

10 A. No, Glad provides. It's normally the plain white shirt, black pants, which the guards buy themselves, and, but the logo and the badges, they put the Glad's badges, they put on.

Q. In the period prior to the events of 13 April 2024, would you regularly meet with Glad?

15 A. We have monthly meeting with them.

Q. Who attended those meetings? This is in the period before 13 April.

20 A. It was either myself or another director, Umar, or if we both are not available, then our operations manager, he used to attend those meetings.

Q. Who would attend those meetings from Glad?

25 A. It could be all of their - either operation manager or a security manager, it depends, sometimes Cameron, Cameron, sometime Rod, it all depends, whoever was available.

Q. Were those meetings site-specific or client-specific? Would you meet to discuss with Glad all the issues or would it deal with one particular shopping centre?

30 A. All the issues we feel, if there is any issue, we discuss.

Q. What else was discussed at those meetings?

35 A. It all depends, like, what issue. We go for the issues, we look, we discuss compliance issues as well, if there is any site-specific issues going on, we address those as well. So it, it's just like operational meeting, anything related to operations or maybe accounts, it all depends.

Q. Based on the evidence in the statements that you have given in this matter to date, it appears that GLA2 was an employee of Cogent Security & Services Pty Ltd, is that right?

40 A. Yes.

Q. Does that mean she wasn't an employee of Falkon?

45 A. No, she was an employee - we - unfortunately it was a mistake made by our operations and accounts team. As I said before, we have other sites as well where we use the employees of a subcontractor, so I don't know how operations team book her on the site and that the thing got neglected, nobody notice that. Operations team was thinking that she is a direct employee of Falkon, but she wasn't. We, we, we didn't know until this whole thing happen.

50 Q. You would be aware Mr Iloski has given evidence this morning that he

LTS:DAT

wasn't aware of this?

A. Yes.

Q. The fact that she was a subcontractor?

5 A. Yes.

Q. Glad's conditions and its supplier agreement with Falkon provides that they won't accept any subcontracting unless there was express written consent, do you agree?

10 A. Yes.

Q. What you're saying in this instance is that this was an oversight--

A. Yes.

15 Q. --on the part of Falkon, is that right?

A. Yes.

Q. Is GLA2 still an employee of Cogent Security & Services?

20 A. She's been on WorkCover.

Q. Now that you are aware that GLA2 was a subcontractor of Falkon, have steps been taken to ensure that doesn't occur in the future?

25 A. We have implemented few extra cover that all the operations team and accounts team, once they - if they're booking any same staff to two different, like, to two different sites, every operation manager and my accounts team, everyone has to sign off one document that, so that they should know if the guard is directly employed or is through a contractor.

30 If it's - if our contractor..(not transcribable)..it, it should be - if it's directly employed site, that's - we need to make sure that that should be the directly employed staff should be booked on that site, a contractor should not be. So we have taken some steps to make sure. I have set up a new team in it, like, they're going to be reviewing. We have reviewed everything and they're going to keep an eye. We, we will put a monthly check on these things, we're going to review everything, like, just to make sure that we are not breaching any of the contract.

35 Q. Is there a written policy or procedure in relation to this?

40 A. Yes. Yes, we have implemented. If you want, I can show you the policy.

Q. Yes, if you could provide that to counsel assisting, that would be of assistance. In that review of the subcontractor and direct employees that Falkon used, did you identify any other instances where a subcontractor had been deployed at a site where it was meant to only be direct employees of Falkon?

45 A. This was the first incident, so because - and it was an oversight. Obviously we make sure that all the, the - if - we honour all of our, our contracts, so that was just an oversight by the operations team.

50 Q. Turning to the training that Falkon provides to its staff, at a general level,

does Falkon provide any training to its employees?

5 A. We just do only the inductions, basic induction, like, we go through all of our policies with the staff and, and we just - like, it's just, like, when, when I record them an interview, we just go through, or induction, we just go through all of the policies with them, and just the general duties they're going to be taking, like, on the site requirements, like, we just go through basic requirements, what site job duties will be with them. So apart from that, no, no specific training.

10 Q. When you are going through that process with a prospective guard, do they know which site or do you know which site they're going to be going to at that point in time?

15 A. It depends, case to case. Sometimes if, for example, at Glad they, they, the have two position available in Bondi, let's say, they're going to ask, they ask us, like, "We need two guards for this specific job. That will be their job duties. Can you please recruit two good guards or just see in your pool whatever the guards you have, just see if they are capable enough to do these job, just provide us the best guards capable enough of this criteria," and just we - then we shortlist and, and at that time once we know, we explain to the 20 guard what will be the job duties, what he should expect, all those things, and then we hand over those guards to Glad.

25 Q. Do you propose or provide any information in relation to those guards? If you're asked to provide the three best guards, does Glad ask you for more information in relation to those guards once they're proposed?

30 A. Well, it, it all depends. The best guard is, like, in security, the best guard is the one who is good with the customer service. So whoever is good with the customer service in spoken language, every client prefer those because it's, obviously security industry is - the, the, the main job is observe and report, so all detail if a situation occurs.

35 So the, the first priority of every client is to provide a guard who is really good with customer service. Obviously all the guards here are not capable, some are shy, some has got communication issue, obviously they are not good communicator. So being in touch with the guards, we know the guards who are good with the communication skills, who has got IT skills, who - the, the guards who are good with the computers, CCTV cameras, all those too. We shortlist, select the three best guards and propose or provide those guards to the Glad, and it's up to them whether they want to keep them or not, it's up to 40 them, we just propose.

45 Q. When you gave evidence earlier that you provide competent and licensed security guards, part of the aspect of competence or an additional aspect includes Falkon has its own understanding of the qualities and experience of the guards and what they can provide, is that right?

A. Yes.

Q. That's from your own assessment and feedback received from clients?

A. Yes.

50

LTS:DAT

Q. In terms of in your second statement, you give evidence about there's an internal orientation by Falkon--

A. Yes.

5 Q. --on general workplace safety and expectations. What does that involve?

A. We, we, as I said, we go through all of our policies, like, if it's a health and safety issue or anything, if something comes up, what we require of a guard. It's almost - they have already got such trainings in during their course, but we just revise them, like, what if, if something happens, like, what will be your  
10 action, what you're going to be doing? If, obviously if they have to report to the control room, what steps do they need to? Like, how they can communicate. Because the first thing we told the guard is your safety comes first, you need to keep yourself safe. Do not indulge into anything. Your safety, your team's safety, people's safety comes first, everything is apart from that.

15

Q. That training or the induction process is general information?

A. It - yeah, it's general information.

20

Q. Does it include any information or training in relation to active armed offenders?

A. No.

25

Q. Other than the general propositions that you've already indicated in terms of you need to keep yourself safe?

A. Yeah.

30

Q. Do you think that there's an opportunity to provide active armed offender training and on a general level to guards?

A. We are looking into it. I'm just organising an online training for my staff.

Q. You're looking into it currently?

A. We, we have work with the, the Glad as well, Glad has implemented those trainings. Falkon is paying for the, every guard, for, like, the training because we've been charged for that so Falkon is paying for the trainings of each  
35 guard.

Q. Paying Glad?

A. Yeah. Not Glad. To, to, to the company who charge, it's--

40

Q. I see, yes, and that includes active armed offender training?

A. Yes.

45

Q. Is there any other training or scenario testing that's provided by Falkon to its guards?

A. No.

50

Q. The evidence you've given earlier is that, for the most part, they are matters that the client delivers in relation to a specific site?

A. Yes.

Q. Is it right just in summary that, and this is from your evidence, that prior to the incident on 13 April, the policy was that Glad or Scentre, as the case may be, would be responsible for providing an online induction for security guards, is that right?

5 A. Yes.

Q. And a site-specific induction?

A. Yes.

10 Q. Other than the internal orientation that we've just addressed which deals with matters generally, Falkon was simply providing employees?

A. Yes.

15 Q. You also give evidence that Falkon employees couldn't start site-specific induction or start work until the online induction is completed, is that right?

A. Yes.

Q. That's the Glad online induction?

20 A. Yes.

Q. That was the case prior to 13 April?

A. Yes.

Q. And it's still the case current?

25 A. Yes.

30 Q. In your second statement, if we just bring that up at paragraph 8 very briefly which is tab 1581A, I just wanted to ask you, this deals with the events that occurred on 13 April 2024. You weren't present at Bondi Junction on the day, were you?

A. No.

Q. Where has the information in that paragraph been obtained from?

35 A. Once when, when all this happen, the, the same day I just flied out from Brisbane to Sydney and we went to the hospital to see Muhammad. At that time in the hospital Muhammad, myself and two other guards, Usman and Fahad, they were all there. They were looking after Muhammad. So we had a general discussion what happened? We tried to disclose what, what, different - because all the three were present on that day and so they, they described us what happened, what steps they took, so all the information came from that  
40 general meeting I had with me, myself and my operations team, we had with Fahad, Usman and Taha - Muhammad.

Q. So this is a summary of the information that they provided to you?

45 A. Yes.

Q. Would you accept that in the circumstances where her Honour has evidence from those individuals and from others who were present at Westfield Bondi Junction, that the best evidence comes from them, is that right?

50 A. Yes.

Q. I understand that after or during that meeting, this was at the hospital, is that right?

A. Yes.

5

Q. An incident investigation report was prepared?

A. Yes.

Q. That was prepared two days after the events of 13 April 2024?

10

A. Yeah.

Q. I understand that was prepared by Mr Hamid Pir, is that right?

A. Yeah, yep.

15

Q. What's his role?

A. He's look after operations.

Q. So he's in charge of operations at Falcon?

A. Yes, mainly Bondi Junction.

20

Q. The report was finalised, you finalised that report?

A. Yes.

Q. You've already indicated that involved, and it's recorded in the report, that you spoke to Muhammad Fahad, Muhammad Taha and Usman Khokhar for the purposes of preparing that report?

25

A. Yes.

Q. We don't need to bring it up, but I just wanted to read a few aspects of that report for you.

30

A. Yeah.

Q. And this does deal with Mr Tahir but none of it is sensitive information. Just reading from the report, "Faraz, being new to the role, was anxious yet excited and was asking Taha" -so that's Muhammad Taha is that right?

35

A. Yep.

Q. "Questions related to their duties, referencing the site induction he had just undergone", and the moving ahead in that document, "Faraz and Taha", this is after observing people running in a panic, "moved towards the crowd to assess the situation and determine if there was any threat that needed to be reported to the control room". Then it gives an account of the attacks on Mr Tahir and Mr Taha, and it says that:

40

45 "Faraz turned towards Taha after being attacked, which gave Taha a moment to brace himself and attempt to defend against the attacker. As a result, Taha was able to avoid being stabbed in more critical areas."

50 Is that taken from evidence from Mr Taha that he told you?

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A. Yes.

Q. There's then later statements that, "Taha tried to assist Faraz, moving him to a nearby couch", that also came from Mr Taha?

5 A. Yeah.

Q. And then finally that:

10 "Faraz demonstrated immense bravery and courage, sacrificing his life to protect others. Security officers are generally limited in their ability to respond to such extreme situations, often placing them in vulnerable positions."

Is that right?

15 A. Yeah.

Q. Do you agree that all of those matters are accurate in that report?

A. As per my knowledge, yes. But I'm not sure whether they are accurate because I haven't gone, seen the real investigation.

20

Q. But so far as they talk to the bravery of Mr Tahir, they are accurate?

A. Whatever is mentioned in there it's all come from Usman, Taha and the other guy, Fahad.

25 Q. But you agree Mr Tahir demonstrated great bravery on the day in question?

A. Yeah. That's what they told me.

30 Q. I understand that Falkon continued to provide support to employees after the event, is that right?

A. Yes.

35 Q. And at paragraph 16 of your second statement you say that you established communications with the families of Mr Tahir and Mr Taha, is that right?

A. Yes.

40 Q. At paragraph 17 you say that, "Falkon provided practical and emotional support, including liaising with the New South Wales police"--

A. Yeah.

Q. --"on behalf of families"?

A. Yeah.

45 Q. "Assisting the families with communications and referrals, administrative support relating to workers compensation entitlements and insurance claims", and that you've remained in close contact with the families of your employees throughout the aftermath of the incident?

A. Yeah.

50

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Q. Those matters are continuing?

A. Yes.

5 Q. Is there anything else that you'd like to say in relation to what Falkon did in response to the incident in relation to its employees and how you supported them?

10 A. Well we have obviously our operations team members, they are in touch with the families, and they've been in - like whatever emotional order support there - we just providing that, and we - as - in Falkon we, we work like a family. It's not like the employ - there is a gap between the management and the staff - my team is in touch with their boys 24/7. If there any issues any staff faces they just discuss it with my team, so we are in touch with them all the time.

15 Q. And that's continued onwards after the incident?

A. Yeah, yeah.

20 Q. Dealing now with the response of Falkon at an operational level rather than dealing with its staff, what steps were taken immediately in response to the events on 13 April by Falkon?

A. In what scenario? Like in what sense?

Q. From an operational perspective in terms of guidelines, procedures, training, what was the immediate response to the events?

25 A. Obviously we, we worked more - like, we, we had the meeting with the Glad Security and with their management and we wanted to implement different - we propose - like implemented different things like stab-approved vests we implemented, so, and obviously there was few extra trainings been implemented so that I think they are more scenario based trainings, like - the main thing was like we being a contractor, we didn't have much, like, we much have control of the, what's going on, onsite, like we're not involved in the procedures or training or anything.

35 But as part, apart from that being, Falkon as an employer - like a company, what we did is we were in touch more with the boys, like just wanted to give them an idea, like look this thing happened so we - emotionally and we tell, like my operations team have told them like look don't put yourself in danger at all as, as a basic rule of security. Don't - your safety, your team safety and the public's safety comes first. That's the only thing we have told them. But apart from formal training, no, nothing, we haven't done.

40

Q. I'll just come back to this issue shortly, but dealing with the meeting with Glad, that was in September 2024, is that right?

A. I don't recall.

45 Q. In your statement it's 11 September 2024 is the date?

A. Yeah, should be, yeah.

Q. In your first statement at paragraph 10 and 11. That was with Iloski?

50 A. Yes.



Q. And Ms Chase at Glad Group is that right?

A. Yes.

5 Q. Your evidence is that that was to review changes to security operations at Westfield Bondi Junction and discuss changes to training and induction for the Glad Group?

A. Yes.

Q. Who organised that meeting?

10 A. It's, it's normally - like I requested them, like that we need to - I have few things to discuss with the management and then we organised the meeting and we went.

Q. Was there anything else discussed or anymore detail that you can provide us in relation to what was discussed during that meeting?

15 A. I ask like, I ask for the, the material, the trainings, like what trainings and materials, the new changes implemented, what are the changes, what are the trainings and all those things? I had requested that if you can provide me all those trainings, like details. Because the problem is I don't have any access to  
20 those trainings. All the trainings, they go straight to the boys' email address and they do online training. So I don't, I have clue, like what trainings me and my boys are doing, or are doing still now. I don't know what trainings my guys are doing. So like I raised that question in that meeting that if they can provide me all those trainings, so that at least being an employer I should know what  
25 trainings my guys are doing.

Q. I think you might have touched upon it at the end of your answer, but why did you ask for that material, given Falkon's role?

30 A. Because I know it, it was a public site, but still I need to know, being an employer I need to know what my guys are being trained. If there is anything missing I should organise. Though I have a very limited resources, we are a small company, but still if there is any lapses I should have this on my behalf.

Q. You've given evidence that you don't have that material currently. Would that be of assistance in your role given you're an authorised subcontractor of Glad to receive that material?

35 A. If it is, if it can use, definitely.

Q. And the assistance that it would provide is that you would be aware of the training that your guards are receiving, and also that incoming guards would be receiving from the Glad Group, is that right?

40 A. Yes, yeah.

Q. We understand from evidence in the brief that there are now monthly operational meetings between Glad and its subcontractors which includes Falkon, is that right?

45 A. Yes, but it, it has been from the day first that we have a monthly meeting every month.

50 Q. Mr Iloski has given evidence this morning that they were scheduled

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monthly but they sometimes wouldn't occur because people's schedules would clash?

A. Yeah, definitely.

5 Q. And there's now a much greater emphasis on those meetings occurring on a monthly basis?

A. Yeah.

Q. Is that right?

10 A. Yes.

Q. Do you attend those meetings?

15 A. Depends. Sometimes I do, sometimes - it depends on my availability, but if I'm not, as I said earlier, either a second director or maybe my operations team member, someone attends that meeting.

Q. In general terms, what's the content addressed at those meetings?

20 A. As I said before, like it's all issues or any concerns or anything, we just have just those things.

Q. Do you give feedback to Glad during those meetings about anything--

25 A. Yeah we do, we do give them the feedback, any issues we're currently facing, what could be - what, what changes we think need to be done and how we make things better. Obviously it's, it's a mutual thing. They, they request few things from us. We request them - it's a general meeting, we discuss different issues.

Q. Are you able to give any examples of issues that you might raise with Glad or feedback that you've provided recently?

30 A. I'm not recall, I can't recall anything.

Q. If concerns were raised by you by guards that are employed by Falcon about their safety, is that something you would raise in those meetings?

35 A. Haven't been raised any safety issue.

Q. No, I'm not saying there has been, but is that something that you would raise if they had been raised with you, or if they were raised with you?

A. If, if, yeah, definitely we will talk to Glad.

40 MURPHY: If we could just bring up Mr Manzoor's second statement at para 19.

45 Q. This follows, there's the meeting on 11 September 2024 with Glad, and then there's your statement and your evidence is, "Following that review Falcon implemented additional measures" and then you list the number of matters. Just to understand them better. So there's the phased provision of stab-proof vests for deployed staff. Is that by Falcon or by Glad?

A. No, it's by the Glad.

50 Q. Then paragraph (b) on the next page is the introduction of mandatory

online video induction models addressing armed offence threats. Is that Glad?  
A. That's Glad comply, as I said, they, they having introduced a new training online modules. It's been implemented by Glad but we paying for that for each guard.

5

Q. You're paying for that?

A. Yeah.

10 Q. There's also strengthen internal protocols for incident reporting and immediate emergency response. Is that Glad too?

A. That's - they, they have, like they have to, like I can see there is a, there is an improvement in those things, like they are addressing more of these things now in the operational meetings as well. So there's, there's a more focus from Glad on these things now.

15

Q. So (a), (b) and (c) are things that Glad has done, not Falkon?

A. No, yeah.

20 Q. Okay, it's just the chapeau to that paragraph is Falkon implemented additional measures?

A. In the meeting, like obviously wanted to say that we work with, like we discuss with, with Glad and these are the changes we recommended or have implemented.

25 Q. In relation to subparagraph (d), it's Falkon has continued to advocate for broader changes in the industry standard, including mandatory active armed offender scenario training for all personnel. Is that something Falkon is doing?

30 A. Yeah, that's what I said, we are in talks, we are organising different trainings, like online modules for the staff, so I'm, I'm just looking for the budget as soon as like the new, I'm going to be organising, so we going to be implementing this thing for my entire staff.

35 Q. When you talk about understanding the changes for staff, but in terms of advocating for broader changes in the industry, what does that involve from your perspective?

40 A. Being in security industry for last I think 12 years, I think like what has done has - what has happened is happen, no-one can change that, but the thing is what we can do is being honest, I recommend like being in security - like if you can on the major entrances, if you can have a security walk through gates - same thing happen - if you know same thing happen in Melbourne yesterday as well.

Q. Yes.

45 A. So no-one can stop this. So if - either we can ban machetes or we can stop people entering into the shopping centres any walk through gate or a security on the major entrances, that's going to help a lot.

50 Q. We'll come to your recommendations you identify shortly. You also in your second statement - and that statement can come down now - refer to embedding a culture of safety at Falkon.

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A. Yeah.

Q. Can you just explain what that means to you?

A. What sorry?

5

Q. What that means to you? So what it means by embedding a culture of safety?

10 A. Yeah that's what I said like I have in - we have implemented that's - we are in the induction, mandatory induction we tell the guards like your safety comes first. Do not put yourself into danger. If you see anything - because you know security guard, we are not cops. We, we have a very limited role and very limited training. So do not put yourself in danger. Your main job is observe and report. That's the only thing.

15 Being obviously the, the industry or the guards we - the work we doing, it's all ad hoc. Like as Falkon is, is involved for the ad hoc work. So if any contractors or any break, breakdown happen, they request for the guards so why you guys going to put yourself in danger for nothing? So the, the main thing is your safety, your staff, your colleague safety and the public, general  
20 public. Anything happens, just call the triple-0 or your control room and report. That's your job, so that's what we've been advocating to all the staff.

Q. So the two key messages that you give to your staff and think apply more generally is keep yourself safe?

25 A. Yeah.

Q. And pass on information?

A. Yes.

30 Q. Just closing off this topic and just to confirm, have Falkon made any changes to its policies and procedures following 13 April 2024?

A. Little bit more of advocating like in the induction verbally explaining the duties to the guards, like what they need to do. It's been all verbal, not in changes generally, not in the, in the policies but we - it's already in place in the  
35 policies but we just advocating them further, giving more emphasis.

Q. In terms of recommendations and changes that may arise as a result of the events of 13 April, in your second statement you refer to - this is at page 2:

40 "Scenario based training specifically addressing armed offender events was not standard across subcontracted or directly employed guards at the time. Falkon acknowledges that such specialised training could significantly enhance preparedness in extreme scenarios."

45

A. Yes.

Q. Is that in relation to the industry generally or in relation to Westfield Bondi Junction?

50 A. It came after the incident so I believe it should have to be general for

everyone, like being in the security industry, it has to be for everyone.

Q. That's acknowledging of course you don't know the exact training that's provided to the ad hoc guards?

5 A. Yeah.

Q. But based on your knowledge, they didn't receive any scenario testing - scenario based training at Westfield?

10 A. I don't know. That's what I'm saying.

Q. Steps haven't been taken to implement such training at the Falkon level, is that right?

15 A. We are taking steps, yeah, that's what I said. Like if I come to know there isn't any, then definitely I will implement because I don't want to be double doing but for other clients yeah obviously being Falkon, we're not working only on Bondi, so definitely I'm working on it.

Q. What does that involve from your end in terms of working on it?

20 A. Online - obviously I will be organising online trainings, or maybe a seminar in six months or a yearly, once in a year, organise a webinar or seminar for guards workshop, just to tell - just to organise like what they need to scenario based training I can organise that for the staff.

25 Q. At paragraph 20 of your second statement, if we can just bring that up again, you set out some recommendations for further consideration by her Honour and the Court. I just wanted to go to four of them. We've touched upon mandatory active armed offender scenario training for all guards at public sites. We understand from evidence given in the inquest that Glad now has mandatory training for active armed offenders including on induction.

30 A. Yeah.

Q. And there was training at the relevant time under the red book audits for guards--

35 A. Yeah.

Q. --in relation to active armed offenders, but your proposal is that it should be mandatory for all security staff, is that right?

A. Yes.

40 Q. Another possibility is that Falkon provide active armed offender training, is that right?

A. Yes.

Q. That's something you'll give consideration to?

45 A. Yes.

Q. Stab-proof or stab-resistant vests is another proposal.

A. Yes.

50 Q. We understand that those now have been rolled out at Scentre shopping

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centres that Glad - that is the security contract are at, is that you're understanding?

A. Yes.

5 Q. Are you aware of any feedback that's been provided by the Falkon ad hoc employees in relation to the use of stab resistant vests?

A. They didn't like it. It's too heavy.

Q. Those complaints are continuing, or those issues still being raised?

10 A. They get - they now used to obviously. Initially when we - when it was implemented, nobody liked it because it was too heavy, it's too much burden and they were walking all around so it was hard for them but now they are used to. The complaints are going down.

15 Q. But despite the complaints, they've continued to use them?

A. Yeah. Because it was a policy outside they have to use it.

Q. So they have used them yes?

A. Yeah.

20

Q. Are any other shopping centre operators or other security companies mandating the use of stab-resistant--

A. No.

25 Q. --vests to your knowledge?

A. Not, not of my knowledge.

Q. So Glad's the only company?

30 A. No, we are working on other shopping centres as well but nowhere implemented.

Q. So Glad is the only company that has implemented them yes?

A. Yes.

35 Q. Just dealing with two other issues which is at (g) and (h). It may be beyond your expertise to comment on them but they've been included in your statement but you say there should be development of media reporting standards to ensure sensitive handling of mass casualty incidents.

A. Yes.

40

Q. Can you comment on the issue from the perspective of your staff? Is that why you've raised that issue?

45 A. Because I, I went to the funeral of Faraz and we all were very sad but the way the media - I'm not going to say the national media. There were bloggers, YouTube bloggers, the way they were communicating, that was hard, hard heartening, but obviously I was, I was getting sad what they were reporting, so we need to have like some control on those things.

Q. This is social media?

50 A. Social media, yes.

5 Q. In relation to the second - subparagraph (h) there which is the creation of centralised communication platforms for families seeking information during emergencies, was that something that you experienced in relation to Mr Tahir and Mr Taha? Is that why you've raised that issue or what's the idea behind this?

10 A. It was all scattered at that time, like there was not a centralised sort of a thing which I felt. It was all scattered like different departments were working separately, like, and nobody knows what's going on, initially, but later on all synced up but initially obviously it, it was not properly synced.

Q. Was that an issue that the families of Mr Tahir and Mr Taha - given you communicated with them?

15 A. No it's not a comment from them. It's my personal opinion.

Q. Are there any other learnings or reflections that you or Falkon have had in response to the events on 13 April 2024?

20 A. I think I have already mentioned in my statement like what recommendations and what - so I'm not sure like could be.

Q. Is there anything else that you wanted to say to her Honour or the Court while you're here today?

A. No I'm all good, thank you.

25 MURPHY: Those are the questions.

<EXAMINATION BY MR FERNANDEZ

30 Q. My name is Lester Fernandez and I act for the family of Faraz Tahir.

FERNANDEZ: Could Mr Manzoor's second statement tab 1581A be put up on the screen please to the top of p 2?

35 Q. I want to ask you about what's in your statement at the very top of the page there, because what you say is before deployment Falkon ensured that all of its guards, including Mr Tahir and Mr Taha, had completed a site specific induction facilitated by Glad Group supervisors. You can see the whole of the sentence there.

40 A. Yes I can yeah.

Q. With all of your guards, how is it that Falkon ensures that they've had a site specific induction? What is it that you do?

45 A. The, the, the process is like whenever we book someone for the - like Faraz, we book the Faraz for a shift, Glad NOC department, they advise us like they have sent an online link to the guard, "Please follow up with the guards and make sure they complete their induction before arriving on site, because if they arrive on site without completing them, we've going to send them back. They are not allowed to work without completing that induction". So we were following up with the guards. We don't have an access to that one so I'm not  
50 sure the guard has completed or not so I had to go back to the NOC

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department, Glad's NOC, and check with them that the guard has completed or not.

5 Q. When you said NOC, could you spell that?  
A. N-O-C, NOC.

Q. Do you know what that stands for?  
A. National operating centre.

10 Q. That's an induction before someone actually goes out to a site, is that right?  
A. Yes.

15 Q. What about a specific induction at the site once the guard gets there, is that something that you're interested in, whether the guards get a specific induction at the site?  
A. Whenever a guards arrive on site, he needs to report to the control room. He goes to the control room of Scentre Group like in Bondi. On - in these control room there is a site manager who does all the other trainings with him, 20 like give them a site specific training, handover the radios, sign on, he sign on over there, sign off over there, he explains him all the procedures on site. I, I have - we are not been aware what guard does, so there - like what trainings they been done by the guard supervisor, but it is, it is - it is a way that every guard has to do.

25 Q. Did you just say you're not aware of what the induction is at the site?  
A. Yeah.

30 Q. Could we go down please to paragraph 16 and 17 of your statement? In court today is Mr Muzafar Tahir. Have you ever met him before?  
A. I haven't met but my operations manager Shajar Ahmad, he's been in touch with him.

35 Q. Shajar, he has spoken once to Muzafar Tahir. Is that your understanding?  
A. No he has been in touch with him, he's been taking to him to his medical appointments as well.

40 Q. Did Shajar tell you that did he?  
A. Yes.

Q. When you say at paragraph 17 that Falkon gave practical and emotional support including liaising with New South Wales Police, just in relation to the Tahir family, what is it that Falkon did in terms of liaising with New South Wales Police?

45 A. Shajar was dealing everything, he was being in touch with the superintendent of police and he was in touch with Tahir's family as well. So he, he helped - like he was, he was representing Falkon and he was being dealing with the - all the legal departments at that time.

50 Q. Do you mean he was representing Falkon in speaking to New South Wales



Police? This is Shajar.

5 A. He did. Like he was giving statements, he was helping them out, reaching out to Tahir's family, because his - all of his family was overseas and we didn't know - I don't know his internal - his contacts. So it was Shajar was - he's been - he's from a specific community and Shajar is, is, is from the same community, so he find all the relations like contacts of his - Tahir's family, he contacted everyone. Maybe he's not directly communicated with his brother but maybe somehow - someone in his community, so he was dealing with everything.

10 Q. Just finally, could we scroll down to 20H, please? Do you remember being asked about a centralised communication platform for families seeking information during emergencies? That's a recommendation that you've made.

15 A. Yep.

Q. Can I let you know that the Tahir family, they heard from other people, before they heard from New South Wales Police, that Faraz had been killed?

A. Yep.

20 Q. That could have happened in many ways. Have you ever spoken to your staff about making sure that information that they might have is not given to other people outside of the organisation?

25 A. No, that's what I told to my - that's why Falkon is - nobody knows that Falkon was, Tahir was Falkon's employee. We, we, we were very conscious we don't wanted to give any false statements or anything goes into the media, we don't wanted that. That's why we kept the privacy of Faraz, Faraz family, everything. That's why you never heard Falkon before maybe before this trial.

30 Q. Just leaving aside whether Faraz was a member of Falkon or an employee of Falkon, have you ever asked any guards that work for Falkon whether they gave information about Faraz having died on this day, having been killed?

35 A. I told the guards, like, do not - because most of the guards, I know there was heaps of things going on, on social media, and people were spreading rumours, incorrect information, so I, I ask all of my staff, "Do not give any statements until an official statement comes out," because incorrect info or incomplete information is how the problem is, and I withstand all of my staff, "Please do not speak to anybody, do not speak to media, don't go onto media."

40 That's why Taha, he - like, for the last - first I think one month, he didn't went onto the media and I, I told him, like, "Look, it's, it's up to your choice if you want to, but being, being" - I can say I told him that, "I'm your elder brother. Being an elder brother, I suggest to you not to go onto media. Let the dust settles down, media calm down. Then if you want to give any statement, then do go."

45 FERNANDEZ: Those are my questions, your Honour.

HER HONOUR: Thank you.

50 ROFF: No questions, your Honour.

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CHRYSANTHOU: No questions, your Honour.

HER HONOUR: Mr Jordan?

5

JORDAN: We have no questions.

HER HONOUR: Mr Casselden?

10

CASSELDEN: No questions, your Honour.

CALLAN: No questions, your Honour.

HER HONOUR: Mr Chiu?

15

CHIU: No questions, your Honour.

HER HONOUR: I'll just go to court 2, does anyone have any questions?

20

MATHUR: No, no questions, your Honour.

FRECKELTON: No questions, thank you.

WILSON: No questions, thank you.

25

LYNCH: No questions, your Honour.

HER HONOUR: Thank you. Ms Clarke?

30

CLARKE: Your Honour, I believe Mr Manzoor has something to say to the families.

35 WITNESS: I just want to say a little bit about the incident, what happen, and I want to express my feelings as well. Today, with a very heavy heart for the families who lost loved ones, the friends left in grief, the members of the public who were present that day, the pain experience is not something that fades with time, to every person affected, I express my sincere and personal condolences. I recognise and acknowledge your grief. Please know that I see your pain. I am deeply sorry for the raw and painful sorrow that this tragedy  
40 has brought into so many lives.

45 Among those affected were the members of my team, we lost Mr Faraz Tahir, a security officer who carried out his duties with integrity, calmness and professionalism. Faraz was doing what he always did, taking responsibility seriously, showing care for the public and being present in service of others. His actions were courageous and his loss has been deeply felt by all of us, not just as colleagues but as people who knew him as, as a kind, reliable and respected member of our workforce.

50 I also recognise Mr Muhammad Taha, another member of my team who was

seriously injured in the same incident, I recognise his bravery and I am grateful for his courage on that day. Like many others here today, I know that Muhammad's life will never be the same again. I am here for him and his family and will continue to support his recovery.

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The tragic events at Westfield Bondi Junction have left a deep and lasting impact on us all. To the first responders and to all those involved on that terrible day, I recognise your service, your bravery, your dedication to those who are vulnerable and to saving lives. I thank you for your passion, commitment and dedication to your chosen service, and the humility and the dignity with which you undertook your duties. I thank you for your care and commitment to my staff. To Inspector Amy Scott, words cannot accurately capture your bravery and professionalism, you placed your own life at risk to save others, thank you.

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As this inquest proceeds, I acknowledge that nothing can undo what happened on 13 April 2024. The loss, the grief and the trauma it caused will stay with many for a long time. To the families, I understand and empathise with your distress at the invasion of your private grief, the lack of respect given to your loved ones. In that, an unnecessary trauma that you have had to live through, seeing the events of that tragic day play repeatedly in the media, I share your anger. Our deepest hope is that in time, the families, friends and all those affected may find space for healing, strength to carry forward and comfort in knowing their pain is recognised and shared.

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Thank you.

HER HONOUR

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Q. Thank you, Mr Manzoor.

A. Thank you.

HER HONOUR: Anything arising?

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MURPHY: Nothing arising.

HER HONOUR

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Q. Thank you very much, Mr Manzoor, you're excused.

A. Thank you.

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NO EXAMINATION BY MS CHRYSANTHOU, MR ROFF, DR FRECKELTON, MR CHIU, MS CALLAN, MR JORDAN, MR CASSELDEN, MS CLARKE, MR GNECH, MS MATHUR, MR PEN, MS ROBB, MR WILSON AND MR LYNCH

<THE WITNESS WITHDREW

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MURPHY: Your Honour, there are no further witnesses today. Tomorrow, Assistant Commissioner Peter McKenna and Deputy Commissioner

LTS:DAT

Wayne McKenna will be giving evidence and propose to start at 10am if that's convenient to the Court.

HER HONOUR: Thank you. We'll adjourn until 10am tomorrow.

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AUDIO VISUAL LINK CONCLUDED AT 3.37PM

ADJOURNED PART HEARD TO TUESDAY 27 MAY 2025