

# TRANSCRIPT

## INTEGRITY AND OVERSIGHT COMMITTEE

### Performance of Victorian Integrity Agencies 2020/21: Focus on Witness Welfare

Melbourne—Monday, 9 May 2022

#### MEMBERS

Ms Harriet Shing—Chair

Mr Brad Rowswell—Deputy Chair

Mr Stuart Grimley

Mr Dustin Halse

Mr Jackson Taylor

Ms Vicki Ward

Hon Kim Wells

## WITNESSES

Mr Sven Bluemmel, Information Commissioner,

Ms Joanne Kummrow, Public Access Deputy Commissioner, and

Mr Annan Boag, Assistant Commissioner, Privacy and Assurance, Office of the Victorian Information Commissioner.

**The CHAIR:** Good afternoon, everyone. I declare open this public hearing for the Integrity and Oversight Committee's review into the Performance of Victorian Integrity Agencies 2020/21: Focus on Witness Welfare.

My name is Harriet Shing. I am the Chair of this committee. At the outset, I would like to note that this review may well contain information that is difficult or indeed traumatic for people to be part of or to listen to, whether in the public gallery or online. If indeed that is the case, I would urge anybody so affected to contact Lifeline on 13 11 14 or alternately Beyond Blue on 1300 224 636.

I would like to introduce my colleagues on this particular committee: Deputy Chair Mr Rowswell, Mr Halse, Mr Wells, and joining us online Mr Grimley, Mr Taylor and Ms Ward.

I acknowledge that we are meeting today, at least here, on the traditional lands of the Woiwurrung/Wurundjeri people of the Kulin nation. I pay my respects to Elders past and present, and I also acknowledge any Aboriginal or Torres Strait Islander leaders or emerging leaders who are either joining us today or participating in proceedings online or as part of the public gallery.

To witnesses: all evidence that is taken by this committee is protected by parliamentary privilege. You are protected against any action for what you say here today, but if you repeat the same things outside of this hearing, including on social media, those comments will not be protected by this privilege. Any deliberately false evidence or misleading of the Committee may be considered a contempt of Parliament.

All evidence given today is being recorded by Hansard, and you will be provided with a proof version of the transcript for you to check once it is available. Verified transcripts will then be placed on the Committee's website. Broadcasting or recording of this hearing by anyone other than Hansard is not permitted.

Without further ado, I might invite you to provide a brief contribution of no longer than 5 minutes, and I will give you the wrap-up should you be going close to time, before we then head into questions. So, Commissioner, over to you.

**Comm. BLUEMME:** Thank you, Chair, and thanks to the Committee for the opportunity to make the brief opening statement here today and for the opportunity to answer your questions. I am joined today by my colleagues Joanne Kummrow on my left, Public Access Deputy Commissioner, and Annan Boag, Assistant Commissioner, Privacy and Assurance, on my right. Unfortunately, Deputy Commissioner Rachel Dixon has succumbed to COVID and is unable to be with us today, but Ms Kummrow, Mr Boag and I look forward to discussing OVIC's performance during the 2020/21 period, noting the Inquiry's focus on witness welfare.

For the relevant period, the theme of our annual report was building resilience, and this was a deliberate reflection on the first full year during which OVIC as well as the agencies that we regulate worked under pandemic conditions for a full 12-month period. Most of our staff of course worked from home during that period, as did staff from many of the agencies that we regulate.

In the freedom of information space we saw another year of record numbers of FOI applications in Victoria. Clearly the public's appetite for information did not decrease during the pandemic, and I would say that that should not be a surprise. At OVIC, we experienced a small reduction in the number of applications we received for review of agency FOI decisions, and we were indeed able to improve our timeliness in finalising such reviews. However, we received a substantial increase in the number of complaints we received about agency delay in FOI decision-making. These trends were evident in a special report my office published in April of this year titled the *State of Freedom of Information in Victoria from 2019 to 2021*. During the year, we also commenced important policy and research projects into agency attitudes to FOI and information release with a view to allowing us to improve access to government information in Victoria more generally. We also

commenced our first own motion investigation into the timeliness of FOI decision-making in State and local government agencies in Victoria.

In the privacy space, we worked extensively with agencies involved in pandemic response to ensure that activities such as contact tracing and verification of vaccination status occurred in a way that minimised the collection, use and disclosure of personal information.

Prior to the pandemic, we were also selected to host the 54th forum of the Asia-Pacific Privacy Authorities, or APPA, in December 2020. It was originally of course planned to be held in person, but I am pleased to say that my office successfully hosted this international forum using videoconferencing technologies over the course of three days.

The year 2020/21 was also the first full year of operation of the information security incident notification scheme. Under this scheme, Victorian State and local government organisations are required to report certain security incidents to my office. We use the information gathered through the scheme to improve security practices across the sector and to identify overall information security trends and emerging issues.

Across all these three areas of FOI, privacy and information security we have now commenced in the order of 20 investigations, audits or examinations since the office was established in 2017. The procedures and policies under which my office takes such action are documented in OVIC's *Regulatory Action Policy*, which is publicly available, and since August 2020 we have also published our regulatory priorities on our website each year. So while the volume of our proactive regulatory action is low, reflecting of course the size and resources of the organisation, the complexity involved in the investigations, audits and examinations can be high. My office has been working to ensure that our approach to regulatory action is fair, measured and mature, and this has included particularly working with the Victorian Inspectorate, and is reflected in material previously provided to this committee. With that by way of opening statement, we would be pleased to answer any questions that you may have.

**The CHAIR:** Thank you, Commissioner, for that opening introduction, and thank you to all of you for attending today. I do wish your colleague a speedy recovery, and I hope that she is watching online with the interest that is no doubt captivating everybody else as part of your evidence here today.

I would like to understand better the nature of the post-interview debriefing process and the way in which witnesses have been engaged within the course of investigations into timely responses, or the lack thereof, in terms of timeliness, what that investigation process has looked like, what the process for debriefing has looked like and the way in which those preliminary observations have been formulated by the OVIC as they relate to witnesses.

**Comm. BLUEMMEL:** Great. Thank you, Chair. I am very happy of course to answer that. Just to confirm the scope of the question, we are talking there about the report that we have undertaken into timely FOI information release?

**The CHAIR:** Timely FOI—that is correct, Commissioner. Sorry, my apologies if I did not make that clear.

**Comm. BLUEMMEL:** No, no. I thought that was the scope. That is perfectly clear. I will ask Mr Boag to comment on that in a little more detail. In fact, it was primarily a team under Mr Boag's direction that undertook the day-to-day work of the review, or the investigation I should say, which led to the report.

Just by way of clarification in terms of the scope: we have not actually used any of our coercive powers in this report. We interviewed individuals, but that was in a broader sort of information-gathering approach rather than compelling them to attend as such, and, again, Mr Boag will be able to provide a bit more detail there. But in fact—I am sure my colleagues will correct me if I am wrong—we have never actually used our coercive powers to require attendance of a witness. We have on a couple of occasions used coercive powers to require the production of a document, and in most, if not all, of those cases that was actually at the request of an agency, where the agency wanted to be completely sure that providing the information to us did not put them in some sort of trouble with some other party.

**The CHAIR:** Is that because you have had 100 per cent voluntary compliance?

**Comm. BLUEMMEL:** Broadly speaking I think that is essentially right, yes.

**The CHAIR:** If you could just perhaps get back to us on that.

**Mr WELLS:** What is your secret?

**The CHAIR:** No, no, because there is a distinction there to be made between a voluntary compliance and a decision being taken not to pursue a matter further, which means that a compulsion might not then be brought into effect. So I am happy for you to take that one on notice should you wish. If you are happy to confirm that you have had 100 per cent voluntary compliance without the need to compel attendance, that would be helpful.

**Comm. BLUEMMEL:** Well, I think the way I can put it, and obviously I will correct this if following today's hearing I find that I need to correct it of course—

**The CHAIR:** Sure.

**Comm. BLUEMMEL:** but my understanding is that we have not had to compel this because we have had compliance. However, in that small number of cases—there was one case in the year 2019/20 where I utilised the power under the FOI Act to compel production of a document using coercive powers and reported that action to the Victorian Inspectorate, as I am obliged to. That was, as I said, at the behest of the agency in terms of its level of comfort that it could provide the document to me. In terms of what it means more broadly, just because we have not had trouble getting hold of documents where we have needed to of course does not mean that we have always agreed with everything agencies have done in the performance of their functions that we are reviewing—put it that way. So I would not want to raise expectations too high.

But on the investigation into delay in FOI and information release, we picked five agencies whose practices we wished to investigate. The report was commenced during the year under review—it was subsequently tabled in Parliament—and in that case we did interview, I guess, broadly—yes, you could say—witnesses from agencies. But I will just ask Mr Boag to outline how that process worked, because it was much broader than sort of some of the more targeted investigations perhaps of other bodies that may be appearing before you today.

**The CHAIR:** Great. Thank you. Assistant Commissioner, again, we are just looking for systemic responses too, so please do not go into of the detail of individual matters, to make sure we are not falling foul of our obligations under section 7(2) of the [Parliamentary Committees] Act [2003 (Vic)].

**Mr BOAG:** Sure. I suppose I can sort of illustrate the approach that we took to conducting interviews and preparing witnesses for those interviews in that and other matters. Although these procedures are not at the moment really documented in a whole lot of detail in our processes and procedures, we have got a fairly standardised approach that we have got worked out in the matters we conduct, and the case that you raised is one that illustrates it.

In that matter we were investigating issues that were causing delay in FOI systemically and individually at agencies, and so we sought to speak to people who were involved in FOI processing at each of the agencies involved. We had identified three individuals—two or three individuals—at each agency we sought to interview, and we asked to meet with them voluntarily to talk about their perspectives on delay. Some of these were quite junior staff—some of these were quite junior FOI processing staff—so we were conscious that we had to make the investigation something that they understood and were not overly stressed by. There was a pre-interview briefing that we held with each set of witnesses. We met with all of the people that we were interviewing at each agency together so they could together understand what was happening and ask any questions about the process. We outlined things like what the agenda would be and how the interviews would be conducted and how breaks would be provided. When we conducted each individual interview, we had a script up-front, which ran through what people's rights were and how the matter would run. And then, after each of the interviews, we again met with the group of people that we had interviewed to debrief on some preliminary findings and to again answer any that they had. All the witnesses had a contact point at OVIC that they could follow up with afterwards. There were not any concerns raised by witnesses following the matters, but of course we were available to talk about any concerns that they had.

**The CHAIR:** Thank you very much, Assistant Commissioner. That is very helpful. I will now defer to you, Deputy Chair.

**Mr ROWSWELL:** Thank you very much, Chair. Commissioner, good afternoon. We have a special focus on witness welfare this year. What do you see as systemic issues in this space? Can you help us identify from your perspective what those issues might be, and have you considered any solutions to them?

**Comm. BLUEMMEL:** In terms of witness welfare I am afraid our experience is just that limited. In most cases our requirements under the Act are to undertake reviews, for example, with as little technicality and formality as possible. Obviously we take that quite seriously, and in the vast majority of cases we are able to do that—on the papers, files are fairly apparent. It is actually fairly rare that we need to talk to witnesses as such, and, as I said, we have never actually had to exercise the coercive power to call in someone to give any kind of information or evidence, which is pleasing. So I am afraid we are not particularly well qualified to do that.

What we have been doing is trying to be proactive in that regard should the need arise more in the future for us to exercise those powers, and in that regard we have actually been working closely with the Victorian Inspectorate and his office to formalise those processes, policies and procedures—and indeed I think they have been provided to this committee. Basically, we are going off the information that we are getting from the likes of the Victorian Inspectorate, who see this a lot more than we do, given their broader oversight role. So I am afraid there is not a great deal we could add other than the general issues of which I am sure you are already aware—that clearly giving evidence in that sort of context can be quite traumatic. The issue of being more junior staff, for example—there can be particular vulnerabilities there. All of these things are reflected in the documents that we are drafting at the moment—issues about cultural background, language difficulties, other vulnerabilities and so on. I think those are all really important, valid issues, but I suspect you are already well and truly across them.

**Mr ROWSWELL:** When do you expect those draft documents to be finalised, what form will they take and will they be made publicly available?

**Comm. BLUEMMEL:** Our default is always wherever possible to make them publicly available. We are hoping, I think, to have things finalised by the end of this financial year—I think it would be safe to say by the end of June. As I said, we will by default publish everything. The sort of considerations that may lead some of the information to not be publicly available might be if disclosing it publicly would allow somebody to manipulate the decisions about how we gather evidence and so on, but the bar is set pretty high for us to not publish.

**Mr ROWSWELL:** Will it be a compulsory process for staff to engage and be educated upon these new processes?

**Comm. BLUEMMEL:** Well, we will certainly need to educate those relevant staff in the office that would have those touchpoints with witnesses. We would certainly have to do that. Whether we do that internally or whether we engage external help, they are probably decisions that are yet to be made based on what the documentation is.

**Mr ROWSWELL:** Thank you. Thank you, Chair.

**The CHAIR:** Great. Thanks, Mr Rowswell. Mr Grimley, you indicated that you were happy to provide time for your questions to others. Mr Wells, I might throw to you.

**Mr WELLS:** No. I am happy.

**The CHAIR:** No. You are happy with Mr Rowswell's questions as asked. Mr Halse, over to you.

**Mr HALSE:** To follow on from Mr Rowswell's question, you note that you have taken advice from the VI with respect to the witness welfare framework. What is the primary theme that you have taken from that advice?

**Comm. BLUEMMEL:** I might ask Mr Boag to elaborate on that, who has been present in all of the discussions with VI. But I think broadly speaking they are the sorts of things we have already touched on about being proactive about these sorts of issues, being aware of particular vulnerabilities, sensitivities, and that issue of, I think, respect and compassion—that, yes, we may be dealing with someone as a witness, but a witness is

always a human being as well, and that is a really important thing for us to take into account. I do not know if you would like to add anything to that.

**Mr BOAG:** Yes, I would certainly agree with all that. For me the point that has come out with our engagement with VI is the need for us to mature what we are doing. At the moment we have an approach that we take in the matters that we are conducting, but it is run a bit case by case. What we are doing now is trying to really formalise it to support witnesses but also to support the staff so that they know what they need to do to help people out.

The other point that has come up in our discussion with the VI is that our investigations typically are looking at whether an agency rather than an individual has contravened the legislation we are investigating. You might think that the stakes are a bit lower for the people we are interviewing than if we were looking at whether they were in breach of the law, but I think something the VI has made clear to us and which we are communicating to our staff is that everyone who is a witness in a formal legislative procedure is under significant pressure. So even though our witnesses are not going to have an adverse finding made against them or are not going to face personal consequences, they still have reputational consequences, career consequences, and we need to be aware of that.

**Mr HALSE:** Thank you.

**The CHAIR:** Great. Thanks, Assistant Commissioner, and thank you, Mr Halse. That then brings us to you, Mr Taylor.

**Mr TAYLOR:** Thank you very much, Chair. My question is: Is the COVID-19 pandemic continuing to impact OVIC's ability to conduct site inspections of Victoria Police facilities?

**Comm. BLUEMMEL:** The short answer is: not any more. Certainly during the last 18 months it has been impacted. We regularly conduct site inspections of Victoria Police facilities to identify and manage security risks. It certainly was impacted quite substantially, but I think it is safe to say that we are now over it and back to business as usual.

**Mr TAYLOR:** Thank you. Just further to that as well, of course the Committee notes that OVIC conducted three site inspections of Victoria Police facilities during the 2020/21 reporting period. Has OVIC observed any notable improvements with respect to law enforcement data management and security policies and practices?

**Comm. BLUEMMEL:** I might ask Mr Boag to clarify that or to dig into that a little bit more. Again, it is his team that undertakes the site inspections. Broadly speaking from a big picture perspective, it is difficult to say, because the threat environment is always evolving. Whenever we see one risk being managed or in some cases even closed right down, some other risk emerges. I think recently, looking at even the geopolitical situation, the risks have been changing constantly. That is sort of the only thing we can count on—that there will be new risks and there will be lots of them and they will keep growing while others change. But I might just ask Mr Boag to add some observations.

**Mr BOAG:** Thank you. I cannot add anything really to those broad systemic comments, but I can speak about the individual site inspections that we have conducted. In those site inspections we are not really looking at big trends over time or systemic information-handling issues across Victoria Police. They are really an opportunity for us to speak to members at individual units and locations to try to talk about what they understand about security and how they can improve it. So the sorts of issues that come up are important but, I would say, not large systemic issues. So they are things around labelling documents appropriately, storing hard-copy documents in the correct places, having access to archiving and security facilities and issues of that nature—adherence to Victoria Police security policies and procedures.

**Comm. BLUEMMEL:** I might just add to that, if I may, Chair.

**The CHAIR:** Of course.

**Comm. BLUEMMEL:** One of the things that we have been doing over the last couple of years is the incident notification scheme that I mentioned in my opening, with agencies now having to provide my office with notification of security incidents, which includes Victoria Police. We are seeing some really clear trends

from that, and in fact we publish every six months an insights report that looks back over the previous six months of incidents and looks for common threads, for trends and so on. And there are always some constants. One of the constants is that it is human behaviour and activity that is the biggest single factor. Most of it is quite innocent. It still leads to a problem and still needs to be addressed, but it is sending the email to the wrong email address—it is those sorts of things. Those kinds of things make up the majority of the kinds of incidents that we see. The more sophisticated, nefarious organised crime, nation-states and so on—they are real and we absolutely have to constantly guard against them, but in terms of sheer volume they make up much less than the human error.

**Mr TAYLOR:** Thank you very much.

**The CHAIR:** Thanks very much, Mr Taylor. On that basis I might, unless you had any other questions, Mr Taylor, move on to Ms Ward.

**Ms WARD:** Thank you, Chair. Thank you, everyone, for attending today. We are all interested here on the Committee in the FOI professional standards self-assessment tool that you have introduced. Have you had much feedback come through on that, and has it changed anything? What have you learned from that as that has started to be rolled out?

**Comm. BLUEMEL:** I might ask Deputy Commissioner Kummrow to answer that. We have had some responses. We have in fact highlighted a couple of those in our annual report, where we have actually quoted some agency feedback particularly on things like the self-assessment tool, but I might ask Deputy Commissioner Kummrow to go into a bit more depth.

**Ms KUMMROW:** Thank you. The professional standards came into effect in December 2019, and then the tool was developed to provide agencies with an opportunity to identify and reflect on where their agency stood in terms of its maturity in relation to the professional standards, and to do so proactively. A number of agencies have utilised the tool, which is terrific, and we are now seeking their feedback and that data through our annual report process to see how many are using it. Obviously we would like to see even more agencies taking that opportunity. It is not compulsory, certainly at the moment, and what we are learning from that is that most of them are coming back in a fairly positive way in terms of the results from that tool. So in that sense we are wanting to proactively assist agencies to be able to succeed in relation to their obligations under the professional standards and through that tool—

**Ms WARD:** So what are the positive things that they are reporting back, then?

**Ms KUMMROW:** Look, on that level of detail, I am so sorry, I would need to obtain that—

**Ms WARD:** Yes, sure. No, that is okay.

**The CHAIR:** Thematically you can respond to us.

**Ms KUMMROW:** I know I can. Overall there are a number of them participating, which is terrific, but we would like to see more, ideally, participating, and the results of the ones that are participating are generally very positive. That is one way that we monitor the professional standards. Another way is through reviews that are coming in, complaints that are coming in. So we are monitoring those issues on every matter that enters OVIC's door. Also members of the public raise issues of professional standards, and that is a great indication of a growing awareness of the professional standards. Then likewise through our stakeholder engagement we are engaging fairly regularly in education with agencies. So it is a multipronged approach. The tools are a great object to direct agencies to utilise. But I am certainly happy to take that question on notice, if I can, Member.

**Ms WARD:** Thank you. So do you think that the toolkit is actually helping them start to focus or have more awareness?

**Ms KUMMROW:** Absolutely. I think we would rather they be able to identify any issues where they may be falling below what is expected and have them address those issues proactively prior to the need for an own motion investigation, for example, or some other form of regulatory action that we may need to take.

**Ms WARD:** Thank you.

**Comm. BLUEMMEL:** I can add some information to that, if I may. Thank you.

**The CHAIR:** Of course, Commissioner. Thank you very much, Deputy.

**Comm. BLUEMMEL:** In our annual report 2020/21, on page 89, we have an update on the professional standards self-assessment tool specifically, which again I am sure you are aware of. There are a couple of comments there from agencies reproduced verbatim, basically saying it is a useful tool for them to analyse and improve their maturity. So I do not know if that is sufficient or you would like to go back further. Is that sufficient for the—

**Ms WARD:** That is great, thank you.

**Comm. BLUEMMEL:** Okay, great. Thank you.

**The CHAIR:** Ms Ward?

**Ms WARD:** No, I am done. Thank you.

**The CHAIR:** No, you are done—excellent. All right, thank you very much. I would like to turn with the time that we have left to a comment you made earlier around the inadvertent nature of sending something to the wrong email address and that that is in fact the larger part of the work that you do as opposed to these targeted systemic attacks of, I think you said, a nefarious nature—always a good word to get into the Hansard transcript. I would like, though, to talk about the way in which these inadvertent breaches, presuming they are not intentional, have been addressed through that file-sharing platform that has been introduced to allow VPS bodies to submit documents, and how in fact that has actually built upon or indeed created complexities or challenges for the secure management and receipt of information to address precisely the issue that you outlined earlier.

**Comm. BLUEMMEL:** Sure. I am very happy to answer that of course. Just to clarify: that is in relation to our secure file-sharing tool for agencies?

**The CHAIR:** Yes.

**Comm. BLUEMMEL:** So just for those that are not aware, fairly early on in the pandemic we deployed a tool that allows agencies to securely submit documents to my office. As you can imagine, when we undertake a review under the FOI Act of an agency, FOI decision, in almost all cases we need the documents that are in question, including some very, very sensitive documents. So we procured a file platform that allows us to do that. We undertook a security risk assessment and a privacy impact assessment on that. The tool has now been in operation for well over a year. It is working very well, and it complies with the standards of the Act. What we find in that regard is from a security perspective I would say it is much more secure than the old system, in the same way that if one were to accidentally leave an iPad or a laptop on a tram, it is not good, but if it is well set up, it will be encrypted and it can be wiped remotely. If someone leaves the same information in a ring binder, it is a very, very different level of exposure, and we are finding the same sort of thing with agencies submitting those documents to us. Rather than coming to us with a box of documents, being able to send them in an encrypted, secure way also allows us to minimise their proliferation. Clearly we have strong access controls at our office, and when the matter is done and our job is done, we can then delete those documents securely. I mean, a caution there: just pressing the delete button on something of course does not necessarily securely delete it; we made sure of course that our system in this case does. So from that perspective, in answer to your question, it is working very, very well. I do not know if Deputy Commissioner Kummrow would like to add any further insights to that, because it is the Deputy Commissioner's teams who receive that information primarily, and then analyse and deal with it, but certainly from the whole-of-office perspective it is working very well.

**The CHAIR:** Great. Thank you. Thanks, Deputy Commissioner.

**Ms KUMMROW:** I think from a security perspective, I have nothing further to add. Only from an efficiency perspective, from OVIC's position previously, staff at OVIC had had to attend an agency's office to view those documents, including cabinet documents, so it has made immeasurable improvement to the efficiency of our reviews. But from a security perspective, I think the security assessment that was undertaken

of it, we have had no issues there, and the reduction in emails with sensitive information being moved around government is a positive thing.

**The CHAIR:** It sounds like significant improvement has been made using digital platforms and advances in tech, but having said that, no system is perfect. This is where I would like to get a sense of what those continuous improvements look like, not just to maintain that better practice, and hopefully best practice, but to safeguard against, well, vulnerabilities, which we all know are present with increasing number and sophistication in the current operating environment, particularly as we emerge from the worst of the pandemic. So I might just get an understanding of how in fact you propose to continue to upgrade and improve the integrity of your tech and data-gathering maintenance and storage capacity.

**Comm. BLUEMEL:** Yes. What we try and do in that regard of course is the same that we expect agencies to do. So under the Victorian Protective Data Security Framework and the associated standards there are a series of steps that we have to take, and you are never done. One of the crucial steps is actually being aware of what you have and what its value and risk is, so undertaking an information asset register so that you know what information you hold, how attractive it is to someone who should not have it, how hard it is to secure and so on. It is constant. So starting from that position, knowing what you have got, constantly scanning and undertaking the assessment against each of the Victorian Protective Data Security Standards is what we expect of agencies, and we do the same thing. It does take effort. It is never set and forget, because the world changes, the risks change, the dynamics change.

**The CHAIR:** Excellent. Thank you very much for that. That brings us, I think, to the end of the time that we have available today. I suspect that there may well be a number of very general questions that will come from the answers that you have given today, so if you are prepared to accommodate those as questions on notice, that would be very, very helpful for the Committee's work in this review.

What will happen after this hearing, as I mentioned at the outset, is that a transcript will be made available to you to provide comment or feedback on. I would again like to remind you of the confidentiality obligations and privilege which attach to the evidence that you have given at today's hearing and to thank you for your attendance today. On that basis, we will declare the hearing closed. Thank you very much.

**Witnesses withdrew.**