

6 August 2018

[REDACTED]
Parliament of Victoria
Legislative Council Privileges Committee
EAST MELBOURNE VIC 3002

Partner [REDACTED]
Direct Line [REDACTED]
Email [REDACTED]
Our Ref [REDACTED]

By email [REDACTED]

Dear [REDACTED]

Stephen Donnelly

We refer to your letter dated 31 July 2018 and the attached questions for Mr Donnelly.

At the outset, we note that the questions referred to "Field Officers". We assume that you are referring to "Field Organisers". We have responded on this basis. We also note that your letter refers to "Field Officer arrangements". This term is unclear, that is, it is unclear whether you are referring to arrangements for the payment of Field Organisers or directing the questions more broadly. We have proceeded on the basis that you are referring to arrangements for the payment of Field Organisers.

The questions attached to your letter are set out below along with Mr Donnelly's responses.

1. What role did you play in the development of the Community Action Network (CAN) arrangement for the 2014 election and the decision to partially pay CAN field officers from electorate office budgets?

Over the period in question Mr Donnelly was employed by the ALP to develop the CAN which was a grassroots organising movement. Mr Donnelly had no involvement in making arrangements for the payment of those Field Organisers who were also employed as Electorate Officers, using funds from Electorate Office budgets.

2. Why were CAN field officers paid 2 days per week from Electorate Office budgets?

Mr Donnelly was aware that some Field Organisers were also employed as Electorate Officers. He did not, however, have any involvement in making arrangements for those Field Organisers to also be employed as Electorate Officers.

3. Did you participate in briefing MPs on the CAN arrangement?

Over the relevant period, Mr Donnelly had frequent meetings with ALP Members of Parliament on many issues relating to the 2014 election campaign including CAN activities.

Melbourne . Sydney . Brisbane

Level 8 555 Bourke Street Melbourne Vic 3000 DX 422 Melbourne
GPO Box 2154 Melbourne Vic 3001 T +61 3 9321 9999 www.holdingredlich.com

ABN 15 364 527 724

4. Did you have any discussions with any MP regarding the field officer arrangements and the use of electorate office entitlements?

Mr Donnelly did not have conversations with MPs about the arrangements for Field Organisers to be employed by DPS and receive payments from DPS.

5. Did any MP raise concerns with you about the use of electorate office entitlements to pay CAN field officers?

Mr Donnelly does not recollect any discussions with MPs who had concerns about the use of Electorate Office entitlements to pay Electorate Officers who were also employed by the ALP as Field Organisers.

6. Are you aware of any MP raising concerns with any other person about the use of electorate office entitlements to pay CAN field officers?

Mr Donnelly's only knowledge of MPs raising concerns postdates the 2014 election and is based on media reports.

7. Did you participate in any meetings with Daniel Andrews where the CAN arrangements were discussed?

Mr Donnelly does not recall particular meetings attended by the former Opposition Leader to discuss the CAN. While he believes that it is likely he did attend such meetings, he is adamant that meetings focussed on the CAN activities rather than arrangements for the payment of Electorate Officers who were also employed as Field Organisers.

8. Did you have any discussions with Daniel Andrews regarding the CAN field officer arrangements?

Mr Donnelly does not recall particular conversations with the former Opposition Leader to discuss the CAN. While he believes that it is likely he did have such conversations, he is adamant that, in those discussions, the focus was on CAN activities rather than arrangements for the payment of Electorate Officers who were also employed as Field Organisers.

9. What role did the ALP campaign committee have in devising and agreeing to the scheme?

We assume that the "scheme" is the grass roots organising movement known as CAN. The ALP Campaign Committee did not devise the CAN. The members of that Committee were aware of its establishment and its operation.

10. Which Labor MPs were members of the ALP campaign committee in October 2013 March 2014?

The Campaign Committee is established by the Administrative Committee pursuant to rule 8.1.2.11 of the ALP Victorian Branch Rules. As the composition of the Committee changes from time to time and some members attend through proxies, and given the elapse of time, Mr Donnelly cannot say with certainty who were the members over the relevant time period.

We trust this is the information required by your Committee.

[REDACTED]

[REDACTED]

Parliament of Victoria
Legislative Council Privileges Committee

Yours sincerely

[REDACTED]

Holding Redlich