

**INDEPENDENT COMMISSION AGAINST CORRUPTION****STATEMENT IN THE MATTER OF: Operation Gerda**

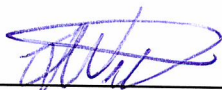
**PLACE:** Sydney, NSW  
**NAME:** Linda Kim Willard  
**ADDRESS:** Known to ICAC  
**OCCUPATION:** National Scheduling Manager Protective Services  
**TELEPHONE NO:** Known to ICAC  
**DATE:** 28 November 2018

**States: -**

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1. This statement made by me accurately sets out the evidence which I would be prepared, if necessary, to give in Court as a witness. The statement is true to the best of my knowledge and belief, and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.
2. I am 45 years of age.
3. I am currently employed as the National Scheduling Manager, Protective Service with SNP Security. I have held this position since August 2016 but I have been with SNP since 2007. I was originally employed as the National Payroll Manager and have also held the roles of project manager rostering systems and IT project manager Microster.

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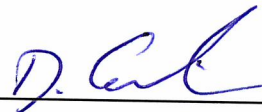
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4. In my current role the National Operations Centre ("NOC") manager, Dominic Giardini, reports to me and the NOC reports to him. I oversee the NOC from a higher level and part of my role is to ensure the contracts are still profitable. I basically work with the rostering of officers, as per the contract which at times can involve dealing with any major issues or claims. I will be involved in performance meetings for subcontractors normally as well.
5. I am based at SNP's head office in West Ryde.
6. I can say that I know a person by the name of Daryl McCreadie ("McCreadie") as I have been with SNP for 11 years and McCreadie was an account manager. I can recall that he was seconded to be the site manager at Sydney University ("the University").
7. Sydney University is the only site that basically operates completely independent and McCreadie was in charge of that. McCreadie and his team had full control of rostering including organising guards and backfilling sick and other leave. My area would receive the timesheets and they would be processed and everything entered into the system as per the timesheets received. It was one of the only sites where they would organise guards themselves instead of the NOC doing it. The university site has been operating in that manner for a long time, but even though it wasn't the norm, it wasn't broken so no-one interfered with it. The general consensus was that it was on site and it made the job of rostering easier for that reason.

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8. My area would receive these horrible handwritten timesheets on a weekly basis. My preference would have been to have them submitted on a daily basis but that didn't normally happen, it was generally weekly. One of our team members that was au fait with trying to decipher the timesheet would update the system.
9. I can say that Request for Service ("RFS's") forms come through directly from McCreadie and Emir Balicevac. I have never met Balicevac but I was aware that he was the second in charge of site operations with the Campus Security Unit ("CSU"), with SNP. An RFS is just a standard form that is completed when there is an ad-hoc request for work. The majority of the time either McCreadie or Balicevac would arrange the guards themselves. They also did this when guards would call in sick, they would arrange their own guards and just told us who was going to be rostered.
10. I can say that I am not aware of any other site that operates in this manner. The practice on other sites would be that timesheets would be completed and they would be sent to our office normally on a daily basis depending on the size of the site. If it's a relatively small site they might be sent in weekly. With sick calls they would come straight to the rostering office or the NOC room so the shifts could be backfilled. That's where the situation at the university differs as that is all controlled over there and managed at the university. In some ways it made things easier as they (McCreadie and Balicevac) knew which guards were trained in certain areas and where best to place them. There is now a training matrix in place

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which sits in the NOC room, so there is a central record that records exactly what guards can do specific shifts.

11. I can recall that SIG only worked on sites where Lisa Cooper and McCreadie were account managers.
12. I can recall that SIG started working for 'Ceva Logistics' which was Jason Woodward's client (former SNP employee) but this was before my time in the NOC.
13. In 2017, I became aware that things were not running smoothly with SIG as there were numerous complaints from Lisa Cooper whose clients raised a number of issues including a husband and wife working for SIG where they were allegedly signing on as each other, guards in unkempt uniforms or not in uniform and fatigue breach issues. These issues were escalated to having SIG brought in for a performance meeting in September 2017. Lisa was the only one who was raising concerns in contrast to McCreadie who did not raise any issues with SIG. However, McCreadie raised issues with SNP in that they were not providing uniforms to SIG.
14. On 1 September 2017, I sent an email to Tamara Bayly, Fawad Walizada and copied McCreadie and Lisa Cooper in to it. I was reiterating a conversation that I had earlier in the week with Tamara in relation to SIG that they be called in for a performance meeting. I stated, *"Lisa would have quite a bit to discuss and I don't believe we have met with them in years. It is probably long overdue, as they provide*

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*services in excess of 2000 hrs per week to SNP, yet we have not really managed them as a supplier.” Attached to my email was a list of sites that SIG worked and the number of hours worked at each site. The total hours, being in excess of 2200 for that week was typical. SIG had had these sites for a number of years and these had not grown. In terms of number of hours, I had not noticed any increases.*

15. The issues with SNP were escalated to the Risk Board which consisted of Fawad Walizada (National WHS Manager SNP), Tamara Bayly (Risk & Compliance Manager SNP) and me. Fawad initiated meetings to address the concerns and I recall I was at one of the meetings and Lynn Li was there. Tommy Sirour was not there at the time but I can recall that he phoned in from Egypt. There was another person there too but I cannot recall who that was.
16. I recall Lynn Li was/is the Administration and Accounting Manager for SIG.
17. I can recall that in the beginning of 2018, the NOC was trying to get SIG to update their compliance information, as SIG were ‘notorious’ for not sending these through. When the information was received Domenic Giardini was able to identify the fatigue issues that were escalated to the risk team and to Tommy.
18. I recall that an email was sent to SIG requesting compliance information. A response to this was received from “Frank” instead of Tommy.
19. I know Frank Lu to be a permanent employee of SNP whose role is a Team Leader at the university. However, at the time I can recall that Linda, Domenic and I were

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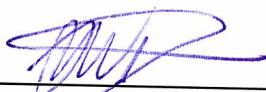

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surprised that someone other than Tommy was replying. Initially the emails would be signed off just with "Frank". We specifically asked who he was, and his position and title but all the information they got back was that he was the person doing the rostering. Domenic later found out in another email that "Frank" was "Frank Lu". In the email Frank left details about calling in sick from SNP while emailing on behalf of SIG.

20. I felt that Frank Lu's role as rostering officer for SIG was a clear conflict of interest with his SNP role. I recall asking the question *"Why didn't anybody highlight this? It's a clear conflict of interest."* The reason why I believed that it was a conflict of interest was that Frank was working for SNP but doing the rosters for SIG. As far as I am aware it is a condition of the employment contract that you cannot work for another security company
21. In relation to SNP employees working additional hours with SIG that was a practice that had been in place for a long time. I looked at this because I look at the site profitability and I can only think that it 'put in place' because it was cost effective as overtime was costly.
22. I can recall that Kerem Akkan told me that he was not allowed to do overtime unless it was with SIG and this surprised me as this is not in place anywhere else except at the university.

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23. If SIG were inflating their hours, we as SNP would not be aware of it. It would only be McCreadie or Balicevac and those in the university control room that would know if hours were not worked and still invoiced. SNP head office is reliant on the SNP employees working on site. The hours worked are signed off through timesheets, this is translated to Microster at head office, and this information is compared to what is invoiced by SIG and what is invoiced by SNP to the university. The timesheet is the record that is the source of the facts. However, if the timesheet contains false information to begin with then SNP would be relying on an incorrect source of accuracy.

24. I can say that all employees and security guards would be trained in the Code of Conduct, Conflict of Interest and Hospitality and Interaction with Clients policies. Due to this I believe that all staff would know it is a "big no-no" to accept anything that could be perceived as a gift or a benefit from a sub-contractor including things like flights, accommodation and meals. The onus is on the staff members to report it. SNP as an organisation is aware that account managers can have a too close relationship with sub-contractors and as such in 2017, Tom Roche sent an email to all staff that there were to be no meetings between account managers and sub-contractors without a member of the Risk Board being present, even if they are teleconferenced in. Meetings between only account managers and subcontractors and/or service suppliers are really frowned upon.

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25. I can recall that line marking at the university was being undertaken by a sub-contractor by the name of Complete Line Marking. At some stage McCreadie approached me about altering the arrangements to enable a person by the name of John Dirienzo (operating under the name of JRD Painting) to do the line-marking. Dirienzo was an SNP traffic officer at the university at the time. McCreadie told me that in his view, the existing sub-contractor was overpriced and that Dirienzo could charge much better rates. At that time I was looking at SNP's operations for cost savings.
26. I proceeded to contact the relevant people and make enquiries to see if there were any safety issues or conflict of interest issues. I spoke to both Sue Matley (who, at the time was reviewing and organising contracts) and to Tammy from HR. I recall Tammy saying to something to me to the effect "Basically this will have to be monitored very carefully". At the time, I think Dirienzo worked a 5 day week, 8 hour shifts. The hours he would possibly be exposed to working had to be monitored due to potential WHS issues. Sue Matley came back to me and explained that it should not be an issue as long as he has all his insurances and an ABN as it's a completely different industry.
27. On 9 February 2017, at 10:57am I sent an email to McCreadie and cc'd Balicevac, Michael Fenwick and Sue Matley. The subject of this email was "Re: Advise from HR". In this email I advise McCreadie that *"we see no issue as long as the points*

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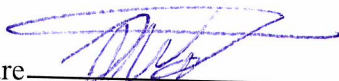
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*previously covered by Tammy is adhered to and Michael may contact you re: covering off safety. Again, this is a great initiative from you and Emir."*

28. I can say that at no time was I aware that McCreadie and Balicevac were carrying out the line-marking themselves. If I had become aware of this I would have reported it straight away. I found this out recently and I was flabbergasted. I cannot recall if it was Phil Tansey, the previous branch manager, or someone else who came to me and said something to the effect of "*Oh, Emir or somebody was doing the line marking.*" I said, "*Well, no, this is another - it's another employee called John somebody.*"
29. I recall that I spoke to Fawad about this and I said something to the effect of "*Under no circumstances did Daryl or Emir ever indicate that they would be doing the line marking.*" To me it would be a problem if McCreadie and/or Balicevac were carrying out the work as to me that's a conflict of interest. It doesn't gel right. They are basically in management with McCreadie an account manager/security manager and Balicevac is his 2IC. I was led to believe that the company engaged to do the line-marking was JRD Painting and no declarations were ever made to reflect McCreadie and/or Balicevac being linked to it in any way.
30. I would describe McCreadie as a likeable person but was not very good at getting back to me as he appeared to always be very busy.

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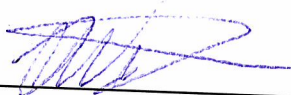
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31. I can say that I never met Balicevac but I am aware through talking to others that he and McCreadie were quite close and socialised together.

32. I knew Phil Tansey when he was an account manager at SNP and McCreadie reported to him. Tansey had personal issues and subsequently left SNP.

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