PARLIAMENT OF THE COMMONWEALTH OF AUSTRALIA

Report 1 2022

Referrals made December 2021

Parliamentary Standing Committee on Public Works

© Commonwealth of Australia

ISBN 978-1-76092-381-5 (Printed Version)

ISBN 978-1-76092-382-2 (HTML Version)

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Members

Chair

Mr Rick Wilson MP

Deputy Chair

Mr Tony Zappia MP

Members

Senator Hollie Hughes

Mr David Smith MP

Mr Tony Pasin MP

Ms Julie Owens MP

Senator Ben Small

Senator Tony Sheldon

## Committee Secretariat

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Inquiry Secretary James Bunce

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List of Recommendations

[Recommendation 1](#s79063rec1)

2.38 The Committee recommends that the House of Representatives resolve, pursuant to section 18(7) of the *Public Works Committee Act 1969*, that it is expedient to carry out the following proposed works: Services Australia — Fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland.

[Recommendation 2](#s79064rec2)

3.34 The Committee recommends that the House of Representatives resolve, pursuant to section 18(7) of the *Public Works Committee Act 1969*, that it is expedient to carry out the following proposed works: Department of Home Affairs — Proposed Fit-out of 808 Bourke Street, Docklands, Victoria.

1. Introduction

1.1 Under the *Public Works Committee Act 1969* (the Act), the Parliamentary Standing Committee on Public Works (the Committee) is required to inquire into and report on public works referred to it through either House of Parliament. Referrals are made pursuant to section 18 of the Act, and by practice are made by the Minister for Finance or their delegate in the House of Representatives or the Senate.

1.2 All public works that have an estimated cost exceeding $15 million[[1]](#footnote-0) must be referred to the Committee. The public works can not be commenced until the Committee has made its report to Parliament, the House of Representatives receives that report, and resolves that it is expedient to carry out the work.[[2]](#footnote-1)

1.3 Under section 5 of the Act, a public work is a work proposed to be undertaken by the Commonwealth or on behalf of the Commonwealth concerning:

the construction, alteration, repair, refurbishment or fitting-out of buildings and other structures;

the installation, alteration or repair of plant and equipment designed to be used in, or in relation to, the provision of services for buildings and other structures;

the undertaking, construction, alteration or repair of landscaping and earthworks (whether or not in relation to buildings and other structures);

the demolition, destruction, dismantling or removal of buildings, plant and equipment, earthworks, and other structures;

the clearing of land and the development of land for use as urban land or otherwise; and

any other matter declared by the regulations to be a work.

1.4 Section 17 of the Act requires that the Committee consider and report on:

the purpose of the work and its suitability for that purpose;

the need for, or the advisability of, carrying out the work;

whether the money to be expended on the work is being spent in the most cost effective manner;

the amount of revenue the work will generate for the Commonwealth, if that is its purpose; and

the present and prospective public value of the work.

1.5 The Committee pays attention to the above matters and any other relevant factors when considering the proposed work.

# Structure of the report

1.6 In considering the works, the Committee analysed the evidence presented by the proponent agencies, including submissions and evidence received at the public and in-camera hearings.

1.7 In consideration of the need to report expeditiously as required by section 17(1) of the Act, the Committee has only reported on significant issues of interest or concern.

1.8 Chapter 2 addresses the proposed Services Australia — Fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland. The estimated cost of this project is $89.36 million (excluding GST).

1.9 Chapter 3 addresses the proposed Department of Home Affairs —Fit-out of 808 Bourke Street, Docklands, Victoria. The estimated cost of this project is $34.26 million (excluding GST).

1.10 Submissions for the projects are listed at Appendix A. The hearings and witnesses are listed at Appendix B.

2. Services Australia — Fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland

2.1 Services Australia (the Agency) seeks approval from the Committee to proceed with the proposed fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland. The aim of the project is to consolidate the Agency’s nine current Brisbane sites (11 leases) into one fit for purpose office space by 2025 in accordance with the Whole of Government Leasing Strategy.[[3]](#footnote-2)

2.2 The estimated cost of the project is $89.36 million (excluding GST).

2.3 The project was referred to the Committee on 1 December 2021.

# Conduct of the inquiry

2.4 Following referral, the inquiry was publicised on the Committee’s website and via media release.

2.5 The Committee received one submission and one confidential submission. A list of submissions can be found at Appendix A.

2.6 On 25 January 2022, the Committee conducted a project briefing, and public and in-camera hearings via videoconference. A transcript of the public hearing is available on the Committee’s website.

# Need for the works

2.7 Services Australia is ‘responsible for the delivery of advice and high-quality, accessible social, health and child support services and payments.’ To support the ongoing delivery of these services, the Agency is seeking to consolidate nine of its currently leased sites in the Brisbane Central Business District ‘to deliver operational and financial efficiencies’.[[4]](#footnote-3)

2.8 The Agency currently leases 47,188m² of office accommodation providing 2,482 work points across nine sites (11 leases) in Brisbane. Out of the nine existing sites in Brisbane identified for consolidation, five sites are within two kilometres, and four sites are within 20 kilometres of the new building.[[5]](#footnote-4)

2.9 The locations of the nine current Services Australia sites in Brisbane are listed below:

143 Turbot Street, Brisbane;

226 Queen Street, Brisbane;

140 Creek Street, Brisbane;

400 George Street, Brisbane;

140 Elizabeth Street, Brisbane;

25 Merivale Street, Brisbane;

1283-1285 Sandgate Road, Nundah;

418-516 Logan Road, Stones Corner; and

20 Wirraway Parade, Inala.[[6]](#footnote-5)

2.10 Services Australia stated that the majority of the nine current sites are ‘approaching the end of their economic life’, and ‘to ensure efficient and effective performance into the future, they will require significant base building and fit-out refurbishment.’[[7]](#footnote-6)

2.11 At the public hearing, the Agency stated that the key objective of the proposed works is ‘to ensure the workplace is a purpose-built space that consolidates our operations in Brisbane, while enhancing collaboration and improving our operational effectiveness’.[[8]](#footnote-7)

2.12 Services Australia confirmed that the lease consolidation would not impact customer facing services and will not reduce Agency jobs in Brisbane.[[9]](#footnote-8)

# Options considered

2.13 Services Australia stated in their submission that they considered the following five options for the project:

Option 1: Renew existing leases (status quo);

Option 2: Build, own and operate a new site;

Option 3: Alternative funding arrangements;

Option 4: Occupy other existing Commonwealth leased/owned properties; and

Option 5: Lease a new site (preferred option).[[10]](#footnote-9)

2.14 Services Australia stated that the renewal of existing leases was discounted as the option would have a higher ongoing operating cost, due to the older age of the buildings, and ‘will require significant investment to ensure they are maintained to adequate operational standards.’[[11]](#footnote-10) Furthermore, progressive building refurbishments and new fit-outs across nine sites could take in excess of 24 months to complete, which would be disruptive to staff and the Agency operations.[[12]](#footnote-11)

2.15 Option 2, Build, own and operate a new site, was discounted as the Agency stated that ‘working accommodation can be most efficiently provided via commercial means’ providing better value for money outcomes.[[13]](#footnote-12)

2.16 Services Australia discounted Option 3 of using a “Public Private Partnership” or hybrid financing model to develop and operate the working accommodation as the Agency stated that ‘alternative funding models do not provide better value for money than a lease model.’[[14]](#footnote-13)

2.17 Services Australia stated that the Department of Finance was consulted regarding the availability of suitable Commonwealth accommodation (Option 4), however the Agency was advised that nothing suitable was available.[[15]](#footnote-14)

2.18 Following an approach to market in September 2019, a range of Expression of Interests were assessed over the initial 10-year period with two further five-year options. Services Australia stated that the financial and qualitative analysis indicated that Option 5 (new leased site) at 205 North Quay would provide the best value for money outcome for the Commonwealth.[[16]](#footnote-15)

# Scope of the works

2.19 Services Australia proposes to occupy 55,221 square metres (gross floor area) of mixed-use commercial building space split across 33 storeys at 205 North Quay, Brisbane.[[17]](#footnote-16)

2.20 Services Australia will be the sole office tenant, occupying 43,700 square metres of net lettable area. This represents a 7% reduction in comparison to the current net lettable area across the 11 current Brisbane leases.[[18]](#footnote-17)

2.21 The scope of works for the proposed fit-out at 205 North Quay include the following:

Integration of services into the base building works including electrical, air conditioning, ventilation, lighting control, voice and data communications, audio visual equipment, security, fire and hydraulic services;

Office accommodation including easily removable partitioning for individual offices, meeting and conference rooms, reception areas, utility and storerooms, secure rooms, training rooms, break-out and staff amenities and communication equipment rooms;

3,617 workstations (1.8 metres long by 0.8 metres deep) at a density of 12m² per workpoint, configured in an open plan layout;

Team and workstation based storage to support the staff and their operations;

Personal lockers to cater for 20% more staff to allow for future flexibility;

Loose furniture including tables and chairs for meeting rooms and lunchrooms;

14 offices for Senior Executive staff; and

195 meeting and coaching rooms of varying size.[[19]](#footnote-18)

2.22 When questioned by the Committee on the available room for growth at the new site, Services Australia stated that:

I think it's fair to say that, like most employers these days, we are trying to be a modern employer and be flexible in the way that we engage staff. There would be no surprises in saying that, over time, we will have more people working flexibly.... Exactly what that looks like is yet to be determined. But you can assume there will be a proportion of people who won't be required to come into the workplace every day. Of course, we will still require some people to come to work, simply by the nature of what we do, the sensitive conversations that they have to have and also the sensitive information that they need to handle. But the exact figures in terms of how many people will work from home or work flexibly are yet to be determined formally.[[20]](#footnote-19)

# Staff consultation

2.23 The proposed works will result in the movement of 3,559 back of house staff and corporate staff:

755 staff from 143 Turbot Street;

212 staff from 226 Queen Street;

785 staff from 140 Creek Street;

614 staff from 400 George Street;

810 staff from 140 Elizabeth Street;

185 staff from 25 Merivale Street;

52 staff from 1283-1285 Sandgate Road;

38 staff from 418-516 Logan Road; and

97 staff from 20 Wirraway Parade.[[21]](#footnote-20)

2.24 With regard to staff consultation Services Australia stated that:

During the design and development phase the agency will undertake interactive design sessions with business areas to understand the design and ensure it is fit for purpose. Staff are our key stakeholders, and their input will significantly form the design of the agency's fit-out. Staff will continue to be engaged, including from the commencement of the works through to relocation.[[22]](#footnote-21)

2.25 In response to questions from the Committee about the impact of the relocation on staff, Services Australia stated that at the time of the public hearing staff had not raised any issues or concerns.[[23]](#footnote-22)

2.26 Services Australia stated that it had been engaging with the Community and Public Sector Union (CPSU) on a fortnightly basis,[[24]](#footnote-23) and had advised the CPSU of the proposed works in December 2019.[[25]](#footnote-24)

2.27 Additionally, the Agency stated that it has created a number of interactive staff working groups:

The interactive staff working groups are actually meeting fortnightly now, every two weeks. Feedback has been positive. The design sessions are really factored in based on an understanding of the building and the future usage of the building, including new work practices et cetera. The remote locations, non-CBD locations, are included in that. To date, any issue that has been raised has been addressed in the current design or future design.[[26]](#footnote-25)

# Cost of the works

2.28 Services Australia’s proposed fit-out of new leased premises at 205 North Quay, Brisbane, Queensland, has an estimated total cost of $89.36 million exclusive of GST.[[27]](#footnote-26)

2.29 Services Australia told the Committee that funding for the lease and fit-out of 205 North Quay, Brisbane will come from the Agency's approved property-operating expenses and capital budgets and incentive contributions.[[28]](#footnote-27)

2.30 The Agency provided further details on project costings in its confidential submission and during an in-camera hearing.

2.31 Services Australia told the Committee that the proposed fit-out has an estimated cost of $2,045 (excluding GST) per square metre which ‘is attributable to the higher density proposed for the new building and reflects post COVID prices.’[[29]](#footnote-28)

2.32 The Committee is satisfied that the costings provided for the project have been adequately assessed by the proponent entity.

# Revenue

2.33 There will be no direct revenue generated by the project.[[30]](#footnote-29)

# Committee comment

2.34 The Committee acknowledges the impact of COVID-19 on the construction industry and recognises that the increases in raw materials and labour have impacted the overall budget for the project, resulting in a higher-than-average cost per square metre.

2.35 While the Committee was concerned that the number of proposed workstations does not leave much room for future growth at 205 North Quay, it was pleased to hear that Services Australia is investigating a number of flexible working options which it hopes will reduce the number of staff required to attend the workplace every day.

2.36 The Committee did not identify any issues of concern with the proposal and is satisfied that the project has merit in terms of need, scope and cost.

2.37 Having regard to its role and responsibilities contained in the *Public Works Committee Act 1969*, the Committee is of the view that this project signifies value for money for the Commonwealth and constitutes a project which is fit for purpose, having regard to the established need.

Recommendation 1

2.38 The Committee recommends that the House of Representatives resolve, pursuant to section 18(7) of the ***Public Works Committee Act 1969*, that it is expedient to carry out the following proposed works: Services Australia — Fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland.**

2.39 Proponent entities must notify the Committee of any changes to the project scope, time, cost, function or design. The Committee also requires that a post-implementation report be provided within three months of project completion. A report template can be found on the Committee’s website.

3. Department of Home Affairs — Proposed Fit-out of 808 Bourke Street, Docklands, Victoria

3.1 The Department of Home Affairs (the Department) seeks approval from the Committee to proceed with the proposed fit-out of 808 Bourke Street, Docklands, Victoria. The aim of the proposal is to consolidate the Department’s three sites in the Melbourne central business district (CBD) and Docklands prior to the expiry of the current leases.[[31]](#footnote-30)

3.2 The estimated cost of the project is $34.26 million (excluding GST).[[32]](#footnote-31)

3.3 The project was referred to the Committee on 1 December 2021.

# Conduct of the inquiry

3.4 Following referral, the inquiry was publicised on the Committee’s website and via media release.

3.5 The Committee received one submission and one confidential submission. A list of submissions can be found at Appendix A.

3.6 On 1 February 2022, the Committee conducted a project briefing, and public and in-camera hearings via teleconference. A transcript of the public hearing is available on the Committee’s website.

# Need for the works

3.7 Currently, the Department’s Melbourne presence is spread across three sites:

2 Lonsdale Street, Melbourne CBD

50 Lonsdale Street, Melbourne CBD

1010 La Trobe Street, Docklands.[[33]](#footnote-32)

3.8 Combined, these sites provide 21,526 square metres of leased office space, and all three leases will expire by March 2023 with no further options for lease renewal. Additionally, the current fit-out in some tenancies ‘are no longer fit for purpose and beyond their design life’.[[34]](#footnote-33)

3.9 As a result, according to the Department ‘it was identified that it was no longer necessary to maintain multiple leased sites’ and ‘the consolidation of the three office and operational sites would optimise operational efficiencies’.[[35]](#footnote-34)

# Options considered

3.10 The Department stated that it considered three options.

3.11 The first option was to ‘do nothing’. This was considered unsuitable as not sourcing new accommodation in light of the lack of options for further renewal at the existing leases was ‘intolerable’ as it would lead to the Department not having ‘enough office space to accommodate all staff and high-level operational facilities’. This would lead to the ‘displacement of approximately 1,740 departmental staff across 27 divisions’, putting at risk ‘the security of Australian borders’ and resulting in reduced ability to provide services to the public.[[36]](#footnote-35)

3.12 Additionally, the Department considered not conducting a fit-out of   
808 Bourke Street. However, this was discounted as:

The existing building does not meet Home Affairs high security and ICT requirements and standards. It is an essential security requirement to separate front of house (public) services from staff entrances and the existing fit-out in the new building provides no feasible way to safely and functionally achieve this.[[37]](#footnote-36)

3.13 Option two – the construction of a new building – was considered unsuitable due to the need to vacate existing sites by March 2023. According to the Department:

The time frames expected for site acquisition, consultant and contractor procurement, design and construction would be unable to be completed prior to the need to vacate existing tenancies.[[38]](#footnote-37)

3.14 The third option examined – the current proposal – was considered to meet all of the Department’s requirements and be achievable within the required timeframe. The Department noted that an additional advantage was the inclusion of a lease incentive, which ‘reduced the upfront capital investment’.[[39]](#footnote-38)

3.15 Following the examination of these options, the Department commenced work to identify suitable alternative working accommodation:

Existing office spaces between 20,000 and 25,000 square metres of quality grade space in and around the Melbourne metropolitan area, situated within a major business/residential district, with proximity to primary road transport and major public transport hubs were considered.[[40]](#footnote-39)

3.16 Of the options identified, 808 Bourke Street was considered the best proposal due to:

Total lease costs per square metre;

Total whole of life costs per annum;

Timing of building availability;

Location of the building and proximity to public transport and existing tenancy; and

The opportunity for the entire building to be leased by Home Affairs (this excludes Landlord plant/services, loading dock, end of trip facilities, a retail space and car-parking for the other adjoining building).[[41]](#footnote-40)

# Scope of the works

3.17 In its submission, the Department outlined the key considerations in developing the design of the proposed works, including:

The need to securely create two separate entrances for front of house public facing services (clients/customers) and a separate entrance for staff. This is the reason for the structural works required on the ground floor to create a new passageway. Additional entrances in the glass façade will also need to be facilitated for the same reason.

Customer service access was also a key aspect of the design consideration, particularly how to enable effective vertical transport for the customer and staff from the ground floor to levels 3 and 8 where most customer engagement will occur (Ground Floor, Level 1, Level 1A and 2 are carparks). Given the vertical distance of level three and eight, stair access is non-compliant from Disability Access and Workplace Health and Safety perspectives, therefore a dividing wall and allocation of separate secure lifts for clients and staff is being incorporated.

The security required to the new tenancy for the safety of staff and clients including both electrical and physical security. Home Affairs security standards include the requirement for CCTV, access control, perimeter treatments including hostile vehicle management, treatment to the glass and tamper-evidence treatments to the internal facades.[[42]](#footnote-41)

3.18 The proposed scope includes ‘modification of approximately 1,786 open plan work points’ and the installation of approximately 104 new work points.[[43]](#footnote-42) Currently, the Department requires space for 1,740 staff in Melbourne. The proposed works provide 150 desks to accommodate future growth in staff numbers. The number of work points will allow for each staff member to have an allocated permanent desk if required.[[44]](#footnote-43)

3.19 The design provides an occupational density of 12.42 square metres per person, compared to 11.95 square metres in the existing sites.[[45]](#footnote-44) While the Department stated that ‘the new fit-out has not been designed specifically for operation within a COVID-19 (or similar) environment’, it has considered this, and aspects have been incorporated into the proposed design.[[46]](#footnote-45)

3.20 In addition to these work points, the scope includes front of house services to the public, construction of executive offices, quiet rooms, meeting rooms and training rooms.[[47]](#footnote-46)

# Staff consultation

3.21 The proposed works will result in the movement of 1,740 staff across   
27 divisions: 157 staff from 50 Lonsdale Street; 746 staff from 2 Lonsdale Street; and 837 staff from 1010 La Trobe Street.[[48]](#footnote-47)

3.22 According to the Department:

To achieve the project objectives and maximise its benefits, comprehensive and well-structured consultation is paramount. The Department is a major employer and thus amenities have an impact on staff satisfaction and retention.[[49]](#footnote-48)

3.23 As a result, the Department told the Committee that it has consulted with the ‘Division Heads across all 27 Divisions throughout the life of the project’.[[50]](#footnote-49)

3.24 Additionally, the Department stated that it has created a project working group:

We have representatives from each building on that working group, as well as senior executive sponsors and members of the [Community and Public Sector Union]. There have actually been no negative comments or concerns raised through this working group, or through other forums which we’ve established – a mailbox, an intranet page and the like. This relocation has actually been received positively by staff.[[51]](#footnote-50)

# Cost of the works

3.25 The Department of Home Affairs proposed fit-out of 808 Bourke Street, Docklands, Victoria has an estimated cost of   
$34.26 million, exclusive of GST.[[52]](#footnote-51)

3.26 The Department told the Committee that $19.1 million is being funded by a lease incentive, with the remainder funded via internal departmental budget processes.[[53]](#footnote-52)

3.27 The Department provided further details on project costings in its confidential submission and during an in-camera hearing.

3.28 The proposed works have an estimated cost of $1,390 per square metre.[[54]](#footnote-53)

3.29 The Committee is satisfied that the costings provided for the project have been adequately assessed by the proponent entity.

# Revenue

3.30 According to the Department:

While the works will support the provision of services which generate revenue, the works will not result in a net difference in current revenue generated, as the works only seek to consolidate these existing revenue producing services.[[55]](#footnote-54)

# Committee comment

3.31 The Committee notes both the relatively low cost per square metre for the proposed works, and the fact that more than half of the overall cost is funding via a lease incentive. Coupled with an annual savings generated by reduced lease costs, this project presents a value for money proposition while also maintaining the Department’s functions and provision of services in the Melbourne area.

3.32 The Committee did not identify any issues of concern with the proposal and is satisfied that the project has merit in terms of need, scope and cost.

3.33 Having regard to its role and responsibilities contained in the *Public Works Committee Act 1969*, the Committee is of the view that this project signifies value for money for the Commonwealth and constitutes a project which is fit for purpose, having regard to the established need.

Recommendation 2

3.34 The Committee recommends that the House of Representatives resolve, pursuant to section 18(7) of the ***Public Works Committee Act 1969*, that it is expedient to carry out the following proposed works: Department of Home Affairs — Proposed Fit-out of 808 Bourke Street, Docklands, Victoria.**

3.35 Proponent entities must notify the Committee of any changes to the project scope, time, cost, function or design. The Committee also requires that a post-implementation report be provided within three months of project completion. A report template can be found on the Committee’s website.

Mr Rick Wilson MP **Chair**

A. List of submissions

# Services Australia — Fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland

1 Services Australia

1.1 Confidential

# Department of Home Affairs —Fit-out of 808 Bourke Street, Docklands, Victoria

1 Department of Home Affairs

1.1 Confidential

B. Public hearings

# Services Australia — Fit-out of New Leased Premises at 205 North Quay, Brisbane, Queensland

Tuesday, 25 January 2022 - via Videoconference

Services Australia

Ms Annette Musolino, Chief Operating Officer

Mr Marc Mowbray-d'Arbela, National Manager Property and Corporate Support

Mr Michael Nelson, General Manager, People Division

Mr Bob Lyons, General Manager, Staff Processing Systems

Mr Andew Read, Executive Director, JLL

Mr Gavin Grahame, Head of Queensland, Cbus

Mr Peter Green, General Manager, Development, Neilson Properties

Mr Andrew Butler, Associate, MBM

Ms Sarah McMahon, Associate Principal, Woods Bagot

# Department of Home Affairs —Fit-out of 808 Bourke Street, Docklands, Victoria

Tuesday, 1 February 2022 - via Videoconference

Department of Home Affairs

Mrs Lee-ann Monterosso, First Assistant Secretary, Property Procurement and Contracts Divisions

Mrs Elise Wattam, Assistant Secretary, Property Branch

Mr Ben Bryce, Director, Property Projects Section

Mr Carey Mudge, Project Director

Mrs Jennifer Moore, Director, Design Services

1. The threshold amount for a public work for Defence purposes is $75 million as per *Public Works Committee Regulation 2016,* Part II, Section 7(a). [↑](#footnote-ref-0)
2. The Act, Part III, Section 18(8). Exemptions from this requirement are provided for work of an urgent nature, defence work contrary to the public interest, repetitive work and work by prescribed authorities listed in the Regulations. [↑](#footnote-ref-1)
3. Services Australia, *Submission 1*, p. 2. [↑](#footnote-ref-2)
4. Services Australia, *Submission 1*, p. 1. [↑](#footnote-ref-3)
5. Services Australia, *Submission 1*, p. 13. [↑](#footnote-ref-4)
6. Services Australia, *Submission 1*, p. 5. [↑](#footnote-ref-5)
7. Ms Annette Musolino, Services Australia, *Committee Hansard,* 25 January 2022, p. 1. [↑](#footnote-ref-6)
8. Mr Marc Mowbray-d'Arbela, Services Australia, *Committee Hansard,* 25 January 2022, p. 1. [↑](#footnote-ref-7)
9. Services Australia, *Submission 1*, p. 4. [↑](#footnote-ref-8)
10. Services Australia, *Submission 1*, p. 6. [↑](#footnote-ref-9)
11. Services Australia, *Submission 1*, p. 6. [↑](#footnote-ref-10)
12. Services Australia, *Submission 1*, p. 6. [↑](#footnote-ref-11)
13. Services Australia, *Submission 1*, p. 6. [↑](#footnote-ref-12)
14. Services Australia, *Submission 1*, p. 7. [↑](#footnote-ref-13)
15. Services Australia, *Submission 1*, p. 7. [↑](#footnote-ref-14)
16. Services Australia, *Submission 1*, p. 7. [↑](#footnote-ref-15)
17. Services Australia, *Submission 1*, p. 9. [↑](#footnote-ref-16)
18. Services Australia, *Submission 1*, p. 8. [↑](#footnote-ref-17)
19. Services Australia, *Submission 1*, pp.9- 10. [↑](#footnote-ref-18)
20. Mr Michael Nelson, Services Australia, *Committee Hansard,* 25 January 2022, p. 3. [↑](#footnote-ref-19)
21. Services Australia, *Submission 1*, p. 5. [↑](#footnote-ref-20)
22. Mr Marc Mowbray-d'Arbela, Services Australia, *Committee Hansard,* 25 January 2022, p. 2. [↑](#footnote-ref-21)
23. Mr Bob Lyons, Services Australia, *Committee Hansard,* 25 January 2022, p. 3. [↑](#footnote-ref-22)
24. Mr Michael Nelson, Services Australia, *Committee Hansard,* 25 January 2022, p. 2. [↑](#footnote-ref-23)
25. Mr Marc Mowbray-d'Arbela, Services Australia, *Committee Hansard,* 25 January 2022, p. 2. [↑](#footnote-ref-24)
26. Mr Bob Lyons, Services Australia, *Committee Hansard,* 25 January 2022, pp. 2-3. [↑](#footnote-ref-25)
27. Services Australia, *Submission 1*, p. 17. [↑](#footnote-ref-26)
28. Mr Marc Mowbray-d'Arbela, Services Australia, *Committee Hansard,* 25 January 2022, p. 2. [↑](#footnote-ref-27)
29. Services Australia, *Submission 1*, p. 17. [↑](#footnote-ref-28)
30. Services Australia, *Submission 1*, p. 19. [↑](#footnote-ref-29)
31. Department of Home Affairs, *Submission 1*, p. 3. [↑](#footnote-ref-30)
32. Department of Home Affairs, *Submission 1*, p. 4. [↑](#footnote-ref-31)
33. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-32)
34. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-33)
35. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-34)
36. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-35)
37. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-36)
38. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-37)
39. Department of Home Affairs, *Submission 1*, p. 6. [↑](#footnote-ref-38)
40. Department of Home Affairs, *Submission 1*, p. 7. [↑](#footnote-ref-39)
41. Department of Home Affairs, *Submission 1*, p. 8. [↑](#footnote-ref-40)
42. Department of Home Affairs, *Submission 1*, p. 7. [↑](#footnote-ref-41)
43. Department of Home Affairs, *Submission 1*, p. 7. [↑](#footnote-ref-42)
44. Department of Home Affairs, *Submission 1*, p. 8. [↑](#footnote-ref-43)
45. Department of Home Affairs, *Submission 1*, pp. 4 and 6. [↑](#footnote-ref-44)
46. Department of Home Affairs, *Submission 1*, p. 15. [↑](#footnote-ref-45)
47. Department of Home Affairs, *Submission 1*, pp. 7 and 9. [↑](#footnote-ref-46)
48. Department of Home Affairs, *Submission 1*, p. 10. [↑](#footnote-ref-47)
49. Department of Home Affairs, *Submission 1*, p. 14. [↑](#footnote-ref-48)
50. Department of Home Affairs, *Submission 1*, p. 14. [↑](#footnote-ref-49)
51. Mrs Lee-anne Monterosso, Department of Home Affairs, *Committee Hansard*, 1 February 2022, p. 3. [↑](#footnote-ref-50)
52. Department of Home Affairs, *Submission 1*, p. 4. [↑](#footnote-ref-51)
53. Department of Home Affairs, *Submission 1*, p. 16. [↑](#footnote-ref-52)
54. Department of Home Affairs, *Submission 1*, p. 4. [↑](#footnote-ref-53)
55. Department of Home Affairs, *Submission 1*, p. 17. [↑](#footnote-ref-54)