Turks LEGAL

INSURANCE ▪ COMMERCIAL ▪ BANKING

LEGISLATIVE DEVELOPMENTS

- 2018 Amendments to Workers Compensation Legislation
- Bill introduced to establish presumptive rights to compensation for firefighters in respect of certain cancers

RECENT DECISIONS

- **At fault driver's injuries arose out of employment!**
  Ballina Shire Council v Knapp [2018] NSWWCCPD 35 (27 August 2018)
- **No employer fault for injury on third party work site**
  Avopiling Pty Ltd v Bosevski; Avopiling v Workers Compensation Nominal Insurer [2018] NSWCA 146 (23 August 2018)
- **Back to basics: Trial judge's obligation to make findings of fact before determining negligence**
  Bauer Media Pty Ltd t/as Network Services Company v Khedrlarian [2018] NSWCA 208 (20 September 2018)

LEGISLATIVE DEVELOPMENTS

2018 Amendments to Workers Compensation Legislation

The *Workers Compensation Legislation Amendment Bill 2018* was passed by the NSW Parliament on 17 October 2018 and is presently awaiting assent and announcement of the date for commencement.

Most notably, the new laws will abolish the current system of review of work capacity decisions by WIRO and SIRA and restore the jurisdiction of the Workers Compensation Commission to determine all disputes, including the review of work capacity decisions - effectively creating a 'One-stop Shop' for dispute resolution.

The Commission will also have the power (subject to Regulations) to determine permanent impairment disputes without referring the dispute to an Approved Medical Specialist (AMS). This may reopen the door to compromise settlements of lump sum claims where there are competing assessments of the degree of permanent impairment.

Another major change is the repeal of the current section 35 (determination of PIAWE) and the introduction of a new Schedule 3 to the 1987 Act which will change the definition of current weekly earnings, remove the current exclusion of overtime and allowances from earnings after 52 weeks, and provides a simplified definition of PIAWE.

Transitional arrangements will apply to some of the changes, which will take effect from the date of commencement.

A summary of the changes is set out in the table below. An update alert will be issued following commencement of the amendments.

New or Amended Provision	Short Description	Comment	Takes Effect	Transitional Arrangements
Amendments to section 43 of the 1987 Act; repeal of section 54 and Part 3 Division 2 Subdivision 3A of the 1987 Act; repeal of section 74 of the 1998 Act	Abolishes reviews of work capacity decisions by WIRO and SIRA; restores jurisdiction of Commission to determine all disputes, including review of work capacity decisions.	Retains internal reviews by insurers, which must be determined and a decision notified to the worker within 14 days after the request for review is made by the worker.	On a date to be appointed by proclamation.	Current provisions will continue to apply to existing WCDs during transitional review period (6 months from commencement) or if subject to review immediately before expiry of the transitional review period – until the review is finally determined.
New section 289B of the 1998 Act regarding stay of disputed work capacity decision (WCD)	WCD is stayed once dispute is referred to the Commission, provided the referral is made before the expiry of the relevant notice period under section 80.	The WCD will not be stayed if the dispute is referred to the Commission after a WCD takes effect.	On a date to be appointed by proclamation.	
Repeal of section 65(3) of the 1987 Act; new section 321A; and amendment to section 322A of the 1998 Act	Allows Commission to determine a claim for WPI without first referring the assessment to an AMS.	Subject to new regulations regarding when a dispute about WPI must or may be referred to an AMS. Note: *The determination of a dispute regarding WPI by the Commission without referral to an AMS will be treated as the 'one assessment' allowed under section 322A.*	On a date to be appointed by proclamation.	

back to top

New or Amended Provision	Short Description	Comment	Takes Effect	Transitional Arrangements
New Schedule 3 to the 1987 Act and repeal or amendment of sections regarding calculation of weekly payments	Simplifies the calculation of PIAWE and amends other aspects of calculating weekly payments.	Provides new definition for PIAWE as: The weekly average gross earnings received by the worker in any employment in the relevant period before the injury (usually, 52 weeks). And defines *earnings* in a week as: The income of the worker received for work performed in any employment during the week.	On a date to be appointed by proclamation.	*Earnings amendments* do not apply to injury sustained by a worker before commencement of the amendments (except a limited application to weekly benefits for injuries sustained between the date of assent and date of commencement of the amendments).
New Part 7 of Chapter 2 of the 1998 Act	Deals with the collection, sharing and use of personal and other information by insurers and the Authority. Introduces a scheme for the mandatory notification of breaches of the Workers Compensation Acts.	Subject to new regulations.	On the date of assent.	
New Division 3 of Part 2 Chapter 4 of the 1998 Act	Deals with notification of insurer decisions to worker and the period of notice required. Effect of stay of decision on the notice period.	Provides for a single form of notice whether disputing liability for a claim or reducing weekly payments; period of notice to be given to worker of decision by insurer; sections 54 and 74 repealed and replaced with new sections 78, 79 and 80.	On a date to be appointed by proclamation.	
New section 87EAA of the 1987 Act	Commutation of medical expenses compensation is not permitted for worker with catastrophic injury.	Definition of *catastrophic injury* is to be included in Workers Compensation Guidelines.	On a date to be appointed by proclamation.	
Amendment to section 231 of the 1998 Act	Requirement for employer to post in the workplace a summary of the Acts and insurance details.	This obligation may be satisfied by posting the required information on a website 'or by any other method authorised by the regulations'.	On a date to be appointed by proclamation.	
Amendments to *Motor Accident Injury Act 2017*	A claimant who receives workers compensation benefits as well as CTP damages for the same injury will only need to repay the amount of weekly payments received (not medical, rehab or other treatment expenses).		On the date of assent.	Extends to compensation or damages paid or payable before commencement in respect of MVA occurring on or after 1.12.17.

back to top

New or Amended Provision	Short Description	Comment	Takes Effect	Transitional Arrangements
Amendments to *Motor Accident Injury Act 2017*	A claimant who recovers CTP damages as well as permanent impairment lump sum compensation under Section 66 of the WCA will only need to repay the section 66 sum if that worker has recovered damages for Non-Economic Loss (i.e. pain and suffering and loss of amenities of life).		On the date of assent.	Extends to compensation or damages paid or payable before commencement in respect of MVA occurring on or after 1.12.17.
	Workers injured in a motor vehicle accident who are entitled to receive workers compensation benefits maintain an entitlement to reasonable and necessary medical, treatment and care expenses from the CTP insurer should workers compensation entitlements cease.		On the date of assent.	Extends to compensation or damages paid or payable before commencement in respect of MVA occurring on or after 1.12.17.

The amendments, with very few exceptions, do not affect 'exempt workers' - i.e. police, fire fighters, ambulance paramedics, and rescue workers.

Note: Information current as at 22.10.2018.

Bill introduced to establish presumptive rights to compensation for firefighters in respect of certain cancers

Link to website

Further legislative changes are presently being considered by the NSW Parliament under the Workers Compensation Legislation Amendment (Firefighters) Bill 2018.

If passed, the changes will enable eligible firefighters diagnosed with one of 12 specified cancers, and who meet applicable employment periods, to be automatically presumed to have acquired that cancer because of their firefighting work. The presumption will apply to all eligible firefighters with cancers diagnosed on or after 27 September 2018. A firefighter who has previously had a claim for one of the specified cancers denied on the basis that the firefighter was unable to prove a link to employment may also bring a new claim under the presumption legislation.

The Bill is currently awaiting further debate in the Legislative Assembly.

back to top

RECENT DECISIONS

At fault driver's injuries arose out of employment!

Ballina Shire Council v Knapp [2018] NSWWCCPD 35 (27 August 2018)

Link to decision

Background

On 5 July 2014, at about 6:18am, the worker was driving to work to perform overtime when his vehicle was involved in a head on collision. The worker was severely injured and two passengers in the oncoming vehicle died as a result of their injuries. The worker was charged with dangerous driving occasioning death. He pleaded guilty and was sentenced to 12 months imprisonment.

As part of agreed facts tendered in the criminal proceedings, the worker admitted that he was using a mobile phone while driving either, at the time of, or shortly before the accident, and that he was driving at a speed of at least 111kph in a 100kph zone.

The worker subsequently made a claim for compensation against his employer, Ballina Shire Council, asserting that his injuries arose out of the course of employment or that the injuries had occurred while on a compensable journey. The claim was disputed, on the following grounds;

1. He did not suffer injury arising out of or in the course of employment (s4 of the *Workers Compensation Act 1987* (1987 Act)
2. There was no real and substantial connection between the accident on a journey and employment (s10(3A) of the 1987 Act)
3. If he was in the course of employment, then his gross misconduct by using a mobile phone and driving in excess of the speed limit took him outside the scope of his employment;
4. If he was on a journey, the injury was solely attributable to his serious and wilful misconduct (s10(1A) of the 1987 Act)

The Arbitrator found in favour of the worker, determining that the worker was on a journey and that his conduct that resulted in the injury was not 'serious and wilful'.

On appeal, DP Wood found that the Arbitrator had erred by not considering all of the relevant facts in assessing whether the worker's conduct was 'serious and wilful'. DP Wood found that the conduct of the worker was 'serious and wilful', but determined that as the injury 'arose out of employment' the causal nexus with employment was satisfied so that the worker's conduct was irrelevant to the determination of liability.

Legislation

Section 4 - Definition of "injury"

injury:

(a) means personal injury arising out of or in the course of employment,

Section 10 - Journey claims

(1) A personal injury received by a worker on any journey to which this section applies is, for the purposes of the 1987 Act, an injury arising out of or in the course of employment, and compensation is payable accordingly.

(1A) Subsection (1) does not apply if the personal injury is attributable to the serious and wilful misconduct of the worker.

(3A) A journey referred to in subsection (3) to or from the worker's place of abode is a journey to which this section applies only if there is a real and substantial connection between the employment and the accident or incident out of which the personal injury arose.

Decision of Arbitrator

The arbitrator accepted that the worker was on a journey and found that his telephone call to his supervisor on the way to work established a real and substantial connection between employment and the accident.

back to top

In relation to the dispute that section 10(1A) of the 1987 excludes the worker from compensation on a journey because the injury was attributable to 'serious and wilful' misconduct, the arbitrator concluded that the worker's conduct did not satisfy the threshold of 'serious and wilful'. He stated that the worker did not comprehend the risk of using his mobile phone and driving in excess of the speed limit. He found that in the absence of any evidence that the worker was aware of the risks associated with using his mobile phone while driving, he could not be considered to have wilfully ignored those risks.

Decision on Appeal

The employer appealed from the arbitral decision, arguing that the arbitrator did not take adequate account of the worker's conduct, and that the relevant legal authority regarding serious and wilful and/or gross misconduct was incorrectly applied.

DP Wood found that the arbitrator had erred by failing to consider the totality of the worker's conduct. She stated that the arbitrator's comment that the worker was driving 'slightly' over the speed limit was a value based assessment, and his discussion of the conduct did not take account of the total factual circumstances. She noted that the speed of the vehicle travelling at 111kph, on a single lane road, with no dividing safety barrier, and that using the mobile phone required him to take one hand off the steering wheel, was insufficiently addressed in the arbitral reasons. DP Wood decided it was appropriate to re-determine the issues in dispute.

DP Wood noted that it was not in dispute that the injury either arose out of or in the course of employment, and that there was a real and substantial connection between employment and the accident. The Council had only sought to argue that the worker's conduct was serious and wilful misconduct disentitling him to compensation while on a journey, or that gross misconduct took him out of the course of employment.

In relation to 'serious and wilful' misconduct, DP Wood disagreed with the arbitrator, she stated that it was common knowledge that driving while using a mobile phone was dangerous, and that by current standards of road safety speeding and using a mobile phone was a serious matter. She observed that police advertising campaigns had highlighted the serious risks associated with speeding and mobile phone usage, and a licensed driver must have knowledge of the risks associated with that conduct.

She also noted the relevance of the total speed of at least 111kph, and that a single lane highway provided minimal margin for driver error, both factors which increased the nature of the risk, which the worker had deliberately disregarded by his conduct.

As the injury to the worker resulted in serious and permanent disablement, there was no dispute raised by the insurer under section 14(2) of the1987 Act, that the worker was disentitled due to the injury being solely attributable to his serious and willful misconduct.

With respect to whether the worker suffered a compensable injury arising out of or in the course of employment, DP Wood found that there were causal factors relating to his being employed which resulted in the accident; namely, that he was calling his employer for a work related purpose on a work issued mobile phone. Thus, the worker's injury 'arose out of employment', which satisfies a causal relationship between the injury and employment. DP Wood stated that as there was a causal relationship between employment and the injury, whether the worker's conduct took him 'out of the course of employment' was irrelevant. She then referred to authorities in support of her determination:

- *Tarry v Waringah Shire Council - a worker engaged in a physical fight with a colleague had taken himself out of the course of employment, but because the fight was about work related matters the injury was considered to have arisen out of employment.*
- *Davis v Mobil Oil Australia Ltd - a worker injured in an altercation had refused to follow a direction of a supervisor, but the altercation arose out of employment because it was about work related matters.*
- *Kassim v Busways Blacktown Pty Ltd - held that a bus driver who assaulted a passenger was not in the course of employment at the time of the injury as his conduct took him out of the course of employment, but that as the altercation arose from provocation from the passenger, the injuries resulting from the assault arose out of employment.*
- *Which supports the finding that if an injury arises out of employment, the conduct or misconduct of a worker is not relevant to liability.*

On that basis, DP Wood found that a compensable injury had occurred under section 4 of the 1987 Act.

Interesting findings in this matter

- A person who suffers an injury due to an accident resulting from making a work related telephone call while on a journey to or from work is likely to satisfy the requirement for a real and substantial connection between employment and the accident.

back to top

- The conduct of a worker making a mobile phone call while driving, may or may not be, considered as 'serious and wilful misconduct' based on the totality of the factual circumstances of the accident, such as; speed of travel, road quality, traffic situation and location.
- A worker making a work related telephone call while on a periodic journey to work, who then suffers an injury as a consequence of making the phone call, may be considered to have suffered an injury which 'arises out of employment'.
- The findings made by the arbitrator and the Deputy President do not delineate between whether the worker was on a periodic journey (s10) when the injury occurred, or whether the injury occurred arising out of or in the course employment (s4). On one view, these concepts are mutually exclusive and cannot be simultaneously correct. A finding that the injury arose out of or in the course of employment must exclude the operation of the journey provisions.

For more information, please contact:

Robbie Elder
Senior Associate
robbie.elder@turkslegal.com.au

Craig Bell
Partner
craig.bell@turkslegal.com.au

RECENT DECISIONS

No employer fault for injury on third party work site

Avopiling Pty Ltd v Bosevski; Avopiling v Workers Compensation Nominal Insurer [2018] NSWCA 146 (23 August 2018)

Link to decision

Summary

The Court of Appeal considered whether to overturn the primary findings of the trial judge that an employer was not liable in negligence for injuries sustained by an employee at a third party work site and that there was no contributory negligence on the part of the worker.

The Court unanimously affirmed the decision of the primary judge stating that the employer could not be held liable for a risk of harm of which it was unaware and could not appreciate, and that the worker had not disregarded his own safety and had acted reasonably in the circumstances.

Background

The worker was employed as a labourer by the employer (Professional Contracting Pty Ltd) and was responsible for keeping a drilling area clear at the site of Cringila Public School, NSW. The worksite was operated by Avopiling Pty Ltd ('Avopiling').

Whilst a mast on a pile driving rig was being erected by two Avopiling employees at the site, an auxiliary cable attached to the mast suddenly snapped causing metal objects to fall and strike the worker. The worker sustained injuries to his head, neck and chest as a result.

The worker commenced proceedings against Avopiling claiming damages for his injuries. Avopiling pleaded contributory negligence against the worker and raised a defence based on the contribution alleged to be payable by the employer pursuant to section 151Z(2) of the *Workers Compensation Act 1987*.

The Workers Compensation Nominal Insurer ('WCNI'), as the entity responsible for compensation payments to the worker, commenced separate proceedings claiming an indemnity in respect of the compensation paid from Avopiling, pursuant to section 151Z(1)(d) of the *Workers Compensation Act 1987*.

The proceedings were heard together by Justice Rothman in the NSW Supreme Court on 13 April 2015 with judgment ultimately entered for the worker in his proceedings, and for the WCNI in the related indemnity proceedings.

The primary judge found that the employer was not negligent and the worker had not been guilty of contributory negligence. Damages were awarded to the worker in the sum of $2,632,390.93, with the WCNI recovering just over $919,000.

Avopiling appealed from the decisions in favour of the worker and WCNI challenging, *inter alia*, the following:

1. Whether the primary judge had formulated the risk of harm for the purposes of the negligence of the employer and the contributory negligence of the worker in a way that was impermissible;
2. Whether the primary judge had erred in finding that the employer was not negligent; and
3. Whether the primary judge had erred by not finding contributory negligence.

There was no challenge made to the finding that Avopiling was liable to the worker for failing to ensure that there was sufficient slack in the auxiliary cable prior to or during the erection of the mast on the pile driving rig and to continually observe the cables.

Employer Negligence

On appeal, Avopiling challenged the primary judge's formulation of the risk of harm as 'the risk of tension failure of a secondary cable in the erection of the pile driving rig' as being "unreasonably specific".

back to top

Instead, it was submitted that the formulation of risk must encompass the precise set of circumstances which occurred and should not be confined to those circumstances. Avopiling contended that the risk of harm should include a "risk of harm… that a person might sustain injury by reason of an unexpected hazard from objects falling or being flung from a pile driving rig during the erecting process", which would apply to the employer as well as Avopiling.

Relying on *Road and Traffic Authority of NSW v Dederer* (2007) 234 CLR 330 and Perisher Blue Pty Ltd v Nair-Smith [2015] NSWCA 90, the Court of Appeal concluded that the primary judge had properly identified the 'true source of potential injury' and the 'general causal mechanism of the injury sustained'.

The Court of Appeal held that the neither of Avopiling's alternative risk formulations allowed for the proper identification of the likelihood of the risk eventuating, nor the reasonableness of precautions that might have be taken, as the 'true source of potential injury' required a determination of the mechanism of the object which might become detached, rather than an undefined and unexpected hazard failing without an identified mechanism.

Avopiling also challenged the finding that the employer did not have the requisite knowledge of the dangers of the pile driving rig given that the risk of cable failure was "ever-present" and that the "relevant risks" were well known within the construction industry. Avopiling also submitted that the employer should not have permitted the worker to be in the vicinity of the pile driving rig irrespective of whether it had foreseen the precise mechanism of injury.

The Court referred to a statement made by an Avopiling employee that was admitted in evidence at the trial and accepted that the worker was involved in and authorised to work in the pile driving rig area, given the need to construct a concrete pad.

Furthermore, the primary judge's finding that the employer lacked the requisite knowledge to be negligent was not disturbed. The unchallenged finding of the primary judge, that the employer would have been satisfied that the system of work was adequate on questioning of Avopiling, demonstrated that the employer did not have any reason to have known that it was dangerous for its employees to be anywhere near the construction of the pile driver. It was also established that the employer could not have appreciated the risk of tension failure of the pile driving rig simply by looking for hazards.

The Court also noted Avopiling's reliance upon the worker's pleadings in formulating its defence pursuant to section 151Z(2).

The fact that Avopiling was found liable (which was not challenged) drew attention to the way that the matter was presented to the primary judge, indicating that the appellant "faces a problem at the outset."

Based on the above findings, the Court of Appeal rejected all grounds of appeal against the employer.

Contributory negligence

Avopiling alleged that the worker was guilty of contributory negligence as he was standing in the vicinity of the pile driving rig during its erection and failed to stand a safe distance away.

The primary judge found that the worker was likely to have been standing at least 6 metres away from the pile driving rig during its erection and that he was in the vicinity of the rig because he was required to construct a concrete pad. Furthermore, at least one employee of Avopiling was aware of the worker's presence.

The primary judge also held that one of the worker's functions was to assist the pile driving rig operators and that once he was told that his assistance was no longer required, was in the process of leaving the scene when he was injured.

In its appeal, Avopiling submitted that the primary judge had failed to identify any evidentiary basis for 'feeling actual persuasion' that the worker was departing the scene when struck.

In response, the Court of Appeal referred to statements by Avopiling employees which supported the finding that the worker had a legitimate reason for being in the zone around the pile driving rig when injured. Furthermore, the Court considered that Avopiling had failed to show that the worker knew or ought to have known of the risk of tension failure or the hazards involved in erecting the pile driving rig.

Following, it was held that the primary judge did not err in failing to make a finding of contributory negligence.

Conclusion

This decision is a further reminder that employers will not necessarily be held strictly liable for injuries sustained by employees and should make appropriate safety enquiries and conduct risk assessments when placing employees to work at third party sites.

The employer's actual knowledge of the risks of harm to its employees and potential reliance on the expertise of other parties, such as other sub-contractors or principal contractors, in formulating such risks are important evidentiary issues that require careful consideration.

back to top

Further, potential inferences that may be drawn as to an employer's knowledge surrounding the nature of tasks being undertaken by third parties may require analysis. In the present case, the evidence did not establish that the employer had knowledge of what was purported to be an "ever-present" risk of tension failure, notwithstanding the allegations set forth by the appellant.

Finally, this case illustrates that independent recovery actions claiming indemnity in respect of compensation paid remain a potent tool against third parties who are liable to pay damages in respect of compensable injuries.

For more information, please contact:

Shawn Finnerty
Lawyer
shawn.finnerty@turkslegal.com.au

John Hick
Partner
john.hick@turkslegal.com.au

RECENT DECISIONS

Back to basics: Trial judge's obligation to make findings of fact before determining negligence

Bauer Media Pty Ltd t/as Network Services Company v Khedrlarian [2018] NSWCA 208 (20 September 2018)

Link to decision

Summary

In a recent decision of the Court of Appeal a retrial was ordered where an employer and host employer persuaded the court that the trial judge did not adequately address how the worker's injury occurred, and whether any negligence caused or contributed to that injury.

Background

The worker was employed by a labour hire company and contracted to work for a host employer as a process worker. The worker alleged that her duties involved two main tasks:

- manoeuvring bundles of magazines or books which weighed more than 15kgs from a shelf to a conveyor belt; and
- using a hook knife to cut the straps or tapes that secured the bundles;
- picking the number of books or magazines required; and
- re-strapping the magazines or books into new bundles.

The worker allegedly injured her neck and right arm when lifting a bundle of magazines which weighed more than 15kgs on 27 February 2011.The worker stated that she first noticed pain in her wrist while using a hook knife a few months before her injury occurred.

The worker sued both her employer and host employer, alleging negligence in the system of work.

The trial judge found that the employer and host employer breached their respective duties of care to the worker relating to rotation of tasks, supervision, training and risk assessment.

The trial judge awarded the worker damages. Both the employer and host employer appealed the trial judge's decision.

How did the injury occur?

The employer and host employer contested the weight of the bundles of magazines, the date when the worker first noticed her symptoms, and the height to which the worker was required to lift the bundles. Evidence from a witness for the host employer had confirmed that there was a computerised system in place so that it was impossible for a bundle weighing more than 11.5kg to be assembled. This evidence was not dealt with by the trial judge.

Ultimately, the Appeal Court noted that the trial judge made no findings regarding how the worker's injury occurred. The Appeal Court found that he could not determine the employer's or host employer's challenges to apportionment of liability and quantification of damages in the absence of a primary finding of how the worker's injury occurred.

Was the duty of care breached?

The trial judge accepted that the host employer had in place a system of rotating employees' duties but ultimately concluded that there was no evidence to suggest that the system of rotation was implemented by the host employer. The Appeal Court pointed to the transcript of evidence which specifically dealt with the rotation of the worker's duties and contradicted the trial judge's conclusion.

The trial judge found that there was no supervision of the worker at any stage in her work. However, the Appeal Court again referred to the transcript of evidence to contradict that finding.

back to top

The trial judge decided that limited initial training was provided and that neither the employer nor host employer provided the worker with training in how to use a hook knife, despite the transcript of evidence including evidence of training courses provided to the worker, and the worker's own evidence that she was shown how to use a hook knife.

The trial judge concluded that no risk assessments were carried out by the employer or host employer. However, evidence was adduced that an OH&S Committee and safety checklists were implemented by the employer and host employer.

The Appeal Court concluded that the trial judge did not adequately explain his conclusion that the safety checklists were disregarded, and that the OH&S Committee was ineffectual.

The Appeal Court was most critical of the trial judge's failure to provide reasons regarding whether the individual breaches discussed above **caused** the worker's injury. This defect, together with the absence of findings regarding how the injury occurred, could not be rectified by the Appeal Court and a retrial was ordered.

Implications

This case is a reminder that the negligence of an employer or host employer must be established by the injured worker on the basis of evidence presented at trial, showing precisely how the injury occurred and how the employer or host employer's negligence (if any) caused that injury.

It is just as important for judges to consider the evidence presented and make findings of fact that are consistent with the evidence.

For more information, please contact:

Corinna Cook
Senior Associate
corinna.cook@turkslegal.com.au

Sam Kennedy
Partner
sam.kennedy@turkslegal.com.au