

**BEFORE THE INDUSTRIAL RELATIONS COMMISSION
OF NEW SOUTH WALES IN COURT SESSION**

IRC of 3140 / 2001

GERARD CREWDSON

Applicant
and

**DEPARTMENT OF COMMUNITY
SERVICES**

First Respondent

**CENTRAL SYDNEY AREA HEALTH
SERVICEq**

Second Respondent

AFFIDAVIT:

Deponent: Valda Kerrison

Date: December 2002

Filed by
Gerard Crewdson

Address for Service of Documents

On the day of December 2002, I Valda
June Kerrison of Unit 5, 71 Probert Street,
Newtown, NSW, TAFE teacher, MYOB
appointed trainer, say on oath

- 1 I have known the Applicant Mr Gerard Crewdson since about April 1998.
- 2 Throughout that year I was in frequent contact with Mr Crewdson. Mr Crewdson told me of his experiences as an employee with the Department of Community Services (DOCS). I had a particular interest in these matters as I had also performed work for DOCS.

Mr Crewdson

- 3 I recall that around September 1998 that Mr Crewdson spoke to me over the phone of a conversation he had had with Mr Raoul Salpeter of the Crown Solicitor's Office. Mr Crewdson told me in that phone call that Mr Salpeter had used the word "disabuse". I recall saying to Mr Crewdson words to the effect: "What does 'disabuse' mean?" I recall that we were speaking on the telephone, and I looked the word up in my dictionary and read the dictionary meaning out to Mr Crewdson in that telephone conversation.
- 4 At no time did Mr Crewdson convey to me either by words or actions that his complaints had been unfounded.
- 5 At no time did Mr Crewdson convey to me either by words or actions that he wished to retract his allegations.
- 6 At no time did Mr Crewdson convey to me either by words or actions that he wished to resign from his position in DOCS

DOCS Reports Disability Program - Information Deleted and Replaced

- 7 On 11 and 12 March 1998 I was employed to do word processing for Department of Community Services Strathfield.
- 8 I was working under the Manager Margo, instructed by Assistant Manager Disability Yvonne Turiano.
- 9 I was instructed to make alterations to reports re care and accommodation of disabled clients in group accommodation and put this on the computer.
- 10 A staffmember Terry and other/s crossed out the paragraphs and information that I was to omit from the real reports and wrote the phrase that I was to insert in the specified places in the phoney reports.
- 11 I asked the Manager Margo about deleting the information and she directed me. Therefore, on the instructions of Strathfield DOCS management I destroyed the field workers' information and replaced it with the managers' somewhat empty phrase throughout this batch of records about Strathfield DOCS' disabled clients program.
- 12 If those records still exist I believe they would be in the office of the Minister for DOCS because that is what DOCS managers conveyed to me when I was instructed to alter the records.

SWORN By the Deponent)
 At Sydney)
 Before me:)

On the third day of December in the year two thousand and two.

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 Solicitor/Justice of the Peace

.....
 Deponent