

22 June 2000

PRIVATE & CONFIDENTIAL

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Partner

David Abernethy

Our reference

DJA/JPC/29233-7545873

Dear Ken

BRISBANE GRAMMAR SCHOOL - ALLEGATIONS BY FORMER STUDENTS

Counselling Arrangements

As foreshadowed in our letter of 7 June 2000, the School is now putting in place a system of referrals for students seeking counselling or psychiatric assistance allegedly necessitated by the actions of Mr Lynch.

Dr Joan Lawrence has agreed to administer the system. Former students who indicate to the School that they wish to avail themselves of counselling services will be seen by Dr Lawrence for an assessment of their counselling needs.

The assessment by Dr Lawrence will be funded wholly by the School.

If Dr Lawrence considers counselling appropriate, she will then refer the former student to an appropriate psychiatrist. (If one or two sessions would be sufficient to resolve the former student's concerns, Dr Lawrence may choose to conduct those counselling sessions herself.)

Any counselling provided would be funded through Medicare, with the School funding the gap between Medicare and the consultant's fee.

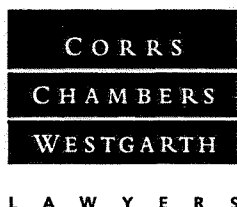
Dr Lawrence will maintain a watching brief in relation to the counselling to ensure that an "open ended" arrangement does not arise in respect of any individual. Assessment and treatments will be subject to the usual confidentiality mechanisms attendant upon medical treatment (without prejudice to any discovery rights which would arise if litigation is commenced by any individual).

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22 June 2000

Page 2

AON Risks Services

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Enclosed is a draft letter which we propose would be sent by the School to any former student requesting counselling. The letter sets out the conditions upon which counselling would be extended. The student would be required to sign and return a copy of the letter as an acknowledgment of consent to those conditions.

We have forwarded a copy of the draft to HIH for its information. As you are no doubt aware, however, HIH have at this stage declined indemnity to our client.

Public liability policies

In light of HIH's decision to decline indemnity, it is now even more important that we:

- confirm the identity of our client's public liability insurer in each of the relevant years; and
- obtain copies of the policy wordings for the various policies.

We await your urgent advices as to your progress in respect of those.

Yours faithfully

CORRS CHAMBERS WESTGARTH

David Abernethy

Partner

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