

Our ref: RA:CMM 9801388
 Contact: Richard Anderson
 Direct Line: 03 5226 8524

Harwood Andrews Pty Ltd

ACN 076 868 034

70 Gheringhap Street Geelong
 DX 22019 Geelong
 PO Box 101 Geelong 3220
 Telephone (03) 5221 7166
 Facsimile (03) 5221 8282

23 March 1998.

STRICTLY PRIVATE & CONFIDENTIAL

Mr S A Burke
 Deputy Principal
 Geelong Grammar School
 50 Biddlecombe Avenue
 CORIO VIC 3214

Dear Sean,

Mandatory Reporting

Further to our discussion this morning I enclose suggested draft letter for forwarding to the police.

I also confirm and summarise my advice as follows:

1. A potential issue of defamation may arise if a copy of Lister's letter to the teacher is provided to the police.
2. The School will need to consider whether it notifies the student's parents of the issue which has arisen.

Given that the police officers concerned have formed a "reasonable belief" that the student was in need of protection (and have accordingly made a report to the Department) it seems to me that there are strong grounds for notification being given to the parents.

Of course, notification should be given in an appropriate manner, particularly as the investigation by the School has not uncovered any evidence of impropriety on the part of the teacher.

Possibly an opportunity might arise to discuss the matter with the parents at any meeting where the well-being of the student is also being discussed, noting the special needs of the student.

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 Telephone (03) 5261 4707
 Facsimile (03) 5261 5166

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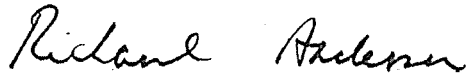
- 2 -

3. As a precaution I also suggest that notification should be given to the School's insurer of the incident which has been alleged by the police, together with details of the outcome of the investigation. This is no more than providing notification of a potential claim and is not providing notice of any claim itself.

Finally, I confirm that it will be important for the School to maintain a file in relation to this matter in the event that it is required in some indeterminate time in the future. I strongly suggest that notification of the claim to the insurer should also be kept in such a manner that it is readily able to be located and the identity of the insurer and the relevant policy easily ascertained. I assume this is a matter which you would take up with Andrew Patterson.

Please do not hesitate to contact me with any query.

With kind regards,



RICHARD ANDERSON

encl.