Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings

WITNESS STATEMENT OF DR SAMANTHA LOUISE CROMPVOETS

I, Dr Samantha Louise Crompvoets in the State of New South Wales, Director, Australian Human Rights Commission, ████████ do solemnly and sincerely declare that:

1   I make this statement in my personal capacity.

2   I make this statement on the basis of my own knowledge, save where otherwise stated. Where I make statements based on information provided by others, I believe such information to be true.

BACKGROUND AND QUALIFICATIONS

3   I have the following qualifications:

(a)   Bachelor of Science (with Honours) from the University of Melbourne; and

(b)   PhD from the National Centre for Epidemiology and Population Health at the Australian National University (**ANU**) in the Sociology of Health and Public Health – my PhD focused on the topics of women's experiences of breast cancer and the breast cancer advocacy movement.

4   I am a sociologist. I am passionate about evidence-based reform. I have worked in policy and research for most of my career, specifically in the context of the Australian Defence Force (**ADF**). I have over a decade of experience conducting ethnographic research on organisational culture. I have led numerous projects focusing on improving workplace climate and organisational culture, focussing mostly on defence and security sectors. My work and research focusses on identifying, understanding, and critiquing organisational culture in hopes of promoting sustainable change. I have authored publications including a book, journal articles and research reports in this area.

5   My relevant experience includes:

(a)   From 2012 to December 2013, I was a Senior Research Advisor with the Department of Defence;

(b)   From October 2006 to July 2014, I was a Research Fellow at ANU;

(c)   From July 2014 to December 2017, I was a Visiting Fellow at ANU;

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(d)   From July 2014 to February 2021, I was the Director of Rapid Context;
and

(e)   From January 2018 to September 2020, I was the Chair of the Australian
Centre for Excellence in Post-Traumatic Stress.

6   Attached to this statement and marked **SC-1** is a copy of my curriculum vitae, which
includes a list of academic works published by me, alone or in collaboration with
other persons, as well as further information about my professional experience.

CURRENT ROLES

7   Since August 2022, I have been a director of the Australian Human Rights
Commission.

8   Since February 2021, I have been the Executive Director & Chair of Rapid Context,
a research and analysis consulting company based in Canberra.

9   In my role as the Executive Director of Rapid Context, I was responsible for
overseeing research and advice.

10   Rapid Context provided:

(a)   evidence based advice through research and analysis during complex
organisational change programs;

(b)   research training to the public sector;

(c)   strategic research and advice for policy development;

(d)   development of strategic research agendas;

(e)   organisational ethnography; and

(f)   research and analysis on health and wellbeing.

11   Since October 2018, I have also been a volunteer member of the NATO SAS
Research Task Group, a project team developing the Code of Best Practice for
conducting survey research in a military context.

PROFESSIONAL BACKGROUND IN ORGANISATIONAL CHANGE

12   Throughout my career, most of my research has centred on enacting change within
the ADF.

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13 In mid-2015, I was engaged by Lieutenant General Angus Campbell, then Chief of Army, and Major General Jeff Sengelman, Special Operations Commander Australia, to interview members of the national security community and gather their perceptions on the role and capabilities of Australian Special Operations Forces. This project aimed to understand culture, reputation, and trust within the ADF. In January 2016, I submitted the report titled, '*Special Operations Command culture and interactions: Perceptions, reputation and risk'* (**attached** to this statement and marked **SC-2**).

14 This report raised serious questions about the culture within the Special Operations Command. In my book '*Blood Lust, Trust & Blame*', I discuss my work within the culture of defence, and the key principles I understand as crucial to effecting organisational change.

15 Outside of my work with the ADF, I have consulted to various public and private sector organisations, including the Australian National University, Queensland Police and the Australian Football League.

ARTICULATING THE PROBLEM

Understanding the organisation

16 The first step towards enacting organisational change is understanding an organisation. As I say at page 19 of my book:

> [t]rying to discover the root cause of an issue and how it manifested in the first place is the key to understanding and being able to address an organisational change problem.

17 Some of the steps that can be taken to understand the organisation include the following:

(a) Focus at the operational levels: Often it can be difficult for organisations to articulate the issues they want to change. To understand an organisation holistically, senior leaders cannot be the sole focus. Often in organisational change projects, focus is on the senior level and working with senior leaders, managers, executives, and the board. I have learnt that the impact of senior leaders on an organisation is limited. In my experience, the real implementers of organisational change are those at the lower levels of the

organisation. Focussing on the operational level allows you to write targeted recommendations that are more likely to be implemented successfully.

(b) Consider previous reviews: It is often the case the organisations I am analysing will have previously been reviewed for cultural or other issues. It is important to read those, as previous cultural reviews can give a sense of the pain points an organisation may be facing and barriers to change.

(c) Ask the right questions: Asking the right questions is an effective tool for understanding an organisation. When interviewing employees of an organisation it is essential that key questions are targeted and encourage people to reflect on the past and the potential for change in the future.

(d) Psychosocial safety surveys: These can be a significant predictor of misconduct, as they assess how conducive an environment is to misconduct. This data allows you to understand what parts of the organisation are high performing with low areas of misconduct and what is common to them.

18 Research of this kind allows reviewers to see where things are working well and why, rather than solely focusing on where things are going badly. Generally an organisation will understand what its issues are. Further, targeting the negative aspects of an organisation alone produces large amounts of data, but does not necessarily paint a holistic picture of its culture. Cultural reviews often focus disproportionately on an organisation's toxic culture, without attempting to understand its strengths. Understanding how an organisation does something well should inform how recommendations are made and how organisational change can be enacted.

The limitations of a culture analysis

19 It is my opinion that the concept of culture is flawed when addressing misconduct. My reasons are discussed in *Blood Lust, Trust & Blame,* where I note: at page 10:

> *'culture' has been used as a trope to encapsulate all that may be wrong within an organisation.*

20 The definition of culture is problematic in itself. Culture is often defined as '*the way things are done around here'*. It is non-specific. Culture revolves around the sum of

all different workplaces that make up an organisation, overlooking their individual nuances and simplifying their problems. I note in my book at page 12:

> [t]he fact is that while the concept of culture might be convenient for describing hard-to pinpoint organisational problems, it is far less useful when it comes to creating genuine change. It becomes an easy way to displace politics and shift blame.

21 Repeatedly, culture is blamed for everything wrong in an organisation. Adopting a cultural lens draws focus to the toxic parts of an organisation without showing its strengths. When interviewed about culture, individuals are motivated to emphasise their position regarding the 'bad' at the expense of the good. This works to obscure an organisation's real issues. Even though culture can be an intuitive and useful starting point, I believe it can and should be avoided.

22 Viewing culture from an alternative lens is more beneficial for realising organisational change. There are a number of alternatives to culture theories when it comes to understanding misconduct within organisations. Adopting an alternative analysis can assist in identifying the barriers that prevent misconduct from being seen and understanding how it spreads. Refusing to point a finger at culture allows for greater attention to be paid to transparency and accountability practices. To create sustainable organisational change, it is integral that the relationship between power and accountability is examined, and that rather than centring the discussion to culture, social networks and climates are considered.

ALTERNATIVES TO THE CULTURAL ANALYSIS

23 There are several factors that assist in assessing issues that may drive organisational change, such as considering the:

   (a)   organisational climate, including micro-climates;

   (b)   organisational structures and networks of influence; and

   (c)   the distribution of power within those structures;

24 It is my view that each of these factors can be used concurrently.

Climate and micro-climates

25 Climate is what you experience when you walk into a workplace, such as the morale, the level of stress, whether people can speak up or ask questions, how

much they can innovate, and if there is safety in failure. Climate is often determined by a manager. It is tangible and it can be measured.

26 For example, a change in climate is a descriptor for the change that is felt when a workplace gains new direct management. For these reasons, climate can change quickly, potentially overnight, whereas it is difficult to measure or change culture in anything less than five year intervals. There are a lot of good robust measurements to assess organisational climate – methods can be as simple as assessing a manager's leadership style.

27 Climate is important because it focusses on aspects of a workplace that impact one's day to day engagement. As opposed to culture, which focusses on the macro-level, an organisation can have multiple micro-climates. This is particularly relevant in hospital settings, where there are different climates within each team; each having a distinct and combined effect on one another. When problems are analysed at the macro level, individual accountability can be obscured. The organisation's problem is presented as a generalised phenomenon, becoming a "thing" to blame (rather than a person or persons).

28 Understanding an organisation at its local levels can assist in understanding where problems lie, what they are, and how they might be fixed. From there you can work backwards to understand whether problems arise from the organisation's policies and procedures (culture) or the person implementing them (climate).

29 Quite often it is a manager's style in adopting policies and procedures that has the most dramatic impact on one's day to day experience. For example, male managers that actively share parenting responsibilities can set a tone across a workplace by sending a message that it is acceptable to take personal leave to look after sick children.

Structures and networks

30 Understanding how structures and networks operate allows us to understand where influence lies, from inside and outside the organisation. Looking at structures and networks rather than culture creates an opportunity to better understand risks to an organisation and how conducive an environment might be to misconduct.

Structures

31 Structures relate to the laws, mechanisms, processes, policies, and tools used in an organisation:

> *[o]rganisational structures are the scaffolding that holds culture firmly in place. I'm not referring to hierarchical, organisational or functional charts that illustrate roles and ranks, but rather the legislation, policies, standard operating procedures, remuneration models, performance management frameworks, and sometimes even the physical locations of buildings and/or parts of an organisation* (*Blood Lust, Trust & Blame,* page 25).

Structures are often far more enduring in their ability to affect people's behaviours and values, compared to any individual leader.

32 Additionally, structures can support the inequality of power. One of the most impactful changes in the ADF recently has been the change in legislation that has enabled part-time service. Before this, the requirement that members of the Defence Force (other than Reserve members) could not work part time had a disproportionate impact on women. In doing so, dismantling existing organisational structures requires small sustainable changes, rather than leading cultural change programs, but can have a significant impact on behaviours.

Networks

33 Organisations are built around networks, both informal and formal, visible and invisible. For example, networks include those existing on the periphery that have the ability to influence an organisation. In the banking industry, networks could include regulators, borrowers, and shareholders. The connection organisations share with their network can be reinforced and facilitated through shared histories and proximal locations.

34 There are a number of tools that assist in assessing a network and its strengths and weaknesses:

(a) Network analysis: A network analysis examines how things like knowledge and influence operate in an organisation. Social networks can operate regardless of the functional structure of an organisation. A restructure will not necessarily effect organisational change if it does not challenge problematic social networks, both formal and informal. Understanding

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networks is important as organisational misconduct often involves individuals who are extrinsically linked.

(b) Peripheral groups: It is also important to acknowledge the influence that groups on the periphery of the organisation have. These groups are highly influential and can often be obstructive to change. There is a need for the relationship between the organisation and periphery to be symbiotic, with both sharing the same view of where the organisation should be heading. Identifying where external stakeholders may be obstructive is essential. For example, young veterans' groups have a significant influence on the culture of the Defence Force. One of the assumptions was that middle management and senior officials were preventing organisational change. However, what was found was that new recruits, mostly young males, were joining the organisation as they viewed it as a bastion of hyper-masculinity. This meant young veterans' groups had this strong negative response to any kind of change to the organisation. That is, they identified so strongly with this version of toxic masculinity the ADF was trying to get away from.

(c) Mapping: Mapping is an effective tool to see where influence and obstruction lies within structures and networks. Mapping out networks is best done as a physical whiteboard exercise, identifying all relevant parties. It is about identifying who has a vested interest in the operation of the organisation. For instance, I recently worked with senior executives to map out the external stakeholders that would have an influence on a sporting organisation. Sports betting agencies were identified as a key obstructer to organisational change, due to their vested interest in the functioning of the organisation. Without mapping, it is difficult to understand relationships and their influences. I completed a similar mapping exercise with a State fire and emergency service at a time when they were trying to recruit more women into the service. After mapping out the organisation's influences, it became clear that unless the Union was also willing to target gender parity, organisational change was going to be difficult to achieve in this space.

(d) Vantage points: these help understand how misconduct throughout an organisation's structures and networks is perceived. You have to look at misconduct through different lenses. It is not effective to merely ask people internally about their experience. As stated, this can yield inaccuracies and

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can focus heavily on either disguising a culture to protect it, or rather focussing on the negative aspects of culture without acknowledging the goal. Instead, an organisation should be examined from a variety of perspectives. This includes external perceptions, the public's perception, and representations in the media. Focussing solely on the people inside an organisation can provide an inaccurate picture.

Power

35 Examining how power exists within organisational structures can assist in promoting organisational change. This means understanding how power operates within different levels of the organisation, asking who and what has power, and how does power shape, influence, and obstruct change. To enact organisational change, you cannot rely on the tools, mechanisms and structures already in practice that have been used to oppress the powerless. Organisational structures are comparable to the scaffolding which holds cultures of misconduct and existing power structures in place. To change culture, you need to change the rules that dictate the distribution of power.

36 When examining power, you can begin to unravel why certain problems persist, or go unnoticed, and identify influential sources of power and the structures that sustain them. The benefits of adopting a power analysis are discussed in *Blood Lust, Trust & Blame* from page 17 and include*:*

> *understanding how power operates within an organisation enables you to move beyond observing the problems. It allows you to focus resources— time, effort, money and goodwill—where they can have the greatest effect. In other words, instead of trying to orchestrate a whole-of-organisation transformation, which so often is doomed to fail, moving beyond culture enables targeted interventions.*

37 Because of this, it is important that organisations are cognizant of the skills and values they reward and promote to positions of power. For example, when reviewing the ADF, at the local level there were toxic leaders who were pursing certain team goals at the expense of team experience. The organisation realised that it could not achieve cultural change if it kept leaders with low emotional intelligence in positions of power, despite their success on the battlefield. They

could understand that too many promotions of the wrong type of person were having a significant impact on the day to day experience of those at lower levels.

Misconduct in the network

38 Misconduct and deviations from broader norms of conduct are more likely in isolated parts of a network. In particular, misconduct will be facilitated by the section of employees who are receptive to engaging in wrongdoing or who are susceptible to social influences. Parallels can be made between these parts of organisations and organisations that are entirely closed, which often develop their own distinct norms and behaviours. This is problematic as when you enter an organisation, you take cues from everyone around you regarding around what is normal and what is not. Part of this is the natural human desire to conform and assimilate. So for organisations or parts of organisations that are closed, it is important that there are checks and balances in place to prevent new employees conforming to the behaviours of the rest of the group. At page 21 of my book I comment:

> *[w]hen poor or undesirable behaviours are institutionalised, they are embedded in organisational memory, solidified in routines and structures. A culture of misconduct then develops.*

39 The concealment of knowledge is a significant predictor of misconduct in institutional contexts. The more elite, secretive and secluded a group is, the higher the chance of deviation, and the concealment of that deviation. This is exacerbated when that group or subgroups hold specialist skills that are not well understood by those outside the organisation, and are revered or despised. This is particularly prevalent in hospital settings and healthcare more generally. These are environments with lots of people who have specialist expertise and knowledge. In these contexts, if culture reform initiatives do not dismantle aspects of power and control, influence and secrecy, organisational change will not occur or will not be lasting.

ACHIEVING ORGANISATIONAL CHANGE

40 Once the above analysis has been completed, it is then possible to implement a range of tools to achieve and implement organisational change.

Effective recommendations: setting the organisation up for success

41 Crafting effective recommendations capable of change should be a priority of cultural reviews and organisational change projects. It is integral that organisations

focus on crafting effective recommendations that are capable of achieving change. In my experience, the first step in this process is understanding your audience. Recommendations are experienced and understood differently by different audiences (e.g. Parliament, the public, operational levels within an organisation).

42 Another important aspect of recommendation writing is understanding what is not going to work. Recommendation acceptance is political and public. For these reasons, organisations are often scared to modify recommendations, and rather choose to accept them all, sending themselves into a state of self-flagellation. This 'accept all' mentality can come at the expense of reflection on the part of the organisation to understand what is going to work in reality. Without reflection, recommendations are implemented ineffectively, and sometimes not at all.

43 To overcome this issue, organisations should discuss recommendations at the senior level and consider what should and should not be included. Consideration should also be given to the existing initiatives, partnerships and foundations that might allow recommendations to be implemented, and the capacity of the teams responsible for implementation.

44 Sometimes a 'less is more' approach to recommendation writing is appropriate, focussing on the recommendations you want achieved really well. This can assist in setting the organisation up for success.

45 Further, it is important for recommendations to include a clear monitoring and evaluation framework. There should be some kind of marked point of return that encourages organisations to assess whether implementation activities are having the desired impact.

Accountability

46 In my experience, accountability is essential to achieving change. This means that someone (not a team or future rule) should be responsible for each recommendation. It can be difficult to gain traction without accountability or transparency in the implementation process.

47 In particular, accountability needs to be tangible. It needs to be built into a senior person's key performance indicators and promotions. Put simply, leaders need to have 'skin in the game' to avoid a 'tick and flick' mentality in relation to implementation. Faulty accountability structures and a lack of consequences (e.g.

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promotion or contract renewal) can impede on the implementation of effective recommendations.

48 Before considering how to construct accountability practices, an organisation should first familiarise itself with the true meaning of accountability. Accountability mechanisms take many forms, and how accountability is viewed and experienced differs between groups within an organisation. On page 20 of my book, I reference the following:

> [d]etailed research into the definitions of both accountability and responsibility has concluded that the confusion between these concepts is a failure to separate the obligation to satisfactorily perform a task (responsibility) from the liability to ensure that it is satisfactorily done (accountability) (*Blood Lust, Trust & Blame,* page 20).

49 In many complex governance structures, there are pockets of power where accountability is blurred. Understanding how power is distributed within an organisation has important consequences for accountability. The operation of power in networks can often be contrary to how accountability is structured. This can become a widespread source of conflict. It is integral that the relationship between accountability and power is examined. Understanding this relationship provides an alternative framework for understanding how misconduct occurs in an organisation and more importantly, how its spreads.

Micro-changes

50 As stated above, impactful micro-changes have the ability to be more successful than broad scale cultural change agendas. The successfulness of micro-change initiatives is stark when you compare them to the demoralising impact of 'failed' change agendas. Agendas are often doomed from the beginning because of their lack of targeted direction and local implementation. Micro-changes may be small, they may not cost a lot of money, but they can effect real change. An example of an effective micro-change program is Rio Tinto's introduction of posters of "below the line" behaviours in meeting rooms. These posters features 50 descriptors of "above the line" behaviours and 50 descriptors of "below the line" behaviours. This enabled meeting participants to simply gesture towards the poster to effectively call out a colleague's behaviour without having to do so verbally.

51 Further, in the context of the ADF, when Angus Campbell first became Chief of the Defence Force, he arranged for the all-male portraits in the ADF offices in Canberra to be replaced with Indigenous artwork. At the time, the walls were lined with portraits of previous white male ministers and chiefs. This gesture was symbolic and powerful; it conveyed the change the ADF was pushing for and signalled what their new priorities were.

Challenges to achieving organisational change

Cultures of resistance

52 All change, even positive change, can be unsettling and resistance is to be expected. Cultures of resistance can promote, permit, or prohibit certain behaviours. In my experience, people generally fall into three different categories in terms of their approach to organisational change:

    (a)   enthusiastic early adopters;

    (b)   those who wait and see before responding to change; and

    (c)   those that will never get on board and who will combat change at all costs.

53 To tackle this and promote sustainable change, it is important to leverage the interest of the early adopters and those in the middle – that is, the people who are ultimately likely to follow. The final category may never get on board – they may ultimately leave the organisation. A level of "regeneration" of this kind is necessary and to be expected. Those who are deeply resistant to change probably do not have a place in the organisation anymore and their departure is probably a good thing.

54 That said, when organisational change is needed, there can be a temptation to remove from the organisation the people who presided over the "old way". However a complete staffing overhaul risks losing years of institutional knowledge. Therefore, this mentality needs to be tempered to avoid the error of rejecting the unfavourable along with the favourable, or more colloquially, 'throwing the baby out with the bathwater'.

Common mistakes

55 In their quest to achieve cultural change, even organisations with the best intentions fall into common mistakes. In my experience the following should be avoided:

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(a) Focussing on the senior leadership level and paying inadequate attention to those responsible for implementation at lower levels. High level strategic recommendations often make little sense to those at the operational level. This means there is a need to bridge this knowledge gap to ensure recommendations are implemented properly.

(b) Failing to adequately resource implementation efforts. A lack of appropriate resourcing symbolises a lack of commitment to organisational change. Without appropriate funding and resource management, organisational change cannot be achieved or sustained.

(c) Failing to recognise the importance of symbolism when promoting sustainable change. For example, when the Australian Navy was undergoing review, the Chief of the Navy situated the team responsible for cultural change work outside his office, almost next door. In my view, this symbolic gesture had a real impact and enabled more change than change teams that are confined to areas with low levels of visibility (e.g. HR) are often able to achieve.

Keeping it simple

56   Organisational change is most effective when it is kept simple. This means having accessible policies that are user friendly and can be understood and considered not only by those at the top of the hierarchy, but also by those at the lowest levels. In applying policies to navigate misconduct, a simple strategy is the adoption of electronic decision trees ('e-decision trees'), which provide those responsible for managing and administering complaints with a clear process to approaching complicated issues. This can avoid the need for 'work arounds' or unapproved working alternatives. Often these alternatives are adopted as gospel and form hard to break behaviours within an organisation. Dictating clear procedures prevents the need for individuals to find their own ways of working and ways that are not uniform or measured.

Knowledge sharing

57   Organisations sometimes lack appropriate forums where everyone can get together to discuss the practices that have or have not worked. This is a lost opportunity. Without knowledge sharing, individuals can feel disheartened. Cultural change can seem like an insurmountable task when you have not seen it in practice. Effective

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knowledge sharing, both between and across organisations, assists in overcoming this issue.

58 An example is the response of Australian universities to the problem of sexual assault on campuses. In 2017, the Australian Human Rights Commission (**AHRC**) undertook a project on sexual assault and sexual harassment of university students entitled *Change The Course: National Report on Sexual Assault and Sexual Harassment at Australian Universities*.) The project was supported by all 39 Australian universities. In my view the lack of information sharing between universities impeded upon the opportunity to create meaningful change. All universities committed to the project, yet there were limited resources to do the work. Meaningful information sharing among universities about what was and was not working could have assisted to overcome this problem.

59 Ultimately, each university focussed on the need for improved complaint management processes. While this conclusion was accurate, it overlooked a series of systemic issues appearing in every tertiary institution around the country (such as the power imbalance in relationships between staff and students). It came as no surprise to me when the AHRC follow up milestone report, published two years later, identified a lack of progress in achieving meaningful change. In this scenario, information sharing may have enabled universities to identify factors that contribute to sexual assault on campus in a more nuanced way.

Measuring success

60 To transform an organisation, change needs to be measured and evaluated. Robust data collection processes allow an organisation to measure their success and monitor progress towards their desired goal. This can involve both qualitative and quantitative data. Over time I have come to understand that qualitative data practices need to be targeted. For example, interviews with participants should focus on a series of short key questions. To effectively measure success in interviews, individuals need to be asked to reflect on the past and the organisation's potential for the future. Measuring this gap over time reflects the success an organisation has made and their ongoing appetite for change.

61 It is important to understand how change is reflected within data, as well as the limits of data. For instance, in the context of a review I was involved in of a workplace, the data failed to reflect any positive changes to gender equality. Despite this, there

was much more optimism amongst female members within the workplace. Expectations in the workplace had changed, but this was not reflected in quantitative data. This highlights the need for both robust qualitative and quantitative data practices.

The importance of critical evaluation

62 Critical evaluation and reflection is an important step in achieving organisational change, however opportunities for critical reflection within organisations are often sparse. Critical evaluation means looking at what an organisation has done well and what it has done badly. Despite its importance, critical inquiry can be a difficult and uncomfortable process and is often not captured in policies and practices (or taught well when it is). It is a skill that needs to be honed.

63 Evaluating issues external to an organisation can be a good start to training people to critique the organisation they are a part of. For example, Rio Tinto did this by encouraging a 'safety share' at the beginning of each meeting. Staff were encouraged to volunteer a safety risk they had seen recently, not necessarily within the company, but anywhere (e.g. on the street or in the media). This practice assisted employees to develop critical evaluation skills and encouraged a culture of safety within the organisation.

64 Unfortunately critical reflection is frequently outsourced as part of review processes, with the result that lessons learned during the process are not necessarily shared at the operational levels of organisations. It is often preferable to allow organisations to learn and grow through their own critical evaluation.

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I make this solemn declaration under the *Oaths Act 2001* (Tas).

Declared at ██████████████ (place)

on 10 September 2022

………………………………………………

(signature of deponent)

Before me

………………………………………………

(signature of witness)

Philippa Clare Munton

Level 17, 8 Chifley, 8 - 12 Chifley Square, Sydney NSW 2000

Legal Practitioner