

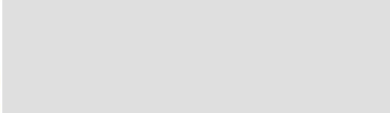
- (a) statewide subacute beds;
- (b) day programs;
- (c) assertive mobile youth outreach services;
- (d) step up/step down units; and
- (e) residential rehabilitation units (Youth Resi).¹⁴

25. As a result of this model a range of new services have been implemented.

COMMENTS ON TABLE 4C REASONS FOR CLOSURE

26. In relation Table No. 4C: Reasons for Closure¹⁵ Counsel Assisting have referred in reasons 8, 9 and 10 to a Briefing Note of 26 October 2012 as having been prepared or drafted by Dr Cleary. It was not. As Deputy Director-General, Dr Cleary did not draft briefs but received them. The briefing note of 26 October 2012¹⁶ was drafted by others and forwarded to Dr Cleary who returned the Brief with a note attached to it requesting changes before it would be considered.¹⁷


GW Diehm QC


CJ Conway
Counsel for Dr Michael Cleary
23 March 2016

¹⁴ Statement of Dr Cleary paragraphs 140 and 222

¹⁵ COI.028.0001.0225

¹⁶ QHD.004.013.9670

¹⁷ Statement of Dr Cleary paragraph 84 and [T14-25]