

IN THE ROYAL COMMISSION INTO TRADE UNION  
GOVERNANCE AND CORRUPTION

**Affidavit of Craig Ferguson McGregor**

I, **Craig Ferguson McGregor** of [REDACTED],  
Union Secretary, affirm as follows:

1. I am the Secretary of the Victoria No 3 Branch of the Health Services Union (**the No 3 Branch**).
2. I have made a previous statement to the Royal Commission dated 16 June 2014.
3. I have been requested by the Solicitor Assisting the Royal Commission to make an affidavit deposing to the following matters relating to the affairs of the Victoria No 1 Branch (**the No 1 Branch**) of the Health Services Union and the conduct of Ms Kimberley Kitching:
  - a) My knowledge relating to Ms Kitching's conduct in meeting with members of the No 1 Branch Committee of Management (**BCOM**) prior to BCOM meetings; and
  - b) My knowledge relating to Ms Kitching completing right of entry tests for other officials or employees of the No 1 Branch.
4. In November 2012, I was first elected to the position of Secretary of the No 3 Branch. About a month later, Ms Asmar was elected to the position of Secretary of the No 1 Branch. The Assistant Administrator, Mr Jim Simmonds, had arranged for the No 1 and No 3 Branches to share common premises in Park Street, Melbourne.
5. Ms Kitching started with the No 1 Branch shortly after Ms Asmar's election. During the time when the No 1 Branch and the No 3 Branch shared offices, Ms Kitching would often drop in to my office and speak to me. My office was located down the end of the first floor. Ms Kitching's office was on the same floor, at the front of the building.
6. In about July 2013, the No 3 Branch relocated to new offices in West Melbourne. The No 3 Branch no longer shares offices with the No 1 Branch.



**BCOM Meetings**

- 7. I recall that, in early 2013, Ms Kitching told me that she would regularly meet with members of the No 1 Branch BCOM in advance of BCOM meetings. She told me she would sit down with them before the BCOM meetings, run them through and rehearse the meeting and suggest questions for them to ask during the meeting. She told me she thought the BCOM members were inexperienced.
- 8. This conversation took place in my office in the Park Street offices.

**Right of Entry Tests**

- 9. I recall that, in early 2013, Ms Kitching came into my office in the Park Street offices and said words to the effect of *"Did another one. Got 100% again."* She was boasting in her tone.
- 10. I understood her to be referring to the tests for right of entry permits, as we had previously spoken about right of entry permit matters and the need to sit a test. Almost all the new officials and new employees of the No 3 Branch did not have right of entry permits and needed to apply and sit the online test. Further, Ms Kitching had previously told me that many of the officials and employees of the No 1 Branch did not have right of entry permits and needed to apply and sit the online test.
- 11. I don't recall what I said in response. The interaction was very brief.

Affirmed by the deponent )  
At Melbourne in Victoria )  
on 24 November 2014 )

  
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Signature of deponent

Before me: )



**ENRICO BURGIO**  
of 456 Lonsdale Street, Melbourne  
an Australian Legal Practitioner  
within the meaning  
of the Legal Profession Act, 2004.