

**INQUIRY INTO NSW GOVERNMENT'S USE AND
MANAGEMENT OF CONSULTING SERVICES**

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**Submission to:
Inquiry into the NSW Government's Use and Management of Consulting
Services**

Ms Abigail Boyd MLC
Chair
Public Accountability and Works Committee
Parliament House
Macquarie Street
SYDNEY NSW 2000

Via Email: PAWC@parliament.nsw.gov.au

Dear Ms Boyd and Committee Members

**Inquiry into the NSW Government's Use and Management of Consulting
Services**

Introduction

Thank you for the opportunity to make this submission which I trust provides the Inquiry with insights required to properly inform recommendations to made by the Committee.

This submission is informed by my background as a chartered accountant for 40 years, including around two decades working with big 4 accounting firms to a National Director level across three sectors (audit, taxation and IT).

My contribution is limited to the issue of controlling the risk of unethical behaviour by big 4 contractors to the NSW government (ie Inquiry Terms of Reference Item 1(e)).

In broad terms, this submission challenges the portrayal given by Chartered Accountants Australia and New Zealand (CA ANZ) (submission 13) and the organisation part owned by CA ANZ (ie the Accounting Professional & Ethical Standards Board, submission 12).

I believe that this submission provides information which supports the central proposition made in submission 5 (ie consulting firms are not publicly regulated) by Emeritus Professor James Guthrie, AM, FCPA, Professor John Dumay, CA, Professor Jane Andrew, CPA and Dr Erin Twyford, CA.

The gist of this submission is that considerable evidence exists which points to the accountant's ethical code not achieving its intended purpose to limit unethical conduct by persons associated with the big 4 accounting firms, primarily since there is little or no effective enforcement against misconduct by such persons.

It is submitted that the unfortunate circumstances outlined in this submission would satisfy a rational fair-minded person that clients of big 4 accounting firms may not rely on the ethical code to prevent unethical conduct, particularly in relation to the concept of objectivity (where lack of impartiality gives rise to the conflict of interest issues noted in many submissions).

Pointers to the ethical code not being enforced against the big 4

A non-accountant may reasonably question why the ethical code could be relied upon to moderate ethical behaviour by sole practitioners and small accounting firms, yet apparently cannot be relied upon to moderate such behaviour by individuals associated with the big 4 firms.

Profit motives trump unenforced rules

The simple answer is that when rules are not enforced, the lower side of human impulses come to the fore and drives unwanted behaviour. History is filled with examples such as the behaviours noted by Commissioner Hayne in the Financial Services Royal Commission which were widely reported.

Findings made by Commissioner Hayne

In brief, Commissioner Hayne observed a problematic culture existed in the financial sector where the pursuit of profit is put ahead of the interests of customers:

... in almost every case, the conduct in issue was driven not only by the relevant entity's pursuit of profit but also by individuals' pursuit of gain whether in the form of remuneration for the individual or profit for the individual's business. Providing a service to customers was relegated to second place (Final report, pp.1-2).

Also highlighted were widespread failures of governance and compliance that led to failures to detect and address misconduct internally, as well as failures to report misconduct to the regulators in a timely manner and, in some cases, failing to report it at all.

Commissioner Hayne also argued that the regulators had failed to properly hold institutions to account for misconduct (interim report, p. 271). Commissioner Hayne asserted that some entities developed a mind-set that regulatory compliance was merely a 'cost of doing business' rather than a mandatory or minimum standard for conducting their business (interim report, p. 67).

The culture of profit prevalent in the big 4 firms has been observed in other submissions and there are no known factors which would provide any confidence that the issues highlighted by Commissioner Hayne would not exist in the management consulting sector. If anything, the risks are likely much greater since unlike the financial sector, the management consulting sector is largely self-regulated and clients are heavily dependant on the ethical code being enforced.

Why are ethical rules not enforced against the big 4?

This then begs the question of how/why are the ethical rules not enforced when it comes to the big 4? The answer requires an understanding of several important factors which work in an interweaved way, and these are outlined as follows.

CA ANZ and APESB lack objectivity in the context of this Inquiry

It is notable that CA ANZ and its related body APESB are not impartial when it comes to the issues being addressed by the Inquiry. They are effectively advocates for the big 4. It is submitted that their submissions don't provide a full picture of the reality relating to the effectiveness of the ethical code. While the content of those submissions may be true 'by the card', key factors bearing on a consideration of the ethical issues have been omitted. Lawyers on the Committee may call to mind the use of the word "tricky" by Lord Lindley MR at 365 in *Kaye v. Croydon Tramways Co* [1898] 1 Ch 358, at 368.

CA ANZ is responsible for monitoring and enforcing the ethical code

It is my understanding that the majority of the consulting work of concern to the Inquiry is the work performed by the big 4 firms. When it comes to individuals associated with the big 4, the key organising body responsible for enforcing the ethical code is CA ANZ. This is because the vast majority of such individuals are chartered accountants (CA). It therefore becomes necessary to understand some important features about CA ANZ and how it operates.

CA ANZ is not accountable to anyone except a judicial body

It is widely known that CA ANZ is a self-regulated body and essentially relies on a social licence to operate to promote the interests of the accounting profession. This requires upholding the highest standards of transparency, accountability and integrity, and CA ANZ rarely misses an opportunity to virtue signal its adherence to these important values. A key issue of concern is that the available evidence points to CA ANZ only paying lip service to such values (and examples appear later in this submission).

Less widely appreciated is that CA ANZ is constituted under a Royal Charter. Importantly, this means that stakeholders in CA ANZ, such as members and the general public, are not protected by the safety measures against oppressive conduct which are built into the corporations law which covers the vast majority of organisations in Australia.

Unlike similar accounting bodies such as CPA Australia, CA ANZ is not subject to regulation by ASIC. The practical effect is that CA ANZ is not accountable to anyone other than a judicial authority.

Big 4 firms can control CA ANZ (their regulator)

While CA ANZ is not subject to external regulatory authority, it would be well aware that any of the big 4 are in a position to effectively control the organisation. The reasons for this relate to CA ANZ's highly convoluted governance structure which in practice results in CA ANZ not being accountable to ordinary members unless they can act in concert with 100 other members. In practice this is only feasible for any of the big 4 firms.

Thus we have an organisation not accountable to anyone except the big 4 firms whose behaviour the public relies upon to control. The moral hazards built into this unfortunate setup are compounded where CA ANZ itself engages in unethical conduct which is known to the big 4 (since in practice the big 4 are the only bodies with the resources to expose such conduct to the wider membership and the public).

I'm sure that readers of this submission would appreciate the significance of this unfortunate circumstance for the public and any client of the big 4, however it is nevertheless useful to highlight how the consequences are not merely theoretical.

Examples reflecting the lack of enforcement of ethical rules against big 4 firms

Deloitte and the Full federal Court - Big 4 partners misbehave with impunity

In February 2020, the Full Federal Court described Deloitte as engaging in conduct being not much better than contumacious and bordering on contempt. See the judgement of the Honourable Justice Wigney in *Deloitte Touche Tohmatsu (A Firm) v Sadie Ville Pty Ltd (As Trustee for Sadie Ville Superannuation Fund)* [2020] FCAFC 23, 27 February 2020

CA ANZ was challenged to explain how, in the face of such reprobation, it could be appropriate to maintain a Deloitte partner as the CA ANZ president. CA ANZ failed to address the challenge and apparently did nothing to cut short the term of the then president.

To be clear, this is not to question the character of the then president but rather to highlight the issues associated with maintaining a Deloitte partner in the most powerful role of an organisation responsible for policing ethical behaviour.

Apart from issues around perceptions and appearances in relation to an organisation claiming to be committed to the highest standard of integrity, how could the public be satisfied that anyone accused of misconduct could be properly reviewed by a self-regulated conduct review body led by a Deloitte partner? This is especially the case if the person accused of misconduct happened to be a partner of the Deloitte firm excoriated by a Federal Court judge.

In my view, any rational person reading the judgement of Justice Wigney would be left wondering how it could be possible for the conduct brought for his consideration to meet the requirements under the ethical code. I'm not aware of any actions from CA ANZ which would have reasonably been expected to arise from that Federal Court case, especially since it was reported in the national media on 27 February 2020 (<https://www.afr.com/companies/professional-services/deloitte-partner-s-conduct-outrageous-and-contumacious-20200227-p544ur>).

It was also reported in the national media on the following day that:

"The main professional body for accountants says senior Deloitte partner [name redacted] could now be "liable for sanctions", including deregistration as a chartered accountant, after a federal court excoriated him for hiding documents as part of a failed legal strategy to avoid handing over information in a court action.

The warning from Chartered Accountants ANZ comes as Deloitte continues to support the Queensland-based partner after his conduct, along with the actions and evidence of the firm in the appeal, was called "outrageous and contumacious", "staggering", "absurd" and "conveniently contrived" by a Federal Court judge."

[<https://www.afr.com/companies/professional-services/deloitte-partner-in-the-sights-of-accounting-body-20200228-p5459o>]

At the time of writing this submission, the LinkedIn profile of the Deloitte partner at the centre of that Federal Court case shows him to still be active as a Deloitte partner and a member of CA ANZ.

Big 4 claim legal privilege against self-incrimination with impunity

Another significant feature highlighted by the abovementioned Deloitte's case is the apparent acceptance by CA ANZ of big 4 accounting firms claiming legal privilege against self-incrimination. For example, the abovementioned media article of 28 February 2020 states that:

"PwC is also seeking to use privilege to prevent its partnership from having to hand over documents in a separate action over its audits of failed education provider Vocation."

In Australia, privilege against self-incrimination entitles a person to refuse to answer questions or provide documents **if it would tend to incriminate that person.**

It therefore appears that the ethical code as it is enforced by CA ANZ, allows for a chartered account to admit (with impunity) to knowledge of information which would make them appear guilty of a crime or wrongdoing.

CA ANZ has ignored requests to comment on this apparently absurd stance which makes a mockery of the ethical code.

PwC abuse of confidentiality

The widely reported scandals involving big 4 firms, such as the current issue with PwC abusing confidential government information, are themselves confirmation of big 4 firms behaving as though there exists an unwritten understanding that CA ANZ would not enforce the ethical rules against them.

Professional Conduct Review forced by CA ANZ inaction against KPMG exam cheating scandal

It is notable that CA ANZ's submission highlights the Professional Conduct Review (PCR) it announced in July 2022, including the appointment of a former Federal Court justice to independently assess and provide feedback on the recommendations arising from that Review. Two factors not highlighted to the Committee are worth mentioning.

Firstly, the PCR was announced after considerable exposure in the national media during 2021 concerning the cheating carried out by KPMG personnel over a period of 5 years up to 2020. A telling sign of the (in)significance attached to the ethical rules by the big 4 in practice is that the exams being cheated on were open book exams.
(<https://www.afr.com/companies/professional-services/test-at-centre-of-kpmg-cheating-scandal-was-open-book-20210920-p58t7h>).

The Australian Financial Review (AFR) reported relevantly as follows on 20 September 2021:

"Accounting body turned a 'blind eye' to KPMG cheating

Chartered Accountants ANZ members have accused the professional body of allowing KPMG Australia partners and staff to get away with systemic exam cheating because of the big four firm's size and influence.

They say the CA ANZ has refused to take disciplinary action against the firm despite the US regulator doing so because it is so reliant on KPMG's funding and due to the sway the firm has over its leadership."

(<https://www.afr.com/companies/professional-services/accounting-body-turned-a-blind-eye-to-kpmg-cheating-20210920-p58t2o>)

Indicative quotes from the AFR article of 22 September 2021 include:

"But KPMG has yet to provide a public explanation of how hundreds, if not thousands, of its staff believed it was OK to cheat on a test designed to ensure they acted with integrity and had the relevant skills for their work."

"KPMG has forced two partners to resign, docked the pay of another 16 partners and 30 staff, and issued warnings to more than 1100 staff."

It was also significant that the scandal, centred on the Australian KPMG firm, was uncovered following an investigation by the Public Company Accounting Oversight Board in the US. The PCAOB found that the cheating was widespread and fined KPMG US\$450,000.

It was not until July 2022 that CA ANZ announced the results of its own review:

"CA ANZ said it had sanctioned eight of the 12 people it was investigating. The other four were let off."

"[A CA ANZ member] said the findings took "far too long" and were too soft, building on complaints from members that it allowed KPMG to get away with systemic exam cheating because of the firm's size and influence."

"CA ANZ chief executive Ainslie van Onselen defended the watchdog's comparatively soft response, saying the sanctions announced on Wednesday recognised the penalties the top four firm and its staff had already incurred from the PCAOB and an internal KPMG investigation.

She said she was “comfortable [the CA ANZ] process was considered expeditiously” as “it’s important to remember when matters are before a court or a regulator, we avoid [starting] investigations that could prejudice that process”.

(<https://www.afr.com/companies/professional-services/kpmg-accountants-cautioned-over-systemic-exam-cheating-20220712-p5b12y>)

It is noted that CA ANZ appears to hold the view that it is acceptable for enforcement of ethical code violations in Australia to be subordinated to an overseas body over which Australia has no control. Moreover, CA ANZ is also apparently comfortable to allow an indefinite timeframe for an overseas process (noting that an overseas body would only ever be relevant to a big 4 firm).

Other reports in the national media confirmed that numerous complaints had been made by members who shared concerns around the inactivity on the part of CA ANZ and the soft treatment afforded to KPMG.

(<https://www.accountantsdaily.com.au/regulation/17322-outraged-ca-anz-member-plans-agm-assault-on-board> and <https://www.accountantsdaily.com.au/regulation/17340-ca-anz-member-abandons-campaign-against-board>).

CA ANZ avoids a truly impartial review of conduct review process

Apart from the Professional Conduct Review being driven by media exposure and member dissatisfaction, a second factor to note in relation to the PCR is that it is portrayed as being independently assessed. The reality is that the Review was led and influenced by the persons who should be the subject of review. It is impossible for such persons to be considered to be impartial in reviewing their own work. The so-called independent assessment by the former judge was in respect of the recommendations made by the review.

Since objectivity is a fundamental requirement in the ethical code, CA ANZ would be expected to be aware that there is a significant difference between a review which is truly independent and accountable to members and the public, compared with a self-assessment presented as a fait accompli.

CA ANZ's own conduct inexplicable

As a self-regulated body and the only monitor and enforcer of the ethical code as far as chartered accountants are concerned, it is important to consider the conduct of CA ANZ: how well does it uphold the principles of transparency, accountability and integrity?

Over the last five or six years, I have attempted to make CA ANZ accountable for dozens of acts which appear inimical to members' best interest and explicable only through self-serving motives.

CA ANZ in denial

CA ANZ determined to avoid impartial review

The common factor in all of the CA ANZ responses is that they have ignored the fundamental requirement in the ethical code for objectivity. My repeated calls over many years for an impartial review in members' best interest have been ignored. The ethical blindness apparently prevalent at CA ANZ around the fundamental requirement for objectivity was confirmed early in my endeavours to seek accountability as reflected in the following statement made by the then chair and president (my emphasis):

*"You have stated that Directors cannot be reviewed for professional misconduct. In fact, the Professional Conduct Oversight Committee (PCOC) has the power and the ability to consider matters concerning member Directors of CA ANZ including professional misconduct. **The fact that the PCOC is appointed by the Board does not mean that the members of the committee could not impartially consider a Director's conduct.**"*

It is clear by their statements and conduct that senior officers of CA ANZ operate under the belief that they can be considered to be impartial when reviewing their own conduct, and impartiality can also somehow exist where they appoint their judge and jury.

Recent examples of unresolved ethical issues

Readers of this submission may find it easier to accept these claims after considering the nature of the issues I and other independent and impartial members have raised. Here are some examples in brief outline (all of which are supported by information in the public domain or correspondence which I would be pleased to share):

- portraying a \$16 million hit to equity in 2019 as being a "surplus" [Note 1]
- portraying a \$3 million hit to equity in 2020 as being a "surplus" [Note 1]
- issuing accounts in 2018 which stated that AASB15 was not expected to have a material impact and yet when adopted in 2019, the standard, unchanged since 2016, resulted in adverse restatements in the order of \$16 million [Note 2]
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- portraying a governance review as independent when it was led by the people who should be held to account (with consequential significant adverse consequences for members) [Note 4]
- lack of disclosures in AGM emails [Note 5]
- claiming that member-led motions to hold CA ANZ accountable for such matters at the 2020 AGM were "illegal" and thus quashing them [See Appendix A and Note 6 below]
- Following the quashing in 2020 of the proposed AGM motions led by the required 10 members, CA ANZ orchestrated to change the rules in 2021 to henceforth require 100 members to make such requests.

Details of such matters were included in my submission #111 to the Australian Joint Parliament Inquiry Into The Regulation of Auditing (see the Links section below which also leads to the CA ANZ and CPA Australia responses so that readers can form their own view on the merits of their positions).

Lack of rational straightforward responses

Notably absent from the CA ANZ responses to the issues raised are explanations which can be considered to be rational and impartial, rather than self-serving. The abovementioned circumstances may be contrasted with the following statement made by the then Chair in the CA ANZ 2017 Annual Report:

"We are ever mindful that as your member body we are here for the sole purpose of serving your needs"

Unexplained sudden departures of former CEO and Chair

Such questions are compounded by the sudden and unexplained departure of her predecessor CEO (after also having early-terminated his immediately prior position as CEO of the Te Papa Museum in New Zealand for 'personal reasons' - it was never properly explained how those reasons could be compatible with accepting the CA ANZ CEO role). The current chairman's immediate predecessor also departed suddenly soon after his term commenced for reasons which still remain unknown. Leaving members and the public in the dark on such matters raises unnecessary questions around how the values of transparency, accountability and integrity are upheld by the organisation.

Financial performance factors

Since the pursuit of profit has been mentioned in submissions and by Commissioner Hayne as a possible factor explaining unethical conduct (and this seems likely to be the case in relation to consulting partnerships), it should be noted that CA ANZ is intended to operate on a break even not-for-profit basis.

In any event, since the time of the amalgamation between the Australian and New Zealand bodies in 2015, the accumulated operating surplus as at 2022 has declined by around \$29 million. This represents an average loss since the merger of around \$3 million, compared with an average profit of \$3 million for the Australian arm leading up to the merger. If the promised annual savings of around \$15 million had been realised, the accumulated shortfall in financial performance since 2015 would be around \$140 million as at 2022. Further losses have been flagged for the 2023 year. CA ANZ does not highlight these accumulated results and these numbers are according to my calculations based on the relevant annual reports.

Concluding remarks

members and the public are left wondering how such actions can be regarded as being consistent with the highest standards of integrity required by the ethical code.

With their own resources apparently being used against them, around 135,000 honest and hardworking CA ANZ members remain either ignorant of the behaviours questioned, or powerless to do something about it.

I should make clear that after many years of working as a CA, including with two of the big 4 firms, my experience has been that ordinary members are hard working and honest, doing their best to cope with significant technical accounting and legal challenges, and generally meeting if not exceeding the expectations of their clients.

Ordinary members trust their organising body to do the right thing, and in my view, all the indications point to such trust having been abused by a relative few individuals in leadership positions who would be expected to know better. It is notable that similar issues were experienced in recent times by members of CPA Australia who share a similar governance structure, and these were widely covered in the national media.

In closing I'd like to share my observation that the absence of enforced regulations will continue to give rise to the kinds of behaviours noted by Commissioner Hayne since they reflect a universal law of organisational behaviour whereby after a period of time, every organising body will tend to prioritise its own self-interest over those of its stakeholders.

I wish the Committee well in its endeavour to serve and protect NSW citizens from the ethical risks associated with professional firms who are not publicly regulated.

I would be pleased to provide additional information on the above if desired.

Yours sincerely

Gerald Jaworski

Notes

Note 1 - Portrayal of significant hits to equity as "surplus"

CA ANZ announced its 2019 results as being a "surplus" in circumstances where the details in the accounts showed retroactive adverse adjustments with a net detrimental effect more than 200 times greater than the highlighted operating result.

This is akin to a stock broker announcing to a client that he had a surplus result due to a \$100 dividend, and leaving him to discover in the fine print that his portfolio value had declined by \$20,000.

Similarly, CA ANZ experienced a \$3m hit to equity in 2020, and its result was also portrayed to trusting members as being a "surplus".

[Also see below link to CAANZ accounts].

Note 2 - Questionable accounts

The CA ANZ 2018 accounts state that AASB15 was "not anticipated to have a material impact on the Group's financial reporting" after that unchanged standard was carefully considered by CAANZ for many years. However, CA ANZ in 2019 revealed retroactive adverse adjustments due to AASB15 in the order of \$15 million, and that the operating surplus for 2018 had been overstated by 118%,

[Also see below link to CA ANZ accounts].

Note 3- Ignoring pointers to fraud

[Also see below links to Australian Parliamentary Inquiries].

Note 4 - Portrayal of Governance Review as "Independent" when apparently led by CA ANZ Leaders

A so-called 'independent' review was led by the Governance Committee apparently dominated by CA ANZ directors including the CAANZ chair, the president and the two vice-presidents.

The external reviewer, when challenged by a member on his findings, stated that: *"The Board of CA ANZ are our client and we don't discuss assignments unless we have some authority from the client to do so."*

The board presented members with various proposals to 'streamline' the structure. These resulted in director terms being extended from 6 years to 9 years (described under the heading "Provide increased continuity in Board appointments") and the vice-president roles being promoted to director roles (under the heading "Increase flexibility and inclusion of representation").

The 'streamline' changes also enabled the then chair to later receive a life membership (the same person who directed members from 2009 to 2019, despite a clear intention in the constituent documents for terms to be limited to 6 years).

The governance review ignored significant flaws in the existing structure and further disenfranchised ordinary members. As noted in the national media, it also did not present the costs and disadvantages associated with the proposals.

A group of seven FCAs publicly expressed concerns around CA ANZ which were reported in the national media yet ignored by CA ANZ.

"The standout principle from the ASX document is to: "Instil a culture of acting lawfully, ethically and responsibly" and as behaving ethically and responsibly is embedded in the DNA of Chartered Accountants, that is also the standard that we should expect from the CAANZ Board."

<https://www.afr.com/companies/professional-services/chartered-accountants-unhappy-with-proposed-changes-20190518-p510ou>

<https://www.linkedin.com/feed/update/urn:li:activity:6536399529707741184/>

[Also see below links to Australian Parliamentary Inquiries].

Note 5 - Lack of disclosures in notices for AGMs

The email sent to members for the 2019 AGM made no mention of a special item of business to increase remuneration for directors and office bearers, and the AGM was held in Wellington New Zealand with no practical way for the vast majority of members to vote against the motion, even if they somehow became aware of it.

It seems that CA ANZ relies on a document posted on its website as being the official "Notice" concerning the AGM (ie a document whose key contents were kept hidden from members in the email sent to them). Even the website 'notice' failed to reveal the reasons for the sudden change of auditor proposed for that meeting and also not mentioned in the email to members (this also being at odds with CA ANZ's recommendation to a Parliamentary Auditing Inquiry).

Note 6 - Quashing member attempts to hold CA ANZ to account

A particularly disturbing issue is the quashing by the board of 38 member-led AGM motions seeking to hold CAANZ to the same standards by which all professional accountants are bound. The proposed motions were placed on the CA ANZ website for an unknown period but have since been removed. A copy has therefore now been included as Appendix A to this submission.

CAANZ claims that such motions are somehow "illegal", despite the CA ANZ constitution making it clear that all the powers of the board are subject to the control and regulation of a general meeting. The board has repeatedly been requested to present evidence of the "thorough testing" it claims supports the "certain legal principles" it relies upon to quash the motions.

Regardless of the legality of the CA ANZ quashing action which will hopefully be properly determined in due course, the question remains how such behaviour can be considered to be consistent with fundamental accounting principles such as transparency and accountability.

Links

Links to more detailed information concerning the CA ANZ issues, including the CA ANZ responses, are as follows:

CA ANZ links

Here is a link to the CA ANZ web page containing links to its Annual Reports since 2018: <https://www.charteredaccountantsanz.com/about-us/governance/annual-reports>

In relation to its 2020 AGM, the content previously housed on the CA ANZ website has apparently since been removed with reasons not given. The below Appendix A is a copy of the proposed motions which were quashed by the CA ANZ board.

Australian Joint Parliament Inquiry Into The Regulation of Auditing - Link

Here is a link to the submissions page of the abovementioned inquiry - see submission #111 and the CA ANZ response. There is also a response from CPAA which may be of interest. In passing it is noted that for some unknown reason, CA ANZ has chosen not to adhere to its own recommendations made to the Inquiry relating to a change of auditor.

https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Corporations_and_Financial_Services/RegulationofAuditing/Submissions

Here is a link to an earlier Australian Senate Inquiry triggered by issues relating to the CPAA governance implosion. It also contains most of the content which was redacted from the submission to the Auditing inquiry (see submission #13 and the CAANZ response):

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/MembersRegistrationBill/Submissions