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30 July 2018

RE – Closing Submission for the ICAC Evaluation

Dear Commissioner Lander QC,

Thank you and your team for undertaking this evaluation and specifically undertaking the work in a sympathetic, diligent and highly professional manner. I appreciate this is an unsettling event for some SafeWork SA staff but it has been eased by the manner in which you and your team supported our people through the process.

Also, thank you for opportunity to provide closing comments.

Lastly, I would like to thank the organisations and individuals who took time to contribute to the evaluation which will, ultimately, lead to improvements across our Agency.

I believe the feedback from South Australia Police and the Metropolitan Fire Service is valid and very constructive. SafeWork SA has already identified some issues relating to our interactions with SA Police and we have changed our processes to ensure one procedure is followed through a central point of contact. This will make our interactions more transparent and auditable. We will also make sure other suggested improvements are implemented and continue over time.

I acknowledge a submission relating to the recruitment and retention of degree qualified professionals in key roles and that it suggested SafeWork SA does not have those people in place or they are reduced in numbers.

My oral submission identified the majority of our workforce as talented, skilled and highly qualified. This includes people with PhD's, Masters Degrees (or multiple Masters Degrees) and other degree qualifications. We have experts in varying types of engineering, lift devices, pressure vessels, chemical engineering, explosives and mining to name a few. I refute the fact that SafeWork SA does not recruit and/or retain these people. In fact, the attrition rate at SafeWork SA is one of the lowest in the Public Service at approximately 3.4%.

Overall, SafeWork SA requires a balanced workforce that is representative of the community and industries we serve. That means employing people with a broad range of skills, experience and qualifications from all industries. The more important issue for me is to ensure we work collaboratively as a team and not in silos, which has occurred under previous management and team structures, including what was known as the Dangerous Substance Team. I can see few easier ways of creating silo mentalities than delineating people by "professional" qualifications.

Other submissions reflect occasions where a former Inspector was confronted with an event that challenged decision making. My initial submission reflected the current SafeWork SA position that this is a risk, it is not currently adequately managed and could occur. We are actively working towards managing that risk and the broader risks relating to fraud and corruption and their controls.

I believe the comments of other written submissions will be addressed through our reform program but I acknowledge them and thank the individuals for contributing.

The Public Service Association (PSA) submitted a written submission and made further extensive oral submissions on the 11th July 2018. I wish to address a number of factual inaccuracies and also clarify some misconceptions contained in those submissions. I will do this first under their heading titles within the written submission, and second by reference to the transcript of the hearing.

From the written PSA Submission

Workload

The PSA state Time off in Lieu and Flexi hours have commonly added up to 80 and 50 hours respectively to an inspector's monthly working hours. I would be grateful of them providing specific information to me as this situation is not acceptable unless agreed to by the worker and manager.

As our time records system is electronic we should be able to find these anomalies quickly but I have not been able to find a record of such hours having been worked in recent times. If the PSA have specific details then we can address it. That said, I am confident that such excessive hours would be rare and not the norm. A range of work has been undertaken with Managers to provide them with the tools and skills to enable them to manage instances where staff accrue large amounts of flexi time. The statement made by the PSA is a rarity in our business when regular audits are undertaken by management and HR.

Leadership

The PSA reference changes in leadership. They reference the change of three Executive Directors in a 28 month period between February 2016 and June 2018.

One of these persons was an acting position, given the sudden resignation of the incumbent at that time. Firstly, placing someone in an 'acting' arrangement is normal organisational management practice when another person leaves a business. Secondly, under the *Work Health and Safety Act 2012* (the WHS Act) the Executive Director of SafeWork SA is the "Regulator" as prescribed in the WHS Act. Therefore, the position requires a named individual to be in it so that statutory functions can be carried out.

I am unclear of the point being raised as to the changes of the Executive Director but am happy to be provided with more specific detail.

The PSA refer to “*Between Feb 2016 and June 2018 the Director of Investigations (formally known as Director of Compliance and Enforcement / Chief Inspector) changed five times*”. This is incorrect.

The Chief Inspector and Director of Investigations roles are two separate roles, occupied by different people. Documentation describing and clarifying these roles and structures were submitted to the PSA at the time they were created, in late 2017.

The latter was introduced after the Review into SafeWork SA Investigations and Prosecutions Function by the Crown Solicitor’s Office Special Counsel. This role took control of the investigations function and team, and ownership of delivering outcomes against the Review recommendations, which are accessible on the SafeWork SA website.

The table, within the PSA written submission, refers to the terms ‘*Authorised*’ & ‘*Unauthorised*’ Investigators, which are both unclear to me and something I have not heard of before.

Change Management

The PSA state SafeWork SA has undergone a number of reviews and I accept that. However, the PSA state the reviews are the cause of the policies and procedures becoming out of date. This is, in my view, incorrect. A lack of adequate management and control of a rigorous document management system is the cause of out of date procedures, not because of a number of change projects.

In the second paragraph of this section the PSA state, ‘*Recently the organisation has improved its consultation processes by providing more opportunity for feedback on proposed change. However, consideration of that feedback and provision of responses to members’ input remains an issue.*’ As I have appointed a dedicated Executive Change Manager, who is also a Human Resources Specialist, I am glad to see that her work is being felt, appreciated and considered an improvement. However, the second sentence suggests that I do not consider that feedback. This is incorrect, I do consider all feedback and it is structured in a documented process

managed by the Executive Change Manager before being passed back to the workforce via several mediums, including 'Town Hall' Whole-of-Agency meetings, email, electronic newsletters and our monthly PSA Consultative Committee Meeting.

The PSA states, *"Inadequate and insecure funding has caused planning to be abandoned or implementation of projects to be rushed to beat funding cuts."* I would appreciate some specific detail in relation to this broad statement as it is something I am unaware of. This is certainly not the case since my tenure commenced.

The PSA also state there are issues with the roll out of Tablet IT technology. They state, *"The tablets cannot perform basic requirements including uploading photographs and burning evidence discs. Consultation with staff would have ensured that this functionality was part of the procurement process."*

These Tablets were introduced as a strategy to make our workforce more mobile, ease operations in the field and to update old hardware. The Tablets are the latest Hewlett Packard Tablet technology loaded with Windows 10. They have built in cameras, detachable keyboard, Wi-Fi connectivity, a data SIM included for those needing internet access in the field and come with a docking station to connect to desktop set ups. They are the standard Tablet device allocated through the Attorney General's Department (AGD) ICT Department to all AGD staff.

I introduced this change because a significant number of people complained about having to take large, old laptops into the field and they were too big, bulky and out of date. In order to provide workers with contemporary and up to date tools for their work I changed the entire hardware with new tablets or desk top computers.

I believe there was no requirement to consult with the workforce or PSA on this issue as I believe it was a normal business decision to upgrade IT hardware and AGD ICT had already done this through their whole of agency IT procurement strategy. SafeWork SA was merely updating old hardware with new. Essentially, we were replacing what was referred to as "bricks" with new Tablets which is what staff had requested.

To ease the transition, a roll out plan was developed and we ensure that we had 3 or 4 IT Specialists, some internal SafeWork SA staff and some from AGD ICT, walking the floors assisting staff to use the new tablet. We also ran twice daily training sessions on how to operate Windows 10. Staff were provided with regular communication about the schedule for their IT replacement/update and for training. In most cases only three to four people attended the training.

I accept that some of the 150 Tablets were not working correctly and needed to be replaced under warranty but I do not accept that they are not capable of being used in the field. To date, I have not had a formal complaint about the Tablet or it not being capable of being used in the field but rather positive feedback on how easy they are to use. Additional IT equipment was ordered to address the issues of burning evidence disks or uploading photographs. At the time of ordering the equipment, the delivery scheduled was planned that this equipment would be available at the same time as the tablets. However, due to unforeseen circumstances (out of our control) delays occurred in the delivery of the additional equipment. I can confirm that all this additional IT equipment has now been delivered and available to Inspectors and Investigators.

If the PSA have further specific detail on this comment I would be happy to take that and investigate.

PEACE Interview Training

The PSA state that the *“PEACE interview model requires two Inspectors to undertake it and that would reduce the number of workplace inspections”*. Mr Kitchin also referred to this in his oral submission at page 9, line 27. This statement is incorrect.

The PEACE Investigative Interview Model can be used by one or two people. It provides a structured, psychology based methodology for taking witness statements and interviews with suspected wrongdoers. Whilst some situations would require two people to interview, it is not essential or necessary. It is a policy decision to require two people to interview, not a requirement of the PEACE Model itself. The

Operational & Legal Support Team (OLST) will provide clarity on the strategies used to interview but the model is certainly not mandated to have two interviewers and this is clearly communicated in the training program.

Decision Making

The PSA state, *“There are many matters recommended for further investigation by Compliance teams which are returned from the Investigations team to the Compliance teams. It is the view of PSA members that the lack of resources and workloads in the Investigation team is a significant cause of this rather than the matters failing to meet the criteria for further investigation”*. This is incorrect.

Referrals back to the Compliance Teams are due to cases not meeting the criteria for a full investigation. In accordance with the National Compliance and Enforcement Policy, the finite investigation resources are devoted to matters where the available evidence indicates a serious breach of the legislation that warrants consideration of prosecution.

Matters may be referred back to compliance teams in cases that are assessed as best being appropriately responded to by use of one of the other enforcement options available to the regulator.

To address a range of concerns raised in the Investigation and Prosecution Review our operating model to respond to incidents has changed and we now adopt a multi-disciplinary approach to responding to serious incidents. This means an Inspector, Investigator, Team Leader or Manager and subject matter expert are involved in the Agency response at the earliest opportunity. This allows us to maximise the opportunity to secure the scene, witnesses and evidence through the coordinated use of people with a broad range of skills and expertise. No longer is a Senior WHS Inspector expected to respond to serious incidents on their own - we attend as a team and in a structured and methodical manner. In some instances, if a team is not available, the minimum standard will be the Senior WHS Inspector attending with a Team Leader and/or Manager although this should be a rarity.

This process is overseen and managed by the Investigations Team Manager. The Manager of OLST is on hand to support site based Inspectors and Investigators to coach, mentor and provide best practice advice at the request of the Investigations Manager and to assist with resourcing, if required.

If an incident is determined as not meeting the criteria for a full investigation then it is referred back to the Industry Team Manager for allocation to an Inspector. Inspectors have been provided training in investigation management, scene management, PEACE investigative interviewing and root cause analysis to aid them to better undertake their work on routine compliance investigations, breaches and prosecutions. Only the most serious or protracted incidents are accepted by the Investigations Team. That said, any compliance case can be escalated to the Investigation Team, at any point, if the severity of the case requires it.

Oral Submission 11th July 2018

In relation to the oral submission I have the following comments.

Page 3, line 15 – Mr Kitchin states there was a “*revolving door of Executives*”. I do not agree with this statement. I am only the 4th substantive Executive Director in the last 13 years. All other Executive Directors spent time in the Agency as Directors before being promoted. I don’t consider 4 Agency Heads in 13 years as a revolving door. Senior Executives are appointed by the Departmental Chief Executive for a period of 3 years. Occasionally, at the determination of the Chief Executive, these contracts are not renewed.

Page 4, line 1 – follows on from the above statement that Mr Kitchin considers sound leadership is more essential in a regulatory environment but does not qualify the statement with a reason why. I consider any senior executive role in any business across any industry requires sound leadership or else it is, regardless of industry, doomed to failure.

Page 4, line 13 – Mr Kitchin links the ‘*revolving door of executives*’ statement to the reduction of Investigators to one position in March 2018. This is incorrect.

Firstly, the change in Executive cannot be, and is not, correlated to the reduction of Investigators. The reduction in numbers of Investigators was solely down to a team restructure whereby the role of the Investigator was updated, upgraded, reclassified and realigned to match other Government Investigator positions. A new Job & Position Description was written and a recruitment process commenced against the new requirements. This included a newly developed assessment centre to ensure we recruited the right skills, values and behaviours for the roles. This assessment centre assessed candidates ability against the essential criteria and formed part of the recruitment process. Also included was shortlisting, abilities assessments, interviews and referee checks. This was a recommendation from the Investigation and Prosecution Review by Special Counsel from the Crown Solicitor's Office.

Some Investigators decided not to apply for these new roles. These Investigators were moved, at their request and with the knowledge of the PSA, into an Inspector role at their substantive classification level.

Others embarked on applying for a new Investigator role, which is now classified at the ASO 6 level. Some were successful and others were not. The unsuccessful applicants were moved into an Inspector role in an Industry Team at their substantive ASO 5 classification level. The two successful applicants remained in the team but at a higher classification of ASO 6. One Investigator who was already substantively classified at ASO 6 level did not have to undertake the application process, as they were job matched into the newly created ASO6 classification level and therefore remained in the team.

Therefore, of the eight Investigators in the team at that time, three remained in the team and the others were assigned to the Inspectorate. Further, the implementation process for the new structure, namely the proposed recruitment process, was disputed by the PSA and their members which resulted in an appearance in the South Australian Employment Tribunal (SAET) over the matter. The vacancies resulting from this process required me to backfill with two experienced Investigation Advisors, on 6 month contracts, whilst I recruited for new positions, to ensure that SafeWork SA was able to respond to investigation matters. These Advisors were have high level investigation skills but are not designated Inspectors under the WHS

Act and therefore do not possess any powers of an Inspector. They are purely an advisory capacity.

Therefore, I disagree with Mr Kitchin's submission on the executive changes being responsible for a lack of Investigators. The PSA were informed, consulted and present at every stage of this process up to, and including, the appearance in the SAET.

Page 7, line 38 – Mr Kitchin states I do not understand consultation, as defined in the South Australian Modern Public Sector Enterprise Agreement: Salaried 2017 (EA). This is incorrect.

I believe we have a different interpretation of the definition. As you Commissioner correctly stated on the 11th July, the process, as described by Commissioner Smith in CPSU v Vodaphone authority, allows for an opportunity to provide feedback but the decision maker does not have to change his/her mind and must, at some point, call an end to consultation (paraphrased).

In addition, to ensure that I do comply with the consultation provisions in the EA and consult in good faith, I have employed an Executive Change Manager, with significant experience in consultation to ensure that someone always has oversight of the process and that it is consistent in the agency.

Page 7, line 44 – This is misinterpreted. I reaffirm my position outlined in my oral submission relating to the effective use of government vehicles. The workforce consultation period is now closed and feedback is being considered, with additional follow up conversations being undertaken with individuals who requested them.

Page 8, line 41 – this comment relates to the project on Expiation Notices where Mr Kitchin refers to it as "*going well*". I do not share this view and it is an example of a project I consider is frustratingly slow when, in my view, it need not be.

The implementation of Expiation Notices should be a quick and easy process for SafeWork SA. We are empowered to issue an expiation notice under the WHS Act.

Other Regulators have the same or similar powers, with expiation processes already in place and the South Australian Government has a Fines Recovery Unit to collect unpaid notices.

I see this project as a simple process that should take no longer than 3 months to implement, particularly when the WHS legislation allows us to do it and many other Regulators have already used this process in past. The main objective behind the proposed procedure was to allow our Inspectors to issue expiation notices, to streamline the process and enable simplicity to the process.

A large amount of work had previously been done by a Team Leader who was leading the project and implementation, but this work did not progress through previous leadership. I recommenced the project at the request of Inspectors.

Nearly 9 months have lapsed and we are still in consultation with the PSA as some workers perceived this to be a significant increase in workload. I consider this delay and the issues causing the delay unnecessary and unacceptable and is another example of my frustration of slow processes, particularly since the legislation providing this option commenced on 1 January 2013.

Page 9, line 14 – following on from a comment by Mr Kitchen that my submission regarding consultation was “*exaggerated and misdirected*”, Mr Kitchin states the removal of the word “significant” from the Employment Agreement consultation clause assists employers and employees to understand the true meaning of consultation. This may be his view but the consequence of removing that word is a requirement to consult the PSA on every change.

This was specifically requested by a PSA Organiser to the Executive Change Manage and myself in a PSA / SafeWork SA Consultative Committee meeting. This has resulted in the requirement to formally write to the PSA on every proposed change (including proposed policies or procedures) and is a significant administrative burden which is slow and cumbersome and poses a significant impediment for me to effectively and efficiently manage the delivery of our service to the South Australian community.

Page 11, line 9 – In relation to the Government Fleet, Mr Kitchin refers to possessing evidence of contractual entitlement to a government vehicle. I am unaware of any SafeWork SA Inspector having a contract of employment providing such an entitlement. I would be happy to receive the evidence in Mr Kitchin's possession.

I have publically stated that I do not consider the use of a government provided vehicle to be a contractual employment right but I am willing to reconsider this view on the production of a contract of employment that specifically includes a term allowing for a car.

I accept the need to have access to a government vehicle to undertake the work of an Inspector and my suggestion of a 'pool' system of vehicles is the proposed solution. This proposed solution will still enable Inspectors to have daily access to a vehicle but at the same time ensures fiscally responsible use of a publicly funded resource and in accordance with the relevant whole of public sector policy. This solution was one of the solutions from the Workforce Fleet Optimisation Working Group.

Page 13, line 23 – Mr Kitchin states that decisions on incident classification are made by external agencies, such as "Crown Law". This is incorrect.

The Crown Solicitor's Office and their lawyers provide legal advice to me and SafeWork SA more broadly, but are never decision makers. Their advice is solely to allow decision makers within the Agency to make informed decisions. They do not make decisions on behalf of, or for, SafeWork SA.

Page 17, Line 21 – Mr Kitchin comments on an ASO 6 classification using a vehicle out of hours. This is incorrect.

The classification of a person who uses, or may use, a vehicle is irrelevant. The use of vehicles outside of work hours is whole of South Australian Government policy. It

does not depend on a particular classification. It is not allowed unless specifically approved.

Page 20, line 11 (and page 22, line 17) – In relation to the PSA providing clarity on what they would not require consultation on, I welcome Mr Kitchin presenting a list of circumstances for which the PSA would not require consultation.

Page 24, line 34-42 – In relation to the written submission on the use of Tablets, Mr Kitchin orally changed his submission. He previously stated that *“The tablets cannot perform basic requirements including uploading photographs and burning evidence discs. Consultation with staff would have ensured that this functionality was part of the procurement process”*. This has changed to an acknowledgement that it is the content rather than the hardware that is an issue and there needs to be better instruction. I am happy to ensure additional training, coaching and support is provided to those who need it.

Page 28, line 5 – I cannot confirm Mr Kitchin’s statement about particular solicitors and lawyers in “Crown Law” (the Crown Solicitor’s Office) *“not having WHS experience”* but I can confirm that during my tenure I have found all Crown lawyers I have dealt with to be of the highest order. There has not been one occasion during my time at SafeWork SA when a Crown Solicitor is anything less than superbly conversed in the WHS legislation.

I would be happy to pass feedback to the Crown Solicitor regarding the performance of particular lawyers if the PSA wishes to supply that information. That said, I cannot accept that work by any Crown Solicitor engaged by SafeWork SA is anything but exceptional.

Response to the written responses to questions taken on Notice

I will respond to each question as they appear in order on the PSA written submission, dated 25th July 2018.

2. Measures that genuinely enable SafeWork SA to more effectively discharge its functions as the State's Work Health and Safety Regulator.

I disagree with the statement that most ASO 5 Inspectors "*now spend much of their time doing office based work*". This is a broad and sweeping statement that is not reflective of the majority of Inspectors, is not supported by data and is incorrect.

Each Industry Team has administrative support. Inspectors access and use this function within their team. There is some office based work which is expected of any regulatory compliance role. The business improvement 'deep dives' that are currently underway are identifying differences in teams on how administrative support is utilised and identifying opportunities to reduce the amount of administrative work performed by Inspectors. However, the workforce mobility strategy is enabling our workforce to be more mobile and allows them to be field based more often.

It should be noted that when suggestions are made about assigning more administrative tasks to the administrative support staff, some Inspectors are reluctant to do this as they have a preference for performing that work themselves. Therefore, making a sweeping statement that "*now spend much of their time doing office based work*" is inaccurate when the amount of administrative work varies from Inspector to Inspector.

4. Inadequate policies and procedures

The training program for Inspectors is not 5 weeks, as indicated in the PSA response.

Development of the SafeWork SA Training Framework is a recommendation of the Investigation and Prosecution Review and we have invested heavily in updating this

program. Documents provided to this Evaluation and in my previous submissions outline key aspects of it.

The Inspectorate training program is not just the 5 day Investigation Management Course from Charles Sturt University. That is one aspect of it. The topics highlighted in the PSA written response are already written and scheduled in the Inspector training program, which covers a 16 week training program along with extended field based competency assessment.

I cannot comment on what was delivered 5 years ago, but I can comment that the current framework is contemporary and underpinned by a curriculum document with learning materials that deliver against the performance requirements of the role.

5. Vehicle related entitlement

In relation to the documents submitted by the PSA to show the contractual entitlement to the provision of a vehicle, my original statement in my oral submission stands. I do not consider the 'Frequently Asked Questions' Sheet to form part of the Government Contract of Employment.

12. Budget cuts of \$6.3m

Firstly, the proposed savings target referred to in my email to staff is \$6.4m.

Secondly, this was a proposed target which was not confirmed. I was permitted, at that time, to share this target with my Agency, hence my email to staff to socialise the proposal and seek people's involvement in contributing to strategies.

Thirdly, as the proposal was not a confirmed value, I left the topic from my oral submission because I was in discussion about alternative strategies. The result of those discussions with the new government has seen a significant reduction.

13. Files reopened due to ICAC Evaluation

I am concerned that this suggestion implies files were not correctly finalised in the first instance. SafeWork SA will investigate this further and is happy to receive specific information from the PSA in this regard. I am also concerned that staff notified the PSA before notifying any SafeWork SA Manager. It is also concerning that the PSA did not forward this concern to SafeWork SA prior to this disclosure.

The correct closure of compliance files is critical. The OLST Team will have an oversight and quality control function in this respect going forward but I am concerned that this statement infers files were closed without the required documentation attached. SafeWork SA will investigate this further and is happy to receive specific information from the PSA in this regard.

14. Review of prosecutions and access to recommendations

To clarify, the recommendations for this review were emailed to all SafeWork SA staff and the PSA. There were also hand delivered to some relevant parties. They were uploaded to the SafeWork SA website and I authorised a message to be circulated on our social media sites. There can be no reasonable conclusion drawn that access to the recommendations were not widely communicated.

Further to this the PSA was provided with a second copy of the recommendations in a hard copy at the attendance in the SAET. The PSA Organiser at the time had also claimed that they did not have access to the recommendations, at that point they were handed the email that was forwarded to the PSA with my communication to staff and the recommendations attached.

I reaffirm my previous communications to the PSA and Investigations Team, and what I presented in the SAET, that the Investigations Team capability review was not a 'spill and fill' but a genuine process of capability assessment against a new requirement and a new structure to operate at a level that aligns with other government agencies.

The process also included a skills matching process of existing Investigators to the new requirements of the role. This was a specific request of the PSA which I agreed to in the SAET hearing. The PSA agreed that if I undertook the skills matching process then they would accept the outcomes and consequential application and assessment centre, which some Investigators decided not to apply for.

In relation to the comment on a lack of Memorandum of Understanding (MOU) between SA Police and SafeWork SA on the exchange of information, this is a moot point. SA Police have requested SafeWork SA to follow a formal process of applying the WHS legislation for the request of information. This negates the need for a MOU as we simply apply the powers afforded to us under the WHS Act.

17. Culture at SafeWork SA

I do not agree with this statement. My oral submission identifies that the root causes of many issues at SafeWork SA *do not* sit with the Inspectorate and this was clearly articulated at that time.

19. Two Inspectors attending workplaces

I have already previously addressed this issue regarding the PEACE Model and confirmed that it does not require two Inspectors.

20. Issues and concerns in relation to Inspectors from Compliance Teams being sought to relieve in the Investigations Team

I have already addressed in my oral submission the improvements being implemented to address the management of teams and people across the Agency. This is part of the wider reform program.

24. Procedures and consultation on matters listed at page 6 of the PSA submission of the 15th June 2018

Further to what I have set out above in relation to the requirement and request to write to the PSA in relation to all workplace changes, this explanation of when consultation is, or is not, required does not help me to determine what should or should not be consulted on.

Commissioner, this concludes my final submission to respond to comments made by participants to the evaluation. Again, I thank you, your team and the stakeholders who took time to contribute.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M. Campbell', with a long horizontal stroke extending to the right.

Martyn Campbell
EXECUTIVE DIRECTOR
SAFEWORK SA