



Sydney CBD and Five Dock
Mail: PO Box 607 Five Dock NSW 2046

19 March 2013

To the Productivity Commission.

I have had an extensive career in both large corporates and small business and recently had the opportunity in working with the Council of Small Business Australia on the Stronger Super committees as well as act as adviser on the Superannuation round table.

I am also a student of the Sciences of Complexity (though no expert) as well as having undertaken studies in behavioural and motivational psychology. As you will see from the attached information, much of my work has involved the internal regulation of production and production personnel within large corporations. Now as a financial adviser I spend most of my efforts interpreting the effects of regulations on small business people and individuals.

Given this experience I thought I may be able to bring a different and perhaps useful view to this current study and so welcome the opportunity to make a submission. I ask the commissions forbearance in reading any poorly structured argument or information, however as a small business person I don't have extensive resources or time to ensure its ease of reading and hope the intent of my argument is reasonably clear.

Again thank you for this opportunity to make a contribution

JOHN STRONG B.Sc.(Hons)

Attached:

1. Cover Sheet
2. Submission: Regulatory Behaviour with Small Business
3. Haslett, T. & Sarah, R. (2006). Mapping and Modeling in the Australian Taxation Office: A Case Study. Systemic Practice and Action Research 19, (3) p. 273 – 307



Sydney CBD and Five Dock
Mail: PO Box 607 Five Dock NSW 2046

**Submission to the Productivity Commission on the Study
of Regulator Behaviour with Small Business**

By: John Strong

Regulator Behaviour with Small Business

Business as a Complex adaptive System and Regulator Capacity

The effectiveness of interaction of a regulator with the business community is primarily one of capacity rather than of management. The structure of “Business” is a complex adaptive system ⁽ⁱ⁾ rather than a rigidly structured, manageable machine. The sciences that analyse complex systems have identified that a regulator’s processes are formed by the system they regulate. To operate effectively the regulator MUST match or exceed the capacity of the system it regulates ⁽ⁱⁱ⁾.

In Conant and Ashby (1970) ⁽ⁱⁱⁱ⁾ the interactions of regulator with the system it is regulating was discussed and the conclusion confirmed that the system and the regulator strongly influence each other’s structure. One way to interpret this is to understand that a regulator is groomed by the system it regulates.

One of the directions given to the commission in this project is “...the Commission should draw where appropriate on examples of the various approaches that are used in shaping regulatory culture.” The Sciences of complex systems indicates that the system being regulated has a strong effect on the culture of a regulator, therefore it makes sense that the ability to control or direct a regulators culture depends on which system is the primary target of a regulator.

The fact that a regulator must match the system it regulates infers that there will be conflicts in regulator style if the same regulator tries to control several different systems. When you have a regulator that provides regulation services to several diverse sections of the business and other communities, this matching of the regulator to the system implies that to be successful the regulator needs to provide different styles of services to each section.

Grooming of the Regulators to a “Large Corporation” World

Quoting from the issues paper, there are eighty seven thousand organisations which employ more than twenty employees and cover fifty four percent of all employees. This is less than five percent of all employers. These organisations have large and significant support structures built around the employees who actually produce income. These support structures provide a buffer for the employee from direct interaction with an external regulator.

The Corporation does however, provide their own targeted and specific regulation of those employee’s activities. These internal support structures contain a great deal of hierarchy and have managers carrying the highest levels of education and who have decades of experience specialising in many different areas of management and regulation. Therefore to be able to regulate these business entities the external regulators also have employees sourced from the highest levels of education and who have decades of experience specialising in many different areas of management and regulation. The internal structure of the regulator also has to match the capacity within the corporations they are regulating and so contain a significant level of hierarchy and support structures.

Regulating two million Small Business people is far too complex for a Regulator so they are treated as Large Businesses.

When the Regulator turns its attention to “Small” business it will see even greater levels of complexity but with a significantly different level of organisation. There are two million entities employing forty six percent of all employees, but with a significantly lower level of hierarchy and support structure around the actual income producers. Of these, 1.8 million employ less than five people.

Instead of a regulator working with only the top echelon of several large ant nests, they are faced with over two million ant nests where the top echelon is also the worker producing the income. Where the income producers in large corporations are protected from direct interaction with a regulator, within a small business they are generally the only people with whom the regulator can interact. The potential for a regulator to disturb income producing activity of a small business is therefore many times greater than in a large corporation.

As individuals these business people represent a wide range of experience, education and attitude. The regulator cannot match this system. It would need the equivalent capacity to interact directly with two million Chief Executives and their boards or senior management.

Because of this capacity constraint and the fact that the regulator has already been groomed to model a large corporation structure, a regulator can only apply the system developed for large corporations directly to the small business community. However it cannot provide the same level of targeted support and regulation that the large corporations provide their workers and it is obvious it cannot provide a buffer to such workers from direct interaction with itself. Two very different systems but with only one answer.

The Small Business Point of View of Regulation

A Small Business person does not have the capacity to run a business and understand all the regulations to which they are subject. When you stand in the small business persons shoes, they are not one of a group of two million people, they are alone and they generally only have the mental capacity of a single person. If they try and understand the fact there are eleven hundred regulators with potentially over one hundred thousand regulations that can affect them, they are completely overwhelmed as any individual would be.

But it is actually much worse than this. Given the business world is a complex adaptive system and is subject to nonlinear interactions, a small business person is subject to a much more complex situation than any regulator generally understands. Given only three regulators controlling just three regulations each, the total number of interactions may appear to be only nine regulations (normal linear thinking) but the actual ways they can interact gives the small business person potentially twenty seven variations.

What one regulator is interested in are their 3 regulations.

What three regulators supply is $3+3+3=9$ regulations

What a small business person potentially receives is $3 \times 3 \times 3 = 27$ interactions.

There are thousands of investigations into the capacity of workers to handle cognitive complexity at work that identifies limits to individual workers capacity^(iv,v). Unfortunately the

vast majority of these are studies on workers within large corporations. The capacity of a small business person to cope with cognitive overload and fatigue has rarely if ever been studied.

However human behavioural psychology has shown that humans are to degree delusional optimists and tend to look to the positive and overestimate their ability to cope ^(vi). It has also been shown that when situations become overly complex, humans become selective as to the information to which they pay attention ^(vii). They have to do this to be able to function, it is not a choice. In other words they instinctively select through the overwhelming plethora of stuff they are told they should pay attention to and avoid trying to absorb the parts that don't appear essential to the operation of their business. This does not mean they are unaware of being selective and every small business person with whom I have ever discussed this situation acknowledges this process. They know there is likely to be things they ignore or avoided seeing which potentially come back to bite them in the future. This is generally followed by a shrug as there is nothing they can do to change that situation.

However it is obvious that the majority of small businesses make good choices as to what to pay attention to and what to ignore. When you look at the amount of non-compliance as a percentage of the total number of small businesses it is very small.

The other capacity that many small businesses have is quick adaptability, so when a regulator gets it wrong in the small business area, small business people generally can adapt and survive whilst maintaining the positive delusion. This does not mean everything is right in this area. With a regulator not having the capacity or systems to manage its interactions with small business, it means that regulator mistakes can have significant repercussions. A change in regulation that grossly affects just one percent of small business means twenty thousand businesses have just gone to the wall.

Complexity and Depression

Despite the delusional optimism of humans there is an underlying adverse reaction to the overwhelming presence of complexity in a job that makes the work outcomes too hard to achieve. All small business people know there will be regulations they will miss. Having a potential unknown adverse event always lurking just around the corner is carried as stress. The more unknowns faced by a small business person the higher the potential stress. When a worker in any situation is in a job that is too complex and there is a sense of a lack of control, the US Centre For Disease Control identifies the need for the employer to act to ensure the mental health of the worker ^(viii). To quote *“Job stress can be defined as the harmful physical and emotional responses that occur when the requirements of the job do not match the capabilities, resources, or needs of the worker. Job stress can lead to poor health and even injury”*.

In Australia the regulators of our workplaces stipulate the attention an employer needs to apply to their business to ensure a safe workplace for an employee, this includes the level of stress a worker encounters. Regulators have no such mandate to make the workplace safe for the small business person in their own workplace when it comes to stress. Given regulators have significant control over the level of complexity it applies to small business people by its selection of what regulations it will enforce, then best practice by a regulator would include evaluating the stress that adding extra regulation can cause.

It is also to be strongly noted that there is a considered to be a significant causal link between depression and a person's position or the esteem they are held with within their society ^(ix). In this context and in support of the move to understanding behavioural psychology noted elsewhere in this submission I believe that every regulator needs to be aware of the deep and potentially damaging psychology where one group has authority over another. I refer to the Stanford Prison Experiments^x and Jane Elliot's Blue Eye, Brown Eye diversity teaching system ^{xi}. These examples show the how susceptible humans are to social judgement and the significant repercussions that can come from poorly applied or overly authoritative control.

Given a regulator is seen as a judge of "good" and "bad" behaviour in the business world, regulators carry more potential to cause depression amongst small business people than just cognitive overload.

Shadow Regulators and Rapid Change.

Added to the complexity of the regulation of Small Business are the shadow regulators who also provide rules and behavioural requirements that impact directly on the activities of the small business community. Whilst the Shadow regulators are not an object of investigation for the Commission's current investigation they are potentially the target of Regulators who regulate competition policy and contract law.

The shadow regulators have significant power and can drive rapid change through the behaviour of small businesses and other entities. Shadow regulators are entities that have enough influence in the system that they can dictate major changes in business practices with significant effect but little responsibility. Insurers, Banks, large retail conglomerates, and commercial property landlords are examples.

I can best explain this phenomenon of one entity being able to drive quick and massive change through the whole system or even discrete parts of the system through the following example.

I am involved in the Scouting movement in training young scouts in water activities such as sailing and canoeing. In 2008 a sudden and immediately enforceable edict was sent out by Scouting head office that no child was to be involved in water activity unless they provided a certificate from a qualified swimming instructor that stated they could swim 50 meters. Permission notes from parents were no longer to be trusted. A ruling by a coroner had decreed that schools had to show more care in assessing whether children could swim than just believing a permission note from their parents. I heard that it was not just the Scouts (and Schools) that were affected, but sailing clubs and similar organisations as well as many small businesses that provided tuition and activities related to water.

The agent of change was what I have termed a Shadow regulator and one can see from the speed of that change, a very effective one. It was an edict from the Insurers that the different organisations and businesses that could be associated with the coroner's recommendations were no longer insured unless they implemented the new rules. The result was the cancellation of many water activities until new procedures could be implemented.

I won't attempt to go into the science of Networks to explain this phenomenon where one player in a complex system can quickly drive massive change through the system, however this event illustrates several facets of other situations that can dramatically affect small businesses. When an institution, which has significant influence within the network, makes a sudden change in business rules, it can have immediate and potentially catastrophic effect on many of the smaller players.

Whilst the official regulators have generally developed a consultative system that normally prevents such drastic change in the official regulation system, this is not true with the shadow regulators. However the official regulators do regulate systems such as competition policy and contract law which can define the behaviour of these massive and influential players towards small business. Unfortunately due to the regulators being groomed by the system to treat small business as if they are large business it is difficult to get them to see an answer to the issue.

In assessing the best practice behaviour of regulators to small business I believe the Productivity Commission should pay regard to actions of regulators which dampen the ability of the large players in the system to use their size, influence and deep pockets to quickly and drastically disadvantage small business people.

Regulator Behaviour in a Complex System

First and foremost I must acknowledge the deep expertise and years of work already carried out by the staff and management of the regulators. Much of what I have highlighted is known and has been studied by many who work in and with the regulators. I believe that because of the natural grooming of a regulator to match the system defined by large Corporations these approaches are difficult to apply when tackling the larger and unwieldy small business sector. There are however answers that are emerging or have been tried and should be re-applied or formalised more strongly.

1. Formalising the Guild Structure

One of the ways that regulation of small business has been managed is through organising the small business into structures. It is an ancient business form previously called guilds. This immediately lowers the level of complexity in the small business world and moves the model closer to the large corporation structure that moulds the regulators actions.

I am a small business person but I am also I am also a member of the SPAA and the AFA and I work under an AFS Licensee. These organisations have their own internal rules which define who I am as a Financial Adviser. They also filter out the plethora of noise that comes at me from the regulators and shadow regulators and guide me as to where I should be paying attention.

As with the large corporation these guilds provide support structures around the worker who actually produces the income and buffers them away from direct interaction with the large regulator.

Where possible regulators have always interacted with these guilds as part of the consultative process. This is a behaviour of regulators towards small business that has much merit if managed correctly. Indeed under the current FOFA arrangements for financial

advise the regulators are seeking NOT to have to write extra regulations by having these guilds provide better internal regulation of their members.

There is potential to continue to simplify interactions with small business by formalising the guild structure. Instead of regulation applied across the board, “all in” so to speak, there may be layers of regulations that can be stripped away. This is by having behaviour defined by industry or activity within the 2 million small businesses rather than seeing just the ocean of faces grimacing at the next layer of universal regulation applied across the board.

In terms of complexity this process will bring the small business sector closer to the regulators model and allow the regulator to further simplify its interactions with more manageable numbers than 2 million individuals.

2. Mapping and modelling reality and building simpler interactions.

There is already a major study that has been carried out by a Australian regulator which looked at taking the deep complexity of trying to regulate a massive amount of people’s behaviour and bring it down to a much simpler process. I strongly recommend the commission study the application of System Dynamics analysis that was carried out within the Australian tax office on the regulation of Superannuation in the late nineties ^(xii). I have also attached a copy for convenience.

The application of Systems Dynamics analysis to the Australian Superannuation system provided an understanding of how the system was actually structured. The top down regulators view of “these are the laws and you should behave this way” was put aside and the actual network of interactions was mapped. From there a very simple view of what was happening was able to be constructed. All the noise that makes up the complexity of a system was able to be segmented. A simplification of the noise inherent in such complexity allowed better identification of the basic drivers of the system and a simple and easily understood and workable model to emerge. Remembering that the Regulator must be a model of the system it regulates, the process of cutting out the noise and concentrating on the main simple drivers can be extremely beneficial to guiding the development of the regulator’s own internal culture.

If the same analysis was applied to the interaction of two million small businesses with regulators, there is guaranteed to be revelations of potential actions that would drastically diminish the complexity both the regulators and small business community currently operate within. The guild structure of current interactions shows one semi-formal way the system has developed strategies to diminish complexity. Recognition of this pathway and the application of complexity sciences will continue to take the system from complexity towards manageable simplicity.

A Different Approach to Simplification: I also would like to bring to the Commissions attention a technique applied to the food industry that, if applied correctly, can have significant application in identifying more effective control points. In the summary of my experience with regulations and regulators I mention the Garibaldi contamination event when I was working in the food industry. Without trying to over explain the relevance I consider that the concept of HACCP (see ^{xiii}) or Hazard analysis and Critical Control Points, has

application to simplifying all regulations by concentrating on the most important aspects rather than blanket bomb an area with compliance requirements.

3. Recognition of how the majority of humans behave rather than treat them all as potential deviants.

I strongly recommend that the Commission study the work of the British Cabinet Office Behavioural Insights Team. <https://www.gov.uk/government/organisations/behavioural-insights-team>

I have already referred to how being a member of an organisation or Guild helps me define how I am expected to behave. I have also referred to how people are strongly influenced by how other people judge them and how a regulator often can be an agent of depression by labelling people potential miscreants. It is obvious that to try and regulate two million people you have to get them to regulate themselves. Understanding behavioural psychology must be at the core of managing the small business sector.

Again I acknowledge that the regulators already understand the basics of this area. I have followed the significant change in the help lines for both the Tax Office and Centrelink. Over the last decade it has gone from adversarial with an immediate approach of “if you have done something wrong you must fix it” to operators who spend time understanding the issue and then give guidance on the best way to approach the problem. Whereas previously I worked with clients to try and fix problems without the stress of involving the regulator I now consider the help lines to be a good resource (as long as I pick the right time to ring!).

It is to be noted and praised that the ATO staff has also undertaken training with Beyond Blue to understand how depression affects small business people and soften their approach so as not to be a significant part of the problem. This is also a best practice behaviour of a regulator that should be continued and expanded.

This approach in working with the behaviour of the majority will also change the focus of regulators away from mainly chasing tail events. I'd like to refer back to example I gave of the coroner's recommendations being quickly driven through the community by the actions of the Insurers. This was a reaction to an event that probably only occurs one in several hundred thousand school child visits to swimming centres. The rapid and dramatic change in business practices driven by a shadow regulator was based on a low probability event. The fact it was a child's life potentially at stake made the change absolutely appropriate and in this case the eventual outcome beneficial to society. Therefore with concerns of safety, concentrating on a tail event was appropriate.

Unfortunately it is not just the most important area of safety upon which tail events are focused. If you look at the Pyramid of Enforcement on page seven of the issue paper you will note that the focus of the regulator is on control of behaviour in general. Often the behaviour it (sorry regulators are also people I will rephrase that) Often the behaviour that the people within regulators try to control are low probability events. However because of the enforcement psychology, the legislation is written in such a way it makes all small businesses people behave as if they are expected to be deviants, actualising behaviour well away from the norm. In a long standing euphemism the tail wags the dog, the main body of people's behaviour is shaken up by an attempt to regulate what deviants do.

A move to focus on promoting behaviour that is socially acceptable will lower deviation. Again I recommend you study the British Cabinet Office Behavioural Insights Team project. Regulators shouldn't just focus on deviations, they should also promote and support acceptable behaviour. The behavioural psychology around this goes beyond the name and shame strategy. It can help define and guide behaviour that lowers the deviant behaviour and help the community undertake greater self-regulation.

References and Pertinent Notes

Notes on Submission content:

- When I refer to “regulator” I include the system that writes the regulation. As acknowledged in the issue paper a regulator is often at liberty to adjust how they implement regulation. However this paper is from the end recipient of the regulations point of view and a regulator is seen as the whole system. Implicit in this view, therefore, is that a regulator should have enough independence from a legislator that they can criticise and influence the decisions of the legislators when the written regulation is inept or potentially inept in its application.
- The format of this submission is not strictly formal in structure. I have used end notes to not only provide references but to also make further comment illustrating specific points. This is an attempt to keep the flow of argument in the main document coherent but still provide the depth needed to understand the reasoning around my observations.
- The references used are not an exhaustive survey of the literature but mainly illustrative of the point showing the information that is out there. Much of the quoted work is focused on analysing the internal working of large corporations and has not been applied to Small Business situations.

References

ⁱ McDaniel, Reuben R., Jr. (2007). Management strategies for complex adaptive systems: Sensemaking, learning, and improvisation, *Performance Improvement Quarterly*, 20(2), 21-42.

ⁱⁱ The Law of Requisite Variety identifies that a system cannot be controlled unless the agent exerting that control has an equal or greater complexity (Requisite Variety) than the system is controlling. It was devised by Ashby and is one of the main principles of Cybernetics. The original article can be found here <http://pespmc1.vub.ac.be/ASHBBOOK.html> and <http://pespmc1.vub.ac.be/books/IntroCyb.pdf>.

ⁱⁱⁱ Conant, Roger C, W. Ashby, Ross. EVERY GOOD REGULATOR OF A SYSTEM MUST BE A MODEL OF THAT SYSTEM *Int. J. Systems Sci.*, 1970, vol. 1, No. 2, 89-97

^{iv} “Catastrophe models for cognitive workload and fatigue” Stephen J. Guastello, Henry Boeh; Curt Shumaker; Michael Schimmels

^v Peng Liu, Zhizhong Li “Task complexity: A review and conceptualization framework”. *International Journal of Industrial Ergonomics* Volume 42, Issue 6, November 2012, Pages 553–568

Below is the Abstract from Peng et al (2012) which I have included because it illustrates a small percent of the work in the area of task complexity and work performance. All carried out within large corporations.

Task complexity has been found to be an important factor that influences and predicts human performance and behavior. It is of great interest in many fields. In the decision-making field, Tversky and Kahneman (1981) claimed that the complexity of practical problems of decision tasks would prevent people from integrating options, even if they purported to do so. Payne (1976) found that task complexity was a key determinant of decision process and strategy: when faced with a low-complexity task, the decision makers employed a compensatory decision process, whereas in a high-complexity

task, they employed a non-compensatory process and focused on selective information. Lussier and Olshavsky (1979) and Kim and Khoury (1987) obtained similar results. In the goal-setting field, Wood et al. (1987) and Campbell (1991) identified task complexity as a consistent moderator of the goal-setting effect. They summarized that the positive effect of goal-setting on task performance was strongest for low-complexity tasks and weakest for high-complexity tasks.

In the auditing field, task complexity was found to interact with leader behavior (Jiambalvo and Pratt, 1982), report format (Blocher et al., 1986), gender (O'Donnell and Johnson, 2001), and knowledge and accountability (Tan et al., 2002), etc., in determining task outcome and human behavior.

In the human-computer interaction (HCI) field, Jacko et al. (1995) determined that task complexity played a critical role in determining the performance of the task performer on the hierarchical menu system. Jacko and Ward (1996) and Zhao (1992) believed that task complexity influenced the task performers' mental workload and, in turn, affected their performance.

^{vi} Weinstein, Neil D. "Unrealistic optimism about future life events". *Journal of Personality and Social Psychology*, Vol 39(5), Nov 1980, 806-820.

^{vii} Slovic, P., & Lichtenstein, S. Comparison of Bayesian and regression approaches to the study of information processing in judgment. *Organizational Behavior and Human Performance*, 1971, 6, 649-744. "In general, the results from these studies seem to indicate that the effects of increasing the amount of information are to increase the variability of the responses and to decrease the quality of the choices while also increasing the confidence of a decision maker in his judgments."

^{viii} <http://www.cdc.gov/niosh/docs/99-101/> Centre for Disease Control, National Institute for Occupational Safety and Health. Job stress results when the requirements of the job do not match the capabilities resources or needs of the workers.

^{ix} Allen, Nicholas B. and Badcock, Paul B.T. "Review article: Darwinian models of depression: A review of evolutionary accounts of mood and mood disorders". *Progress in Neuro-Psychopharmacology & Biological Psychiatry* 30 (2006) 815–826

^x <http://www.prisonexp.org/>

^{xi} Bloom, Stephen G (September 2005). "Lesson of a Lifetime". *Smithsonian Magazine* http://www.smithsonianmag.com/history-archaeology/lesson_lifetime.html

^{xii} Haslett, T. & Sarah, R. (2006). Mapping and Modeling in the Australian Taxation Office: A Case Study. *Systemic Practice and Action Research* 19, (3) p. 273 – 307

^{xiii} GUIDELINES FOR THE VALIDATION OF FOOD SAFETY CONTROL MEASURES CAC/GL 69 – 2008

John Strong: Specific experience with regulators and regulations.

Between 1979 and 1996 I worked in technical and production management positions within the food industry. After 2000 I became a financial advisor. Specific experiences with regulation included;

- 1979 – 1984 Tooth & Company / Carlton United Breweries. Technical and Production Management.
 - Duties involved applying Quality Assurance and TQM principals in the Brewery
 - Pertinent Regulations : OH&S, Customs and Excise, Pure Food Act, Building Codes and Standards, Labelling laws.
 - Specific Project of interest: work with Dr. G.A. Starmer, Sydney University & Roads and Traffic Authority on the effect of low alcohol beer consumption on blood alcohol levels.
- 1985 Quality Assurance Rep for the Coca-Cola Corporation USA
 - Duties were the inspection and testing of Coca-Cola production facilities and products produced under licence in Australia. Licence holders included large corporations as well as small bottling operations in country towns. This was when defined territories still operated in the Coca Cola business (prior to the absorption of these local small businesses by the large Corporates).
- 1985 – 1988 Technical Manager NSW Egg Corporation (Semi Government Instrumentality and then Regulator of the NSW Egg Industry)
 - Under the NSW Egg Act the Technical Manager of the Corporation was responsible for monitoring the quality of eggs produced in NSW. This involved management of extensive chemical and microbiological testing laboratories and liaison with field Inspection staff (Egg inspectors), Department of Agriculture, CSIRO, Standards Australia, the Australian Government Laboratories and AQUIS.
 - In that period the Corporation was undertaking change management in the egg industry and had increased surveillance and supervision of real hen numbers within licence conditions. The Corporation was subject to weekly bomb threats, with managers and inspectors also subject to personal threat. My duties included meeting with suspected renegade farmers and detailing the need to destroy batches of their eggs due to pesticide and other “out of spec” issues. Interesting times.
- 1988 – 1992 Head Brewer Hahn Brewing Company
 - OH&S, Customs and Excise, Pure Food Act, Building Codes and Standards.
- 1993 – 1996 Technical Manger (in Italian Small Goods subsidiary of Plumrose Australia)
 - Main duties were to introduce TQM processes within a newly purchased traditional Italian Small Goods manufacturer. It was here I developed much of my understanding of the difficulty of explaining regulations and enforcing compliance on ornery, older and very experienced operators who had little formal education. Sigh.
 - An event of strong significance that occurred during my time there was the contamination of Garibaldi Metwurtz in S.A. with an extremely virulent E.coli strain. This resulted in the death of one child and many others being placed on dialysis. The industry went into crisis mode and several regulators from all states, devised drastic solutions including shutting down production and importation of all traditional fermented small goods and

unpasteurised cheese production. The introduction of a technique of regulation called HACCP allowed the industry to survive.

- 1996 – 2000 Purchased and sold a Franchise: Experienced negotiated regulation via franchise system.
- 2000 – current: Small Business person, specialising in Financial Advising
 - My role as an adviser focusses on financial strategies. A significant part of this work involves acting as an interpreter of regulations for clients regulated by the ATO, APRA, ASIC, Centrelink and Aged Care Australia (and others). I act as Centrelink correspondent for several clients.