

1 Wednesday, 27 March 2019
 2 (10.00 am)
 3 THE CHAIR: Good morning, everyone. Welcome to Day 13 of
 4 this public hearing. Mr Altman?
 5 MR ALTMAN: Chair, the first witness is Robert Montagu, who
 6 is in the witness box and is to be sworn.
 7 MR GEORGE CHARLES ROBERT MONTAGU (sworn)
 8 Examination by MR ALTMAN
 9 MR ALTMAN: First of all, give us your full name, if you
 10 would, please.
 11 **A. It's George Charles Robert Montagu. I was called George**
 12 **first, but my parents changed it to Robert. So it's**
 13 **always caused a little confusion, so "Robert" is the**
 14 **right one.**
 15 Q. You mention your parents. Tell us about your father and
 16 your mother. Who was your father?
 17 **A. My father was the Earl of Sandwich until 1964, when he**
 18 **was -- had to leave the Commons to go to the House of**
 19 **Lords, his father having died previously, and he then**
 20 **decided to resign -- I'm sorry, he became -- he stood as**
 21 **an independent for South Dorset against the**
 22 **Common Market, and then was not voted back. So he lost**
 23 **his place. He didn't want to stay in the House of**
 24 **Lords, and so he semi-retired at that point, in 1964.**
 25 Q. So he was the Earl of Sandwich; also

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1 Q. Did you visit your father at his home during holiday
 2 times, which you said were about four weeks a year?
 3 **A. He bought the house in 1955.**
 4 Q. Which was where?
 5 **A. This was Mapperton House in West Dorset, which is a very**
 6 **beautiful Elizabethan house. I went there for two weeks**
 7 **in the summer, a week at Easter and a week at Christmas.**
 8 Q. So about four weeks in total?
 9 **A. Every year, yes, until I was probably 16 or 18.**
 10 Q. And your mother, would she be present or not? You told
 11 us that they were separated?
 12 **A. Yes, they were separated. She never visited that I can**
 13 **recall. She had friends locally. If she wanted to**
 14 **come, she stayed with them. I don't recall her ever**
 15 **being in my father's house.**
 16 Q. Did she live in the local area, though?
 17 **A. No. She lived in London and she had a house in the**
 18 **Isle of Wight, and the rest of my holidays would be**
 19 **spent there.**
 20 Q. When you went to visit your father at Mapperton, were
 21 you the only child of the family who visited?
 22 **A. As far as I know, I was the only child who visited him**
 23 **before breakfast every day.**
 24 Q. So are you saying there were other of your siblings in
 25 the house at the time?

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1 Viscount Hinchinbrooke?
 2 **A. Also Viscount Hinchinbrooke until his father died, yes.**
 3 **You asked me to say something about my mother?**
 4 Q. Yes.
 5 **A. My mother was Rosemary Maud Peto, who was an artist, and**
 6 **they separated in 1955 and divorced.**
 7 Q. There are other siblings. We don't need, perhaps, to
 8 ask about those.
 9 **A. We were six. In fact, we were seven, but one child died**
 10 **young, as a baby, so there were six remaining, of which**
 11 **I was the last number, the baby.**
 12 Q. You made, for which we thank you, a statement to the
 13 inquiry, INQ003588. You will see it come up on screen
 14 to your right, Mr Montagu.
 15 **A. Nothing coming on.**
 16 Q. Just be patient, if you would. It will come up.
 17 Looking at the second paragraph, your parents in fact
 18 separated when you were five?
 19 **A. That's right.**
 20 Q. Am I right in thinking you were born on 25 January 1949?
 21 **A. Correct.**
 22 Q. So the separation came when you were five. I am going
 23 to ask you, obviously, some sensitive matters, and
 24 I understand you're comfortable with that?
 25 **A. Yes.**

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1 **A. Oh, yes. Certainly my brother John, my sister Kate and**
 2 **my sister Julia, the three younger ones, were usually**
 3 **there, but not always.**
 4 Q. Did your father have staff?
 5 **A. He had staff: he had a housekeeper and a cook and in the**
 6 **early days he had a valet as well.**
 7 Q. Now, you mentioned about visiting your father in the
 8 mornings. Tell us about that, please?
 9 **A. I don't know whose invitation it was, whether it was my**
 10 **request or my father's, but I used to go in time for the**
 11 **7.30 news every day, and we would listen to the news for**
 12 **two or three minutes and then read a story, a nursery**
 13 **story or some such, or he would use a story of his own**
 14 **invention.**
 15 Q. Now, this began, what, age five or so?
 16 **A. As far as I recall, it happened at six, because he moved**
 17 **in probably at the tail end of five, so when I was six**
 18 **and a half, probably.**
 19 Q. What you're about to describe to us you say in your
 20 witness statement towards the end of the second
 21 paragraph continued until about the age of 11?
 22 **A. That's right. Shall I speak about that now?**
 23 Q. Of course, yes. I want to ask you about that.
 24 **A. When the story finished, after 15 or 20 minutes, from**
 25 **the age of six and a half, he would then take off my**

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<p>1 pyjamas or ask me to take them off, and he would then 2 fondle me all over the body, kiss, stroke and suck my 3 penis, almost invariably, and sometimes for quite a long 4 time. That went on until I was about nine and a half, 5 and at that point, he would have me on my front and 6 place a handkerchief over my bottom and then rub his 7 penis between the cheeks of my bottom, sometimes without 8 ejaculation and sometimes with ejaculation. Then ... 9 Q. Carry on. 10 A. Shall I carry on there? 11 Q. Yes, please. 12 A. Then there was one act of full penetration shortly 13 before a skiing holiday, when I was 11, just over 11, 14 and that happened in his house in London. We were there 15 for the night before, because it was an early start in 16 the morning, and he ran the bath, he then asked me to 17 strip, and we wrestled for a short time, and then he 18 asked me to position myself on the side of the bed with 19 my top half leaning over the bed, and he then put his 20 penis inside me and masturbated or -- I don't want to 21 use the word beginning with "F", but that's what 22 happened for a few minutes until he ejaculated, and then 23 he withdrew. Then we had the bath in the evening and 24 met his friends at dinner, and so on. 25 Q. As if nothing had happened?</p> <p style="text-align: center;">Page 5</p>	<p>1 A. As if nothing had happened, yes. 2 Q. Help me with this: the other acts which you summarised 3 for us, were they a daily occurrence when you stayed 4 with your father in Mapperton? 5 A. Yes, invariable. 6 Q. At the same time of day? 7 A. Always at that time of day. Sometimes he would ask me 8 to go for a rest with him after lunch, but I always 9 refused that. I should say, there were certain acts 10 that I refused. I refused to touch him with my hands. 11 I refused to kiss him, although he wished me to kiss 12 him. And he would try to pull my hands onto his private 13 parts, and I resisted that as well. So there were small 14 acts of resistance. 15 Q. The act which you describe to us having taken place 16 before the skiing holiday in your father's London house, 17 was that an isolated incident of that particular sexual 18 act or not? 19 A. It's very hard to be sure. I've tried many times to be 20 certain of that. It's the only event that I can be 21 certain of. There may have been other moments which 22 I have overlooked in my mind, but that certainly stood 23 out. 24 Q. Now, looking at your paragraph 5, Mr Montagu, you say: 25 "The abuse led me to believe that I was standing in</p> <p style="text-align: center;">Page 6</p>
<p>1 for my mother." 2 Was this a belief which developed over time after 3 the abuse had come to an end aged around 11 -- we will 4 come to the reasons why -- or was that a belief that 5 developed during the period in which these acts were 6 taking place? 7 A. Again, it's quite difficult to recall and separate 8 memory, but, as I recall it, he very often, when he was 9 stroking me, made comparisons or suggested by the 10 intensity of it that I was almost acting like a woman, 11 and then he would say -- he would compare me to my 12 mother at other times. There were moments -- and 13 I could perhaps show a picture of how I looked at the 14 time? 15 Q. Yes, please. What you are about to show us is a picture 16 that is on the back cover of a book which you wrote over 17 several years but was published in 2014, "A Humour of 18 Love". If you turn the back around, Mr Montagu, there 19 is a picture of you as you were aged -- 20 A. Aged 10. 21 Q. In school uniform? 22 A. Say again? 23 Q. In school uniform, is that? 24 A. Yes. 25 Q. So that's 10, about a year or so before all of this came</p> <p style="text-align: center;">Page 7</p>	<p>1 to an end? 2 A. Yes. Yes. 3 Q. You say in your statement: 4 "I also thought I was serving as a prostitute for 5 mercenary reasons such as presents and that filled me 6 with self-deprecation." 7 What did you mean by that? 8 A. Well, I felt that I was given presents that were rather 9 larger than my siblings'. This might have been an 10 exaggeration in my mind, which was pretty self-critical, 11 as you can imagine, but it was my sense that the more 12 willing I was as a victim, then the bigger the gift 13 might be over the weekend or when my birthday came or 14 Christmas, and so it was a mechanism by which 15 I increased my self-criticism, you might say. 16 Q. May I ask, was there any suggestion from your father 17 that this was, for example, your special secret, that 18 you shouldn't tell anyone, or were there any threats not 19 to tell anyone? 20 A. Extraordinarily, he never asked me to say nothing to 21 anybody. Perhaps that was one of the techniques 22 sometimes that people use, because they feel that it's, 23 by their logic, so consensual that it's unnecessary to 24 ask the victim to say nothing to anyone. I could have 25 done at any time.</p> <p style="text-align: center;">Page 8</p>

1 Q. What about the fact that you were receiving, as you saw
2 it, greater gifts than your siblings. Did that have any
3 effect on whether you might or might not reveal what was
4 going on to others?
5 **A. Not really. I did feel that I was envied, that my
6 position -- my special position in regard to my father
7 was quite envied by the other siblings, and there was
8 some teasing over that close connection. He was quite
9 a distant man in many respects and quite frightening at
10 times. I think we all lived a little bit in fear of
11 a moment of temper, and so that played a part in
12 becoming more willing.**
13 Q. Now I'd like to ask you, because of the position that
14 you were in, about the effect on you at that time. I'm
15 focusing for the moment at the last sentence of your
16 paragraph 5, which goes into page 2, about your
17 attractions.
18 **A. Yes. It was very difficult to contain the emotions.
19 You can imagine, and you have probably heard much
20 evidence on the subject of how it feels for a child to
21 be put in that adult position. I was always the victim.
22 There was never, in a sense, any compliance on my side.
23 Nevertheless, I was filled with shame and self-disgust,
24 and I thought of killing myself, and I might have done
25 so at 11, if it hadn't been for the fact that God**

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1 Q. You say in paragraph 6 that, understandably, it led to
2 years of struggle and self-dissatisfaction and you
3 married early?
4 **A. Yes, I married, quite deliberately, early, before I was
5 21. Wonderfully, I found a girl in Italy when I was 17,
6 and we slowly enjoyed a developing relationship over two
7 years, and then eloped when I was 20 and she was 19,
8 eloped and married in Geneva, and my wonderful wife has
9 been with me ever since. We are just coming up to our
10 50th wedding anniversary. But if it hadn't been for
11 her, I would most surely have gone in a wrong direction.**
12 Q. Let's talk, if we can, Mr Montagu, about how it was
13 discovered and how it came to an end, aged about 11.
14 **A. Yes.**
15 Q. You say that you were too ashamed to consider telling
16 anyone until many years after, and wouldn't have done so
17 had it not been for the discovery which I am going to
18 ask you to tell us about?
19 **A. Yes. This was the most painful part of it, because --
20 and I'm sure this part is shared with so many, because,
21 having been abused, I was then reabused by the failure
22 of the investigation. What happened was that I was
23 sharing a bath with my father, as we always did,
24 unbeknownst to anybody, at 11, and my sister came with
25 a message that there was a telephone call, looking for**

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1 **intervened, magically, suddenly -- shall I describe that
2 for a moment?**
3 Q. Yes, please.
4 **A. I was the chorister who did most of the singing in my
5 prep school. I was the head of the choir. I was
6 leaving the chapel after a service, and there was nobody
7 else there, and I heard this sudden thunderous voice
8 from the rafters of the church saying, "This is my
9 beloved son in whom I am well pleased", and it was
10 a huge, reverberant voice. I couldn't believe the
11 sound. And I looked around to see if someone was
12 playing a prank on me and had rigged up a loudspeaker or
13 something, and nothing was there. So unless you have
14 a strong belief in God, you must assume that I produced
15 it within myself somehow, but it came out of the blue.
16 I didn't feel anything but miserable and
17 self-depreciating, and it stopped me dead from the
18 thoughts of suicide, and I started instead to do little
19 good deeds, singing people to sleep and such. I did
20 have some physical attraction to boys around me, but
21 I fought against it because I felt that would have
22 been -- the devil would have won if I'd allowed myself
23 to go down that route, and I was determined not to do
24 that. So I didn't give in to those impulses.
25 **So, yes, that's about it, I think.****

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1 **me, and she shouted out my name. My father responded
2 from the bath and then I responded. He was quite
3 annoyed that I had shown that we were in the room
4 together. However, I did. And later, my sister and my
5 second sister, older than her by two years, Kate, came
6 to interview me in bed while I was trying to get to
7 sleep, and asked, you know, how it was that I was
8 sharing a bath with him at 11, and bit by bit they got
9 all the information out of me about what had happened
10 since I was 6 or 7. They then shared that information
11 with my mother, as a result of which I was interviewed
12 by my mother and my family doctor when I returned to
13 London before going back to school.**
14 **I told them, very painfully, everything that had
15 happened in pretty much the graphic terms as I have
16 described it to you. That meeting finished. I went
17 back to school, and I was waiting in school for the
18 police to arrive and an investigation to begin, and
19 nothing happened. I had no message from anybody within
20 the family about what should happen or was happening
21 and, when I returned at the end of the school term,
22 I realised that there was now going to be no -- not only
23 no action taken through the police, but that I would be
24 allowed to go back to my father after a period of being
25 separated.**

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1 **So we went on a family holiday to Greece. I didn't**
 2 **see my father during the summer holidays. And then**
 3 **returned to his care as if nothing had happened in the**
 4 **winter, as a result of which he asked to continue the**
 5 **relationship -- not before breakfast, because I made it**
 6 **quite clear I was not going anywhere near him before**
 7 **breakfast, but after lunch, for example, "Do come and**
 8 **have a rest, dear boy", and there was no attempt by the**
 9 **family to prevent that happening.**
 10 Q. So did you feel defended at all by members of your
 11 family, let alone the authorities, but by your family?
 12 **A. Not really. I think sisters were supportive to an**
 13 **extent. Obviously there was an awareness and occasional**
 14 **discussion going on, but no active defence.**
 15 Q. Can I ask you this, Mr Montagu: two words that you have
 16 used in your evidence, certainly one of which you use in
 17 your witness statement at paragraph 7, when you say,
 18 following the cross-examination in your statement, you
 19 say, by your sisters following the discovery in the
 20 bath, "I was interviewed in London" by your mother, "by
 21 her and our family doctor". The use of the word
 22 "interview" presumably deliberate and in evidence you
 23 have called it a "meeting". There doesn't sound to be
 24 much by way of maternal affection or understanding or,
 25 for that matter, by the professional who was there. So

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1 **generation.**
 2 Q. I suspect it's implicit in what you tell us, but you
 3 were away at school?
 4 **A. Yes.**
 5 Q. Those were the years then. Eventually, you wrote --
 6 I think it took you some time to write -- the book which
 7 you have shown us, "A Humour of Love", published in
 8 2014. What was the underlying emotion and purpose of
 9 writing the book?
 10 **A. I first wrote my first draft of that book when I was 16,**
 11 **sitting in a ruined castle outside Rome, where I'd been**
 12 **taken by a Franciscan priest who wished to abuse me, but**
 13 **I didn't know that until the first night when he tried**
 14 **to climb into my bed. But I wrote the first draft then**
 15 **and kept it hidden, and the book is really written as**
 16 **I finalised it then. Then, over the years, I have done**
 17 **various other drafts alongside other books that**
 18 **I published. So the final draft was written in**
 19 **2013/'14, and I felt it was important to establish not**
 20 **only my voice, but the multifold of voices. So in the**
 21 **book, I interviewed, in my imagination, my father, to**
 22 **understand his motivations; I interviewed my mother;**
 23 **I interviewed the doctor; I interviewed the lawyer;**
 24 **everyone who was involved came under some**
 25 **cross-examination. I was quite pleased with that effect**

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1 why did you choose words like that?
 2 **A. It was a bit like the Spanish Inquisition. My mother**
 3 **was disgusted by the news. She couldn't believe it.**
 4 **She didn't want to know about it. And I imagine now**
 5 **that she had discussions with my doctor and with our**
 6 **lawyer and her friends and decided that it was more**
 7 **important to keep this horrible news from examination by**
 8 **the police partly in order to protect me, in a sense,**
 9 **thinking that was the best thing to do. But, of course,**
 10 **I wanted an examination and the truth to come out,**
 11 **because, if it had, my father would have been stopped**
 12 **and there would have been no further victims.**
 13 Q. Do you think, apart from further victims, to which we
 14 will come, your mother understood that in doing nothing
 15 about it and in allowing you unsupervised access to your
 16 father, or he to you, that there was always a risk that
 17 it might continue?
 18 **A. I'm not sure if she thought that it might continue. She**
 19 **had various exchanges with him. For me, the ones**
 20 **I overheard were never hot-tempered, but there must have**
 21 **been some hot temper there. But it's as though everyone**
 22 **assumed that I would then take care of myself and keep**
 23 **myself separated. It was rather assumed then that**
 24 **children of 11 and 12 were rather more adult than it is**
 25 **assumed now. We've changed, rather, over the**

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1 **in the book, and that's the way it came out.**
 2 Q. At the time of publication, your parents had been long
 3 dead?
 4 **A. Yes. It was important to me that my parents were no**
 5 **longer around, and also that my family was in such**
 6 **a position that the children were grown but the**
 7 **grandchildren weren't mature enough to pick up the news**
 8 **in some magazine or newspaper. So it was a window of**
 9 **opportunity. I think it is for many victims. They have**
 10 **to find this window of opportunity when they feel brave**
 11 **enough, but also when their family fits that moment.**
 12 Q. In the book, you talk about having become vaguely aware,
 13 at the age of 12, that other boys had been attending
 14 your father's bedroom in the morning, just as you had
 15 done?
 16 **A. Yes.**
 17 Q. How did you become aware of that?
 18 **A. It was a quite shock to me, because I thought I was the**
 19 **one and only love, if you like, in my father's life.**
 20 **But then I discovered, as soon as I had stopped going to**
 21 **his room, there might be a newspaper boy or there might**
 22 **be some worker's son from the estate or some other**
 23 **person. And I became aware of those. I couldn't be**
 24 **sure what was happening. I was too scared, at that**
 25 **time, to do anything to intervene. But I became aware**

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1 **that there were other children, and then later on**
2 **I became more aware of it when my own schoolfriends**
3 **might be approached, neighbours' sons that I knew could**
4 **be approached. So it was a slow realisation that I was**
5 **just one in many.**
6 Q. Did you ever come to identify any of the other boys and
7 speak to them in later life?
8 **A. I have done, yes; particularly in the years before the**
9 **publication of the book, I did have discussions with --**
10 Q. I don't want any names, Mr Montagu, obviously.
11 **A. No, I will not produce any names, and I don't want to**
12 **give information that tends in that direction.**
13 Q. To identify them.
14 **A. But I realised there were at least ten victims, and**
15 **I suspect the ones I didn't pursue and ask, there would**
16 **have been nearer 20, probably.**
17 Q. Among those that you spoke to, did any one of them wish
18 to make any declaration to anybody in authority when
19 they were being abused?
20 **A. Not one. They were anxious to finish the conversation**
21 **as quickly as possible. And there were a large number**
22 **who said, "Oh, yes, he did try, but I wouldn't go along**
23 **with it".**
24 Q. You speak about going back to school after the meeting
25 and the interview with your mother and the family doctor

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1 also, professionally, experience of these matters? Tell
2 us something about your professional work over the
3 years?
4 **A. Yes. Well, having been an importer for most of my**
5 **career, until 1995, when I sold the business, I then**
6 **retrained as a family therapist, having in mind the**
7 **experiences I'd had as a child, and also the service,**
8 **I suppose you could call it, that I provided at Eton to**
9 **boys who'd suffered in similar ways, or were suffering**
10 **at Eton by being molested by older boys. And so**
11 **I thought, I'll put that to use, and I retrained as**
12 **a family therapist, quite an extensive training with use**
13 **of cameras and video screens and two-way mirrors and**
14 **reflecting teams behind the screen, and so forth, and**
15 **towards the latter part, families would come in, I would**
16 **interview them, always with a team behind the screen,**
17 **and so forth. So a very intensive training process.**
18 **Since then, I worked for the NHS for a while, in**
19 **child and adolescent mental health, and then I practised**
20 **privately in Dorset. I decided to start a trust that**
21 **would support the NHS, because wherever I worked, there**
22 **was a one-year waiting list for children, and I felt**
23 **that it was important to do what I could within the**
24 **private sector to help at least the local Dorset NHS,**
25 **and so I formed a group of 15 to 20 therapists, of which**

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1 and waiting for the police to arrive and nothing
2 happened. Did you ever become aware of any police
3 investigation into any offences committed by your
4 father?
5 **A. No. It came as a great shock to me to hear that there'd**
6 **been a police investigation in 1972. That was the first**
7 **I heard of it --**
8 Q. But not in relation to you?
9 **A. Not in relation to me, no.**
10 Q. You will have read the material which you have been
11 privy to, which shows that aspects that were taken into
12 account in not prosecuting your father included the fact
13 he was a man of good character and that a caution would
14 suffice. How do you feel about that?
15 **A. I think that's entirely wrong, and it's very indicative**
16 **of the attitude at the time towards people in public**
17 **positions, but in general, "Some interference with**
18 **children? Well, I mean, so what?" It was almost the**
19 **flavour of the day. It's since changed, but certainly**
20 **from my experience, '50s, '60s, even the beginning of**
21 **the '70s, people didn't want to know. These were**
22 **private matters, shouldn't come to public notice,**
23 **shouldn't be discussed, shouldn't be brought to court.**
24 Q. You are giving us your view, obviously, as somebody who
25 was himself a victim of child sexual abuse, but have you

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1 **I was one, as a family therapist, and we had**
2 **a management team and we had -- all our systems began to**
3 **get into place, and then we started to help, first,**
4 **25 families a year, 50, 75, 100. We are now helping**
5 **around 250 to 300, and we have also now expanded into**
6 **other counties, so we are in Wiltshire and Somerset and**
7 **Hampshire. For me, it's been a triumph, I suppose you**
8 **might say, of turning something that happened that was**
9 **awful into something that was carrying -- bringing good**
10 **and helping lots of kids who might not have received any**
11 **attention otherwise, each in its own way adding a little**
12 **bit.**
13 **There was certainly an element of feeling that I was**
14 **kind of repaying a debt that my father owed to the**
15 **community for the sins that he committed over time, and**
16 **that's been a sort of background aspect to it.**
17 Q. Against all of that, your personal and your professional
18 experiences, just focusing on what you had to say in
19 paragraph 16 of your statement, let me ask you a general
20 question: what steps, Mr Montagu, do you consider should
21 be taken, or could be taken, drawing on all of those
22 experiences, to reduce the risk of child sexual abuse
23 allegations not being taken seriously, not just by
24 public authorities, but, in your instance, the family,
25 or powerful people being treated with deference when

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1 such allegations are being made?
 2 **A. I think it's essential to bring into effect new law**
 3 **which imposes a mandatory reporting, certainly within**
 4 **institutions such as schools. That should have been in**
 5 **place long, long since. But also I'd like to see**
 6 **mandatory law in the domestic setting as well. I don't**
 7 **think it's right that, let's say, a mother can know**
 8 **positively of the abuse sexually of one of her children,**
 9 **or all of her children, by her partner or husband.**
 10 **I don't see how we can tolerate that that should**
 11 **continue unreported. Of course there are extenuating**
 12 **circumstances, and mothers can feel threatened sometimes**
 13 **with their lives by declaring anything, but we must**
 14 **protect our children from sexual abuse, and it's vital**
 15 **that we bring these perpetrators to justice and they're**
 16 **put in prison, treated and not left just to come out**
 17 **untreated.**
 18 **We have to go down that path, and it has happened in**
 19 **certain places, such as Australia, in some, I think,**
 20 **Victoria county, and it's had the result that four times**
 21 **as many allegations are coming forward and being**
 22 **investigated and an appropriate number of perpetrators**
 23 **have been brought to justice. It seems to me an**
 24 **irresistible argument that that should come about.**
 25 **Now, I hope this investigation will make those**

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1 **A. 1962.**
 2 Q. That's better. Did you serve for many years in uniform
 3 in the police force?
 4 **A. I did, yes, as a PC and a sergeant.**
 5 Q. You became a sergeant. Did you join, in due course, as
 6 a sergeant, what was known as the Obscene Publications
 7 Team --
 8 **A. Yes, I did.**
 9 Q. -- in or about 1974?
 10 **A. Yes.**
 11 Q. What was the essence of your role in the Obscene
 12 Publications Team when you joined? What were you
 13 investigating?
 14 **A. To involve yourself in the production and sale of**
 15 **pornography.**
 16 Q. Why were you brought onto that team?
 17 **A. Because I was an honest policeman, and there'd been**
 18 **a lot of dishonest policemen in the Obscene Publications**
 19 **Squad for many years. It had come on top of them**
 20 **eventually, and John Smith, or Sir John Smith, knew me.**
 21 **I'd served with him before. And he needed to put**
 22 **trusted men around him.**
 23 Q. You're talking about corruption. What type of
 24 corruption had there been? Had it been a noble cause
 25 type of corruption, framing people, or was it taking

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1 **recommendations, and I would like to thank the chair and**
 2 **the panel and everyone here for doing what you are**
 3 **doing, because it's vitally important to our law and our**
 4 **country that this investigation proceeds the way it is.**
 5 MR ALTMAN: Thank you very much, Mr Montagu. Those are in
 6 fact all of my questions. I will see if the chair and
 7 members of the panel have any questions for you?
 8 THE CHAIR: No, we have no questions. I'd like to thank you
 9 very much for coming here. We are grateful for your
 10 evidence today, Mr Montagu. Thank you.
 11 MR ALTMAN: Yes, I feel that. Thank you very much,
 12 Mr Montagu.
 13 (The witness withdrew)
 14 MR ALTMAN: Chair, the next witness is Bryan Collins.
 15 MR BRYAN COLLINS (sworn)
 16 Examination by MR ALTMAN
 17 MR ALTMAN: Give us your name, please.
 18 **A. Bryan Collins.**
 19 Q. Mr Collins, tell us something, please, about yourself?
 20 Were you in the police force?
 21 **A. I was, yes.**
 22 Q. When did you start? Do you remember?
 23 **A. 1962.**
 24 Q. Can I ask you to sit a little forward so the microphones
 25 can pick up your voice?

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1 money?
 2 **A. Taking money.**
 3 Q. I'm going to ask you about a number of discrete matters,
 4 please, Mr Collins. You made a statement -- well,
 5 you've made a few statements -- in 2015, which I ask you
 6 to look at to help refresh your memory. It is found
 7 behind tab 3 of our bundle, it's IPC000520. I hope
 8 you've had an opportunity to read it -- I suspect, but
 9 I don't know. Have you got tab 3?
 10 **A. I'm turning at 3, yes.**
 11 Q. Hopefully there's a handwritten statement behind --
 12 **A. There is.**
 13 Q. -- tab 3, dated 20 October 2015?
 14 **A. That's it.**
 15 Q. Is that your handwriting or somebody else's?
 16 **A. No, somebody else's.**
 17 Q. I think it's fairly legible. Unhappily, I don't think
 18 we have a typewritten version of it. But the first
 19 thing I want to ask you about, please, is a visit to
 20 a youth at Feltham Borstal, as I think it would have
 21 been in the 1970s, with an officer by the name of
 22 Jim Donnelly as a result of information received, and
 23 you deal with that on the first and second page of
 24 the statement that we are looking at. What do you
 25 remember about that?

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<p>1 A. First of all, I ought to say I've seen a statement from 2 Jim Donnelly, who said he wasn't with me at that time. 3 I'm not surprised. I think it was another officer, 4 Graham Rogers, who was actually with me. 5 Q. So not Jim Donnelly? 6 A. Not Jim Donnelly, it was someone else. 7 Q. You've made a mistake. It was Graham Rogers? 8 A. I don't know where the information came from, but we 9 went to see the young man, who made various allegations 10 against -- well, various people. He was essentially 11 a rent boy, and these people were his clients. 12 Q. Can we just look at what you recall this youth actually 13 saying to you, and let's just pick up, perhaps, from 14 what you said in the witness statement to get some 15 detail, Mr Collins. It's on the first page, the final 16 paragraph. You agree that in October 2015, this is what 17 you had to say: 18 "In the late '70s, a boy had reported information 19 about something that fell within our remit ..." 20 Yes? 21 A. Yes. 22 Q. "... so we arranged to visit him at Feltham Young 23 Offenders. We worked in pairs and a colleague, 24 Jim Donnelly ..." 25 But you have just corrected that, it should have</p> <p style="text-align: center;">Page 25</p>	<p>1 been Graham Rogers, I think you have told us: 2 "... a PC in A3 ..." 3 Pausing there, what was A3? 4 A. That was the Obscene Publications Department. 5 Q. "... came with me to visit the boy. Arrangements were 6 made by telephone to visit the boy. At the time, we 7 would have known the boy's name and why he was held at 8 Feltham. 9 "When we visited the boy, he was on his own and 10 I cannot recall when he visited. I can only describe 11 him as a young lad. We were with the boy for some time, 12 but I cannot say how long. 13 "The boy stated that he was a rent boy and had gone 14 to a hotel with Cyril Smith." 15 So in October 2015, it was an allegation about 16 Cyril Smith. Do you remember that now? 17 A. Yes, I do. 18 Q. "They didn't have full sex that day as Smith got cramp", 19 is what the boy told you: 20 "He also spoke of a second MP that he visited, he 21 did not know his name but described him [in a particular 22 way]" and told you he was an MP." 23 Did the boy also speak, according to what you had to 24 say in this statement in October 2015, about a boy who 25 had been killed and his body was put in a skip and that</p> <p style="text-align: center;">Page 26</p>
<p>1 a police officer was involved? 2 A. Yes, he did. 3 Q. Again, just helping you refresh your memory from what 4 you said a few years ago: 5 "The boy explained that when he met Smith it was 6 possibly a hotel. Smith carried with him a small case 7 containing a boy scout's uniform. The boy laughed so 8 much that it made us laugh. I think at the time the boy 9 did not initially know who Cyril Smith was. The boy 10 spoke of orgies and places that these people met in 11 a barn. 12 "We did not discuss how the boy came about being 13 a rent boy or why, it was just not discussed then." 14 Then you add that, when you returned to the police 15 station, you spoke to John Smith? 16 A. Yes. 17 Q. And presumably passed on to him what you'd just been 18 told? 19 A. Yes. 20 Q. In the statement -- we can summarise matters -- you said 21 you imagined -- this is the foot of the second page -- 22 that a chief superintendent of C1, a department you 23 called C1, at Scotland Yard taking over the 24 investigation. What was C1? 25 A. That was the main department of the CID.</p> <p style="text-align: center;">Page 27</p>	<p>1 Q. Did you assume that there had been a handover between 2 John Smith, who was then the commanding officer, and the 3 chief superintendent of C1? 4 A. Yes. 5 Q. Did you recall returning to see that boy on a second 6 occasion at Feltham? 7 A. I returned there with John Smith. 8 Q. With John Smith. During the course of that second 9 visit, do you remember anything further being discussed 10 about what he had told you the first time about 11 Cyril Smith? 12 A. No, I can't remember anything further. 13 Q. Was that the topic of conversation? 14 A. That was the main topic of conversation, yes. 15 Q. Did you remember going along to see the chief 16 superintendent of department C1 with a colleague of 17 yours, a second constable by the name of Atkins? 18 A. Yes. 19 Q. Who has since died? 20 A. Yes. 21 Q. Because you and I think Mr Atkins had tried to search, 22 or research, the general registry for files on 23 Cyril Smith, but you found nothing? 24 A. That's right. 25 Q. I'm simply picking this up from your statement, just to</p> <p style="text-align: center;">Page 28</p>

1 shorten matters. When you saw the chief superintendent
 2 of C1, did he say that he would bet that you both would
 3 have found nothing and then held up a red file?
 4 **A. Yes. His words were, "I bet you didn't find this one".**
 5 Q. Did he show you what was inside the red file?
 6 **A. Yes.**
 7 Q. What was inside it?
 8 **A. It was an allegation against Cyril Smith for indecent**
 9 **assault on a 9-year-old boy.**
 10 Q. In Rochdale?
 11 **A. In Rochdale.**
 12 Q. I think, again picking this up from the statement you
 13 made, was there another occasion when you recalled being
 14 outside the same chief superintendent's office in
 15 company with Mr Atkins hearing an argument between that
 16 chief superintendent and a commander?
 17 **A. Yes. That was actually the time when we were shown the**
 18 **file.**
 19 Q. It was the time you were shown the file?
 20 **A. Yes, that time.**
 21 Q. Was it after you'd been shown the file or before?
 22 **A. No, before.**
 23 Q. Before. What was the nature of the argument?
 24 **A. Well, we heard the chief superintendent say -- or shout,**
 25 **because we were sitting outside waiting to go and see**

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1 Q. He visited another boy at Feltham whose name is
 2 ciphered, so we are not revealing his name, but that
 3 visit was on 19 May 1976; all right? We have heard that
 4 evidence.
 5 **A. Yes.**
 6 Q. And you have seen it. Did you later become aware of
 7 a television programme in which Mr Foulston appeared
 8 talking about visiting a boy at Feltham?
 9 **A. I don't know anything about this man Foulston. I never**
 10 **met him or spoke to him and I can't -- I can't really --**
 11 **I can't remember a television programme, no.**
 12 Q. All right. But be that as it may, the boy who you saw,
 13 if I provide his name, let's see if it rings any bells.
 14 Was it an Andre Thorne? Do you remember that name,
 15 Andre Thorne?
 16 **A. I don't even remember the name of the boy, but that**
 17 **was -- seeing a newspaper cutting, that sort of jogged**
 18 **a memory. I think it was the same person, yes.**
 19 Q. We know that that's not the same boy that Paul Foulston
 20 saw on 19 May 1976. Now, let me ask you this: we know
 21 that Andre Thorne withdrew his allegations certainly
 22 against the second MP that he named to you during the
 23 course of the first visit. Those allegations were
 24 withdrawn by him on 18 May 1976, the day before
 25 Mr Foulston visited another boy with a Sergeant Vallis

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1 **him, and he shouted, "But you can't, because we've got**
 2 **him bang to rights", and I don't know what the reply was**
 3 **from the commander. I can't say what it was. He could**
 4 **have been talking about anything, but we believed he was**
 5 **talking about what we had been called down there for,**
 6 **because it was a continuation of Cyril Smith.**
 7 Q. What you did recall when you made the October 2015
 8 statement is you and Mr Atkins had nothing more to do
 9 with that investigation?
 10 **A. No, we didn't.**
 11 Q. How long after you had visited the boy the first and
 12 second time was this argument between the chief
 13 superintendent and the commander -- days, weeks?
 14 **A. Probably weeks. It was weeks. It wouldn't be days.**
 15 Q. Now, when you were asked about it, you said you couldn't
 16 recall the name of the boy who you visited. Do you
 17 remember?
 18 **A. I couldn't recall when I was asked. I have done it now,**
 19 **but I didn't know then.**
 20 Q. You have since, of course, been asked by this inquiry to
 21 look at a witness statement and some other material
 22 relating to an officer, a retired officer, but then an
 23 officer by the name of Paul Foulston, who was an officer
 24 of Thames Valley Police; is that right?
 25 **A. I have, yes.**

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1 of Thames Valley Police. Now, did you know any of that?
 2 **A. No.**
 3 Q. Did you know that Thorne had very publicly withdrawn his
 4 allegations against the second MP? Did you discover
 5 that at all at the time?
 6 **A. No. I'm surprised at that, because he had some evidence**
 7 **against that man that we checked.**
 8 Q. And against Smith?
 9 **A. No, in relation to the second MP.**
 10 Q. You say you checked the information --
 11 **A. We checked some information that he gave us, initially**
 12 **because you want to try and find out if somebody is**
 13 **telling you the truth about anything, and it checked**
 14 **out.**
 15 Q. I don't want the MP's name, but what was the nature of
 16 the information he gave you, without identifying him,
 17 please?
 18 **A. It was the location of a barn, and I'm not certain, but**
 19 **I think it was Feltham somewhere. I can't remember.**
 20 **Farnham. Farnham. It was a location where an orgy had**
 21 **taken place between a number of men.**
 22 Q. So some of the information Thorne had given you was
 23 checked out?
 24 **A. Yes.**
 25 Q. But on 18 May, it was reported that Thorne had withdrawn

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<p>1 the allegations he made against that MP, but you didn't 2 know that at the time? 3 A. I didn't know that, no. 4 Q. On 21 May 1976, so a few days later, did you know, or 5 did anybody tell you, that Thorne produced an affidavit 6 saying that the allegations he had made about Smith were 7 also lies? Did you know that? 8 A. I know nothing of that. 9 Q. Two days after that, on 23 May 1976, he made a public 10 apology in the national press and admitted in a Sunday 11 People article -- you will have seen that, I suspect, 12 Mr Collins -- that he had made up the allegations. 13 Let's see if we can put that up on screen, so depart 14 from your witness statement for the moment. Tab 21, if 15 you would, and if we can put up on screen, please, 16 OHY005110. Do you see that? 17 A. Yes. 18 Q. Sunday People, front page: "I lied about that blue 19 film". We understand the date of this was 23 May 1976. 20 If we go over the page to tab 22, we can put up on 21 screen INQ004199, you may have wondered what this was 22 all about. It's another article in another newspaper. 23 It was one of several, but we have just picked a couple. 24 "South Africans asked how Liberals could be 'smeared', 25 colonel says", and this relates to -- it is an article</p> <p style="text-align: center;">Page 33</p>	<p>1 by Michael Horsnell: 2 "Documented evidence which, it is claimed, provides 3 proof of plans by the South African security services to 4 'smear' the Liberal Party is expected to be disclosed to 5 the House of Commons today by Mr David Steel ..." 6 Someone in fact who we have heard from in this 7 investigation: 8 "... the leading contender in the party's leadership 9 race." 10 So that dates it to around 1976: 11 "The evidence was given to Mr Steel during the 12 weekend by Lieutenant Colonel Frederick Cheeseman, who 13 describes himself as a former intelligence officer in 14 the United States Air Force. Colonel Cheeseman ... told 15 Mr Steel that he has seen 15 dossiers on prominent 16 Liberals at the headquarters of the Bureau of State 17 Security (BOSS) in Pretoria. 18 "They included a mass of detail about 19 Mr Jeremy Thorpe, Mr Cyril Smith and 20 Mr Richard Wainwright and possibly Mr Steel, according 21 to a prominent Liberal Party official last night." 22 If we just turn the page, for which I apologise -- 23 you probably need a magnifying glass for this, but if we 24 can put it up on screen, INQ004200, by which I mean 25 tab 23. Let's see if we can zoom in on this a bit</p> <p style="text-align: center;">Page 34</p>
<p>1 better: "Yard officers investigate 'blue film' 2 allegation." 3 I am going to tell you what this is about in 4 a moment. By Stewart Tandler: 5 "The South African Government last night strenuously 6 denied newspaper allegations that a diplomat had tried 7 to smear a British politician by obtaining an 8 incriminating blue film." 9 There is more to it, but I'm not going to bother 10 reading it. The situation appears to be this, that 11 Andre Thorne had offered his story, which included 12 allegations about Cyril Smith, to South African 13 intelligence services to be used in a smear campaign of 14 the Liberal Party because of their anti-apartheid views. 15 Did you know anything about that? 16 A. Nothing at all. 17 Q. Part of the story that he was peddling had been the 18 existence of a so-called pornographic or blue film, 19 hence the headline, "I lied about blue film", which 20 included prominent politicians engaged in acts of sexual 21 abuse against children. Had you ever heard of that 22 before? 23 A. No. 24 Q. I take it, at the time, you never saw these newspaper 25 articles?</p> <p style="text-align: center;">Page 35</p>	<p>1 A. No, I didn't. Well, if I did, I can't remember them. 2 Q. On 28 May 1976, as a matter of history, he withdrew his 3 allegations about Smith in a statement under caution, 4 and both the affidavit which I told you about a little 5 earlier and the statement under caution were seen by 6 Operation Conifer. You have heard about 7 Operation Conifer? 8 A. I have heard of it, yes. 9 Q. If we go, please, in your divider 6, and if we can put 10 up on screen the Operation Conifer closing report, which 11 is IPC000861. First of all, at paragraph 6 on page 2, 12 this was in relation, you see, Mr Collins -- you have 13 had access to this. I don't know if you have read it. 14 But this was in relation to what you told 15 Operation Conifer about the visit to this boy in 16 Feltham, hence this operation and investigation into it 17 under the auspices of Winter Key. Paragraph 6 reads: 18 "During the course of this investigation, it was 19 established that there was a 'secret file' in existence 20 which related to sexual offences alleged to have been 21 committed by Cyril Smith MP and [someone we have 22 ciphered as WM-F26, which is the second MP he named]. 23 This file has been viewed by Operation Winter Key 24 investigators. It contained details of a C1 25 investigation into the same allegations made by ...</p> <p style="text-align: center;">Page 36</p>

<p>1 which Mr Collins has referred to. Checks revealed that 2 a detective commander and a detective chief 3 superintendent, both of C1, were in charge of this 4 investigation. Efforts were made to trace the two 5 retired officers through pensions branch. The retired 6 commander, who is now 93 years of age, did not reply to 7 a letter sent to him and it was decided not to pursue 8 this line of enquiry. Pension branch had no trace of 9 the detective chief superintendent, which tends to 10 indicate that person is now deceased. If alive, he 11 would be 92 years of age." 12 Then can we turn to page 8 of this document, and if 13 you go, please, to page 8, at the top, this is in 14 relation, we see at the top, to Andre Thorne, 15 paragraph 38: 16 "Andre Thorne withdrew his allegations against ..." 17 We have got the ciphered name of the second MP: 18 "... by a statement to police on 18 May 1976." 19 So this is where my information comes from: 20 "On 21 May 1976, Andre Thorne provided an affidavit 21 which stated his allegations against Cyril Smith were 22 lies. 23 "On 23 May 1976, Andre Thorne made a public apology 24 in the national press. He admitted in a published 25 Sunday People article on 23 May 1976 that he made up the</p> <p style="text-align: center;">Page 37</p>	<p>1 allegations. A copy of the relevant newspaper article 2 ... was obtained from the British Library. 3 "The article contains an interview with Andre Thorne 4 in which he describes how he lied to both the police and 5 a reporter from the Guardian newspaper about the alleged 6 existence of a film which had included prominent 7 politicians engaged in sex acts with children. It was 8 headline news entitled ..." 9 And this is what we looked at: 10 "... 'I lied about that blue film'. It has been 11 confirmed that Andre Thorne is deceased. 12 "With regards to Cyril Smith, he withdrew his 13 allegations via a statement under caution to police on 14 28 May 1976. The withdrawal statements and affidavit 15 are contained in the secret file." 16 If we look, please, within the same document to 17 page 10, paragraphs 53 and 54, you will see, contrary to 18 your understanding at the time, Mr Collins, that, as far 19 as this investigation, Operation Conifer, under the 20 auspices of Winter Key was concerned, it's been 21 established that there was an investigation into 22 Andre Thorne's allegations: 23 "Because of its 'secret' classification, it is 24 unlikely that Mr Collins would have been notified of 25 the outcome. Having reviewed all available</p> <p style="text-align: center;">Page 38</p>
<p>1 documentation, including the affidavit written by 2 Thorne, there is no evidence that it may be considered 3 would support any allegations of misconduct." 4 And paragraph 54: 5 "Because of Andre Thorne's retraction of his 6 allegations, C1 closed their investigation as NFA." 7 No further action. As this closing report suggests, 8 I take it none of that was ever told to you at the time? 9 A. No. 10 Q. There is a further twist to this story, the story of 11 Andre Thorne, and let's see if we can complete that 12 before we break. If you go to tab 18, please, and can 13 we put up on screen MPS002898. Have you read this 14 statement, Mr Collins? Did you have an opportunity of 15 reading this statement? 16 A. I have had a chance to, well, go through this, but not 17 in detail. 18 Q. No, of course not. Nobody would expect that. It is 19 dated 20 October 2017 and it is authored by Detective 20 Chief Inspector Glen Lloyd of the Metropolitan Police. 21 Let me summarise it for you without going into it. The 22 file into Andre Thorne's allegations was originally 23 registered on 18 May 1976, which happens to be the day 24 before Mr Foulston and Mr Vallis visited another boy at 25 Feltham. The file relates to allegations -- if you look</p> <p style="text-align: center;">Page 39</p>	<p>1 at the third paragraph, the one with the blacked-out 2 redaction, the file relates to allegations of a film 3 involving members of parliament: 4 "Mr Andre Thorne was the principal character in 5 relation to this investigation, which concerned 6 allegations of blackmail. The file also shows that the 7 Metropolitan Police undertook an investigation in 1976 8 into the allegations, in the course of which 9 Mr Cyril Smith's solicitor told the investigating 10 officers about the 1970 Lancashire Police investigation 11 and the fact that the DPP had advised that no further 12 action be taken." 13 Pausing there, did you know anything about the 1970s 14 Lancashire Police investigation into Cyril Smith? 15 A. No. 16 Q. Or that the DPP of the day had advised no prosecution of 17 him? 18 A. No, I didn't. 19 Q. What had happened is, if we look at the final paragraph 20 in this statement, on 18 May 1976, Cyril Smith's 21 solicitor telephoned the Metropolitan Police Service 22 requesting an interview with a police officer, as he had 23 reason to believe that his client was the relevant 24 member of parliament which had been referred to by the 25 media at the time in connection with the allegations</p> <p style="text-align: center;">Page 40</p>

<p>1 concerning the film. It appears that Smith attended on 2 18 May 1976 for an interview which took place in the 3 presence of his solicitor, and Smith provided a written 4 statement in which he denied knowing Andre Thorne and 5 entirely repudiated Mr Thorne's allegations. The 6 solicitor gave further information to the 7 Metropolitan Police about the Lancashire investigation, 8 it appears, in a further phone call. 9 What happened, Mr Collins, and if we went back to 10 the Conifer report I think we would find this, but in 11 due course Thorne was charged with, and pleaded guilty 12 to, offences of blackmail, theft and handling stolen 13 goods, and I assume you knew nothing of that either? 14 A. No, I didn't, no. 15 Q. In fact, I'm wrong, I'm not sure it is in Conifer. We 16 can see that at the bottom of Mr Lloyd's statement, the 17 final paragraph: 18 "Andre Thorne pleaded guilty to, and was convicted 19 of, blackmail, theft and handling." 20 So we have, on the face of it, something of 21 a coincidence, possibly. We have got two boys who were 22 clearly at Feltham at the same time; Andre Thorne who 23 you saw, Paul Foulston and Mr Vallis seeing another boy, 24 entirely different, WM-A12, both of them making similar 25 allegations or allegations of child sexual abuse about</p> <p style="text-align: center;">Page 41</p>	<p>1 Cyril Smith and in the case of the boy you saw in 2 relation to another MP. That appears to be the case, 3 doesn't it, Mr Collins, from everything you have read 4 and you have heard, except, in the case of Thorne, he 5 said, "I said these things to the officers, but I was 6 lying about them", and have you read in relation to what 7 happened in relation to the Foulston boy -- 8 A. I know nothing about that. 9 Q. No, no, I know, but did you read -- because that's all 10 been disclosed to you. Did you have a read of it? 11 A. Oh, in here, some of it, yes. 12 Q. Because he more recently has denied ever saying such 13 a thing to the police who saw him. But you knew none of 14 this at the time? 15 A. I didn't. 16 Q. So you didn't even know at the time that Thames Valley 17 Police had visited another boy who was making 18 allegations of child sexual abuse about Smith? 19 A. No. 20 Q. Can I ask you this: were you aware of Special Branch 21 having any interest in anyone who was in custody in 22 Feltham at that time? 23 A. No. 24 MR ALTMAN: Thank you, Mr Collins. I think that's all I am 25 going to ask you on that topic. I am going to come to</p> <p style="text-align: center;">Page 42</p>
<p>1 a few other topics. It is almost 11.15 am, when the 2 chair and panel have their break. If I suggest we rise 3 now and return at about 11.30 am, please. Thank you. 4 (11.11 am) 5 (A short break) 6 (11.31 am). 7 MR ALTMAN: Mr Collins, back to your witness statement, if 8 we can, please. Tab 3. IPC000520_004. Just over 9 a third down the page, did you recall working on the 10 Obscene Publications Squad when, as a result of an 11 article in the News of the World, you commenced an 12 investigation into the Paedophile Information Exchange, 13 PIE. 14 A. Yes. 15 Q. Did the investigation focus on, amongst others, 16 Tom O'Carroll? 17 A. Yes. He was the initiator and organiser of PIE. 18 Q. I want just to ask you about some of the investigations 19 that you undertook, again, with Dave Atkins -- is that 20 correct? 21 A. Yes. 22 Q. He was your partner. Were you able to go through a list 23 of the members of PIE? 24 A. Yes. 25 Q. Where did you get the list from?</p> <p style="text-align: center;">Page 43</p>	<p>1 A. I can't -- I really can't remember where it came from. 2 Q. But it was a list of names? 3 A. It was a list of names and addresses of members of 4 parliament. 5 Q. Did you select individuals to interview up and down the 6 country? 7 A. Yes. 8 Q. Not all of them, but some of them? 9 A. A selection, yes. 10 Q. Was it just a random selection? 11 A. Well, we had a lot of letters and correspondence, 12 photographs, that these people had had, and we selected 13 about a dozen that were probably the worst. 14 Q. The worst? 15 A. Yes. 16 Q. What do you mean by that? 17 A. The degree of photograph or desire in connection with 18 sexual activity with children. 19 Q. How did you discover those aspects or those 20 characteristics of the individuals you selected? 21 A. From their own correspondence with PIE. 22 Q. Does that mean that you had access to Magpie, the 23 publication, as well as any other newsletters -- 24 A. Yes. 25 Q. -- or documentation?</p> <p style="text-align: center;">Page 44</p>

<p>1 A. Yes, we did. 2 Q. Had there been a raid on their office or offices? 3 A. I really just cannot remember where we got all the 4 paperwork from. I just can't remember. 5 Q. But you did. Having access to that, including the list 6 of members and for the reasons you have given, you 7 selected -- so it was less random, more targeted -- the 8 worst individuals? 9 A. Yes. 10 Q. It was through these investigations that you began to 11 put a case together, particularly against Tom O'Carroll? 12 A. Yes. 13 Q. Ultimately, for conspiracy to corrupt public morals? 14 A. Yes. 15 Q. Now, of the persons that you interviewed, was one of 16 them, one of the names that you came across as a member 17 of PIE, a Peter Henderson? 18 A. Yes. 19 Q. Did you track this Peter Henderson down to what you 20 describe, three lines up from the bottom of page 4, as 21 an "almost empty flat"? 22 A. Yes, in Notting Hill. 23 Q. It was in Linden Gardens. It's been, perhaps, 24 over-sensitively redacted here, but we can find 25 elsewhere the flat was actually in Linden Gardens in the</p> <p style="text-align: center;">Page 45</p>	<p>1 Notting Hill area? 2 A. Yes. 3 Q. Did you make your way to that flat or did you see 4 Peter Henderson by appointment? How did it work? 5 A. We went to the Linden Gardens at first and couldn't get 6 in. There was nobody in. We went away for a while, 7 came back again, and the place was still locked up. But 8 while we were there, Henderson, as we knew him at that 9 time, arrived with a locksmith. Apparently, he'd had 10 some difficulty with the lock himself and couldn't get 11 in. So he arrived while we were there, and that's -- of 12 course we went in. 13 Q. Did you, at that point, sit him down and interview him? 14 A. Yes. 15 Q. And take a statement from him? 16 A. Took a short statement from him as a member of PIE. 17 Q. Would that have been a formal witness statement? 18 A. Yes. 19 Q. The statement was in the name of Henderson? 20 A. Yes, Peter Henderson. 21 Q. Did he reveal to you who he actually was? 22 A. No. 23 Q. Did he give any indication at all that Peter Henderson 24 was not his proper name? 25 A. No.</p> <p style="text-align: center;">Page 46</p>
<p>1 Q. There was a search of the flat at Linden Gardens, in 2 particular I think a wardrobe, or wardrobes, where 3 around 45 diaries, each of a couple of hundred pages, 4 were discovered. Was that during this visit or another 5 visit? 6 A. Yes. 7 Q. This visit? 8 A. Yes. It was locked up, but we opened it. 9 Q. In his presence? 10 A. In his presence. 11 Q. Did he consent to it, as you remember now? 12 A. Yes. 13 Q. Without putting too fine a point on it, did these 14 diaries contain his description of just about every 15 sexual deviancy you could think of? 16 A. And some I couldn't think of, yes. 17 Q. As well as, again, without describing them too closely, 18 what I call a number of trophy items that he'd received? 19 A. He had a great deal of them pinned or affixed to the 20 back and sides of the wardrobe. 21 Q. So those were the diaries. Were they all taken away and 22 taken to the police station? 23 A. Yes. 24 Q. Where were you working out of, at that point? 25 A. Scotland Yard.</p> <p style="text-align: center;">Page 47</p>	<p>1 Q. What, Scotland Yard itself or any particular police 2 station? 3 A. No, out of Scotland Yard. That's where our offices 4 were. 5 Q. Out of the Yard itself, yes. Did you also become aware 6 some time afterwards that property had been found on 7 a bus -- 8 A. Yes. 9 Q. -- as well as in a park? 10 A. I can't remember. I know it was found in a park, but 11 I don't remember knowing anything about that at the 12 time. The stuff that was found on the bus was somewhere 13 on A Division and, because of the content of 14 the material, they decided to send it to the Obscene 15 Publications Department. 16 Q. So material was found on a bus, you say in A Division. 17 What does that mean? 18 A. Well, that's the -- 19 Q. District? 20 A. Around Westminster. 21 Q. Was it in a briefcase or some other container? 22 A. Yes, a briefcase. 23 Q. It was because of the content which was, what, obscene? 24 A. It was obscene material and details which identified 25 Henderson.</p> <p style="text-align: center;">Page 48</p>

<p>1 Q. As Peter Hayman?</p> <p>2 A. As Sir Peter Hayman.</p> <p>3 Q. Did you actually see the material yourself?</p> <p>4 A. No.</p> <p>5 Q. Who did it go?</p> <p>6 A. Somebody dealt with it in the office. I'm not sure.</p> <p>7 All I got was, "Look, this is your man, Henderson",</p> <p>8 so ...</p> <p>9 Q. In this statement that you made in 2015, as you know, if</p> <p>10 you look at the top of page 5, you say:</p> <p>11 "... and in a park in London that related to</p> <p>12 pornography in the name of Henderson."</p> <p>13 So certainly, in 2015, you recalled that it wasn't</p> <p>14 just one finding, there were two: one on a bus and one</p> <p>15 in a London park?</p> <p>16 A. Yes.</p> <p>17 Q. There is support for that, Mr Collins, not least -- if</p> <p>18 we depart from your statement to tab 15, and I will put</p> <p>19 this up on the screen as well, CPS004445, all of which</p> <p>20 is to be adduced. Just go to the front page of that, if</p> <p>21 you would, Mr Collins, for the moment. Immediately</p> <p>22 behind tab 15. I will wait for it to go up on the</p> <p>23 screen. I don't think you're at the front page of it.</p> <p>24 The very first page --</p> <p>25 A. No, you can't see anything.</p> <p style="text-align: center;">Page 49</p>	<p>1 Q. Wait, wait, wait. You have got the front page.</p> <p>2 A. Yes.</p> <p>3 Q. It is up on screen now. If you look to your right, you</p> <p>4 will see the same document is on the screen. If you</p> <p>5 look at it, there are a couple of things we get from it.</p> <p>6 First of all, it's a report, "Hayman & others"; is that</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 Q. In the bottom right-hand corner, "Obscene Publications</p> <p>10 Department ... PS Collins. PC Atkins."</p> <p>11 So this is your report?</p> <p>12 A. Yes.</p> <p>13 Q. There is a stamp on the top of it, received by the DPP's</p> <p>14 department on 7 December 1978?</p> <p>15 A. Yes.</p> <p>16 Q. All right, so it dates it for us. If you please look on</p> <p>17 the second page, which is the first page of the text of</p> <p>18 your report -- do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Have you got that?</p> <p>21 A. Yes, I've got it, yes.</p> <p>22 Q. If you look at paragraph 2 -- you will see the</p> <p>23 numbering -- there is a slightly wide margin. Let's</p> <p>24 start with paragraph 1:</p> <p>25 "With reference to the above-quoted registry folio.</p> <p style="text-align: center;">Page 50</p>
<p>1 This refers to a quantity of obscene photographs and</p> <p>2 correspondence which had been sent through the post to</p> <p>3 a Peter Henderson of 95 Linden Gardens ...</p> <p>4 "These items were found on a bus on 21 March 1978 by</p> <p>5 a member of the public and handed to police."</p> <p>6 So this report, I think in part, but not completely,</p> <p>7 relates to items found on the bus, which suggest that</p> <p>8 you must have seen them at some point, don't you think?</p> <p>9 A. Yes -- well, I imagine so, but I can't remember actually</p> <p>10 standing there and looking at them.</p> <p>11 Q. Don't, please, worry about that. Nobody would expect it</p> <p>12 after all these years. If we go over, please, to page 5</p> <p>13 of this same report, and paragraph 13 at the top, and</p> <p>14 putting this in context, at paragraph 12 -- I'm sorry if</p> <p>15 it means the evidence handler is jumping around. At</p> <p>16 paragraph 12 -- we have to start at the foot of</p> <p>17 page 4 -- you date the Linden Gardens search as being</p> <p>18 2 October 1978:</p> <p>19 "When Hayman arrived during the search of the flat,</p> <p>20 it was obvious that he was not who he claimed to be ...</p> <p>21 he admitted that all the items in the wardrobe were his</p> <p>22 and that he had been engaged for many years in</p> <p>23 exchanging obscenities through the post with others. He</p> <p>24 made a short statement under caution regarding his</p> <p>25 association with PIE, but this is of little value to</p> <p style="text-align: center;">Page 51</p>	<p>1 this report. There was nothing to suggest ..."</p> <p>2 Perhaps a word is missing:</p> <p>3 "... left the premises. Hayman signed a disclaimer</p> <p>4 for all the property found in the wardrobe."</p> <p>5 And then this paragraph 13. So it puts in context</p> <p>6 not only what happened, but when:</p> <p>7 "A few weeks later ..."</p> <p>8 So, clearly, after the search of his flat and when</p> <p>9 he made a statement under caution to you, and many</p> <p>10 months after the bus finding in the March, so a few</p> <p>11 weeks later, so this is clearly after October:</p> <p>12 "... a briefcase containing various obscene writings</p> <p>13 and photographs was found and handed into police. These</p> <p>14 articles were identical to those found in Hayman's sex</p> <p>15 records and other correspondence then showed his true</p> <p>16 identity. Exhibit No RB/1 refers to the finding of</p> <p>17 the briefcase."</p> <p>18 Did you understand that what you were talking about</p> <p>19 there was the reference to items which had been found in</p> <p>20 a park, St James's Park?</p> <p>21 A. Yes.</p> <p>22 Q. This is a long shot, Mr Collins, but do you recall that</p> <p>23 the material from the park finding -- I think it was the</p> <p>24 Royal Parks Police who had found yet another briefcase</p> <p>25 with items in it. But the material included photographs</p> <p style="text-align: center;">Page 52</p>

<p>1 of boys aged around 8 to 11 in their underwear? Does 2 that ring any bells with you? 3 A. No. 4 Q. If we look, please, at one of the other closing reports, 5 IOPC reports, that you have been asked to look at, it's 6 IPC000510, and you will find it in your file in tab 5. 7 If we go to the second page of that, internal page 1, 8 but the second page under the inquiry reference, this is 9 Operation Hesper. Paragraph 1: 10 "During the 1970s, within the grounds of 11 St James's Park, an officer from the Royal Parks Police, 12 John Hooper, together with two dog handlers from the 13 Metropolitan Police, conducted a sweep of an area in the 14 park and found a hard-backed, leather briefcase. The 15 officers seized the briefcase and took it to a police 16 building to examine the contents and establish 17 ownership. 18 "Documents were apparently found in the briefcase in 19 the name of Sir Peter Hayman. Also found were envelopes 20 containing black-and-white photographs of boys aged 21 8-11 years, dressed only in their 'Y-fronts'. 22 Does any of that come back to you now? 23 A. No. 24 Q. It doesn't, okay. If you look on the next page, page 3, 25 there's more detail of the same, and if you go to</p> <p style="text-align: center;">Page 53</p>	<p>1 paragraph 9 -- paragraphs 7 and 8 effectively repeat 2 what I have just read, but paragraph 9: 3 "Unaware of who Sir Peter Hayman was, the officers 4 completed a check on the name and realised that he was 5 the Queen's High Commissioner to Canada. Arriving at 6 Canon Row, Hooper spoke to a sergeant about the items 7 that had been found. The supervisor took the briefcase 8 from the officers and apparently said, 'Keep your gobs 9 shut and don't say anything!.' 10 Did you know John Hooper? 11 A. No. 12 Q. Didn't mean anything either? 13 A. No. 14 Q. Then if we turn on, please, to inquiry page 6, internal 15 page 5, under "Conclusion", paragraph 25: 16 "John Hooper has provided two statements to the 17 investigating officers, neither of which highlights any 18 criminality nor any evidence of corruption. In the 19 first statement, Hooper states that he saw three photos. 20 None of the boys in the photos were naked, all were 21 wearing white, Y-front pants and none were engaged in 22 sexual activity nor appeared, on Hooper's assessment, to 23 'be scared or under duress'. 24 "It is acknowledged that Hooper's recollection does 25 not mean the children were not victims of abuse, but</p> <p style="text-align: center;">Page 54</p>
<p>1 without more, his assessment must be considered as 2 subjective, but potentially significant. 3 "The briefcase and its contents have not been 4 located. However, Hooper's statement is partly 5 supported by a statement obtained in 6 Operation Magnolia." 7 That relates to you, Mr Collins: 8 "This relates to property connected to Hayman that 9 was found on a London bus. A former police officer, 10 Brian Collins ..." 11 Misspelling your name: 12 "... who worked on the Obscene Publications Team in 13 the late 1970s, refers to a briefcase found in a park 14 that contained pornography linked to diplomat 15 Sir Peter Hayman. 16 "Brian Collins made a statement in which he 17 indicates that documents were passed to his team and it 18 is possible that these are the same documents Hooper is 19 referring to. This was a matter linked to the 20 Paedophile Information Exchange. During his 21 investigation, Collins realised that Peter Henderson was 22 in actual fact Sir Peter Hayman. Hayman received 23 a caution in relation to this matter. This is 24 corroborated by a letter sent to the Director of Public 25 Prosecutions by the Assistant Commissioner, stating</p> <p style="text-align: center;">Page 55</p>	<p>1 'Henderson (Sir Peter Hayman), who, having been 2 cautioned, disclaimed all property'. 3 So there is the appearance, Mr Collins, that there 4 were two incidents where it so happened, separated by 5 several months, between March and sometime 6 after October 1978, when obscene materials were found in 7 a briefcase on a London bus in A Division, you tell us, 8 and also items were picked up by Royal Parks Police in 9 St James's Park, containing items, in particular 10 including photographs of semi-naked boys aged 8 to 11. 11 But sitting there right now, you can't remember so much 12 about that, but you clearly mention in your witness 13 statement that there were two incidents? 14 A. Yes. 15 Q. Did you put a case together against Hayman as well as 16 PIE? Were these two investigations happening at the 17 same time or were they investigations which were running 18 in parallel? 19 A. Well, it was at the same time, but they weren't 20 connected in that sense. I dealt with Hayman and I was 21 dealing with PIE, which -- PIE being the most important. 22 But they were both happening at the same time and were 23 connected, in that Hayman was a member of PIE, and as he 24 was one of those that we'd selected to interview, it was 25 possible, of course, that we would have used him,</p> <p style="text-align: center;">Page 56</p>

1 **initially anyway, as a witness against PIE, which we did**
 2 **with several of the other people that we interviewed, we**
 3 **used those as witnesses in the trial against O'Carroll.**
 4 Q. Speaking of O'Carroll, he was tried, am I right, in
 5 1981, but there was a disagreement, a jury disagreement,
 6 and was he retried in March 1981 and convicted?
 7 **A. He was convicted.**
 8 Q. I think it was on a retrial, 13 March 1981. He was
 9 convicted of conspiracy to corrupt public morals?
 10 **A. He was.**
 11 Q. And sentenced, I think, to two years' imprisonment?
 12 **A. Two years' imprisonment, yes.**
 13 Q. Were there co-defendants in that trial?
 14 **A. No.**
 15 Q. Were there co-defendants in the original trial?
 16 **A. To be honest, I'm surprised you're saying that to me.**
 17 **I don't remember there being a second -- a two-trial**
 18 **job. Was it?**
 19 Q. That's the information that we have.
 20 **A. You've got the paperwork, you'll know. But 40 years**
 21 **ago, I can't remember, to be honest.**
 22 Q. Did you remember the names of two men in particular:
 23 Wardell and Sewell?
 24 **A. I remember Wardell particularly.**
 25 Q. Was he anything to do with PIE or was he a correspondent

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1 "At the trial of Wardell, the DPP had apparently
 2 made arrangements to ensure that Hayman's name would not
 3 be mentioned in open court, but his name was
 4 inadvertently mentioned by Wardell's solicitor. The
 5 investigation conducted by Collins and Atkins was later
 6 leaked to the press and published in the satirical
 7 magazine 'Private Eye'.
 8 Do you remember anything about whether or not
 9 Hayman's name, as "Hayman", was deliberately kept out of
 10 those proceedings?
 11 **A. No-one said anything to me about it, but at the trial of**
 12 **Wardell, when Hayman's name came out, other counsel in**
 13 **court then started discussing in front of me the fact**
 14 **that that shouldn't have happened, and that was the**
 15 **first I knew about it.**
 16 Q. When it came out, was it the name Hayman or the name
 17 Henderson and that was equated with Hayman? Do you
 18 remember what happened?
 19 **A. No, I don't.**
 20 Q. How was it resolved?
 21 **A. I don't think it was. It couldn't be resolved. It was**
 22 **mentioned in a public court.**
 23 Q. Did anybody publish at the time?
 24 **A. I don't know. I don't know.**
 25 Q. Do we understand from this that Wardell's trial was

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1 with Hayman?
 2 **A. Well, he was a member of PIE, and he was a correspondent**
 3 **with Hayman.**
 4 Q. And the same of Sewell?
 5 **A. Sewell. I remember the name, but I can't remember the**
 6 **details.**
 7 Q. Can you look, please, behind your tab 4. You saw me
 8 mention Operation Magnolia, and this is the third of
 9 the three closing reports which are relevant to your
 10 information. If you go to page 4 of it, please, it's
 11 IPC000514, at paragraph 20:
 12 "During the course of Collins' investigations into
 13 Hayman, he established a link between Hayman and another
 14 known PIE member, Robert Brian Wardell. Wardell had
 15 been a member of PIE for 18 months. He was described as
 16 having paedophilic leanings of the most violent and
 17 sadistic nature. He had fantasies that were the most
 18 horrific and sickening accounts of sexual maltreatment
 19 of children. Wardell knew Peter Henderson
 20 (Sir Peter Hayman) as the pair exchanged various obscene
 21 stories through the post. Wardell was subsequently
 22 charged due to the serious and extreme nature of
 23 the content."
 24 I'd like to ask you about this while I'm on it.
 25 Paragraph 21:

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1 a separate trial of him alone?
 2 **A. Yes, it was a separate trial.**
 3 Q. If you look at your statement again, go back to tab 3,
 4 please, and if you go back to your statement at the foot
 5 of page 5, IPC000520, in this section of your statement
 6 you talk about the Wardell trial, and right at the
 7 bottom, read with me:
 8 "Throughout their prosecution ..."
 9 You're talking about Wardell and another man. Was
 10 Wardell tried with another man whose name you can't now
 11 recall?
 12 **A. Quite possible. I just don't know. I just don't know.**
 13 Q. That might have been Sewell. Right at the bottom of
 14 page 5:
 15 "Throughout that prosecution, the DPP had organised
 16 it so that Hayman's name was never mentioned during the
 17 court case. I do not know how they did this. I cannot
 18 recall if I did the papers for this case, but I was not
 19 present at court."
 20 So "did the papers" rather suggests what you were
 21 meaning is whether, as a police officer, that you
 22 prepared the case for court.
 23 **A. I would have thought I would have prepared it for court,**
 24 **as I was dealing with the whole thing.**
 25 Q. Yes.

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<p>1 A. But it's possible, because I had so much to do, I wasn't 2 just dealing with this -- 3 Q. No, no. 4 A. It's possible someone else in the office said, "Well, 5 look, just give that to me. I'll prepare that for 6 court". I just can't remember. 7 Q. What I'm really asking you is, the way that you express 8 yourself here, that the DPP had organised it so that 9 Hayman's name wasn't mentioned, was the impression you 10 had, at least when you wrote this statement four years 11 ago, less than four years ago, but in 2015, that it was 12 a deliberate ploy by the DPP to ensure that Hayman's 13 name wasn't a feature? 14 A. What else could it be? 15 Q. That was your impression? 16 A. Who else could authorise such a thing? Who else could 17 organise such a thing? 18 Q. Now, let's look at the case against Hayman himself, 19 please, because at the same time you were trying to 20 prepare a case against him, weren't you? 21 A. Yes. 22 Q. If we look, please, at the same witness statement at 23 page 6, having said, "During the trial, Hayman's name 24 was mentioned by mistake by a defence solicitor or 25 counsel", you add this:</p> <p style="text-align: center;">Page 61</p>	<p>1 "The case we put together against Hayman was sent to 2 the DPP as a separate matter. I personally discussed 3 the charges to be preferred against Hayman with the 4 DPP's solicitor ..." 5 A gentleman we are going to hear from later: 6 "... Jeremy Naunton, particularly with regard to 7 dates." 8 First of all, what do you mean by that, 9 "particularly with regard to dates"? 10 A. Well, if you're preparing cases for prosecution under 11 the Post Office Act, you've got to be able to state when 12 these items were sent through the post or by whichever 13 means, and dates are always difficult. With Hayman, we 14 had a mountain of material to try and decide from that 15 as to what date we could say, "Ah, yes, he sent that or 16 he sent that", whatever, so it was discussing the 17 difficulty of arranging the dates for what you would put 18 in a charge. 19 Q. So from your perspective, the charges that you envisaged 20 against Hayman were offences under the Post Office Act 21 of sending obscene material through the post? 22 A. Yes. 23 Q. Did you envisage, as you recall it, substantive 24 offences, so individual offences, relating to individual 25 dates or bracketed dates or a conspiracy?</p> <p style="text-align: center;">Page 62</p>
<p>1 A. Well, I would imagine one would have ended up with 2 probably three or four different charges covering 3 different dates -- 4 Q. So individual substantive -- 5 A. -- and different material, yes. 6 Q. -- offences? 7 A. Yes. 8 Q. Let's look, please, again -- I'm sorry we are jumping 9 around, but that's the nature of our bundles -- back to 10 tab 15, please, which is your report which we looked at 11 a little earlier, CPS004445. Can we go to page 5 of 12 that, please. I just want to select certain of 13 the information that was available to you and what you 14 wrote about in the report. At paragraph 15, a little 15 over halfway down, on page 5: 16 "Many of the obscenities written in Hayman's books 17 referred to children, and although it was reasonable to 18 assume that much of it was fantasy, further enquiries 19 were made in this direction." 20 First of all, Mr Collins, again, appreciating that 21 this was all many years ago, can you remember why you 22 came to the conclusion that it was fantasy rather than 23 him describing actual experiences? 24 A. It was so extreme in some cases that you had to say, 25 "Well, this is fantasy", or he would refer to well-known</p> <p style="text-align: center;">Page 63</p>	<p>1 people, friends of his family, whatever, and fantasise 2 as to what he would like to do to them. It was obvious 3 that some of the stuff, or most of the stuff, that he 4 had there -- no, not most; some of it was fantasy, 5 because it was a very detailed -- these aren't little 6 pocket diaries, these are this big (indicating), and 7 they have each got, like, 200 pages in them, and they 8 went into great detail, for -- can I give an example? 9 Q. Yes, of course. 10 A. I dare say most people are familiar with Cynthia Payne 11 and "Madam Cyn" and Julie Walters that was in the film. 12 Q. I suspect people of a certain age in this hearing room 13 and listening in probably are not, Mr Collins? 14 A. "Luncheon voucher orgies", it was called, down at 15 Streatham. But it was a very big thing. One of his 16 books was almost word for word -- well, it was almost 17 complete with what took place at one of her orgies. And 18 he'd obviously been there, you know. So that would be 19 fact. But then there were other things that you would 20 read that -- well, you'd think, "Oh, my God, how does 21 anybody ever think of that even", and with my 22 experience, where I've -- I'd spent 12 years doing 23 nothing but children, for me to sit back and say, "How 24 do you think of that?", it really means a lot. 25 Q. You emphasise "some" were clearly fantasy --</p> <p style="text-align: center;">Page 64</p>

<p>1 A. Yes.</p> <p>2 Q. -- which permits of the obvious possibility that some</p> <p>3 were not?</p> <p>4 A. Well, I cannot say that I took anything from Hayman</p> <p>5 which led me to be able to charge him with any sexual</p> <p>6 offence against a child.</p> <p>7 Q. Can I ask you, in paragraph 13:</p> <p>8 "Further enquiries were made in this direction."</p> <p>9 What did you mean by that and what were the further</p> <p>10 enquiries?</p> <p>11 A. I just read that, and I'm trying to think. Certainly we</p> <p>12 visited a couple of addresses where he had actually</p> <p>13 been, and those addresses were families that had</p> <p>14 children, and we visited those addresses and spoke to</p> <p>15 them, but I can't really think of what else was done at</p> <p>16 the time.</p> <p>17 Q. Let's just look at a couple of aspects, please, of your</p> <p>18 report insofar as children are concerned. Turn to</p> <p>19 page 7, please, and look at paragraph 24. So it is one</p> <p>20 thing that the diaries did not, to you, at least, as an</p> <p>21 investigator, indicate that he had actually committed</p> <p>22 offences of child sexual abuse against children. That's</p> <p>23 what you are telling us?</p> <p>24 A. I had no evidence of that.</p> <p>25 Q. No evidence of it?</p> <p style="text-align: center;">Page 65</p>	<p>1 A. No.</p> <p>2 Q. And none of the confessions he made within these diaries</p> <p>3 you felt were anything other than fantasy writings, on</p> <p>4 that topic?</p> <p>5 A. Yes.</p> <p>6 Q. Let's just have a look, then, please, at paragraph 24 at</p> <p>7 the foot of page 7. You refer to an exhibit number:</p> <p>8 "... are pages from Hayman's sex records for 1975</p> <p>9 and they show a photograph of a girl called ..."</p> <p>10 Her name has been redacted:</p> <p>11 "... aged 11 years and obscene comments about her</p> <p>12 [are] written ..."</p> <p>13 I suspect that this was something which had been</p> <p>14 sent to Hayman, but they relate to a photograph of</p> <p>15 a girl aged 11. This doesn't tell us anything about</p> <p>16 whether the girl was in any compromising position,</p> <p>17 whether she was in the course of being abused, whether</p> <p>18 she was naked or fully clothed or had been posed</p> <p>19 provocatively or anything like that. But had it been</p> <p>20 any of those, would that have lent itself to different</p> <p>21 considerations?</p> <p>22 A. Well, yes, there were a number of things that would have</p> <p>23 led to different considerations. But, at the end of</p> <p>24 the day, when nothing -- no action was taken and we were</p> <p>25 told, "Forget it", in those days, you didn't sue the</p> <p style="text-align: center;">Page 66</p>
<p>1 commissioner, you forgot it and went back to doing what</p> <p>2 you should be doing, what you were told to do.</p> <p>3 Q. Go to page 11, if you would, please, paragraph 37. The</p> <p>4 paragraph disappears in the left margin. Do you see</p> <p>5 about five lines down:</p> <p>6 "Although the sex volumes contain references to the</p> <p>7 [something] children, there is no evidence to suggest</p> <p>8 that they have been involved in any way in this matter</p> <p>9 apart from being fantasised about by Hayman and other</p> <p>10 members of 'the circle', abhorrent as these remarks</p> <p>11 are."</p> <p>12 So were you there considering certain of his sex</p> <p>13 volumes that referred to the children of a family to</p> <p>14 whom he had become close and you had concluded that</p> <p>15 these were fantasy writings, again?</p> <p>16 A. I'm trying to remember the particular --</p> <p>17 Q. It is a bit difficult because, for understandable</p> <p>18 reasons, there have been redactions. But I think this</p> <p>19 may have been in relation to --</p> <p>20 A. Yes, I do. I remember that particular family.</p> <p>21 Q. Don't name them, please, if you remember them?</p> <p>22 A. Well, I couldn't, anyway.</p> <p>23 Q. But this was a family. Was this a woman with whom he</p> <p>24 was having sexual relations and there were children of</p> <p>25 the family?</p> <p style="text-align: center;">Page 67</p>	<p>1 A. Yes.</p> <p>2 Q. So there you are saying, on page 11, no evidence to</p> <p>3 suggest the children had been involved in any way other</p> <p>4 than being fantasised about by him.</p> <p>5 Then on the next page, please, page 12 -- again,</p> <p>6 while we have it in mind, you refer to something called</p> <p>7 "the circle". First, what was "the circle" and was it</p> <p>8 your term or somebody else's?</p> <p>9 A. No, he had a favourite group that used to meet, a group</p> <p>10 of men, similar desires and nature, and they used to</p> <p>11 meet quite regularly at the Bush House in the Strand.</p> <p>12 Apparently their toilets were better than other places</p> <p>13 where they could go and they used to meet there quite</p> <p>14 regularly, a number of them. Probably -- I mean, they</p> <p>15 used to speak about their different names. It was</p> <p>16 probably half a dozen.</p> <p>17 Q. And that included Hayman, did it?</p> <p>18 A. And that included Hayman. He would take his trophies</p> <p>19 along to "the circle" for them to have a look at.</p> <p>20 Q. Who called it "the circle"? Where did the name come</p> <p>21 from?</p> <p>22 A. It would have come from him; it wouldn't have come from</p> <p>23 me.</p> <p>24 Q. So if we are on page 12, please, this is the statement.</p> <p>25 So this is you summarising the statement of somebody</p> <p style="text-align: center;">Page 68</p>

<p>1 who's been ciphered as WM-F24, and at paragraph 44: 2 "WM-F24 was in possession of a quantity of obscene 3 material relating to young children. He also had two 4 photographs of naked young girls sent to him by Hayman." 5 So in this instance, there is evidence that you had 6 that Hayman had been corresponding with somebody else to 7 whom he'd sent two photographs of naked young girls. 8 Now, can you help whether any consideration was given as 9 to whether these might have constituted indecent images? 10 A. Well, I just don't know. I just don't know. They 11 were -- well, I mustn't say what may probably be. But 12 he could have received them from anybody. 13 Q. Finally for the moment, can I ask you to look at page 17 14 at the top, which is your paragraph 65. At the top, you 15 write: 16 "Hayman has been cooperative since his true identity 17 was ..." 18 It is hard to read the next word: 19 "... although he obviously has a great deal to lose 20 because of his position in society, the sheer filth 21 spread far and wide by him, and particularly its content 22 with regard to the sexual and physical abuse of 23 children, must place him in the category of being one of 24 the worst offenders in relation to sending obscene 25 material through the post."</p> <p style="text-align: center;">Page 69</p>	<p>1 So that was your overall conclusion about quite 2 where he sat, as it were, in the hierarchy, if there is 3 one, of degree of seriousness of offending of this 4 nature? 5 A. Yes. 6 Q. Sorry again, back to your witness statement, tab 3, 7 please, IPC000520_007. Right at the foot of the page, 8 did you recall when you made this statement in 2015 that 9 while you were investigating the job, you had a message 10 to telephone a particular number and, when you did so, 11 you found yourself talking to Sir David Napley -- 12 A. Yes. 13 Q. -- who was at the time the President of the Law Society, 14 as you remembered it, and he asked you, going to page 8, 15 if you were investigating Hayman, and, if so, who was 16 dealing with it at the DPP? 17 A. That's right. 18 Q. Did he indicate to you that he was in fact the solicitor 19 instructed on behalf of Sir Peter Hayman? 20 A. Yes, the phone call went, "Are you the officer dealing 21 with Sir Peter Hayman?" "Yes". "This is 22 Sir David Napley. Who is dealing with it at the DPP's 23 office?". I knew that I was at that time talking to 24 Jeremy Naunton about dates and he was one of 25 the solicitors at the DPP's office, but I thought, well,</p> <p style="text-align: center;">Page 70</p>
<p>1 I don't want to land him with Sir David Napley on his 2 lap with no warning, so I said to Napley, "I'm not 3 certain yet, but I'll give them a ring and find out and 4 come back to you". His reply was, "Don't bother. I'll 5 talk to Hetherington himself", and he put the phone 6 down. 7 Q. And Hetherington was the DPP at the time? 8 A. Yes. 9 Q. Sir Thomas Hetherington, who was the DPP. 10 A. The following day, the following day, in the morning, my 11 partner and I were called into the chief inspector's 12 office -- 13 Q. So this is, forgive me, you and DC Atkins -- PC Atkins? 14 A. Yes, at the Porn Squad. We were called in and he said, 15 "I think you'd better sit down", and I said, "You're not 16 going to stop our overtime, are you?"; joking, and he 17 said, "No, Hayman's finished. He's to be cautioned. 18 That's it". Why -- I never knew why until last 19 Wednesday when I was shown these papers, and I saw 20 a note from the DPP who said that he didn't prosecute 21 Hayman because Hayman hadn't hurt anybody and he was 22 suicidal. Well, during this period, he was so suicidal 23 that he appeared on Mastermind on television twice in 24 his true colours, and not long after that he was not 25 suicidal when he was arrested importuning or engaged in</p> <p style="text-align: center;">Page 71</p>	<p>1 a sexual act with a lorry driver in a toilet. So ... 2 Q. So it wasn't long after -- 3 A. Well -- 4 Q. Forgive me, Mr Collins. It wasn't long after, so that 5 we just get an idea of what you are telling us. It 6 wasn't long after the call you had from 7 Sir David Napley, who effectively said, "Don't bother, 8 I'll talk to Hetherington myself", that you learned from 9 a senior officer that Hayman was not to be prosecuted 10 but was to be cautioned? 11 A. Yes. 12 Q. Was the officer who told you that -- I'm just getting 13 this from your 2015 statement -- Shepherd? 14 A. Shepherd, yes. 15 Q. Was he the chief inspector who administered the caution 16 to Hayman? 17 A. He was. 18 Q. Because you were present at the time he was cautioned? 19 A. I was. 20 Q. You remember -- I will come back to another aspect of 21 this, don't worry, Mr Collins, because I know that there 22 is another aspect to something that happened that you 23 will be wanting to tell us about. But was Hayman asked 24 if he wished to say anything in response to the caution? 25 A. Yes.</p> <p style="text-align: center;">Page 72</p>

<p>1 Q. And, on your page 8 of your witness statement, just over 2 halfway down, did he say he would specifically like to 3 thank the officers, in other words, you and Mr Atkins, 4 for the discretion that you had shown in the 5 investigation? 6 A. That's what he said, yes. 7 Q. Did you think you'd shown him any discretion? 8 A. I'm sorry? 9 Q. Did you think you'd been discreet or not, in the way 10 that he meant? 11 A. We had been totally discreet. People had been trying to 12 find out who this person was for months. 13 Q. Yes. 14 A. And it would have been so easy for us to have -- I mean, 15 Dave Atkins and I obviously had connections with the 16 press, it was part of our job to know press reporters, 17 et cetera. But while I say that, it's not in answer to 18 your question, but -- excuse me. 19 In two or three places in these papers, it says that 20 Dave Atkins released this to the press. The Deputy 21 Commissioner of Police says it in a file that it's quite 22 obvious David Atkins released this to the press and 23 Sergeant Collins is just covering for his partner. 24 Well, he did not release this to the press, and nor 25 did I. That can go down on paper as well, because it's</p> <p style="text-align: center;">Page 73</p>	<p>1 wrong that he's been accused of that all the time, and 2 that Deputy Commissioner didn't have the courage to come 3 and tell us that, although he did tell the Director of 4 Public Prosecutions that that was the case, and that 5 both officers had been advised as to where their 6 loyalties lie. Well, our loyalties lie to the public, 7 not to any Deputy Commissioner. I'm sorry, I'm somewhat 8 bitter about it, but I've really got to put that in, 9 because he's dead and his wife isn't. 10 Q. We understand that. 11 A. I'm sorry. 12 Q. No, no, no need to apologise. I was going to come to 13 it, but as you've touched on it, the information that 14 you were both accused of leaking was to Private Eye; is 15 that right? 16 A. Yes. 17 Q. So that we are clear, is the article that was the 18 Private Eye article of which you were accused of leaking 19 the one we find behind tab 16 of your file, HOM002200? 20 A. Well, I remember seeing that. I don't know whether it 21 was that article or another one. 22 Q. We can date it. 23 A. I don't know. 24 Q. We can date this one. There were two. There was one in 25 early January 1991 which followed this one, but this was</p> <p style="text-align: center;">Page 74</p>
<p>1 the principal article, "The Beast of Berlin". It is 2 dated, although not on the copy we have in front of us, 3 24 October 1980. There is an aspect of it which I want 4 to ask you about, as you've raised it. It is very 5 difficult to read, and it may be easier on screen, if 6 I ask the evidence handler to zoom in on the bottom half 7 of the article. There is just one part I wish to quote. 8 If you look at the bottom -- it may be easier on the 9 screen, Mr Collins. Do you see the words "The decision 10 not to prosecute Hayman"? 11 A. Yes. 12 Q. "The decision not to prosecute Hayman, who was certainly 13 as guilty as these two unfortunates ..." 14 That's a reference I think to Wardell and the other 15 man who was prosecuted alongside him: 16 "... came from high up, much to the disgust of DPP 17 Tony Hetherington ..." 18 So Private Eye got the first name wrong: 19 "... Tony Hetherington's aides and also the 20 policemen involved in the case. They were told that 21 this was 'no reflection on the evidence' and indeed, at 22 one stage, Hayman appears to have been cautioned. He 23 was also warned not to send obscene material through the 24 post again." 25 Let me ask you this: there's a reference to the</p> <p style="text-align: center;">Page 75</p>	<p>1 policemen investigating, and that, by implication, was 2 you and Mr Atkins? 3 A. Yes. 4 Q. If you didn't leak the information and Mr Atkins didn't, 5 who do you think might have done, and your reaction to 6 it? 7 A. We could have released it any time we liked, Atkins 8 and I. But it was -- the knowledge of what it was all 9 about was throughout our office, throughout the DPP's 10 office. There are umpteen people who could have 11 released it to the press. It's no good me saying it 12 could have been him or him. 13 Q. No, I'm not asking you to. 14 A. Obviously, I've got my own suspicions, but they mean 15 nothing now. They don't mean anything. It could have 16 been one of 20 or 30 people. Anybody. 17 Q. Not only police, presumably, but within the DPP's 18 office? 19 A. They knew as well. Who talks to the press and gives 20 them these stories, especially people like Private Eye. 21 They seem to get information from all over the place, 22 don't they? 23 Q. Help me with this: coming back to the caution -- Hayman 24 was cautioned, you were present? 25 A. Yes.</p> <p style="text-align: center;">Page 76</p>

1 Q. Do you remember now what he was cautioned for?
 2 **A. Sending indecent material through the post.**
 3 Q. One offence or more than one offence?
 4 **A. Continuing. Continuing offences.**
 5 Q. In those days, as now, did the caution -- did the
 6 acceptance of a caution mean that he admitted what was
 7 said against him?
 8 **A. Yes.**
 9 Q. Now, in the course of the investigation into Hayman in
 10 particular, did you have meetings with Mr Naunton, who
 11 was working in the DPP's Office at the time?
 12 **A. Yes. We spoke about the case.**
 13 Q. You and Mr Atkins?
 14 **A. I would have spoken to him.**
 15 Q. On the telephone or face to face?
 16 **A. Mainly on the telephone.**
 17 Q. I'm simply picking this up for a reason, but I think in
 18 your statement you make a very serious allegation about
 19 Mr Naunton. You say that he lied. I want to
 20 understand, first of all, why you make such a serious
 21 allegation about a man who worked in the DPP's Office
 22 and a solicitor, and what you say he lied about?
 23 **A. Well, I saw -- when I was being investigated, under**
 24 **caution, questioned by a commander, for many hours --**
 25 Q. This was about the leak?

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1 **of the accusations against me, because I coupled the DPP**
 2 **with Jeremy Naunton on that occasion, because I think**
 3 **somewhere in that statement that I made under caution**
 4 **I said, "Well, are you going to put a crime report in**
 5 **the book that I've made an allegation of conspiracy**
 6 **against the DPP?", which of course wasn't done, but**
 7 **there we are.**
 8 Q. Can we just go to your statement, just to understand
 9 a little more about this, because of course Mr Naunton
 10 will be having his say a little later.
 11 If we go back to your witness statement, your tab 3,
 12 IPC000520_007, halfway down:
 13 "One day I was called in by Chief Inspector
 14 Shepherd ..."
 15 You will see that paragraph:
 16 "... who was head of A3 at the time, who said, 'You
 17 had better sit down'. He told me that it had been
 18 decided that Hayman would not be prosecuted but
 19 cautioned. He said that that was the decision of
 20 the DPP."
 21 It is this I want to ask you about:
 22 "Later, Jeremy Naunton made a statement to say that
 23 the officers in this case, namely, me and DC Atkins,
 24 must have been mistaken as to the DPP's intention to
 25 prosecute Hayman. This is a lie, I felt that Jeremy was

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1 **A. This was about the leak. There was a question or**
 2 **something put to me in that, "Oh, well, Jeremy Naunton**
 3 **denies dealing with charges against Hayman, or dealing**
 4 **with details of charges against Hayman", and I said,**
 5 **"Well, then, Mr Naunton is lying, but" -- and it is**
 6 **a big "but", right? That was put to me under caution in**
 7 **a different atmosphere to what we are talking about at**
 8 **the moment. I have nothing but admiration for**
 9 **Mr Naunton. He was an excellent solicitor. He dealt**
 10 **with a number of cases that I dealt with with**
 11 **pornography and that type of thing. And I personally**
 12 **think Jeremy Naunton didn't say to me, "We are not going**
 13 **to prosecute Hayman"; the DPP said, "We are not going to**
 14 **prosecute Hayman", and Jeremy Naunton was one of his**
 15 **solicitors, and would have had to fall in line, like**
 16 **everybody else. He couldn't stand up and say, "Well,**
 17 **just a moment, I don't think that's right". In actual**
 18 **fact, I think in papers that I've read here that I've**
 19 **never seen before Jeremy Naunton speaks of not being**
 20 **party to it, in that Sir David Napley went to see**
 21 **Hetherington and Jeremy Naunton himself says that was**
 22 **most unusual, these sort of things are usually dealt**
 23 **with in correspondence.**
 24 Q. Yes.
 25 **A. So although I called him a liar, that was in the context**

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1 under pressure from somewhere else, but he lied."
 2 The lie you seem to be suggesting is something
 3 Mr Naunton had said about the DPP's intention to
 4 prosecute. What were you talking about here in 2015
 5 that was the lie?
 6 **A. Well, must have been mistaken as to the DPP's intention**
 7 **to prosecute Hayman.**
 8 Q. You will accept, Mr Collins -- carry on.
 9 **A. What I'm saying is a lie, that there was a decision that**
 10 **Jeremy Naunton was aware of not to prosecute Hayman, and**
 11 **that had been told to us. What I'm saying, that was**
 12 **a lie at that time.**
 13 Q. So, sorry, because I'm not understanding. It may just
 14 be me. What are you saying was the lie? What was it
 15 Jeremy Naunton had said that was untrue? Because in
 16 this statement you say it was -- in the witness
 17 statement you say --
 18 **A. That we --**
 19 Q. -- that you had been mistaken about the DPP's intention.
 20 So it rather suggests that what you were saying, at
 21 least in 2015, was that Jeremy Naunton had told you that
 22 the DPP intended to prosecute, yet he hadn't. That
 23 seems to be the lie that you are suggesting here?
 24 **A. Well, the lie that I'm suggesting is that it was being**
 25 **said that we had never said that we would prosecute.**

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1 **That's what I'm saying is the lie. To say that he's**
 2 **just mistaken and that I thought, "Oh, whatever**
 3 **conversation we'd had he must think -- he obviously**
 4 **thinks I said that", whatever it was, and from that he**
 5 **took it that it was going to be prosecution; no, there**
 6 **was going to be prosecution and we were discussing**
 7 **dates. I specifically remember the discussion of**
 8 **the dates.**
 9 Q. So your takeout is that, on the occasion that you
 10 discussed the dates, as you described to us earlier, of
 11 individual Post Office Act offences, are you saying the
 12 impression you came away with was, at that point in
 13 time, there was to be a prosecution?
 14 **A. Absolutely.**
 15 Q. And are you saying Jeremy Naunton actually said that to
 16 you or is it simply the impression you came away with?
 17 **A. If you sit discussing -- why am I talking to**
 18 **Jeremy Naunton? He's saying -- he must have spoken to**
 19 **me. Why am I talking to him if we're not going to**
 20 **prosecute? I've got no need to talk to him. If there's**
 21 **no prosecution, I don't want the DPP's Office involved.**
 22 **We just say, "Right, there's no prosecution".**
 23 Q. So this wasn't a discussion about the evidence or
 24 improving the evidence. In your mind --
 25 **A. We didn't have to prove the evidence. We had ample --**

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1 **A. Yeah -- no, he wouldn't have come in off the street. He**
 2 **would have telephoned or said, "I want to meet", or**
 3 **whatever. So we met him in a public room in**
 4 **Scotland Yard.**
 5 Q. You told him not to be so stupid, not to make matters
 6 worse for himself, and sent him on his way?
 7 **A. Yes.**
 8 Q. Did you report it?
 9 **A. No.**
 10 Q. Because?
 11 **A. If he'd put a bag of money -- a bag on the counter full**
 12 **of £20 notes, I'd have arrested him. To walk into the**
 13 **Porn Squad office and say, "I've been offered a bribe",**
 14 **was like saying, "Does anybody want a cup of tea". We**
 15 **replaced men that had been taking bribes for years.**
 16 **They were crooks. And they've taken money hand over**
 17 **fiat. Everybody that we came into, those of us that**
 18 **went up there then, and had to deal with those same**
 19 **people that had been giving out bribes, they were trying**
 20 **to bribe us, because they thought, "Oh, well, that's all**
 21 **right. We've been doing it" -- as one man said -- one**
 22 **man said to me, "Well, I know where I stood for**
 23 **22 years. You don't mind me offering, do you?" If we'd**
 24 **have started reporting every time we had -- somebody**
 25 **tried to bribe us without the bribe, we'd have been**

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1 **stacks of evidence.**
 2 Q. In your mind, this was a discussion about a prosecution?
 3 **A. Yes.**
 4 Q. On page 6 of the same statement, you recalled before any
 5 decision was made, so before any decision was made not
 6 to prosecute but to caution, there was an occasion you
 7 met Hayman?
 8 **A. Yes.**
 9 Q. He came, you recall, to Scotland Yard and he spoke to
 10 you and Mr Atkins?
 11 **A. Yes.**
 12 Q. What did he speak to you about? What did he want from
 13 you?
 14 **A. He wanted to know if £25,000 each would have made any**
 15 **difference to what we were doing.**
 16 Q. This is the very kind of corruption that you were
 17 brought in, in other words --
 18 **A. Well, my reply to him was, "You're in enough trouble**
 19 **already. Don't be stupid".**
 20 Q. Well, you were brought in by John Smith, Sir John Smith
 21 as he became, because you were incorruptible?
 22 **A. I am incorruptible.**
 23 Q. So he comes along -- just himself or anybody with him?
 24 **A. No, just himself.**
 25 Q. What, by appointment or just came off the street?

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1 **there all day. We wouldn't have done anything else.**
 2 Q. But there was, in one sense --
 3 **A. I've read in here that there was a procedure in the**
 4 **Metropolitan Police.**
 5 Q. What you're referring to is the Operation Magnolia
 6 closing report, aren't you, which is what you've read,
 7 because they make certain observations about what you
 8 might have done in the circumstances. You remember
 9 that? You must have read --
 10 **A. I didn't read that, because I -- I read it and**
 11 **I thought, well, I was fairly au fait with all the rules**
 12 **and regulations. You had to be. But I don't remember**
 13 **anything that was laid down that says, "If you are**
 14 **offered a bribe, you must go and (a), (b), (c), (d)".**
 15 **One would walk into the office -- as we did, you'd walk**
 16 **into the office and say, "You wouldn't believe that,**
 17 **that guy's just offered us 50 grand", and they'd go,**
 18 **"What?". But if he'd put it on the desk, then you've**
 19 **got him. It's no good him just saying, "I'll give you**
 20 **a bribe". You've got to have some sort of evidence**
 21 **other than a man saying, "I want to bribe you". It's no**
 22 **good walking into a charge room with that. They'd just**
 23 **tell you to go away.**
 24 Q. The criticism of the Operation Magnolia closing report,
 25 at its highest, seems to be that it was unfortunate that

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1 you didn't report the approach because it is not known
 2 what impact it might have had on your investigation --
 3 and this is what I need to ask you about, Mr Collins,
 4 because I hear what you say about the fact that you
 5 didn't have the £20 notes in a bag which would prove the
 6 fact that a man who was under investigation was trying
 7 to bribe you, but the fact is there was you and
 8 Mr Atkins who could corroborate each other in terms of
 9 what had happened -- there might be evidence that Hayman
 10 had walked into the police station alone, unaccompanied
 11 by a solicitor and had had a meeting with you, but over
 12 and above that, whether or not money had changed hands,
 13 this was the clearest case of perverting the course of
 14 justice, wasn't it?
 15 **A. You're trying a case, sir, if you don't mind me saying**
 16 **so. Would you prosecute or make out on those lines?**
 17 **You wouldn't, would you? You wouldn't take the brief**
 18 **that said, "Well, he offered me the money". You**
 19 **wouldn't go to court with that. You'd say, "Go and get**
 20 **me a decent bit of evidence and I'll do it".**
 21 Q. Mr Collins, you're looking at it in an isolated fashion.
 22 This was a man who was under investigation. If you had
 23 evidence that he'd sought to pervert the course of
 24 justice and there was a good case on the substantive
 25 offences here, Post Office Act offences, it would be

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1 **It was awful --**
 2 Q. Were you aware --
 3 **A. -- for him. I don't excuse him, but it was awful, the**
 4 **effect that that would have had on his family.**
 5 Q. So were you sympathetic towards him?
 6 **A. In that sense, yes.**
 7 Q. Were you aware at the time of any Attorney General
 8 guidelines or Metropolitan Police prosecuting policy in
 9 relation to post office offences, for example, if there
 10 was no financial gain or the parties between whom
 11 correspondence of an obscene nature was taking place
 12 were consenting or that items were sent in sealed
 13 envelopes, that that wouldn't, as a matter of policy, be
 14 prosecutable? Were you aware of that?
 15 **A. I can answer that on the papers that you have there.**
 16 **You've got statements there saying that Mr Wardell had**
 17 **sadistic material connected with the description of**
 18 **sexual offences on children which he exchanged with**
 19 **Hayman. Mr Wardell was a bus inspector. He didn't have**
 20 **Sir David Napley, did he? He was prosecuted for exactly**
 21 **the self-same material that Hayman had.**
 22 Q. Would you have been sympathetic to him in the same way
 23 as you were to Sir Peter Hayman, if he had a wife at
 24 home whose position in society might be lost?
 25 **A. You've always got -- it is popular television and people**

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1 something that you could consider seeking to add to the
 2 same indictment, which would strengthen the case against
 3 him. What I want to ask you is whether you thought
 4 about that?
 5 **A. No, I didn't.**
 6 Q. So it was never reported, it was left there, and that
 7 was the end of that?
 8 **A. There was no official report.**
 9 Q. Did you ever make notes about it?
 10 **A. No. The man was in a terrible state. I'm not**
 11 **vindictive. I don't agree with what he did. But**
 12 **I wasn't there to punish him, just to -- you know, I'd**
 13 **been to his house and seen his wife, for God's sake.**
 14 **The effect it must have had on her must have been**
 15 **terrible.**
 16 Q. When you say --
 17 **A. So I'm telling him, "Look, don't be stupid. You're only**
 18 **making matters worse for yourself", and that's the end**
 19 **of it.**
 20 Q. When you say, Mr Collins, he was in a terrible state,
 21 help us, what do you mean? When he come to see you?
 22 **A. No, he didn't stand there trembling, or crying or**
 23 **anything like that. But you've seen his record and his**
 24 **whole family, his future, anything, it was diabolical**
 25 **for the man and his family that it should come to light.**

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1 **like to think that all police officers go around and**
 2 **they hate villains and they hate everybody that they**
 3 **deal with. It's not true. The majority of people the**
 4 **policemen deal with are ordinary human beings, whatever.**
 5 **I wasn't vindictive in any way towards Hayman, but the**
 6 **man was -- what probably concerned me more was the fact**
 7 **that there was a man who was our representative in**
 8 **Berlin throughout the Cold War and he was still writing**
 9 **his diaries then. And the positions that he'd held, if**
 10 **somebody had come to me and said, "Look, that man has**
 11 **got so much that he could be blackmailed for, and we**
 12 **don't think that it would be good for the country if**
 13 **people knew who he was, so we're not going to prosecute**
 14 **him", I would have said, "Amen, the same as has been**
 15 **said in connection with other people in the public eye,**
 16 **when there's been no prosecution because it would be bad**
 17 **for the country, or whatever, I could understand that.**
 18 **But not in this case. It was just a wealth of filth**
 19 **being sent all over the country.**
 20 Q. Do you agree or disagree, if you have had the
 21 opportunity of reading it, Greg McGill, who is the
 22 current director of legal services at the Crown
 23 Prosecution Service, who says that, based on the
 24 information available to him, the policy he felt was
 25 a reasonable one, if there was such a policy. Do you

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<p>1 agree or disagree with that?</p> <p>2 A. I disagree with it. How could it be policy if they took</p> <p>3 Wardell to court? It wasn't policy in connection with</p> <p>4 Mr Wardell, so how was it policy in connection with</p> <p>5 Mr Hayman? The argument doesn't hold water.</p> <p>6 Q. What you are saying is, there was one law for Wardell</p> <p>7 and another for Hayman?</p> <p>8 A. Absolutely.</p> <p>9 Q. Can I ask you about something else, just a small matter</p> <p>10 that you mention in the witness statement, if we have it</p> <p>11 open, at pages 6 to 7, but we can deal quite shortly</p> <p>12 with this. Do you remember being asked during the</p> <p>13 course of the investigation into PIE to take an exhibit</p> <p>14 seized from a witness to the Attorney General's Office</p> <p>15 at the Royal Courts of Justice?</p> <p>16 A. Yes.</p> <p>17 Q. What was that all about?</p> <p>18 A. I wish I knew. I received a telephone call to say would</p> <p>19 I take an exhibit, which was the material we seized from</p> <p>20 one particular person, whose name I can't remember, and</p> <p>21 would I take it to the Attorney General's Office, and</p> <p>22 I thought -- in my innocence, I thought, "Well, what is</p> <p>23 it -- does he want to see the type of material that</p> <p>24 we're getting? Because this only covers whatever.</p> <p>25 I can, if he wishes, give him a selection of</p> <p style="text-align: center;">Page 89</p>	<p>1 the material that we're obtaining from these people".</p> <p>2 "No, no, just that one. Just that particular person".</p> <p>3 So I took it to the Attorney General's Office on the</p> <p>4 basis that, "Please, I've got to have this back because</p> <p>5 it's an exhibit in the case against PIE", and I've never</p> <p>6 seen it to this day. It never came back.</p> <p>7 Q. I think you remember finding the office in the Royal</p> <p>8 Courts of Justice and speaking to somebody by the name</p> <p>9 of Gerald Adams, who was the solicitor to the attorney?</p> <p>10 A. Yes. He used to work in the DPP's Office.</p> <p>11 Q. You recalled giving him the item. You record in your</p> <p>12 2015 statement on page 17 that Mr Adams said that the</p> <p>13 attorney was of the opinion that Hayman should be</p> <p>14 prosecuted. Do you have a memory, a distinct memory, of</p> <p>15 that being said to you?</p> <p>16 A. I do remember it, but I don't -- I do remember talking</p> <p>17 to him about Hayman, but I can't remember specifically</p> <p>18 him saying, "The Attorney General says that it ought to</p> <p>19 be ..." I can't remember him saying that.</p> <p>20 Q. Certainly in 2015?</p> <p>21 A. But I wouldn't have put it down if he hadn't said it.</p> <p>22 Q. That's what you said in 2015.</p> <p>23 A. Yes.</p> <p>24 Q. Who was the Attorney at the time; do you remember?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 90</p>
<p>1 Q. Michael Havers?</p> <p>2 A. Sorry?</p> <p>3 Q. Was it Michael Havers?</p> <p>4 A. Havers, yes, Nigel Havers' dad.</p> <p>5 Q. But to this day, you have no idea why you were asked to</p> <p>6 take it, the exhibit?</p> <p>7 A. No, no idea.</p> <p>8 Q. A couple of other topics, please, Mr Collins. Can you</p> <p>9 go, please, in your bundle to tab 20, which is</p> <p>10 OHY007089, and we have got selected passages from this</p> <p>11 document. What it is, Mr Collins -- first, let me ask</p> <p>12 you if you recognise it?</p> <p>13 A. It's a statement I've made at some time.</p> <p>14 Q. It's a ...? If you go to the final page, behind tab 20,</p> <p>15 you will see your name is there. So it appears to be</p> <p>16 a report written by you. It doesn't have a date on it,</p> <p>17 but I think we can date it in the sense of the internal</p> <p>18 logic of certain of the things you wrote suggest it was</p> <p>19 in the period after Hayman had been cautioned. If we go</p> <p>20 to the first page, you can see it's in relation to PIE,</p> <p>21 Paedophile Information Exchange, to the commander of</p> <p>22 a department, and we have got A3(1) at the top, which is</p> <p>23 where you were working?</p> <p>24 A. Yes.</p> <p>25 Q. Is that right?</p> <p style="text-align: center;">Page 91</p>	<p>1 A. Yes, that's right.</p> <p>2 Q. Paragraphs 1 to 4 are really the introduction into what</p> <p>3 PIE were. If we go to the next page, please, you will</p> <p>4 see we have skipped several pages because we have had to</p> <p>5 be selective. We turn immediately to page 71 of</p> <p>6 the report. You will see "71" at the top. It is page 2</p> <p>7 of the inquiry document, and it is headed "Sir Peter</p> <p>8 Telford Hayman", so it is clearly about him and deals</p> <p>9 with aspects of the investigation into him.</p> <p>10 You will see in paragraph 151:</p> <p>11 "On 2 October 1978, Police Sergeant Collins and</p> <p>12 Police Constable Atkins interviewed Hayman ..."</p> <p>13 And it repeats some of the information we saw in</p> <p>14 your other police report. At 152, Hayman's personal</p> <p>15 particulars, true identity, weren't known. He used the</p> <p>16 name Peter Henderson, and so on and so forth. This</p> <p>17 deals with the interview of him under caution at the</p> <p>18 flat and the findings about which you have already told</p> <p>19 us.</p> <p>20 On the next page, page 3, paragraph 152 continues,</p> <p>21 where you describe 45 bound volumes, a record of his</p> <p>22 sexual activities. Then skipping down a bit:</p> <p>23 "As a result of joining PIE, he then corresponded</p> <p>24 with a number of members and they, with Hayman, are the</p> <p>25 subject of a separate report to the Director of Public</p> <p style="text-align: center;">Page 92</p>

<p>1 Prosecutions ... who has advised that Hayman be 2 officially cautioned for sending indecent material 3 through the post. This has been done." 4 So this clearly helps us at least see that this 5 report was being written after Hayman had been 6 cautioned. Do you agree, Mr Collins? 7 A. Yes. 8 Q. Although we don't have a date on it. Then on the same 9 page, paragraph 153: 10 "Hayman corresponded with PIE in the person of 11 David Grove." 12 So that was a pseudonym he used. Exhibit PH/1 is 13 one of these letters: 14 "It states: 'Dear Mr Grove, thank you for your very 15 prompt and cautious reply to my letter. I am most 16 impressed. I am eager to receive more information as 17 you have promised, some information about other contacts 18 too, please, and your next letter. 19 "I have great affection for a little girl 20 called ..." 21 You see that a name has been ciphered: 22 "Naturally, we have seen each other naked. We have 23 engaged in kissing and external caressing, but I have 24 not dared to go further. I have also seen her stark 25 naked with a little boy similarly nude. It is</p> <p style="text-align: center;">Page 93</p>	<p>1 a wonderful and beautiful experience, but naturally my 2 virile feelings are aroused and I long to go further. 3 Can you give me some advice, please?." 4 Which is underlined. At the top of the next page, 5 which is 73 of the report: 6 "This letter is signed Peter Henderson." 7 The fact that it was exhibited as PH/1, does that 8 help identify where it was seized from? 9 A. Well, that would be Peter Henderson. 10 Q. Does that mean it was a letter that was attributed to 11 him because it was seized at Linden Gardens or it was 12 seized from somebody else to whom, or with whom, he 13 corresponded? 14 A. I imagine it was seized from this man Grove. I don't 15 remember it. 16 Q. No, Grove is him, it appears, because he seems to be 17 using that name, if I have understood your report 18 correctly -- maybe I have that wrong. "Hayman 19 corresponded with PIE in the person of David Grove". So 20 it is seized from Grove? 21 A. I don't remember this at all. 22 Q. You don't remember it? 23 A. No. 24 Q. But there seems to be this correspondence. On the face 25 of it, was there any reason to think -- I'm going to ask</p> <p style="text-align: center;">Page 94</p>
<p>1 you this question just to ponder for a moment -- given, 2 first of all, that Henderson/Hayman was in fact a member 3 of the Paedophile Information Exchange whose aims were 4 to lower the age of consent for men to have sex with 5 children from the age of 4, and taking the content of 6 this letter, that he didn't have paedophilic tendencies, 7 was there any confidence the police could have that 8 Hayman wasn't in fact a paedophile? 9 A. I really wouldn't know how to categorise Hayman except 10 he was everything: every sexual deviancy that you can 11 think of -- 12 Q. Well, the one I think of -- 13 A. I just don't -- 14 Q. The one I'm thinking of, Mr Collins -- this is not 15 a criticism, I'm just asking for your view of it. We 16 have the fact he's a member of PIE. We have the content 17 of a letter written to a David Grove here, which talks 18 about an experience, on the face of it, with a child, 19 and that he wants to go further. My question is, 20 really, taking the two together, and perhaps other 21 material like this, could anyone have had at the time 22 any confidence that, amongst all the other things he 23 might have been, he wasn't a paedophile? 24 A. I can't see how anybody would say that. I think he 25 would have grasped at any opportunity to take advantage</p> <p style="text-align: center;">Page 95</p>	<p>1 of man, woman or child sexually. 2 Q. One other document. If you flip back, please, to 3 tab 19, INQ004038, please. This is a branch note from 4 A3(1), so this is from your unit, to the Commissioner's 5 Office, I think. It is dated, we can see, top right on 6 the first page, 24 August 1983. If you go to the final 7 page -- I'm afraid it's not easy to entirely discover 8 the name, but was there a DM Lewis -- that's how I read 9 the name -- who was an inspector? It may be I've got 10 that wrong. I think it looks like "Lewis". Does that 11 mean anything to you, an inspector? 12 A. No, I can't see it, "Lewis". 13 Q. 1983. Were you still on the unit then? 14 A. No, I was off the unit then, I was in America. I was in 15 America in '83. No, I wasn't on the unit then. I was 16 on Special Intelligence Section then. 17 Q. If you go back to the first page, you will see that the 18 branch note relates to the Paedophile Information 19 Exchange, and if we can blow it up on the screen a bit, 20 you might be able to read it a bit more easily: 21 "... is an organisation consisting of a group of men 22 who advocate that sexual acts between adults and 23 children should, with certain limited exceptions, be 24 made lawful, and, even in the event of such an act 25 falling into their category of exceptions, that act</p> <p style="text-align: center;">Page 96</p>

<p>1 should be dealt with outside the criminal law and with 2 the utmost leniency. 3 "An investigation into this group was carried out in 4 1978 by Police Sergeant Bryan Collins and Police 5 Constable David Atkins, both formerly ..." 6 Which accords with what you have just told us: 7 "... members of the Obscene Publications Branch." 8 What it goes on to do is describe certain people and 9 certain detail. But on the final page, taking it 10 shortly, it suggests that during the investigations no 11 people of public prominence were unearthed. If you look 12 at the final page, if you are there, Mr Collins, the 13 second, two-line paragraph on page 3: 14 "As far as the investigating officers are aware ..." 15 This could relate to the present as well as the past 16 when you were on the unit: 17 "... there are no persons prominent in public life 18 involved in this organisation at the present time." 19 Then: 20 "In order to assist investigations into serious 21 crime in Leicestershire and Sussex, a list of known 22 members of the Paedophile Information Exchange which was 23 compiled during the investigation by PS Collins was 24 forwarded to the respective constabularies. Again, as 25 far as is known, no prominent persons feature in this</p> <p style="text-align: center;">Page 97</p>	<p>1 list." 2 Are you able to understand that, given the fact that 3 Peter Henderson, also known as Peter Hayman, was 4 excluded? 5 A. No. 6 Q. Because he was a person of public prominence. 7 A. Very much so. 8 Q. Finally, this, Mr Collins: can we just understand, all 9 of this stuff that we have really been discussing in 10 your evidence happened in the late '70s/early '80s, and 11 obviously, for all of those years, you have harboured 12 considerable doubts and concerns about the fact that 13 nothing was done about Hayman in particular. I'm 14 putting Andre Thorne to one side. Can you help us 15 understand why it is that it wasn't until, by the look 16 of it, 2015 until you raised those concerns in the way 17 that you did? 18 A. Sorry, could you repeat? 19 Q. Why is it that over all of those years, it wasn't until 20 2015 that you raised those concerns in the way that you 21 did? 22 A. In the way that I did? 23 Q. Yes, by making a statement to the police. 24 A. To the police, when they came to see me about it? 25 Q. Yes.</p> <p style="text-align: center;">Page 98</p>
<p>1 A. Raised concerns. Who was going to listen to me? The 2 police won't listen to me. The police wouldn't listen 3 to me. All they were interested in was getting 4 somebody's head to roll for what was published in 5 Private Eye. That was their only intent. There is 6 nothing -- nothing -- in my police career, whatever, to 7 suggest that I wasn't just a good copper. I was good at 8 my job. And they couldn't have cared less. They ruined 9 me. And -- well, as you can see, I'm still bitter. Not 10 as bitter as I was, but I'm -- it is not good to stand 11 there and somebody turns around to you and says, "You've 12 done this. You've committed an offence. We want your 13 warrant card. You can't be a police officer while we're 14 talking to you". To me, that was -- I'd rather be 15 stabbed than have that happen. But having that said to 16 you, what does it tell you afterwards? All this that 17 they did in trying to accuse Atkins and accuse me and 18 all this so that they could satisfy the DPP by telling 19 him that we were told where our loyalties lie. 20 After this all happened, what happened? They gave 21 me a position in an organisation just starting off. 22 I spent more time in America dealing with cases than 23 I dealt with here, so what was that? Can I be trusted? 24 Was I good at what I do? Yes, I was good at what I do. 25 Then they come up with all this sort of thing over</p> <p style="text-align: center;">Page 99</p>	<p>1 a man -- I don't want to feel too bitter about Hayman, 2 but the point is, they squared it up. There's no other 3 explanation for it at all. It was squared up. Napley 4 came on the phone and that was the end of it. 5 Whatever -- at the end of the day to say, "That man, oh, 6 we can't prosecute him because he didn't hurt anybody 7 and he was suicidal", and then I see him on Mastermind. 8 You know -- 9 Q. The way you see it, Mr Collins, it was Sir Thomas 10 Hetherington doing a deal with Sir David Napley in 11 relation to Sir Peter Hayman? 12 A. Best club in the world, isn't it: three knights of 13 the realm? You know, not bad, is it? 14 Q. Well, that will be for others to answer. 15 A. Mr Wardell didn't get out of that. He didn't get three 16 bus conductors down there to try and help him, did he? 17 Sorry. 18 MR ALTMAN: On which note, we have some food for thought for 19 lunch. Mr Collins, I have no further questions. Just 20 before we break and let you go, I will see if the chair 21 and panel do. 22 Questions by THE PANEL 23 THE CHAIR: There are a couple of questions. One small 24 point from me. If someone were found guilty of Post 25 Office Act offences involving the type of material</p> <p style="text-align: center;">Page 100</p>

<p>1 Hayman had, what's the range of sentence, if they were 2 found guilty? 3 A. In general terms, it would have meant a fine. 4 THE CHAIR: A fine? 5 A. Yes. 6 THE CHAIR: Substantial, or ...? 7 A. A substantial fine, yes. 8 THE CHAIR: Was there a general sense at the time that 9 indecent images were a victimless crime; in other words, 10 the children concerned, if there were indecent images of 11 children, were not considered to be victims? 12 A. There were different attitudes, madam, but certainly 13 children didn't take precedent. 14 THE CHAIR: Thank you. Ms Sharpling? 15 MS SHARPLING: Just a couple, Mr Collins. Thank you for 16 your evidence. When you were in the Obscene 17 Publications Team, you were there for quite a number of 18 years, I think you told us. 19 A. Yes. It was -- initially, we were going there for two 20 years so that we wouldn't be too affected, but I stayed 21 about four. 22 MS SHARPLING: I understand. Did all your cases for 23 prosecution go to the DPP's department or were some of 24 them prosecuted by the Metropolitan solicitor's 25 department?</p> <p style="text-align: center;">Page 101</p>	<p>1 A. No, all our stuff went to the DPP's Office. 2 MS SHARPLING: I see. An entirely different question from 3 me. If you were to come across children during the 4 course of your duties who may have been abused or the 5 victims of child abuse, either at the time or 6 previously, was there a system in place where those 7 children could be protected? 8 A. Absolutely. Well, we would contact Social Services, 9 wherever it was that the child was living. They were 10 the people that we would go to initially to make sure 11 that the child received some care. 12 MS SHARPLING: I see. Thank you very much. 13 THE CHAIR: Thank you very much, Mr Collins. We have no 14 further questions. 15 A. Thank you. 16 MR ALTMAN: Thank you, Mr Collins. That completes your 17 evidence, thank you. 18 THE CHAIR: We will return at 2.00 pm. 19 MR ALTMAN: Can we say 2.05 pm? 20 THE CHAIR: Yes. 21 (1.04 pm) 22 (The short adjournment) 23 (2.07 pm) 24 MR ALTMAN: Chair, before we start with Mr Naunton, 25 Mr Henderson is going to adduce a few documents.</p> <p style="text-align: center;">Page 102</p>
<p>1 Witness statements adduced by MR HENDERSON 2 MR HENDERSON: Thank you, chair. There are three sets of 3 documents I would like to ask you to adduce. The first 4 is a set of documents provided by Simon Danczuk, who, as 5 you probably remember, is the former Labour MP for 6 Rochdale and the co-author of the book "Smile for the 7 Camera" about Cyril Smith. He has also provided 8 evidence to the inquiry about a separate matter, and 9 that's allegations that Tom Driberg, who was a Labour MP 10 from 1942 to 1974, escaped prosecution for sexual 11 offences because of his status and prominent position. 12 The references are as follows: INQ003692, INQ003693, 13 INQ003694 and INQ003695. In short, what these show is 14 that Mr Danczuk's office was passed information by a man 15 named Michael Cookson, who was a retired police officer, 16 about Tom Driberg. The office of Simon Danczuk 17 forwarded that to the CPS, who conducted searches of 18 their records and the legacy DPP office records, insofar 19 as they were able to, and found no matters relevant to 20 Tom Driberg, so the trail went cold there. 21 The second set of documents relate to Mr Don Hale, 22 who, as you will recall, chair, gave evidence to the 23 inquiry on Friday, 8 March. He has, following that 24 evidence, provided the inquiry with two further witness 25 statements following up on some points that were raised,</p> <p style="text-align: center;">Page 103</p>	<p>1 and we would adduce them in full. They are INQ004202 2 and INQ004203. 3 We would also like to ask you to adduce in full the 4 handwritten version of his 2014 police statement. You 5 will recall there was an issue about that. That is 6 MPS003550. 7 We have also received further statements from the 8 Northamptonshire Police which confirm, contrary to the 9 information that they initially gave the inquiry, that 10 Mr Hale was in fact interviewed by two officers from 11 Northamptonshire Constabulary on 9 April 2015 about the 12 rumour that Cyril Smith had been stopped on the 13 M1 motorway back in the 1980s and some form of child 14 pornography was found in his car. Those two references 15 from Northamptonshire Police are OHY007103 and 16 OHY007104. So we would like to make it clear that 17 Mr Hale's evidence about that interview with 18 Northamptonshire Police is now confirmed to be true by 19 them. 20 Then, finally, chair, I would invite you to adduce 21 some statements from Peter McKelvie. You will recall 22 hearing about him back in the first week of these 23 hearings. You have seen the report produced, 24 Operation Red Rail 2, which looked at his allegations. 25 For completeness, we would invite you to adduce four</p> <p style="text-align: center;">Page 104</p>

<p>1 documents which give his allegations and the information 2 he provided, and those are PMK000472, OHY005548, 3 OHY005582 and OHY005539. 4 MR JEREMY JOHN NAUNTON (sworn) 5 Examination by MR ALTMAN 6 MR ALTMAN: Full name, please. 7 A. Jeremy John Naunton. 8 Q. Mr Naunton, obviously retired now, but were you 9 a practising solicitor? 10 A. Yes, I was. 11 Q. Admitted to the roll of solicitors, when? 12 A. 1971, I think it was. 13 Q. 1971. When did you join the DPP's Office? 14 A. I think the same year. 15 Q. So straight in as a new practising solicitor? 16 A. Yes. 17 Q. Clearly, you were, as you say, moved around. In your 18 inquiry statement -- which we can put up on the screen, 19 INQ003886. Presumably you were moved around in the 20 DPP's Office? 21 A. Yes. 22 Q. Where did you begin? 23 A. I began in a division called the research division, 24 which dealt with research law and prosecuting police 25 officers.</p> <p style="text-align: center;">Page 105</p>	<p>1 Q. If we go to the second page of your statement, you set 2 out a number of points about your career: between 1973 3 and 1979, you dealt with a variety of criminal matters 4 which were referred to the DPP. From 1979 to 1981, you 5 were a senior lawyer, dealing with all types of criminal 6 allegation against police officers throughout England 7 and Wales. From 1981 to 1986, you were a senior lawyer 8 at the DPP's Office reviewing serious fraud cases. Is 9 that correct? 10 A. Yes. 11 Q. Then 1986, when the DPP's Office became the Crown 12 Prosecution Service, to 1990, did you review cases 13 dealing with centrally and advised or decided-on 14 criminal proceedings and did you advise CPS areas, 15 police as well as others? 16 A. Yes. 17 Q. From 1990 to 1992, head of division at CPS HQ, 18 responsible for a variety of themes, including major 19 disasters, homicide, international crimes and obscene 20 publications? 21 A. Yes. 22 Q. 1992 to 1995, head of division at CPS HQ, responsible 23 for dealing with all criminal allegations against police 24 officers in England and Wales other than traffic 25 offences, but offences such as homicide, death in police</p> <p style="text-align: center;">Page 106</p>
<p>1 custody, corruption, Data Protection Act offences? 2 A. Yes. 3 Q. Then 1995 to 1996, Assistant Chief Crown Prosecutor, 4 heading the international and legal services division at 5 headquarters? 6 A. Mmm-hmm. 7 Q. And then, in July 1996, did you leave the CPS and later 8 become joint force solicitor for Kent Police? 9 A. Yes. 10 Q. You have since retired, presumably? 11 A. Yes. 12 Q. When did you retire? 13 A. I think it must have been about ten years ago. 14 Q. You have been asked in general -- 15 A. Sorry, I'm going to correct that. I am still 16 a non-practising solicitor. 17 Q. But in terms of retired from employment? 18 A. Yes, I suppose so. 19 Q. I am going to ask you just to speak up a touch. I am 20 going to ask the usher to point the microphones closer 21 to your mouth, please -- 22 A. Thank you. 23 Q. -- because your voice is slightly drifting. You were 24 asked for your recollection of the Peter Hayman case, 25 and you set out in six points, just in general terms,</p> <p style="text-align: center;">Page 107</p>	<p>1 what your recollection was. In fact, you call him 2 Sir David Hayman. Does that rather suggest that, by the 3 time you made this statement to the inquiry, he was long 4 forgotten? 5 A. I don't think -- he wasn't forgotten. 6 Q. But as far as you're concerned? 7 A. Oh, I -- yes, yes. 8 Q. You said -- was this from pure recollection -- that it 9 related to a package found on a bus? It involved 10 section 11 of the Post Office Act 1953? 11 A. Yes. 12 Q. He was a senior diplomat involved with Canada? 13 Sir David Napley, of Kingsley Napley, represented him? 14 A. Mm-hmm. 15 Q. It was suggested that Hayman might commit suicide? 16 A. Mm-hmm. 17 Q. And the prosecuting decision was made by 18 Sir Thomas Hetherington, then DPP, at a meeting with 19 Sir David Napley which you didn't attend? 20 A. Yes, that's I think right, except I don't think it was 21 Sir Thomas Hetherington at that time. I think it was 22 Tony Hetherington or Thomas Hetherington. He wasn't 23 knighted, I don't think, until -- 24 Q. Would he have been knighted -- 25 A. Thereabouts. I think he was knighted the next year,</p> <p style="text-align: center;">Page 108</p>

<p>1 in 2000 -- in -- 2 Q. We can always check. 3 A. The next year, anyway, after I had any dealings with 4 this matter, I think, but, yes, that's right. 5 Q. So those are the essential features of your 6 recollection -- 7 A. Yes, that's right, yes. 8 Q. -- which you were asked to consider, but since which 9 time, as you set out there -- and we don't need to go 10 through them now because we will look at various 11 documents -- you were sent, in order to aid the making 12 of your statement, a variety of documents, and 13 presumably you've read them all? 14 A. Yes. In varying depth. 15 Q. Yes, of course. Now, one of the documents you were 16 asked to look at, and can we go to it now, please, it is 17 behind tab 4, which is the file. I am going to ask for 18 this to be adduced in full. CPS004445. We can see that 19 there are in fact two parts to it, Mr Naunton. The 20 first 21 pages, which we looked at this morning with 21 Mr Collins -- I don't know if you were in the room for 22 his evidence? 23 A. Yes, I was. 24 Q. That's the report which was sent up and received by the 25 DPP's Office on 7 December 1978 into Hayman and others</p> <p style="text-align: center;">Page 109</p>	<p>1 in relation to obscene photographs and correspondence. 2 From page 22 to page 25 is a note, a minute, coming out 3 of your office. Is that correct? 4 A. Yes. 5 Q. We will look at that. Then from page 26 -- I'm using 6 the inquiry reference pagination -- through to page 29, 7 there are some statements or extracts from statements 8 that were taken by the officers for the purposes of 9 their inquiry. Is that right? 10 A. It appears so. 11 Q. You have had an opportunity of reading all of that 12 material, I assume? 13 A. Yes, I did when it came in. 14 Q. Can we look, first of all, then, please, at the interim 15 note which begins at page 22. 16 A. Yes. 17 Q. I think you have your own version as well, which you 18 have highlighted? 19 A. Yes. 20 Q. First of all, the note. Is this your note? 21 A. I believe it is, yes. Initially, I questioned it 22 because I couldn't recognise the corrections on them 23 because of the way in which it had been photographed. 24 But I think it probably was my note. Certainly the part 25 at the end, which is the handwriting, is mine.</p> <p style="text-align: center;">Page 110</p>
<p>1 Q. We will come to that. Who was "A/D Met". What does it 2 mean? 3 A. That's "assistant director Met division", and I think 4 that might have been a man called Tim Taylor, 5 Timothy Taylor, I think. 6 Q. Where did he sit in the hierarchy? 7 A. Well, he was above me, but he wasn't the principal 8 assistant director, as I think they were then called, 9 nor deputy director, obviously, but he was fairly 10 senior. He was my -- above me, my line manager, if you 11 like, directly. 12 Q. Let's have a look, please, at some of the substance of 13 this, because this, am I right in thinking, is your 14 advice note, I suppose, for want of a better term, to go 15 to A/D Met, and was it based on the police report which 16 Sergeant Collins and Constable Atkins had supplied to 17 you and which had been received in the office on 18 7 December? 19 A. I think it probably was. I don't know. I cannot recall 20 whether I'd already spoken to the officers by then or 21 not. But I think it was based upon that. 22 Q. So based upon the note. Does that mean that you recall 23 having a meeting, or at least a conversation, with one 24 or other of the officers? 25 A. Yes, I had a meeting with both the officers at some</p> <p style="text-align: center;">Page 111</p>	<p>1 stage or the other, and it would have been before, 2 I suspect, that this was written, before 21 December. 3 Q. Does that suggest it was a face-to-face meeting, 4 a conference? 5 A. It was a conference, yes. 6 Q. Just while we have that in mind, you have heard 7 Mr Collins' evidence. What would the conference have 8 been about? 9 A. It would have been about this particular case of 10 Mr Hayman. 11 Q. I understand that. It's my rather general question 12 which provoked that answer. One can have a conference, 13 a legal conference, about all sorts of things. One can 14 talk about the evidence and further enquiries that might 15 be made; one can talk about whether the case is 16 prosecution ready and what the charges might be. You 17 have heard Mr Collins talk about a meeting which he 18 recalled with you, at which dates were mentioned, which 19 suggested to him that the case would be prosecuted, and 20 his evidence, you will remember, before lunch, was that 21 somebody had suggested to him that there was some 22 dispute between you and him as to whether or not you had 23 ever said that the case should or shouldn't be 24 prosecuted, about which he made a serious suggestion 25 that you had lied?</p> <p style="text-align: center;">Page 112</p>

1 **A. Yes, I heard that.**
 2 Q. What do you say about that? Let's just get that out of
 3 the way immediately?
 4 **A. As far as I was concerned, we had the meeting, which**
 5 **I think you will see in his statement was not concluded.**
 6 **We didn't conclude that particular meeting.**
 7 Q. Can you just speak up a bit for us, Mr Naunton?
 8 **A. Sorry, we didn't conclude that particular meeting. We**
 9 **discussed, I think, the way in which it was to go, we**
 10 **would discuss the dates for the offences and the type of**
 11 **offences that we would be going for, and I think I left**
 12 **him with the definite impression that we would progress**
 13 **to a prosecution for -- under the Post Office Act,**
 14 **which, in my opinion, was not a particularly serious**
 15 **offence by comparison to some of the others, not as**
 16 **serious as the Obscene Publications Act. It referred to**
 17 **indecent material through the post.**
 18 Q. Yes, carry on, please.
 19 **A. And we would need to see -- I would need to see the**
 20 **material. As far as I recall, I did not receive any**
 21 **material. I did not see any material. And I did not**
 22 **see any witness statements. So those were things that**
 23 **were going to have to be sorted out before we could**
 24 **actually go ahead and have Sir Peter Hayman charged, or**
 25 **Henderson, whichever you like.**

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1 **A. I would like to see the material that was going to be**
 2 **produced in court to prove that they were indecent**
 3 **material that was going through the post.**
 4 Q. As far as you're concerned, and, as I say, we will go
 5 through some of this, by the time you'd signed off this
 6 note and it had been submitted to your superior, did you
 7 expect that a prosecution decision was possible on the
 8 basis of this interim note?
 9 **A. Yes.**
 10 Q. You did?
 11 **A. I thought there was a possibility that that would go**
 12 **ahead.**
 13 Q. Even if it was an interim note only and you hadn't seen
 14 the exhibits?
 15 **A. Yes. The idea would be to seek the view of my assistant**
 16 **director. This was a decision -- it wasn't**
 17 **a decision-making minute, it was one as party to other**
 18 **minutes that ought to have come, or I would have**
 19 **expected to have come.**
 20 Q. Come from whom?
 21 **A. My assistant director or whoever he sent it up to.**
 22 Q. Are you telling us you weren't the only lawyer involved
 23 on this case at the time?
 24 **A. Yes, I anticipate I wasn't.**
 25 Q. Insofar as not seeing the original exhibits, did you

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1 Q. So, from your perspective, it sounds as if this was
 2 a feasibility conference --
 3 **A. Yes.**
 4 Q. -- rather than anything else?
 5 **A. And, in my mind, it was possible that we would do it.**
 6 Q. Let me meet the accusation head-on: do you accept that
 7 you have ever lied about what happened during the course
 8 of that meeting?
 9 **A. No. I never lied. I never intentionally misled them in**
 10 **any way whatsoever. It was purely a -- the first part**
 11 **of a conference to decide what type of offences we**
 12 **should be looking at, to give them some guidance as to**
 13 **how they should put the papers together.**
 14 Q. With that in mind, let's have a look at the first line
 15 of the note:
 16 "This is a regrettably long interim note as I have
 17 not yet seen the original exhibits."
 18 "Interim" and having not seen the original exhibits:
 19 why did you characterise it as an interim note?
 20 **A. Because I believe that's exactly what it was, I think it**
 21 **was an interim, it didn't come to a conclusion. I think**
 22 **that says so in the report itself.**
 23 Q. The fact that you hadn't seen the exhibits, by which you
 24 meant -- what were the exhibits you would like to have
 25 seen?

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1 ever see them or call for them or did matters move on so
 2 quickly that it never came to it?
 3 **A. I think matters might have moved on faster than that.**
 4 **So I didn't -- I didn't see them. I don't recall ever**
 5 **having seen them.**
 6 Q. Then you carry on in the note, if you look back to the
 7 note, please:
 8 "Like many of the Yard's investigations into
 9 section 11 of the Post Office Act offences, this case
 10 leaves a lot to be desired and it is difficult to make
 11 a decision without seeing the original photos or the
 12 latest letters."
 13 On the basis of that, Mr Naunton, was it foolish of
 14 anybody to expect a prosecuting or a charging decision
 15 to be made when the actual exhibits had never been
 16 looked at?
 17 **A. I think it would have been. I didn't make a final**
 18 **decision as I hadn't seen the material. Certainly the**
 19 **idea was to progress towards a prosecution.**
 20 Q. Then you set out some of the findings. You talk about
 21 following the finding on a bus, which we have heard
 22 about, as well as the 45 volumes in the wardrobe in
 23 Henderson's Notting Hill flat in March 1978, which, in
 24 the next paragraph, you say:
 25 "It appears apparent from the Aladdin's cave of

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<p>1 obscene writings that part of Hayman's sexual kink was 2 to correspond with others in obscene fashion ..." 3 Then you refer to the Paedophile Information 4 Exchange, PIE: 5 "Although the theme of PIE goes through the papers, 6 with most of these named either having corresponded or 7 because members of the organisation, there is no 8 evidence to suggest that any of them have committed 9 offences with children." 10 Pausing there, a long time ago, I accept, but what 11 was it that made you say that? 12 A. I think it's from this report, I think. 13 Q. And what Mr Collins had to say himself, that certainly 14 in terms of Hayman, most of the writings were fantasy, 15 or at least some of them were, and he gave his 16 explanation of why there was nothing at least that 17 suggested that he was depicting or describing actual 18 events, albeit it seems Mr Collins accepted that there 19 was nothing that could rule out that Hayman was also -- 20 had paedophilic tendencies. Did these thoughts occur to 21 you at the time, do you think? 22 A. I can't remember. I was dealing with Henderson and not 23 with PIE. 24 Q. So you say this, and just follow with me: 25 "Whilst we are shortly to receive a full report on</p> <p style="text-align: center;">Page 117</p>	<p>1 the activities of PIE, I am told by the police that this 2 is an independent offshoot that can be dealt with 3 separately." 4 Then you said this: 5 "I hope that any decision we make here will not be 6 a rod for our backs when the PIE case arrives." 7 Then you talk about the nature of the charges: 8 "That the police are anxious that we take 9 proceedings against those named and possibly for 10 conspiracy to contravene section 11 of the Post Office 11 Act ..." 12 Then you talk about the articles found in Hayman's 13 flat which would form the basis of proceedings. Then 14 point 3: 15 "There does not appear to have been an organised 16 general postal distribution of obscene material ..." 17 And 4: 18 "Whilst Hayman's articles are obscene (and 19 disgusting) they do not appear to fall within the usual 20 categories under the Obscene Publications Acts, as 21 although money did pass, there was no real arrangement 22 for a financial gain to be made." 23 Was there, to your knowledge, any policy that the 24 DPP's Office applied in relation to Post Office Act 25 offences and Obscene Publications Act offences?</p> <p style="text-align: center;">Page 118</p>
<p>1 A. No, but for Obscene Publications Act, it would have to 2 be published or having in their possession for 3 publication for gain, and I am not sure that in fact we 4 had the evidence for either of those things, but I don't 5 know. 6 Q. What about in relation to Post Office Act offences? 7 A. The Post Office Act offence was really aimed -- and 8 I think, I'm not sure, the preamble to the Act said that 9 it was to protect the Post Office employees, and that's 10 what the Act was built for. But it still existed. It 11 only -- it existed for Post Office. It did not exist 12 for other couriers that might deliver material. So it 13 was becoming, I think -- I don't know whether it still 14 exists or not now, but it was becoming slightly 15 obsolete. 16 Q. You heard Mr Collins tell us in evidence before when he 17 was asked by one of the panel members what Hayman might 18 have received had he been convicted for the Post Office 19 Act offences, and Mr Collins told us a fine, a financial 20 penalty. Can you confirm that certainly subsection (2) 21 of section 11 of the Post Office Act, by way of 22 punishment, carried a fine or imprisonment up to 23 12 months? 24 A. I have no idea, at the moment. 25 Q. I'm sure you're prepared to accept it?</p> <p style="text-align: center;">Page 119</p>	<p>1 A. I will accept it. 2 Q. If that were so, subject to the view a judge would take 3 and any, at that time, pre-Sentencing Council guidelines 4 if there were such for such offences, so guidance in the 5 Court of Appeal, there was also a possibility if, as 6 Mr Collins had said, this was one of the worst cases he 7 could imagine, that imprisonment could follow. That was 8 always a possibility? 9 A. Always a possibility. 10 Q. Carrying on, just before you got to the individual 11 defendants, you say: 12 "Therefore, in my view, the activities described in 13 the papers -- and we should not guess any further 14 activities -- were for the personal and private sexual 15 benefit of the individuals, some of whom had been known 16 to each other for a number of years, and not for 17 indiscriminate circulation, and thus the case falls into 18 a lower category than others we see and could possibly 19 be dealt with by individual substantive charges under 20 section 11 of the Post Office Act 1953." 21 Then, as we see, you go through the defendants one 22 by one, the first being Hayman himself, who was known as 23 Henderson, and at point 2 on the next page, page 23, 24 somebody whose name has been redacted, but another 25 individual, is somebody you look at. Indeed, over the</p> <p style="text-align: center;">Page 120</p>

<p>1 page, if we go to page 24, if you would, another 2 individual whose name is ciphered. Then the man whose 3 name we have heard before, Wardell. If we just go down 4 that page a little further. Do you see that, 5 Mr Naunton? 6 A. Yes, I see. 7 Q. And then somebody else called Sewell. Were Wardell and 8 Sewell, to your knowledge, in fact prosecuted? 9 A. I have no idea. 10 Q. Do they mean anything to you now? 11 A. No, nothing at all. The names just ring a bell, but 12 I know nothing about them at all. 13 Q. Now, I went through the report with Mr Collins this 14 morning. I am not going to go through it again with 15 you. But let me ask you, to see if there are some 16 answers you can give to a couple of questions. 17 First of all, one of the things that Mr Collins told 18 us about, and certainly told the investigating officers 19 in 2015, is that, not only was there obscene material 20 found on a London bus, but also in a park, in St James's 21 Park. You will have heard me put to him the results of 22 the police operation, having spoken to the Royal Parks 23 officer, a chap called Hooper who had found a briefcase 24 in St James's Park which included photographs of boys, 25 estimated to be between 8 and 11, wearing underpants.</p> <p style="text-align: center;">Page 121</p>	<p>1 Did you know anything about that? Because I don't see 2 any reference to it in -- 3 A. No, I don't recall that one. I don't recall it. 4 Q. Although Mr Collins mentions it in his report, there 5 isn't any detail to it. Did you pick up on that, that 6 in fact there were two instances of items being found in 7 separate locations separated by several months in 1978? 8 A. I seem to recall there being a possibility. But the 9 material on the bus I think was the main feature, so far 10 as I was concerned. It may well be that when I saw the 11 material and the exhibits, then one might have taken it 12 into account. 13 Q. What you certainly knew is that there was material found 14 on the bus? 15 A. Yes. 16 Q. And all of the diaries found in the wardrobe in the flat 17 in Linden Gardens. But at the time of writing this 18 note, none of which you'd actually seen? 19 A. It was a very preliminary note to get guidance from 20 above as well. 21 Q. Can we go, please, in your file to tab 9. It is 22 something we looked at this morning with Mr Collins, but 23 I would like to ask you a few things about it, if I may. 24 We can put it up on screen, it's OHY007089. 25 A. Yes.</p> <p style="text-align: center;">Page 122</p>
<p>1 Q. This is the full report into the Paedophile Information 2 Exchange which Sergeant Collins submitted, and the 3 internal logic of the document suggests that it was 4 submitted after Peter Hayman had been cautioned, and 5 therefore not prosecuted but simply cautioned. Amongst 6 other things, if you go to paragraph 153, which is on 7 page 72 at the top of the internal pagination, page 3 of 8 the document for us at the bottom -- 9 A. Mm-hmm. Sorry, 4445? 10 Q. It is page 003, at the bottom. I'm just wondering if 11 you have the right document. You're looking at your own 12 file of documents, are you, Mr Naunton? 13 A. Yes, I am at the moment, because they should be exactly 14 the same. 15 Q. It is paragraph 153. 16 A. It's CPS, is it? 17 Q. No, you're looking at the wrong document. It is our 18 tab 9. It is a report into PIE which Mr Collins, 19 Sergeant Collins as he was then, submitted at a time 20 after Hayman had been cautioned. 21 A. Yes. 22 Q. So it is a subsequent full report into PIE. If you go 23 to the third copied page, which should have a "72" at 24 the top and a paragraph 153 halfway down -- have you got 25 that? It is tab 9. It might be easier to look in the</p> <p style="text-align: center;">Page 123</p>	<p>1 file. 2 A. Yes. 151 on the left -- no, that's -- 153. 3 Q. 153, that's it? 4 A. That's it, yes. 5 Q. Are you happy? 6 A. Yes, thank you. 7 Q. "Hayman corresponded with PIE in the person of 8 David Grove." 9 I was rather perplexed by the wording, but it 10 actually means David Grove was the correspondent and 11 Hayman clearly in the name Henderson: 12 "It states: 'Dear Mr Grove, thank you for your very 13 prompt and cautious reply to my letter. I am most 14 impressed ... eager to receive more information.' 15 It goes on in the next paragraph: 16 "I have great affection for a little girl 17 called ..." 18 The name is ciphered: 19 "Naturally, we have seen each other naked. We have 20 engaged in kissing and external caressing, but I have 21 not dared to go further. I have also seen her stark 22 naked with a little boy similarly nude. It is 23 a wonderful and beautiful experience, but naturally my 24 virile feelings are aroused and I long to go further. 25 Can you give me some advice, please?'"</p> <p style="text-align: center;">Page 124</p>

<p>1 Did you see this report?</p> <p>2 A. Not that I know of. I don't know the date of it.</p> <p>3 Q. Unhappily, nor do we. That's why I have had to rely on</p> <p>4 the internal logic of it to suggest it had to be after</p> <p>5 Hayman was cautioned, because it talks about Hayman</p> <p>6 being cautioned within it. But one has to assume it was</p> <p>7 probably sometime in late 1978 or must be early 1979,</p> <p>8 because you didn't receive the original report until</p> <p>9 7 December?</p> <p>10 A. Yes.</p> <p>11 Q. So probably much later than that, but maybe early in</p> <p>12 '79. But certainly afterwards?</p> <p>13 A. Well, 21 December 1979, I did my --</p> <p>14 Q. '78?</p> <p>15 A. -- I did my minute. By that time, as far as I'm aware,</p> <p>16 Hayman had not been cautioned or I wouldn't have -- you</p> <p>17 know, I would have taken a different slant entirely.</p> <p>18 Q. So sometime after Christmas of 1978, he was cautioned,</p> <p>19 so presumably sometime in 1979?</p> <p>20 A. Yes.</p> <p>21 Q. Then this report is submitted presumably to the DPP's</p> <p>22 Office. There are other parts of it which speak about</p> <p>23 the name Wardell, I think. We would find -- if you look</p> <p>24 at paragraph 155 on the next page, page 4, it talks</p> <p>25 about the letter at the top was signed by</p> <p style="text-align: center;">Page 125</p>	<p>1 Peter Henderson -- the one we just looked at -- and then</p> <p>2 155:</p> <p>3 "Hayman's true identity was later established ...</p> <p>4 seen again by police at his home address."</p> <p>5 Then at the foot of page 4:</p> <p>6 "His association with PIE enabled him to correspond</p> <p>7 with [certain other members whose names are ciphered],</p> <p>8 Sewell and Wardell, all dealt with in this report. All</p> <p>9 the correspondence between them is obscene."</p> <p>10 Are you saying, Mr Naunton, as far as you can tell,</p> <p>11 you never received this full report?</p> <p>12 A. I never saw it, but then that might well be because</p> <p>13 I might not have been on the division at that time.</p> <p>14 I don't know, because I don't know when it was sent,</p> <p>15 or -- and I don't know when it was received by the DPP's</p> <p>16 Office.</p> <p>17 Q. No.</p> <p>18 A. I don't recall it and, at the same time, not only not</p> <p>19 recalling it, I can't help thinking that maybe</p> <p>20 consideration would have been given to action even</p> <p>21 though he had been cautioned. So I don't even know that</p> <p>22 it was sent to the DPP's Office, even though the last</p> <p>23 paragraph suggests that it should be.</p> <p>24 Q. The reason that I ask you, and you have just touched on</p> <p>25 it, is, if you now go back to something I read before,</p> <p style="text-align: center;">Page 126</p>
<p>1 your tab 4, our CPS004445_022, do you see in the</p> <p>2 paragraph -- about the fourth paragraph down:</p> <p>3 "Although the theme of Paedophile Information</p> <p>4 Exchange ..."</p> <p>5 Have you got that?</p> <p>6 A. Yes.</p> <p>7 Q. "... goes through the papers ..."</p> <p>8 I read this before:</p> <p>9 "... with most of these named either having</p> <p>10 corresponded or because members of the organisation,</p> <p>11 there is no evidence to suggest that any of them have</p> <p>12 committed offences with children. Whilst we are shortly</p> <p>13 to receive a full report on the activities of PIE ..."</p> <p>14 What I have just shown you is that report, isn't it?</p> <p>15 A. I have no idea.</p> <p>16 Q. Well, it's the only full report on PIE that we know</p> <p>17 about, and it runs -- we have only selected a few pages,</p> <p>18 but it runs, I think, to well over 100 pages. So it was</p> <p>19 a pretty full report that Sergeant Collins had written?</p> <p>20 A. Yes.</p> <p>21 Q. So:</p> <p>22 "Whilst we are shortly to receive a full report on</p> <p>23 the activities of PIE, I am told by the police that this</p> <p>24 is an independent offshoot that can be dealt with</p> <p>25 separately."</p> <p style="text-align: center;">Page 127</p>	<p>1 In other words, the Hayman case. And then this,</p> <p>2 which you may think was rather prescient:</p> <p>3 "I hope that any decision we make here will not be</p> <p>4 a rod for our backs when the PIE case arrives."</p> <p>5 Because I pose the same question to you that I did</p> <p>6 to Mr Collins: granted, you tell us that you didn't see</p> <p>7 this full report and therefore it suggests it went</p> <p>8 elsewhere. There are two important facts. First of</p> <p>9 all, that Hayman, as Henderson, was a member of PIE and</p> <p>10 corresponding with others, including about children.</p> <p>11 And, on the face of it, we have that letter, which</p> <p>12 I read out to you in one of the paragraphs, of the full</p> <p>13 report which suggested, if it was true and accurate, not</p> <p>14 so much about an experience that Hayman was claiming he</p> <p>15 had had with children, but that he was looking forward</p> <p>16 to having more of a more serious and intrusive kind.</p> <p>17 Do you think if you had had this before you,</p> <p>18 Mr Naunton, that questions and serious questions might</p> <p>19 have been asked at the time that you had the original</p> <p>20 report into Hayman at the back end of 1978 about whether</p> <p>21 a caution or anybody knowing this information, whether</p> <p>22 a caution was the appropriate out-of-court disposal for</p> <p>23 a man who was disposed to behaving in this way?</p> <p>24 A. I don't know, because I wasn't the one who decided on</p> <p>25 a caution.</p> <p style="text-align: center;">Page 128</p>

1 Q. What do you think you would have decided?
 2 **A. I was aiming -- as I said, I was aiming for**
 3 **a prosecution of Hayman under the Post Office Act. If**
 4 **this had come in and I'd taken that into consideration**
 5 **as well, then maybe there would have been more offences**
 6 **under the Post Office Act, or it may be that there was**
 7 **evidence to go in a different direction.**
 8 Q. But, on the face of it, you're willing, I'm sure, to
 9 accept that what you said in your interim note about
 10 "hoping that this wouldn't be a rod for our backs", some
 11 could take the view that the full report on PIE had come
 12 home to roost as far as that thought was concerned, in
 13 the sense that if it provided evidence not only which
 14 was known about, that Hayman was a member of PIE, but
 15 that perhaps some of his writings weren't so much
 16 fantasy, then prosecuting him for offences which were
 17 far more serious than merely corresponding between
 18 others were indicated?
 19 **A. I don't recall seeing a full report about PIE.**
 20 Q. All I'm asking is for your view as a lawyer who was
 21 looking at this kind of material all those years ago:
 22 would you have been a bit worried, once -- say this
 23 report had come across your desk, the fuller one into
 24 PIE, and even though it wasn't your decision, Hayman had
 25 been cautioned and had gone away with a caution and yet,

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1 **A. That's probably the easiest way of explaining it.**
 2 **Probably something my A/D would understand.**
 3 Q. "... but I consider that the police are making a storm
 4 in a teacup -- as far as I can see (subject to [one of
 5 the ciphred individuals] above). No child has been
 6 affected by their group activities and no-one has been
 7 offended by seeing any obscene writing through the
 8 post."
 9 What was the "storm in a teacup"?
 10 **A. Just that, I think, taken in context.**
 11 Q. Spell it out for us?
 12 **A. Well, I don't really know now what the reasons for**
 13 **putting that in were, but, nevertheless, the Post Office**
 14 **employers had not seen it, as far as I was aware, it**
 15 **wasn't sent through the post, it wasn't collected from**
 16 **the post, and, as far as this says, I think you just**
 17 **read it out, no children were affected by that.**
 18 Q. Well, material was sent through the post, in fact, but
 19 be that as it may, "no child has been affected by",
 20 what?
 21 **A. Sorry, I don't know that it was sent through the post.**
 22 **I'm assuming it was.**
 23 Q. Yes.
 24 **A. I hadn't seen the material. But the envelope I don't**
 25 **think was sent through the post by Hayman. The**

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1 months later, a full report comes in which suggests that
 2 Hayman might in fact be involved in far more serious
 3 offending than we first thought. Don't you think that
 4 would have put a different hue on matters?
 5 **A. If he had been cautioned and these other matters came to**
 6 **light afterwards and were relevant, then there's no**
 7 **reason why he shouldn't be prosecuted for those offences**
 8 **or for any other disclosed there, merely because he**
 9 **happens to have been cautioned. As far as I'm**
 10 **concerned, the caution related to the offences for which**
 11 **in fact he was being cautioned, but not something which**
 12 **would have come to our notice or the police's notice**
 13 **later.**
 14 Q. Did you know what offences he was being cautioned for?
 15 **A. No.**
 16 Q. Mr Collins recollects Post Office Act offences?
 17 **A. So I understand. I didn't even know he was going to be**
 18 **cautioned.**
 19 Q. Can we look, then, at your decision or your interim
 20 note. If we go, please, to page 25, which is part of
 21 the conclusion, the last page of your conclusions:
 22 "No-one can really support what the 'defendants'
 23 have been doing ..."
 24 Why did you put "defendants" in inverted commas?
 25 Because they weren't defendants yet until charged?

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1 **briefcase wasn't sent through the post.**
 2 Q. No, no, of course not?
 3 **A. There was stuff which was perhaps contained with it and**
 4 **so on. Sorry, you were going on to ask ...?**
 5 Q. "No child has been affected", and you said "by that" --
 6 I'm trying to understand what you meant by that? What
 7 was no child affected by?
 8 **A. There was no evidence that a child was actually**
 9 **affected, apart from those who had their photographs**
 10 **taken, in a much more general way.**
 11 Q. A question you will have heard the chair ask this
 12 morning: did you agree with what Mr Collins said that at
 13 the time that we are talking about, in the late '70s,
 14 would photographs being taken of children semi-naked,
 15 underwear, that sort of thing, and some naked, be
 16 regarded as a victimless crime in those days? In other
 17 words, would the interests of the children be
 18 disregarded?
 19 **A. They might be disregarded to an extent, so far as the**
 20 **Post Office Act was concerned. It might alert the**
 21 **police to do more investigations into it. But so far as**
 22 **the Post Office Act, which was sending indecent material**
 23 **through the post, and that's what we were looking at.**
 24 Q. So because it was a Post Office Act offence, that's what
 25 you were looking at, no child had been affected, "by

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<p>1 their group activities". What were the group activities 2 that you had in mind in writing that? 3 A. I should think it is something to do with some of 4 the evidence that's in the report about other people. 5 Q. "No-one has been offended by seeing any obscene writing 6 through the post." 7 You carry on: 8 "In my view, a conspiracy to contravene the Post 9 Office Act would be a misuse of the conspiracy 10 procedure -- I agree that substantive offences appear to 11 have been committed within the time limit (although this 12 must be checked) ..." 13 What time limit were you talking about? 14 Magistrate's Court proceedings or a different time 15 limit? 16 A. I'm not sure, without knowing the law now, as to whether 17 there was a six-month time period or not on it. It's 18 not a particularly big penalty offence. 19 Q. You say: 20 "... but surely their action was aimed purely at the 21 private distribution of the letters ..." 22 A. Yes. 23 Q. "... as opposed to an agreement to commit an offence for 24 the purposes of [disseminating] material to all and 25 sundry. Indeed, to prove a conspiracy may be difficult,</p> <p style="text-align: center;">Page 133</p>	<p>1 as their activities seemed to just grow instead of there 2 being a concerted effort", is that? 3 A. I can't see where you actually are at the moment. 4 Q. In the paragraph that begins, "In my view, a conspiracy" 5 and I have just come to the end of that paragraph. It 6 is page 25, Mr Naunton. The third paragraph from the 7 top. 8 A. I've got you, yes. 9 Q. The last word which has been struck through in the last 10 line, struck through, it seems to be in capitals. Is 11 that "concerted"? 12 A. Probably. I can't read it. 13 Q. Was it your handwriting? 14 A. I don't know that it was. It may have been somebody 15 else's. This memo would have gone up to the director, 16 it seems, and therefore it might have been corrected by 17 anybody on the way up. 18 Q. "The Post Office Act offence is very useful, if now 19 somewhat out of date, as, had they sent the letters by 20 Red Star, there would be no corresponding offence." 21 What do you mean by that? 22 A. Well, it was only to do with the Post Office. 23 Q. And, what, Red Star didn't count? 24 A. Red Star wasn't the Post Office. 25 Q. "It would be a novel idea in these circumstances to</p> <p style="text-align: center;">Page 134</p>
<p>1 consider prosecuting Hayman under the Obscene 2 Publications Acts for passing obscene articles for gain 3 whether for himself or another -- the other being the 4 person whom he pays for the replies, as there is no 5 evidence that he obtained money -- indeed, detailed 6 evidence of money passing is sadly lacking. Only if 7 required will I deal with the possible offences of 8 aiding and abetting possession of obscene articles for 9 gain or of publishing ..." 10 It is hard to read that: 11 "... both of which would require proof of 'likely to 12 deprive and corrupt those likely to see or read the 13 articles'. 14 Then you consider, and I don't have to, living off 15 immoral earnings. Then you say: 16 "Finally, as it seems no harm has been done to 17 anyone, I wonder whether any useful purpose would be 18 served by prosecuting any of the defendants, but if 19 proceedings are to be instituted, I suggest substantive 20 charges under section 11 of the Post Office Act for 21 offences against each person who sent material through 22 the post on the basis that they did so on a day between 23 (say) 15 January 1978 and 1 November 1978 and if further 24 charged against the same defendant are required on a day 25 other than in charge 1."</p> <p style="text-align: center;">Page 135</p>	<p>1 In other words, to distinguish between each count: 2 "The above note is based upon the papers and what 3 I have been told by the police ..." 4 Which suggests you've had at least one conference by 5 now with them: 6 "... but if you feel that any other offences are 7 justified, I will write specifically on those." 8 So at the time, although you don't actually spell 9 this out, were you looking at two parts of a test, 10 really: first, in those days, characterised as, was 11 there a reasonable prospect of conviction; and, 12 secondly, was it in the public interest to prosecute? 13 Were those two sides of the same coin, as it were, that 14 you were looking at, without spelling it out? 15 A. I don't think that the public interest side came into 16 it. It was a question as to whether legally there was 17 a realistic prospect of a conviction. 18 Q. So whether the evidential test was satisfied? 19 A. Yes. 20 Q. Who would decide on any public interest factors in those 21 days? 22 A. Well, I think it would have been decided maybe by the 23 A/D, maybe -- it may have gone up higher. It probably 24 would have gone up higher, because of Hayman's 25 background.</p> <p style="text-align: center;">Page 136</p>

<p>1 Q. We don't perhaps have to go back to it unless you wish 2 to, but in your statement at page 4 you talk about you 3 believing that Sir Thomas Hetherington -- I know what 4 you say, that as director at the time he might not yet 5 have been knighted? 6 A. Yes. 7 Q. But in the second paragraph on page 4 of your witness 8 statement, and if we want to go to it, we can, you say: 9 "I believe that the director ... had a meeting with 10 Sir David Napley ..." 11 I'll just wait for you to get there. Have you got 12 that? The second paragraph on your -- 13 A. On my -- 14 Q. Yours are paginated or have paragraph numbers. But it's 15 the fourth page in your case and the fourth page of 16 the inquiry reference. It is tab 2, 004 at the bottom. 17 A. Yes. Page 4. 18 Q. Second paragraph? 19 A. "I believe that the director ..." Is that right? 20 Q. Yes: 21 "... Sir Thomas Hetherington, had a meeting with 22 Sir David Napley, but I don't know the date. I was not 23 asked to be present and knew nothing about it until it 24 had taken place. Hence, I do not know the details 25 discussed. I do not know who else attended."</p> <p style="text-align: center;">Page 137</p>	<p>1 How did you find out about that meeting? 2 A. Not sure. I think I found out after it had taken place, 3 and I was told -- and I didn't have the file back, as 4 far as I recall. 5 Q. Was that a normal thing to have happened, for a suspect 6 solicitor to have a private meeting with the Director of 7 Public Prosecutions to discuss the outcome? 8 A. I couldn't say. I couldn't say at all. I couldn't say 9 at all. You know, he had, I suppose, the control over 10 the DPP's Office and therefore had a right to make 11 a final decision. 12 Q. So -- 13 A. It would be up to him to decide whether or not he should 14 have a meeting with Sir David Napley. 15 Q. Would it be normal for nobody else to be present? 16 A. I personally would have thought somebody would have been 17 present. I would have thought for this one I would have 18 been present. I possessed the file, you might say, or 19 possessed the matter, and it would have been useful to 20 have been there. 21 Q. But you say you weren't? 22 A. I wasn't there. I wasn't invited. I don't even know 23 what was discussed. I don't know whether the deputy 24 director was present or an assistant -- principal 25 assistant deputy director was present or what was</p> <p style="text-align: center;">Page 138</p>
<p>1 discussed at all. 2 Q. I assume you have never seen a minute -- 3 A. No. 4 Q. -- of that meeting? Ought there to have been a minute 5 of that meeting? 6 A. I would have expected there to have been a minute, but 7 I don't recall ever seeing one. 8 Q. Mr Naunton, is it you're not prepared to say whether it 9 would have been usual for the DPP to entertain the 10 solicitor of a person about a charging decision? 11 A. I wasn't in that type of circle, to know whether it was 12 usual or not. I would have thought -- I wouldn't -- 13 I wouldn't know. I really wouldn't know. 14 Q. You've -- 15 A. I think nowadays it wouldn't be done. 16 Q. Since that time -- that's what I'm going to ask you. 17 Since that time, you have had many years of experience 18 within the DPP's Office as well as within the CPS. You 19 started in 1971. You moved over to the CPS in 1986. 20 Had you ever had experience during those years, 21 particularly when it was the DPP's Office, of the DPP 22 entertaining a suspect solicitor and, as it were, 23 carving up a resolution to a particular case? 24 A. No. 25 Q. You've heard Mr Collins' account and his approach and</p> <p style="text-align: center;">Page 139</p>	<p>1 feelings about the fact that Hayman wasn't prosecuted 2 whilst Wardell and it looks like Sewell were, who were 3 a different social class, and his point is, well, if 4 there were guidelines which dictated whether in these 5 circumstances somebody should be prosecuted or not, why 6 did they apply to Hayman but not apply to Wardell, who 7 was a bus conductor? Do you have any views about that? 8 A. No, I can't. 9 Q. You had clearly not heard anything about the £25,000 -- 10 A. No. 11 Q. -- bribe that Peter Hayman had offered both these 12 officers, in effect, to drop any charges or to drop the 13 investigation, he never being charged, and because 14 Mr Collins never reported it, you didn't know about it? 15 A. No. 16 Q. Had you done so, what views might you have taken about 17 whether that had amounted to perverting the course of 18 justice? 19 A. If I thought that it was true -- I'm not questioning 20 Sergeant Collins' attitude, but if I thought that it was 21 a genuine offer, then I think it should have been 22 reported and gone up. But I don't know whether it was. 23 Q. Let's assume it was true. Let's assume both officers 24 had reported it, both of them had made witness 25 statements, the one corroborating the other, and at the</p> <p style="text-align: center;">Page 140</p>

1 same time Hayman was being investigated for other
 2 offences, whether Obscene Publications, whether Post
 3 Office Act offences. Do you think that that is
 4 something that would have been looked at seriously as,
 5 first, being a criminal act in itself, trying to bribe
 6 police officers, but also strengthening the evidence of
 7 the other offences?
 8 **A. It obviously would be looked at seriously. Whether that**
 9 **would result in further investigation and charges, I do**
 10 **not know.**
 11 Q. Had he been convicted of perverting the course of
 12 justice by trying to bribe two police officers £25,000
 13 each -- and we are talking about 1978; today it is a lot
 14 of money, then it would have been an awful lot of
 15 money -- imprisonment would inevitably have followed,
 16 wouldn't it?
 17 **A. I would have thought probably. I don't know. I really**
 18 **don't know.**
 19 Q. Well, imprisonment is at large for an offence of
 20 perverting the course of justice, you will agree,
 21 because they are -- it is a common law offence. But
 22 trying to bribe a police officer, in effect, to stop an
 23 investigation, do you think would have resulted in
 24 a substantial sentence of imprisonment?
 25 **A. I think it's a possibility it would have done, but**

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1 commit suicide?
 2 **A. No. I was never told that. I was not told the reasons**
 3 **for this.**
 4 Q. Where did you get that from to say it?
 5 **A. The assumption at the bottom of my memo there.**
 6 Q. Let's look at that.
 7 **A. That would have gone up and that is what I assumed. And**
 8 **then, because that came from Sir David Napley, and**
 9 **because Sir David Napley contacted the director,**
 10 **I rather assumed that that was going to be the point**
 11 **that was raised. It might not have been. That's what**
 12 **I assumed.**
 13 Q. That begs the question, you see, Mr Naunton, because you
 14 have accepted this is your handwriting at the bottom of
 15 the page?
 16 **A. Yes, it is.**
 17 Q. And that's your signature?
 18 **A. Yes, it is.**
 19 Q. The date is 21 December 1978?
 20 **A. Yes.**
 21 Q. Can I just check that I have read this correctly,
 22 because it's your handwriting and not mine. Is the
 23 first word, the first letter, "I"?
 24 **A. "I am told by Sir David Napley that Hayman has suicidal**
 25 **tendencies because of this case."**

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1 **I really don't know. I can't answer questions like**
 2 **that. I'm not now doing that type of law.**
 3 Q. Would you mind if we went back, please, to your note.
 4 So we need to go back, please, to divider 4,
 5 CPS004445_025. You tell us that following the meeting
 6 between Thomas Hetherington and Sir David Napley you
 7 heard that Hayman wouldn't be prosecuted. Is that
 8 correct?
 9 **A. I think so, yes. I think that's so.**
 10 Q. How do you think you heard about it?
 11 **A. I have no idea.**
 12 Q. Would it have been minuted or --
 13 **A. No. It might have been --**
 14 Q. -- would you have been told?
 15 **A. It might have been just my assistant director telling**
 16 **me. I have no idea.**
 17 Q. You also understood -- I think I took this from your
 18 witness statement -- that that decision was being taken
 19 because of the concern he might commit suicide?
 20 **A. That might be wrong. But that's what I tend to believe.**
 21 Q. Because?
 22 **A. Because of that.**
 23 Q. Let's be clear about what you are saying. Did somebody
 24 tell you that the decision not to prosecute but to
 25 caution had been made because there were fears he might

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1 Q. When were you told by Sir David Napley?
 2 **A. No idea. I haven't got the file, so I wouldn't know.**
 3 Q. Do you see, you say you weren't present at any meeting
 4 between Hetherington and Napley --
 5 **A. Yes.**
 6 Q. -- when it appears that an agreement had come to which
 7 resulted in the fact that he wasn't to be prosecuted but
 8 to be cautioned instead. We have a note by you in hand
 9 on this document, dated 21 December, which indicates
 10 that you, yourself, had a conversation with David Napley
 11 are?
 12 **A. Yes, it does.**
 13 Q. When and in what circumstances?
 14 **A. I have no idea. He may have rung me.**
 15 Q. But this note doesn't suggest that you were at that
 16 meeting?
 17 **A. I wasn't at the meeting with Sir Thomas -- or**
 18 **Thomas Hetherington and Napley, no.**
 19 Q. Let's think about this. If David Napley had a meeting
 20 with Thomas Hetherington at which something had been
 21 said to persuade the DPP that Hayman ought not to be
 22 prosecuted, what could it have been, if not about his
 23 suicidal tendencies, to result in a caution?
 24 **A. I have no idea. I wasn't there, so I wouldn't know what**
 25 **Napley raised.**

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1 Q. You must have thought about this note, Mr Naunton.
 2 "I am told by Sir David Napley that Hayman has suicidal
 3 tendencies because of this case". I just want to see if
 4 I can press a little, because you must have thought,
 5 "When on earth was I told that and why was I told it?
 6 What was the purpose of me, Jeremy Naunton, being told
 7 it?" That's what I want to ask you.
 8 **A. I have no idea. The fact is, I was told that by**
 9 **Sir David Napley.**
 10 Q. Face to face?
 11 **A. No, I don't recall ever meeting Sir David Napley on this**
 12 **matter at all.**
 13 Q. What would its relevance have been? If a decision was
 14 made not to prosecute Hayman at which weren't you
 15 present during the course of a meeting, what was the
 16 point in Napley repeating to you something he might
 17 already have said to Hetherington?
 18 **A. I don't know that he would have said that already to**
 19 **Hetherington. I think that that was put on before**
 20 **Napley saw Hetherington, because that is my minute and**
 21 **it would have gone up to the assistant director -- it**
 22 **would have been a waste of time sending that minute up**
 23 **to the assistant director at that time with all that on**
 24 **it if a decision had already been made which I didn't**
 25 **know about, but a decision had already been made that**

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1 also a possibility?
 2 **A. Well, it's a possibility. But I just don't know the**
 3 **answer.**
 4 Q. If it is, it could suggest, Mr Naunton, that you were
 5 the first port of call in the DPP's Office that
 6 Sir David Napley called, told you that his client had
 7 suicidal tendencies because of this case, and it could
 8 be that information that led to his not being
 9 prosecuted.
 10 Do you understand what I'm asking you about? I'm
 11 asking you whether any conversation you had with
 12 David Napley, whether you took part in, participated in,
 13 the decision not to prosecute?
 14 **A. No. I think I know what you're saying, but that is**
 15 **a note of, I think, a telephone call from Napley, and he**
 16 **was just informing me -- if this is so, because I can't**
 17 **remember it anyway -- that Hayman has suicidal**
 18 **tendencies because of the case. But it didn't take the**
 19 **matter any further towards a caution so far as I was**
 20 **concerned, and I don't think it would have done because**
 21 **I sometimes tend to believe that those people who say**
 22 **they are going to commit suicide don't do so. It is the**
 23 **ones who don't say it who do.**
 24 Q. Exactly.
 25 **A. And because of that, I might not have taken an enormous**

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1 **Hayman was to be cautioned.**
 2 Q. Do you remember Mr Collins' evidence to us this morning,
 3 that he, himself, had received a phone call from
 4 David Napley --
 5 **A. Yes.**
 6 Q. -- who asked him who at the DPP's Office was dealing
 7 with this?
 8 **A. Yes.**
 9 Q. And although Collins knew it was you, he didn't want to
 10 land you in it by getting a surprise call?
 11 **A. That's right.**
 12 Q. So he said he would find out. Did Mr Collins ever tip
 13 you off that David Napley was going to call the DPP's
 14 Office to have a chat?
 15 **A. Not that I'm aware of. I can't remember it.**
 16 Q. If we look at what Mr Collins told us and we look at the
 17 note that you have written, do you agree inferentially
 18 it rather suggests that perhaps that's what happened and
 19 David Napley actually spoke to you because you were
 20 dealing with the case and that's what he told you and
 21 you have noted it?
 22 **A. David Napley could have probably got my name from**
 23 **a number of places within the DPP's Office and then**
 24 **spoken to me.**
 25 Q. But do you agree the scenario that I have painted is

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1 **amount of notice of it unless I had received some**
 2 **evidence, which the director might have done,**
 3 **psychiatric evidence from Napley, to show --**
 4 Q. That was my next question. It would have been
 5 remarkable, even in those days, for the word, even of
 6 somebody as distinguished as Sir David Napley, to have
 7 been taken on behalf of a third party client, as it
 8 were, that he had suicidal tendencies in order to arrive
 9 at an out-of-court disposal without psychiatric evidence
 10 of some description. Do you agree?
 11 **A. Probably partly I agree. It may well be that -- as**
 12 **I wasn't there, I don't know whether the director**
 13 **obtained psychiatric evidence at all, but it is more**
 14 **likely, I suspect, that Napley might have brought some**
 15 **along, more likely than the director producing it. So**
 16 **it could have been that Napley produced some psychiatric**
 17 **evidence to say what his client was like.**
 18 Q. But you never saw any?
 19 **A. I never saw any report --**
 20 Q. Or heard of a psychiatric report?
 21 **A. No, never heard it at all.**
 22 Q. Do you agree, looking at all the material, that not to
 23 prosecute was a highly charitable decision?
 24 **A. I don't know. It depends on how forcefully it is put by**
 25 **Sir David Napley.**

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1 Q. Do you agree, in light of what Mr Collins told us about
2 Wardell and the other chap, on the one hand, and Hayman
3 on the other, that the favourable, or relatively
4 favourable, outcome in Hayman's case was one that
5 potentially showed undue deference to a man in
6 a powerful position?
7 **A. I don't know. I wasn't responsible, as far as I know,
8 for the prosecutions of those two people. The taller
9 they are, the harder they fall, and Hayman was fairly
10 tall in respect of the diplomatic side of it.
11 Therefore, you know, he had a lot to lose. I'm not
12 saying the others didn't, but he had a lot to lose if he
13 was prosecuted.**
14 Q. Everybody has a lot to lose. It's just relative, isn't
15 it?
16 **A. It is indeed.**
17 Q. You will agree, I'm sure, that in those days a caution
18 involved an admission of the offence. Is that correct?
19 **A. Yes, and if the caution were refused, then the person
20 would be prosecuted.**
21 Q. Yes.
22 **A. That's the alternative to it.**
23 MR ALTMAN: It is 3.15 pm, Mr Naunton. I haven't got very
24 much more for you, but I'm going to invite the chair and
25 panel to have a break, if you don't mind. I won't be

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1 Another individual admitted that it had come from him,
2 also admitted that he had written a vast amount of
3 obscene letters to Henderson, and clearly those had been
4 sent by way of post.
5 Over the page, please, if you would, to our page 24,
6 a ciphered individual, WM-F24, age 70:
7 "Admits being a member of PIE and writing to ..."
8 And that individual "was shown some of the writings
9 from Henderson's book and admitted that he did them --
10 Henderson sent his obscene things to comment on, this
11 WM-F24 did and sent them back."
12 Wardell admits corresponding with Henderson
13 "regularly up to February this year". He put an advert
14 in PIE's magazine and got a reply from Henderson and,
15 like others, would receive from Henderson various
16 obscene stories and send them back with observations.
17 Then Sewell, after initial denials, admitted that
18 a letter found in Henderson's volumes of books were his,
19 and one could read on. Therefore, there was evidence of
20 items going through the post to these various
21 individuals and between them. Do you agree?
22 **A. Yes, sounds like it.**
23 Q. Now, do you remember just before we broke one of
24 the questions I asked you was whether in Hayman's case
25 what we were actually seeing was undue deference being

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1 much longer with you once we come back. Can I suggest
2 3.30 pm, please? Thank you very much.
3 (3.14 pm)
4 (A short break)
5 (3.33 pm)
6 MR ALTMAN: Just a few more things, please, Mr Naunton. Do
7 you still have open your note, your interim note?
8 Tab 4, CPS004445_022.
9 **A. Yes.**
10 Q. Can we just have a very quick -- and I mean very
11 quick -- look at what you said about the defendants.
12 With Hayman, he'd admitted the initiating packet found
13 on the bus was sent by him to a Post Office in
14 Lancashire and was sent back to him. Is that correct?
15 If you look at the foot of page 22, under the heading
16 "The defendants", and then "Hayman".
17 **A. Yes.**
18 Q. There was, by way of example, correspondence by post.
19 At the top of the next page, in passing, on
20 24 October 1978, police visited Hayman, now knowing his
21 identity due to a briefcase, RB/1, being found in
22 St James's Park, which contained obscene writings and
23 photos similar to those found in the flat. So clearly
24 you had some more information about the second find at
25 that time. Then under point 2, the name is redacted.

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1 shown to him because of his position, and, as I recall
2 it, you said something along the lines of, "The taller
3 they are, the harder they fall, and Hayman was
4 particularly tall!"
5 **A. Yes.**
6 Q. Is that right?
7 **A. Metaphorically.**
8 Q. Of course.
9 **A. But so far as that is concerned, we had got, I think,
10 a definite thought that he would commit suicide. That
11 is, if Napley pursued that particular one in accordance
12 with what I believe was his telephone call to me, which
13 presumably the others hadn't said. So therefore that
14 might have been the consequence.**
15 **The minute which you're referring to was not written
16 for the director, it was written for my assistant
17 director, and he then, of course, could send it up to
18 wherever he wanted to, but it was not written for the
19 director.**
20 Q. May I ask you this, though: if that was a factor, would
21 it have been a legitimate one? In other words, to make
22 a decision which showed undue deference to somebody
23 because of his position in society?
24 **A. I don't think it's because of that. I think it's
25 because of the seriousness that he might commit suicide,**

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<p>1 and he might commit suicide because of his position in 2 society. 3 Q. Can I show you something, please, which you won't have 4 seen before, but it's a report in the Times written by 5 somebody called Ronald Butt, and this was a report of 6 26 March 1981, just after Geoffrey Dickens made his 7 disclosures in parliament. I wonder if that can go up 8 on screen, please. If the central column can be 9 expanded: 10 "There is no dispute by Sir Peter Hayman's 11 solicitor, Sir David Napley, that his client was 12 involved ..." 13 This is all about Hayman: 14 "... in passing pornography illegally through the 15 mail. Sir David's justification of the DPP's decision 16 not to prosecute was on the quite different grounds that 17 a customary factor taken into account when deciding 18 whether to prosecute was 'whether the indirect 19 punishment and hardship which a defendant may suffer is 20 likely to be so disproportionate to the severity of 21 the alleged offence and to any penalty imposed by 22 a court that it would be unjust to prosecute'. 23 "'This', Sir David asserted, 'was overwhelmingly the 24 situation in Sir Peter's case and manifestly justifies 25 the director's decision'. On the contrary. Far from</p> <p style="text-align: center;">Page 153</p>	<p>1 justifying the DPP's decision, the excuse condemns it. 2 If a man is to be excused the due processes of law, 3 other things being equal, because he is well known, then 4 we are indeed in a two nations society." 5 Directly, at least, Sir David Napley in that quoted 6 part doesn't refer to any of the suicidal tendencies 7 which was a factor, but seems implicitly, at least, if 8 not explicitly, to be referring to his position, and 9 that's the way the author of this report took it. 10 Anything you want to say about that? 11 A. I have no idea about it, because I wasn't at that 12 meeting. So I don't know whether, in fact, Sir David 13 did refer to these things to the director and the 14 director took them on board. I don't know. 15 Q. Clearly, that's what Sir David Napley, if it was 16 accurately quoted, told Mr Butt and that's how Mr Butt 17 reported David Napley in 1981 describing the nature of 18 the decision that was made in Hayman's case, but you say 19 you know nothing about that? 20 A. I know nothing about the decision. 21 Q. A couple of other things, then. Do you know anything 22 about Hayman's name being kept out of the Wardell trial? 23 A. No, nothing at all. 24 Q. Were you aware of the Attorney General's position on the 25 Hayman case, if he had one?</p> <p style="text-align: center;">Page 154</p>
<p>1 A. No. 2 Q. That was Michael Havers. He was attorney at the time. 3 Would that be right? 4 A. I have no knowledge about the attorney being informed or 5 consulted or -- 6 Q. No, but do you agree it was Michael Havers at that time? 7 A. I can't remember. It may well have been. But I can't 8 remember. 9 Q. Finally, this, please. Tab 5. Something we have not 10 looked at before. It's a Private Eye article, something 11 I asked Mr Collins about, and I would just like to ask 12 you about it finally. 24 October 1980, the first of 13 a couple of articles Private Eye wrote in relation to 14 Peter Hayman. Right at the bottom, it's HOM002200, 15 right at the bottom, you will see the article says: 16 "The decision not to prosecute Hayman, who was 17 certainly as guilty as these two unfortunates ..." 18 Which is a reference to Wardell and probably Sewell: 19 "... came from high up, much to the disgust of DPP 20 Tony Hetherington's aides and also the policemen 21 involved in the case. They were told that this was 'no 22 reflection on the evidence' and indeed, at one stage, 23 Hayman appears to have been cautioned. He was also 24 warned not to send obscene material through the post 25 again."</p> <p style="text-align: center;">Page 155</p>	<p>1 Do you have any idea who the aide, the DPP's aide, 2 was who was disgusted? 3 A. No, I don't. The "aides", it's plural, isn't it? 4 Q. Yes, all right. 5 A. No, I don't know. I don't know. 6 Q. Were you one of them? 7 A. Not that I know of. 8 Q. Were you disgusted by the decision? 9 A. I was only concerned -- as I said earlier, only 10 concerned that I wasn't present, because it was my case. 11 I wasn't able to make any notes about what was being 12 said or anything else. That's all. 13 Q. Did you register that concern? 14 A. No. In my opinion, it was up to the director to have 15 whatever meetings he wanted to have. It wasn't for me. 16 It would have been impertinent for me to question what 17 he was doing. I wasn't that high up the chain at that 18 time. 19 MR ALTMAN: Thank you, Mr Naunton. That's all I ask. 20 I will see if the chair and panel have any questions. 21 THE CHAIR: No, thank you, we have no questions. 22 MR ALTMAN: Thank you for coming, Mr Naunton. 23 (The witness withdrew) 24 MR ALTMAN: Gregor McGill, please. 25</p> <p style="text-align: center;">Page 156</p>

<p>1 MR GREGOR ANTHONY MCGILL (sworn) 2 Examination by MR ALTMAN 3 MR ALTMAN: Your name, please? 4 A. Gregor Anthony McGill. 5 Q. Mr McGill, tell us what you do, please, by way of 6 occupation? 7 A. I am a qualified solicitor and I'm currently director of 8 legal services at the Crown Prosecution Service. 9 Q. Which you have been, I think, since January 2016? 10 A. That's right. 11 Q. Not the first time you've given evidence in this 12 inquiry? 13 A. Indeed. 14 Q. You have provided, for the purposes of this 15 investigation, two statements, one dated 3 January 2019, 16 CPS004659, which I am going to adduce in full; and one 17 dated 28 January 2019, CPS004666, which I also invite to 18 be adduced in full. The first, in essence, deals with 19 the Montagu case; the second with the Hayman case? 20 A. That's right. 21 Q. Before we go to the detail of the Montagu case, can 22 I just ask you about something you have helped us with 23 in the past but in very short measure in this instance 24 for a reason I will come to later. Can you go, please, 25 to page 5, your paragraph 29 of your first witness</p> <p style="text-align: center;">Page 157</p>	<p>1 statement, CPS004659? 2 A. Yes, I have it. 3 Q. Just to help us with a couple of things, on the law of 4 corroboration as it applied in the 1970s, in particular 5 by reference to your paragraphs 29 and 30, do you say 6 this -- I'm going to lead you on it just to save 7 a little time. 8 A. Thank you. 9 Q. Was the position in 1970 that in general the evidence of 10 one competent witness was enough to support a verdict 11 except in cases of perjury? But there were statutory 12 exceptions to the general rule which included some 13 sexual cases where there was a requirement for 14 corroboration before a defendant could be convicted? 15 A. That's correct. 16 Q. So, for example, your paragraph 30, there was 17 a statutory requirement for corroboration of unsworn 18 evidence of children and the practice for the sworn 19 evidence of children. Section 38 of the Children and 20 Young Persons Act 1933 rendered admissible the evidence 21 of a child of tender years, though not given on oath, 22 provided that there would be no conviction unless that 23 child's evidence was corroborated by some other material 24 evidence implicating the defendant. And where 25 a complainant's evidence was given on oath,</p> <p style="text-align: center;">Page 158</p>
<p>1 corroboration was not essential in law, but was an 2 established practice, the lack of which rendered 3 a conviction unsafe if a judicial warning was not given 4 about the -- if there was a lack of corroboration that 5 it would be unsafe to convict? 6 A. That's right. 7 Q. Paragraph 32, you say in addition to the statutory 8 requirement, and this is where you deal with it, the 9 long-established practice is that judges were obliged to 10 warn juries to exercise additional caution when 11 considering convicting a person of a sexual offence 12 irrespective of age or gender of the complainant on the 13 basis of uncorroborated evidence. 14 And paragraph 33, the judge would point out what 15 evidence in law was capable of being corroborative? 16 A. That's right. 17 Q. And paragraph 34 on the next page at the top, 18 corroboration was therefore looked for and juries had to 19 be warned of the dangers of acting without it in all 20 cases of sexual offences irrespective of age or gender? 21 A. Yes, that's right. 22 Q. One other feature, please, of this, if we go to page 7 23 of your first statement, what could or could not amount 24 to corroboration, and then the second head, "Could 25 evidence of other, unproven allegations amount to</p> <p style="text-align: center;">Page 159</p>	<p>1 corroboration?" There you deal with -- and I am going 2 to shorten this -- whether evidence of what we call 3 similar fact, in other words, between two sets of 4 alleged offences which were unrelated and, in the 5 absence of collusion between each other, the one could 6 prove the other or amount to corroborative evidence 7 sufficient to go to a jury? 8 A. Yes. 9 Q. That's what you deal with there? 10 A. Yes. 11 Q. The statement is adduced and therefore I'm not going to 12 propose to go through that. But I will come back to 13 touch on it a little later. 14 Can we therefore, please, look at the statement, and 15 in particular the Montagu chronology? 16 A. Yes. 17 Q. You begin, if we go back in the statement to 18 paragraph 18, which is on page 3, and you set out 19 a table which I think you have got, Mr McGill, 20 principally from a file which had been recovered; is 21 that right? 22 A. That's right. 23 Q. If you want to keep with your statement, and if we turn 24 to the file, please, which we haven't looked at before, 25 which is to be found in two places, really. First of</p> <p style="text-align: center;">Page 160</p>

<p>1 all, tab 8, CPS004383. These are two pages. I'd like 2 this adduced in full, please, CPS004383. Here we have 3 a letter dated 24 November 1972 to the director, then at 4 Buckingham Gate, in respect of Alexander Montagu, 5 indecent assault, and this is the letter submitting the 6 file and it comes from the Chief Constable of Dorset and 7 Bournemouth Constabulary? 8 A. That's correct. 9 Q. Over the page, we find on 29 November, so five days 10 later, but I can tell you, Mr McGill, if you don't 11 already know, 24 November, the date of submission, was 12 a Friday, and so the 29th was the Wednesday of 13 the following week. 14 A. Right. 15 Q. A letter goes back from the DPP's Office. We don't know 16 who signed it off, but: 17 "Dear Sir, 18 "I have considered the report sent with your letter 19 dated 24 November ... and in my opinion this case can 20 properly be dealt with by way of a caution. 21 "The assaults, which are admitted ..." 22 These related to a young boy who had made complaints 23 against Montagu of various indecent assaults: 24 "... are not of themselves very serious, and if 25 Mr Montagu is prepared to take the excellent advice</p> <p style="text-align: center;">Page 161</p>	<p>1 given to him by Detective Chief Inspector Newman and 2 avoid any contact with the boy in the future, I do not 3 think that proceedings are called for." 4 That, as it were, brackets the date of 5 the submission of the file to date of the decision, in 6 effect, three working days at the most; would you agree? 7 A. It would appear to be. I will take it from you, 8 Mr Altman, yes. 9 Q. That's very kind of you, Mr McGill. In the next tab, 10 tab 9, which I seek to adduce in full, is the Montagu 11 file which has been recovered from the National 12 Archives, CPS003345. If we take it from your table at 13 the same time, you've seen the date of submission, you 14 say in your statement -- we will pick up on certain 15 things in the file in a moment: 16 "Between 24 and 27 November, the CPS opened the case 17 file in respect of Montagu, who was then aged 66. The 18 offences under consideration were indecent assault of 19 a boy." 20 A. Yes. 21 Q. On the 28th, which was the Tuesday of the next week, you 22 say the front page of the file on the transit chart -- 23 I'm not sure we have got this as part of this file -- 24 "records the file was passed to A/D South." 25 Would that be "assistant director"?</p> <p style="text-align: center;">Page 162</p>
<p>1 A. I'm not entirely conversant with the workings of 2 the previous DPP's Office. But from the previous 3 witness, he seemed to indicate that "A/D" stood for 4 "assistant director". 5 Q. So it could be the assistant director, and South 6 presumably being his name? 7 A. Or it could be the assistant director for the south. 8 Q. For the south? 9 A. I don't know. 10 Q. One of the two. But to whom it was allocated, and then 11 also to A/DC, whoever that was? 12 A. Yes. 13 Q. You say that there was a single-page handwritten review. 14 We should have that open on page 3. If we turn to 15 page 3 of this document, please. This has got two dates 16 on it. Let's see if we can read through it together. 17 One or two words are a little difficult to decipher and 18 maybe you can help. I don't know. But it begins at the 19 top, does it not, Mr McGill? 20 A. It does. 21 Q. "Victor Montagu -- ex Earl of Sandwich. 22 "All allegations are by one boy, aged 10." 23 A. Yes. 24 Q. "... son of a worker on the estate. Montagu has 25 admitted outwardly ..."</p> <p style="text-align: center;">Page 163</p>	<p>1 Is that the word? I couldn't quite decipher that 2 one? 3 A. I think it probably is, it seems to read "outwardly all 4 that the boy says "". 5 Q. "... all that the boy says, but says that there was no 6 sex in it -- at 66 he is past sex". 7 Mr Henderson says "virtually", probably more like 8 it, "admitted virtually all that the boy says": 9 "The assaults consisted in the main of [something] 10 and ... in the nude"? 11 A. "... [something] and wrestling in the nude", I read that 12 as. 13 Q. "... romping and wrestling in the nude, but there were 14 occasions when Montagu kissed the boy's penis." 15 A. Yes. 16 Q. "The case is a bit bedevilled by the relationship ..." 17 A. "... in a rural community ..." 18 Q. "... rural community of employer and employee, though 19 the latter says he is [something] to leave the 20 estate..." 21 "Minded to"? No: 22 "... prepared to leave the estate, which Montagu 23 says ..." 24 It is quite difficult to read. It continues with 25 something about the boy's father:</p> <p style="text-align: center;">Page 164</p>

<p>1 "... and in any case he is prepared to leave the 2 management to his own son. The affair came to the 3 notice of the police through ..." 4 A. "Rumours" I think that is. 5 Q. Yes, "rumours": 6 "Several other employees have got the idea of what 7 was going on. 8 "Borderline -- but with a man of previous good 9 character and no fear of repetition with this boy, 10 I think" -- 11 A. "... we could caution". 12 Q. "... I think we could caution." 13 So that seems to be the decision. You noted in your 14 table that on 29 November the file was passed to 15 A/D Smith and, on the same file note -- and we see 16 that -- beneath the signature, a further note says 17 "I agree". So the memorandum is itself dated 28 January 18 by A/D South, and the decision in agreement with it is 19 signed off the Wednesday, 29 November 1972, and we saw 20 the letter which got sent back to the constabulary 21 confirming that that was the decision. 22 In your statement, Mr McGill, at your paragraph 19 23 and onwards, you go through the facts. You say at your 24 paragraph 21 that, unfortunately, there is nothing 25 further to shed any light on the decision making in this</p> <p style="text-align: center;">Page 165</p>	<p>1 case: 2 "I also do not have the benefit of understanding 3 what, if any, policies may have applied to offences of 4 indecent assault or any caution guidance which may have 5 been in place at the time." 6 A. That's right. 7 Q. Do you think -- this is a question you were asked, of 8 course, you will remember well, in the Rochdale 9 investigation about the turnaround of the submission of 10 a file, in that case from Lancashire Constabulary to the 11 DPP's Office, and then a decision being turned around 12 relatively quickly. We seem to have a similar 13 circumstance here, but a much simpler case than the 14 Cyril Smith case, which involved a number of 15 complainants. Difficult, perhaps, for you to say, but 16 do you think this looks a little quick? 17 A. The allegations are serious. As I point out in 18 paragraph 24, it's certainly -- all I can say is, it's 19 certainly quicker than we would do it now. Whether it 20 was normal in the circumstances of 1978 to turn them 21 around so quickly, I can't say. But it's certainly 22 quicker than we would do it now. 23 Q. Looking at your paragraph 22, what was it that tipped 24 the balance? I mean, this is the borderline section, 25 but what tipped the balance in favour of a caution?</p> <p style="text-align: center;">Page 166</p>
<p>1 A. It looks like the decision maker appears to have 2 concluded that Mr Montagu would not offend again, at 3 least in respect of this complainant. The previous good 4 character seems to have been a factor that played a part 5 as well. 6 Q. These were the days long before the Code for Crown 7 Prosecutors. At the time, the test was one of 8 reasonable prospect of conviction, that was the 9 evidential test. Were public interest factors taken 10 into account? 11 A. If you look at my paragraph 13, the statement from 12 Sir Thomas Hetherington, they talk about public interest 13 but they talk about public interest in a different way 14 than we talk about it today. I simply don't know how 15 they made their decision making in 1978. Certainly now 16 the public interest test is enshrined in the Code. 17 Q. Yes, of course. In paragraph 13, it happens to be 18 Sir Thomas Hetherington who explained the policy to the 19 Royal Commission in 1978 -- 20 A. Indeed. 21 Q. -- as being whether evidence is sufficient to justify 22 proceedings and whether or not there is a reasonable 23 prospect of conviction. These days, it's "realistic"? 24 A. "realistic", yes. 25 Q. " ... whether, in other words, it seems rather more</p> <p style="text-align: center;">Page 167</p>	<p>1 likely that there will be a conviction than an 2 acquittal ... indeed, the very first regulations under 3 which the Director of Public Prosecutions worked 4 provided that he should ... prosecute 'wherever it 5 appears that the offence or the circumstances of its 6 commission is or are of such a character that 7 a prosecution in respect thereof is required in the 8 public interest'. That is still the dominant 9 consideration." 10 Now there are all sorts of public interest factors? 11 A. There are. 12 Q. That public interest factor seemed to be rather 13 intermingled with the evidence test itself, whether 14 there was a reasonable prospect? 15 A. Yes. I read it, and it is difficult because it is not 16 clear, are they looking at the serious nature of 17 the allegation or are they looking at something else? 18 Q. But certainly this particular decision, which was 19 described as borderline, appears based on two essential 20 factors. First of all, that he was man of previous good 21 character and, secondly, that there was no fear of 22 repetition with that boy. Looking at today, your 23 paragraph 23, judged by -- perhaps one would arrive at 24 a different decision, but by the standards of the day, 25 what view do you have, your paragraph 23? Judged by the</p> <p style="text-align: center;">Page 168</p>

<p>1 standards of the day?</p> <p>2 A. Well, it's difficult because I haven't got a benchmark</p> <p>3 to judge it against, either the investigation or the</p> <p>4 decision making, really. All I can sort of compare it</p> <p>5 with is how we would approach such a case today.</p> <p>6 Q. And how would we?</p> <p>7 A. I would say we would approach it very differently.</p> <p>8 I set out in paragraph 24 what I think are the</p> <p>9 aggravating factors that would tend towards</p> <p>10 a prosecution in this case if we were looking at it now.</p> <p>11 Q. With a clear public interest?</p> <p>12 A. With a clear public interest. And I set out in</p> <p>13 paragraph 24 what I think those clear public interest</p> <p>14 factors are.</p> <p>15 Q. Age, vulnerability of the complainants, the marked</p> <p>16 disparity in age between them, position of authority and</p> <p>17 trust which Montagu held, there was a grooming aspect to</p> <p>18 the interactions between them, and the fact that the</p> <p>19 contact occurred when both were naked and involved the</p> <p>20 touching of genitalia. In fact, if one were to go</p> <p>21 through the police report and the witness statements</p> <p>22 more accurately that are contained behind it, all of</p> <p>23 which are now adduced in evidence, we know that there</p> <p>24 were allegations of kissing, the touching of private</p> <p>25 parts, the kissing of the boy's private parts --</p> <p style="text-align: center;">Page 169</p>	<p>1 A. Yes.</p> <p>2 Q. -- rubbing his penis, Montagu, on the boy's legs,</p> <p>3 holding the boy's hand against his penis. Do you think</p> <p>4 that Chief Inspector Newman was rather charitable</p> <p>5 towards Mr Montagu?</p> <p>6 A. Well, I think it's certainly a different type of police</p> <p>7 report than we would get today.</p> <p>8 Q. Paragraph 23, for example, just by way of example, we</p> <p>9 have on page 13 of CPS003345, just over halfway down</p> <p>10 that paragraph:</p> <p>11 "Rumour has it that Mr Montagu's second marriage was</p> <p>12 not consummated and since that time he appears to have</p> <p>13 lived a lonely life and it was thought that his interest</p> <p>14 in [the boy] was no more than fatherly."</p> <p>15 A. Mmm.</p> <p>16 Q. The interesting feature is that we heard from</p> <p>17 Robert Montagu this morning who himself was abused for</p> <p>18 several years in the mid '50s, and he also felt that his</p> <p>19 father was using him as a substitute for his own mother</p> <p>20 from whom he was separated. This paragraph continues:</p> <p>21 "From his replies, I am certain that he does not</p> <p>22 realise the seriousness of what has occurred, but when</p> <p>23 one considers that he has grandchildren of a similar</p> <p>24 age, and incidentally these grandchildren, together with</p> <p>25 [the boy] and other adults were going to form a 'skiing</p> <p style="text-align: center;">Page 170</p>
<p>1 party' later this year, then perhaps some sympathy may</p> <p>2 be afforded him."</p> <p>3 Would he get much sympathy today?</p> <p>4 A. No, I don't think any credence would be given to any of</p> <p>5 that by any prosecutor now. We need to remember, and</p> <p>6 you have summarised it, Mr Altman, that there were at</p> <p>7 least, I think, four allegations set out in the report.</p> <p>8 Q. At least?</p> <p>9 A. At least.</p> <p>10 Q. And several occasions?</p> <p>11 A. Yes.</p> <p>12 Q. Then, 24:</p> <p>13 "In fairness to the family, Mr Montagu has said that</p> <p>14 their position on the estate would not be jeopardised in</p> <p>15 any way arising out of this enquiry, and should</p> <p>16 Mr Montagu's eldest son take over the estate, then the</p> <p>17 father or the boy's employment would be furthered and he</p> <p>18 would guarantee this would be done. He also accepted my</p> <p>19 advice ..."</p> <p>20 This is the chief inspector to the putative</p> <p>21 defendant:</p> <p>22 "... that the association with the boy should end</p> <p>23 immediately. I warned him that, if it continued, my</p> <p>24 superiors would have to consider that the boy be brought</p> <p>25 before a juvenile committee for consideration of putting</p> <p style="text-align: center;">Page 171</p>	<p>1 him into safe custody as being exposed to moral danger.</p> <p>2 He confirmed that the association would end as from that</p> <p>3 moment. In conversation, Mr Montagu mentioned that he</p> <p>4 would have to consider handing over the estate to the</p> <p>5 eldest son, as described above, and, of course, to</p> <p>6 eliminate death duties. The period of time has now come</p> <p>7 when he has already considered this. This, too, was</p> <p>8 also rumoured at Mapperton."</p> <p>9 So it looks, on the face of it, two things: Newman</p> <p>10 has given him advice, which formed part of</p> <p>11 the director's decision, because that was what was</p> <p>12 written in the response letter of 29 November; and,</p> <p>13 secondly, that if the activity continued, the boy would</p> <p>14 have to be put in safe custody rather than anything</p> <p>15 being done with Montagu, which is remarkable?</p> <p>16 A. It makes uncomfortable reading, yes. Police reports now</p> <p>17 tend to be much more factual.</p> <p>18 Q. Yes, of course. I asked you earlier about the issue of</p> <p>19 corroboration, for this reason: we don't see the word</p> <p>20 "corroboration" appear anywhere, because, on the face of</p> <p>21 it, there was none, because it was just a series -- when</p> <p>22 I say "just", I don't mean to trivialise them, but</p> <p>23 a series of offences against one boy. So the individual</p> <p>24 offences of one boy wouldn't corroborate each other, but</p> <p>25 if there were other boys who had complained of similar</p> <p style="text-align: center;">Page 172</p>

<p>1 activity and those were all investigated and potentially 2 charged at the same time, they could, based, as 3 I understand it, on what you say about corroboration in 4 that period of time, have potentially provided 5 corroborative evidence. Is that right? 6 A. They could have done. Of course, in this case, you 7 wouldn't be looking for corroboration because there 8 appears to have been an admission. 9 Q. True. There was at least a virtual admission -- 10 A. Yes. 11 Q. -- as we saw. But, yes, I agree. Putting that to one 12 side, that didn't suffice for him to be prosecuted, did 13 it, in this case, because he was merely cautioned? 14 A. Yes. The date of this was '72. Going back to what we 15 talked about before, the law on corroboration was still 16 in a state of flux -- 17 Q. Infancy. 18 A. -- at that stage. 19 Q. Relative infancy. 20 A. Potentially, there were a line of cases that meant that 21 you could do that, yes. 22 Q. Of course. But just thinking about it, of course, what 23 the police and the DPP didn't know then was that Montagu 24 had been offending against his own son for several years 25 between around 1955 and 1961, but no action was taken by</p> <p style="text-align: center;">Page 173</p>	<p>1 the family, by the family's doctor, who we were told 2 this morning had interviewed him about it, and do you 3 think, had he been investigated, Montagu Snr, charged 4 and convicted at the time, or sometime thereafter, that 5 might have made potentially a difference to the outcome 6 of these offences? 7 A. I can't possibly comment about that: it's all 8 speculation. I don't know. 9 Q. Put it this way: if he had been convicted because the 10 family had done something about it and reported it to 11 the police, he couldn't have been advanced as a person 12 of good character who shouldn't be prosecuted on this 13 occasion? 14 A. That's certainly true. 15 Q. Had the matters been known about and investigated at the 16 same time, let's say that the complaints that 17 Robert Montagu had made about his own father had come to 18 the fore at this time, might they have been considered 19 to amount to similar fact evidence as to have satisfied 20 the requirement for corroboration? 21 A. Depending on the circumstances, yes, there's an argument 22 that they could have been, yes. 23 Q. Thank you. Let's then move to the Peter Hayman file, if 24 we can, please. This has already been adduced. It is 25 your tab 10 and it is your second statement of</p> <p style="text-align: center;">Page 174</p>
<p>1 28 January, which is CPS004666. You were in court for 2 Mr Naunton's evidence, I think? 3 A. I was. 4 Q. Were you in the hearing room for Mr Collins as well? 5 A. No, I caught the very last bit of it. 6 Q. Your paragraph 9, please, in your statement, 7 CPS004666_002, please. You deal with the nature of 8 the case there and we can see what you say. It simply 9 reiterates what we know, in paragraph 10, that 10 a briefcase was found on a bus. At paragraph 11, you 11 understood the correspondence which had passed between 12 Hayman and others. Is that right? 13 A. Yes. 14 Q. You have read through and understood that 15 Sergeant Collins had submitted to the DPP's Office, 16 received by them on 7 December 1978, a report. You say 17 at your paragraph 13 that you understood from the police 18 report that many of the obscenities within the 19 correspondence referred to children, and that was 20 correspondence which had presumably passed between 21 Hayman, AKA Henderson, and others, including photographs 22 of children, although I think you found that they were 23 described as normal snaps of children generally fully 24 clothed, which are to be found in paragraphs 19 and 50 25 of Sergeant Collins' report.</p> <p style="text-align: center;">Page 175</p>	<p>1 A. We didn't have the photos, I don't think. I think it 2 was just descriptions of -- 3 Q. Mr Naunton didn't, certainly. Mr Collins, I think, did. 4 Then you have looked through Mr Naunton's interim note. 5 A. Yes. 6 Q. At your paragraph 15, you set out the points which you 7 derive from the Naunton note. In paragraph 16, you 8 understood from what he had to say that the offence 9 under section 11 was becoming outdated at the time of 10 the incident, and you make reference in your 11 paragraph 17 to the handwritten addition to the note 12 about which I was asking Mr Naunton just before you came 13 into the witness box, about his having a conversation 14 with Sir David Napley about his suicidal tendencies. 15 Your paragraph 18 dealt with, insofar as you were 16 able to discern it, the policy that may have applied in 17 the DPP's Office to offences of sending obscene material 18 through the post not to prosecute where there had been 19 a complaint from the recipient, or the object of 20 committing the offence was not for financial gain. So 21 where there had been no complaint and it hadn't been for 22 financial gain but purely a private transaction between 23 adults, et cetera, et cetera, then there was a policy. 24 Did you know of any policy or was this simply what 25 you'd taken from the papers you've read?</p> <p style="text-align: center;">Page 176</p>

1 **A. It's the latter. It's what I've taken from the papers**
 2 **that I read.**
 3 Q. So you've summarised at your paragraph 19 that the DPP's
 4 Office considered whether to prosecute these matters as
 5 an offence contrary to the Post Office Act, and in
 6 deciding against prosecution, it appeared to you the
 7 following were taken account of. First, at the time,
 8 the offence was considered to be outdated.
 9 **A. Mmm-hmm.**
 10 Q. Second, the offence was aimed at protecting Post Office
 11 employees and therefore the circulation of the material
 12 had not harmed those whom the Act was intended to
 13 protect. Third, the material was circulated to a group
 14 of like-minded adults who willingly made comments of an
 15 obscene nature upon the material. Fourth, there was no
 16 intention to gain financially from the material.
 17 Therefore, your paragraph 20, reasonable or
 18 unreasonable, if that had been the policy at the time,
 19 not to prosecute?
 20 **A. Yes, that's precisely it. I've deduced -- I've tried to**
 21 **recreate it from what I've seen in the papers.**
 22 Q. In relation to the alleged fantasy writings of Hayman in
 23 relation to children, was there anything that you could
 24 help us with about that from what you saw?
 25 **A. Well, we would look at it in a very different way now.**

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1 **looking at the core material. That seems to me to be**
 2 **something that a prosecutor shouldn't probably do.**
 3 Q. Even he must have accepted that there were limitations
 4 to what he could do, because it was in the first line of
 5 his own minute, that it was an interim note and he'd not
 6 seen the exhibits. As he's accepted, clearly it was in
 7 his mind then too?
 8 **A. Yes, and I think he said that it was an interim note**
 9 **because he hadn't seen the exhibits.**
 10 Q. Quite. You have become aware of the report behind
 11 tab 11, Mr McGill, if you go to that. We have seen it
 12 several times now. OHY007089. We have got selected
 13 passages from it which I would like, please, to be
 14 adduced in full. It ran to, in fact, 159 pages, but we
 15 have only selected about half a dozen.
 16 You probably heard me read to Mr Naunton that which
 17 appears on the third page in terms of the inquiry
 18 reference, page 72 at the top, paragraph 153?
 19 **A. Yes, I have.**
 20 Q. A letter from Hayman to a David Grove talking about his
 21 desires for children and how he'd like to take matters
 22 further?
 23 **A. Yes.**
 24 Q. Signed off by him as Peter Henderson. Do you think,
 25 looking at this, together with the fact that Hayman was

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1 **Case law has moved on, and that material now would come**
 2 **within the definition of "publish" because of**
 3 **the circumstances of this case and because of a case of**
 4 **Gavin Smith, which is, I think, referred to in**
 5 **footnote 10 on the paragraph. We would be looking to**
 6 **expect our prosecutors to build a case and build a case**
 7 **around that and seek to prosecute this case now.**
 8 Q. What about images? Sergeant Collins in his report to
 9 the DPP's Office refers to the sending of, and the
 10 finding of, photographs which included photographs of
 11 semi-naked children. The indications are that
 12 photographs that were found in St James's Park in
 13 a briefcase were those of boys aged about 8 to 11 just
 14 in their underpants. Other photographs appear to have
 15 been sent between individuals, including Hayman, of
 16 naked girls. Would those be looked at with a different
 17 eye today?
 18 **A. Well, they may be. It depends on the nature of**
 19 **the images, quite frankly, and the way that the**
 20 **prosecutor has to look at them is to look at the images**
 21 **themselves. But the ultimate arbiter of whether they**
 22 **are indecent or not is ultimately the jury.**
 23 Q. Should Mr Naunton have looked at the exhibits before
 24 arriving at a decision, or an interim decision?
 25 **A. I think it would be unwise to reach a decision without**

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1 clearly a member of PIE, although Mr Naunton in his
 2 minute records the fact that, when spoken to under
 3 caution, Hayman claims that he didn't subscribe to PIE's
 4 views, would that have given a measure of concern to
 5 anybody looking at the file that he had already been
 6 cautioned for offences which involved the correspondence
 7 by post of material, some of which involved children?
 8 **A. Yes. Of course, what he had been cautioned about before**
 9 **was different. What this I think is material that --**
 10 **I think I would characterise it as requiring further**
 11 **investigation.**
 12 Q. Yes.
 13 **A. So I think just because he'd been cautioned for**
 14 **something else wouldn't mean that he couldn't be**
 15 **investigated for this.**
 16 Q. No.
 17 **A. On the face of it, again, the allegations are serious.**
 18 Q. The real point, I suppose, is this, that
 19 Sergeant Collins, and indeed Mr Naunton, had arrived at
 20 the conclusion -- probably Naunton from Collins because
 21 of what Collins said -- that some, if not most, of
 22 the writings about children were fantasy. One can't
 23 help but think that part of the cautioning process, or
 24 at least the decision not to prosecute, was based on
 25 that --

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<p>1 A. Mmm-hmm. 2 Q. -- conclusion. If what we are looking at here, which is 3 a report which was compiled and submitted after Hayman 4 was cautioned, was true, and if it suggested, as is 5 written, that Hayman in fact had paedophilic tendencies, 6 which, if you couple that with his membership of PIE, 7 despite what he said, was right, then the caution, or at 8 least the decision not to prosecute, was based on 9 a completely wrong set of circumstances potentially? 10 A. I think it's fair to say this seems to me to be 11 a salutary reminder to all prosecutors that, before 12 making a decision, you need to have all the facts at 13 your disposal before making a decision. Because if you 14 do it too quickly, there could be material that may 15 materially affect the decision you've made. 16 Q. The irony of which is, of course, Mr Naunton foresaw 17 that himself, because you will remember me putting to 18 him that in his own note he wrote about how making 19 a decision, in effect, at that time, he hoped wasn't 20 a rod for their own backs? 21 A. Yes. 22 Q. One could look at this and suggest that that's exactly 23 what this is? 24 A. You could say that, yes. 25 Q. The fact that the DPP's Office, whether it was</p> <p style="text-align: center;">Page 181</p>	<p>1 Mr Naunton, the DPP himself or both of them, separately 2 or together, were told that Hayman had suicidal 3 tendencies, which was clearly a factor on the face of it 4 that was taken into account then in disposing of 5 the matter by way of caution, is that something that 6 would be looked at as sympathetically today? 7 A. Mr Altman, I don't want you to consider me to be too 8 cynical. 9 Q. I would never do that, Mr McGill. 10 A. It's my experience that when people are arrested for 11 serious offences, they often become suicidal. So 12 I think any suggestion like that has to be treated with 13 some scepticism. Faced with an allegation of that 14 today, we would expect to see some medical evidence in 15 support and, for a serious offence, we would probably 16 ask for the suspect to be independently looked at by 17 a psychiatrist on behalf of the prosecution. We 18 wouldn't accept it at face value. 19 Q. Can I just, as it were, incorporate by reference, you 20 deal under the head "Media reports", your paragraphs 25 21 to 30, with aspects of that. I'm not going to deal with 22 that now through you because it's simply confirmation 23 I would seek of what you have said there, so I'm not 24 going to repeat that. But can I ask you hopefully, if 25 I can try and finish within the next few minutes, first</p> <p style="text-align: center;">Page 182</p>
<p>1 of all, you have been asked to reconsider the evidence 2 you gave and some of the documentation in the Rochdale 3 investigation in light of some evidence we heard in the 4 course of this investigation from Lord Jopling, who told 5 us in a second statement -- we will find this in tab 15, 6 INQ004197 -- that approximately 50 years ago -- this is 7 his paragraph 3 -- during a private conversation with 8 John Cobb QC, later Sir John Cobb, he told him in an 9 informal capacity that he had been asked by police or 10 the DPP to look at papers regarding child abuse 11 allegations against Cyril Smith and that he added that, 12 after going through all the papers, he advised the 13 police or the DPP that he didn't think there was 14 evidence sufficiently strong to get a conviction. 15 Without raking over everything that we went through 16 in that investigation, all of which is written up in the 17 report at paragraphs 46 and 48 of the Rochdale report, 18 and it was something I mentioned to you earlier about 19 the quick turnaround, all I think I can ask you is, when 20 you looked at those papers and have perhaps revised and 21 refreshed your memory when we have asked you to do so, 22 because of what Lord Jopling had to tell us, did you see 23 any reference at all to the instruction of counsel? 24 A. No. If I had, I would have mentioned it. 25 Q. How likely is it, thinking about it, because the --</p> <p style="text-align: center;">Page 183</p>	<p>1 again, without going to the actual documentation, the 2 letters that passed between Lancashire Police in 3 submitting the file and the DPP in coming back to 4 Lancashire with a decision was between Friday, 5 13 March 1970 and, I think, Monday, 16 March 1970, when 6 the file must have been received, and the letters 7 indicate it was submitted, the file was submitted and 8 received. You will remember the file was at least 9 80 pages thick, so it was quite a substantial file. And 10 the decision was made the following week, on Thursday, 11 19 March 1970, with, as is clear, a weekend intervening. 12 So a quick turnaround then. It is dealt with, as I say, 13 in paragraphs 46 and 48 of the Rochdale report. So the 14 likelihood in those days of counsel being briefed to 15 advise in writing and turn it around that quickly, how 16 likely do you think that might have been? 17 A. I simply don't know, Mr Altman. It's speculation. It 18 could happen. It could happen. I note that it says 19 "been asked by either the police or the DPP", and 20 I don't know the procedure back in the early 1970s, 21 I think it was, whether the police could go to get their 22 own informal advice. They did the investigation at that 23 stage and of course did the charging as well. 24 Q. They did, except we know the papers had to go to the DPP 25 because of the nature of the case?</p> <p style="text-align: center;">Page 184</p>

<p>1 A. Yes. 2 Q. And we know there was a lengthy report from 3 Lancashire Police up to the DPP with no mention of 4 the advice of counsel. And we know that there was no 5 mention of counsel in anything passing between 6 Lancashire Police and the DPP and in the opposite 7 direction. So all we can say is, we don't know, this is 8 all we have? 9 A. I saw nothing in the file to suggest that the matter 10 went out. 11 Q. The last thing, please, Mr McGill: yesterday, we heard 12 evidence from a witness of the Secret Intelligence 13 Service, MI6, who gave us some examples of cases that 14 they have had to deal with under their current 15 safeguarding policy and indeed before they ever had one. 16 One of the cases he referred to which he characterised 17 as his case 2, which if we can bring it up on screen is 18 INQ003831_003. Do you see at the bottom there: 19 "In 2006, a substantial amount of pornographic 20 material, including indecent photographs of children, 21 was identified on a computer used by SIS staff. The 22 material was preserved and an internal investigation 23 conducted ..." 24 Then over the page: 25 "The individual [who was discovered] was dismissed</p> <p style="text-align: center;">Page 185</p>	<p>1 from SIS employment and charged with two counts of 2 possessing indecent photographs of children ... The 3 material was handed to the police and provided the 4 necessary access and support to the prosecution ..." 5 Then at (c): 6 "Ultimately, the prosecutor decided to offer no 7 evidence against the defendant following an abuse of 8 process application. SIS was not involved in that 9 decision and wrote to the CPS to express disappointment 10 at the outcome." 11 I'm just going to ask a general question: if there 12 has been an abuse of process application which has 13 succeeded, that would tend to indicate the defence had 14 made an argument that it was unfair to try the defendant 15 or he couldn't get a fair trial -- those are the two 16 limbs -- and if the judge acceded to it, then the 17 indictment is stayed? 18 A. Yes. 19 Q. It can't proceed unless the prosecutor decides to go to 20 the Court of Appeal to treat it as a terminating ruling, 21 and the Court of Appeal, if they were minded to, says 22 the judge got it wrong, the case is sent back and the 23 defendant is tried. So that, in a nutshell, would be 24 the process. If the Court of Appeal found against the 25 prosecution appealing on a terminating ruling, then that</p> <p style="text-align: center;">Page 186</p>
<p>1 would be an end of it? 2 A. Yes. 3 Q. The defendant would remain effectively acquitted? 4 A. Yes. 5 Q. But SIS here say that, nonetheless, they wrote to 6 express their disappointment at the outcome. So what 7 I am going to ask you to do, Mr McGill, and you're alive 8 to this, is, if you would kindly, when you leave us, see 9 if you can find out what happened in that particular 10 case from the CPS point of view and what passed between 11 you by way of correspondence, and if you would -- and 12 I'm sure we can help behind the scenes to give you more 13 information that you need -- write a short statement 14 about it to us. 15 A. I'm happy to do that. 16 Q. Thank you very much. 17 A. I'm happy to make those enquiries. 18 MR ALTMAN: Chair, those are all the questions I have. 19 THE CHAIR: Thank you. Ms Sharpling has a question. 20 Questions by THE PANEL 21 MS SHARPLING: Thank you, Mr McGill. Just a couple of 22 questions. I apologise if they appear slightly 23 hypothetical, but if you just bear with me for a moment. 24 I want to talk about the decision in the Hayman 25 case, if I may. We know now that Mr Hayman was</p> <p style="text-align: center;">Page 187</p>	<p>1 cautioned in relation to an offence or offences under 2 the Post Office Act. In Mr Naunton's interim report, 3 there's clearly a reference to other defendants. Do you 4 know what happened to those other defendants? 5 A. I don't, no. 6 MS SHARPLING: If, for example, those other defendants, one 7 or two of them, were charged with offences under the 8 Post Office Act and Mr Hayman was given a caution, would 9 that give you any concern about the decision to caution 10 Mr Hayman in the first place? 11 A. I think it all depends on the circumstances and it 12 depends on the individual circumstance of each suspect. 13 So there could be individual circumstances in which we 14 are provided with information that may enable us to 15 differentiate between suspects. 16 MS SHARPLING: Would the seriousness of the material in the 17 correspondence have an effect on that decision? 18 A. It could do: 19 MS SHARPLING: That's not one of the references I think 20 that's made in Mr Naunton's report, though, is it -- 21 A. No. 22 MS SHARPLING: -- the seriousness of the material? 23 A. No, but it could do. It depends on a number of factors. 24 The prosecutor would have to look at the matter in the 25 round and work out the criminality and ask themselves</p> <p style="text-align: center;">Page 188</p>

<p>1 whether the cautioning guidance is satisfied and whether 2 a caution is an appropriate disposal in the 3 circumstances. Of course, everyone should be treated in 4 the same way. 5 MS SHARPLING: I understand. Secondly, if no action was 6 taken in relation to the other defendants at all, then 7 it looks as if Mr Hayman came off worse by getting 8 a caution. 9 A. If that's the case, yes. 10 MS SHARPLING: I see. Thank you. 11 THE CHAIR: No further questions. 12 MR ALTMAN: Thank you very much, Mr McGill. Subject to 13 that, that's an end of your evidence. So thank you for 14 assisting us once again. 15 A. Thank you. 16 MR ALTMAN: Thank you very much, Mr McGill. 17 (The witness withdrew) 18 MR ALTMAN: Chair, that is all the evidence for today and 19 all the evidence, at least live, and adduced, I think -- 20 is there any more to be adduced; no -- in this 21 investigation. We are not sitting tomorrow and resume 22 at 10.00 am for closing statements, but I'm getting 23 stage whispers to my right that there might be a few 24 more documents to adduce first thing on Friday. Thank 25 you very much.</p> <p style="text-align: center;">Page 189</p>	<p>1 THE CHAIR: Thank you. We will reconvene on Friday. 2 (4.31 pm) 3 (The hearing was adjourned to 4 Friday, 29 March 2019 at 10.00 am) 5 6 7 I N D E X 8 9 MR GEORGE CHARLES ROBERT MONTAGU1 10 (sworn) 11 12 Examination by MR ALTMAN1 13 14 MR BRYAN COLLINS (sworn)22 15 16 Examination by MR ALTMAN22 17 18 Questions by THE PANEL100 19 20 Witness statements adduced by MR103 21 HENDERSON 22 23 MR JEREMY JOHN NAUNTON (sworn)105 24 25 Examination by MR ALTMAN105</p> <p style="text-align: center;">Page 190</p>
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