

<p>1 Tuesday, 2 July 2019 2 (10.00 am) 3 THE CHAIR: Good morning, everyone, and welcome to Day 2 of 4 this public hearing. Ms McNeill? 5 MS McNEILL: Good morning, chair and panel. Our first 6 witness today is Mr Ian Elliott. Can the witness please 7 be sworn? 8 MR IAN ELLIOTT (sworn) 9 Examination by MS McNEILL 10 MS McNEILL: Mr Elliott, thank you. If you can just make 11 sure you keep your voice up, that microphone in front of 12 you will record and magnify also. 13 You produced a witness statement for this inquiry, 14 which is at tab A6 of your bundle, for the chair and 15 panel. That statement is dated 5 April 2019, and signed 16 by you, with a statement of truth. Can you please just 17 confirm for us that that witness statement is true, to 18 the best of your knowledge and belief? 19 A. Yes, I can confirm that that is the case. 20 Q. Chair, the reference for that witness statement is 21 ANG000529. We will ask that it be published on the 22 website that we can focus today on the issues arising 23 from it. 24 Mr Elliott, if we can start with a little bit of 25 information on your professional background, your</p> <p style="text-align: center;">Page 1</p>	<p>1 professional background is in child protection, or 2 safeguarding, and you have 45 years of experience in 3 that field; is that correct? 4 A. That is correct. 5 Q. Not to do a disservice to the very great amount of 6 experience you have, but, in short, you are a qualified 7 social worker, you have been the director of the NSPCC 8 in Northern Ireland for, I believe, five years? 9 A. Yes, that's correct. 10 Q. And you also have particular experience in safeguarding 11 within the church setting, and have acted as the CEO of 12 the National Board of Safeguarding Children in the 13 Catholic Church in Ireland? 14 A. Yes, that's correct. 15 Q. Your evidence today largely arises from a review you 16 undertook on behalf of the Church of England in 2015 17 about the response to allegations by the individual we 18 know as A4? 19 A. Yes. 20 Q. Is that fair? 21 A. That is correct. 22 Q. Can you tell us, in brief terms -- I know there were 23 detailed terms of referencing, but what was the scope of 24 your review into the handling of the allegations by A4? 25 A. The review was in fact asked for by CCPAS, and I was</p> <p style="text-align: center;">Page 2</p>
<p>1 acting as a consultant for CCPAS. I was given terms of 2 reference, which are dated, I think, July 2015, and that 3 set out the scope of the review and the methodology to 4 employ it, the time limit as well, which was three 5 months, but I was specifically focused on a particular 6 case, and that was the situation of A4. 7 Q. So it was focusing on just the one case, and it was to 8 be turned around within a three-month period? 9 A. Yes, that's correct. 10 Q. Chair, it is tab A6 for this witness statement. In 11 terms of how you conducted the review, what material did 12 you consider? 13 A. There was material that I was directed to through the 14 terms of reference, which was the documentation that was 15 created specifically in relation to the management of 16 A4's case, but I also looked at the policies that were 17 in place in the Church of England. I also identified 18 key individuals that I wished to interview, and made 19 approaches to them to engage in interviews with me. 20 Q. Now, in terms of the individuals you interviewed, who 21 did you interview? 22 A. I can name those individuals? 23 Q. You can name those individuals, except for the 24 complainant, who is allocated the cipher -- 25 A. A4. A4. The alleged offender was in fact deceased, but</p> <p style="text-align: center;">Page 3</p>	<p>1 I also spoke to key individuals within the church, and 2 the person -- the Lead Bishop for Safeguarding within 3 the Church of England. 4 Q. At that time, it was Bishop Paul Butler? 5 A. That's correct, Bishop Paul Butler. I also spoke to the 6 national safeguarding advisor, who is Graham Tilby, and 7 I also interviewed Sheryl Kent, who is the DSA for -- or 8 was the DSA for the Diocese of London. 9 I also had conversations throughout the period of 10 the review with Jane Dodds, who is a senior case worker 11 within the National Safeguarding Team. 12 Q. One of the things that you looked at, and we heard a bit 13 of information about it yesterday, was the withdrawal of 14 pastoral support from A4 following some advice that they 15 received. Did you have copies of the contact between 16 the church and its advisors and between individuals 17 within the church? 18 A. Yes, I read specifically the entry made in the case 19 record by the DSA for London, Sheryl Kent, where she 20 made reference to a telephone conversation that took 21 place in January, but I also raised that matter in 22 interview with each of the individuals that I have 23 already named -- Bishop Paul Butler and Graham Tilby -- 24 both of whom confirmed to me that it was their 25 understanding that the withdrawal of pastoral support</p> <p style="text-align: center;">Page 4</p>

<p>1 for G4 [sic] had been advised by EIG. 2 Q. Just to summarise it, in short, we had the complainant 3 in this case, the individual we call A4, who was, he 4 told us, in contact with both Bishop Paul Butler and 5 Sheryl Kent for the Diocese of London? 6 A. Yes. 7 Q. And you spoke to both of those individuals? 8 A. Yes, I did. 9 Q. If we can turn, chair, to tab B3 of your bundle, 10 document reference ACE026968_026. On screen we see an 11 extract of your notes of the meeting with Sheryl Kent, 12 Diocesan Safeguarding Advisor, and what she says is -- 13 can we go back one page, please, Ralph, to page 25, and 14 can we look at paragraphs 4 and 5. 15 She told you: 16 "When the insurance company ... became involved 17 in March 2014, they informed everyone involved in the 18 case that they were not to have contact with A4 and not 19 to comment [about] him. Sheryl argued and stated that 20 it was not acceptable. Sheryl has a regret about this: 21 she could have challenged but she did not. She wished 22 she had pushed more. Sheryl contacted the National 23 Church -- emailed ... Acknowledged but no action." 24 Then we hear a little bit about the legal 25 representatives for EIG.</p> <p style="text-align: center;">Page 5</p>	<p>1 From the information you gleaned, did those within 2 the church want to withdrawal pastoral support from A4? 3 A. No, and very similar sentiments were expressed to me by 4 Bishop Paul Butler, who stated, as Sheryl has stated 5 here, that he bitterly regretted the fact that he 6 followed the advice that had been given, and he felt 7 that that was a major error, a major mistake, and that 8 he should not have done that. So similar sentiments 9 were expressed to me by Bishop Paul Butler and also by 10 Sheryl Kent. However, both did follow the advice. 11 Q. We are going to turn to your conclusions ultimately, 12 which is about the following of that advice. But before 13 we do, there has been some criticism made of you by the 14 Ecclesiastical Insurance Office that you didn't speak 15 with or engage with them during the preparation of your 16 report. Why was that? 17 A. Initially, I realised that I had not done so because 18 I had spoken to the lawyer mentioned there, 19 Paula Jefferson, and I had met her on two occasions when 20 I attended the core groups that were held in relation to 21 the case of A4, and I had conversations with her at that 22 time. However -- and I realised that she was not 23 a direct employee of EIG, but in fact worked for a law 24 firm who were employed by EIG. 25 Q. So you didn't speak with EIO directly?</p> <p style="text-align: center;">Page 6</p>
<p>1 A. No. 2 Q. But you did speak to one of their lawyers? 3 A. Yes. 4 Q. Did you feel you needed any additional information from 5 the Ecclesiastical Insurance Office in order to complete 6 your report, bearing in mind that its focus was on the 7 response of the church? 8 A. And that's the key point. The point about the advice 9 that was given was that it was followed, and that was 10 the point that I was making. I felt very strongly 11 that -- you know, advice can be given by advisors, but 12 it's ultimately up to the receiver of the advice to 13 follow that advice or not. And the fact that that 14 advice had been followed, in my view, was a mistake, and 15 caused risk to A4 that could have had very unpleasant 16 consequences. I have certainly had experience 17 previously in working with survivors in similar 18 situations. They are under particular pressure, 19 particularly at times when legal proceedings are being 20 initiated, and something like the withdrawal of pastoral 21 support can be an event that can actually push them over 22 the brink and cause them to self-harm, and that 23 concerned me very greatly. So it was the receiving of 24 the advice and the willingness to act on the advice 25 which is why I emphasise that.</p> <p style="text-align: center;">Page 7</p>	<p>1 Q. We jumped ahead to your conclusions so we might double 2 back and look at this a little bit more. But while we 3 are talking about it, we know, in terms of 4 the chronology, that the church was engaging with A4, 5 but there came a period when they stopped engaging with 6 him directly and the effect of that was that he ceased 7 to receive pastoral support? 8 A. Yes. 9 Q. One of the factors which has been raised by the 10 Ecclesiastical Insurance Office and others is that the 11 window in which support ceased is two weeks or 12 thereabouts, so it wasn't actually that long. How would 13 you respond to that as a mitigation, for want of 14 a better word? 15 A. Well, I don't think that's relevant at all. The fact 16 that it was withdrawn at all and communicated to A4 is 17 the issue, and that's the point. Whether it was for 18 a day, whether it was for a week, whether it was for 19 a fortnight, whether it was for a month isn't the issue; 20 the issue is that that message was communicated to A4 21 and was acted on, and that's where the source of risk 22 is. 23 Q. One of the activities you undertook during your 24 investigation was to attend a core group meeting at 25 which the case of A4 was discussed. Chair and panel,</p> <p style="text-align: center;">Page 8</p>

1 this is on page 2 of the witness's statement, if it
 2 assists, and I'm looking at paragraph 5. Mr Elliott,
 3 can you tell us what your impression was and your views
 4 were about the core group that you attended in the case
 5 of A4?
 6 **A. In fact, I attended two core group meetings. I was**
 7 **initially expecting that the core group meeting would be**
 8 **similar to a case conference model, which I would be**
 9 **familiar with, but essentially would be a meeting**
 10 **whereby all those who were involved in providing care**
 11 **and support to A4 would come together, be present, and**
 12 **would use that as an opportunity to co-ordinate what**
 13 **they were doing and how they were doing it together, so**
 14 **that the best possible service could be provided for A4.**
 15 **I did not think that that was happening at that**
 16 **meeting. I felt it was very much a business meeting,**
 17 **that it didn't have a focus specifically on the care and**
 18 **welfare of A4. I was quite shocked by that. A4 was not**
 19 **in attendance, no-one was there, as such, representing**
 20 **him, so I found it to be quite different from what**
 21 **I expected and, following the meeting, I spent some time**
 22 **talking at length to members of the NST to establish**
 23 **exactly what was the purpose of a core group meeting, as**
 24 **such.**
 25 Q. And what was the purpose of the core group meetings that

Page 9

1 **support and who are working with the survivor to improve**
 2 **their situation.**
 3 Q. What about the survivor themselves or their legal
 4 representatives?
 5 **A. Absolutely.**
 6 Q. One of the things A4 raised yesterday is, he didn't know
 7 it was happening and his representatives were not aware
 8 or invited?
 9 **A. No.**
 10 Q. Bearing in mind the matters that were discussed, do you
 11 think that the individual themselves or their legal
 12 advisors ought to be present at a care group meeting?
 13 **A. Yes. The case conference model that I would be familiar**
 14 **with would be one where the subject of the conference**
 15 **would be afforded the opportunity of contributing to the**
 16 **conference, so they would be present. They may be**
 17 **present for all of the time or maybe only for part of**
 18 **the time. But, essentially, they would be given an**
 19 **opportunity to speak to the professionals who were**
 20 **involved and to say to them ultimately what their needs**
 21 **were and their views with regard to how those needs can**
 22 **and should be met. So, in other words, there was**
 23 **a dialogue that should take place between the subject**
 24 **and those who are providing services, and that wasn't**
 25 **present in the format that I was -- that I experienced**

Page 11

1 you attended?
 2 **A. It was essentially a business meeting, but the focus,**
 3 **I think, was more to do with, to some degree, the**
 4 **protection of the institution, the protection of**
 5 **the church, as opposed to the care and welfare of A4.**
 6 Q. Was that discussed during the meeting?
 7 **A. The care and welfare of A4?**
 8 Q. Yes.
 9 **A. Sheryl Kent was present --**
 10 Q. For the record, she was the Diocesan Safeguarding
 11 Advisor in London?
 12 **A. Absolutely, and she certainly attempted to do that. But**
 13 **there were others who were present, you know, who were**
 14 **not directly involved in the care and welfare at all**
 15 **of --**
 16 Q. So who was present?
 17 **A. Well, the correspondence secretary of the archbishop,**
 18 **who has been previously identified, I think.**
 19 Q. Mmm-hmm.
 20 **A. And there were other bishops who attended. There were**
 21 **lawyers, there were comms personnel. It was very much**
 22 **a business meeting.**
 23 Q. Who would you expect, at a core group, to be in
 24 attendance?
 25 **A. The people who are directly involved in the pastoral**

Page 10

1 **at the core group meetings.**
 2 Q. If you turn to page 5 of your witness statement for us,
 3 I want to talk a little bit about some of
 4 the conclusions you reached and some of the comments you
 5 made about the process.
 6 **A. Yes.**
 7 Q. What you have indicated at the top of page 5 of your
 8 witness statement is that you considered the
 9 Church of England's policies that were in place at that
 10 time and you thought they were good policies?
 11 **A. Absolutely.**
 12 Q. But, in essence, did the way in which A4's case was
 13 managed reflect what was set out in the
 14 Church of England's policies at that time?
 15 **A. No. That was, you know, a very critical point, because**
 16 **I had no in-depth knowledge of the Church of England at**
 17 **all whenever I accepted the contract. So my way of**
 18 **briefing myself into the role was to read the policies**
 19 **of the church, and I have commented on the fact that**
 20 **I was very impressed by the document, particularly**
 21 **responding well to those -- and I felt, this is good,**
 22 **this is great, we have an enlightened approach, that's**
 23 **excellent. And then what I found was that there was**
 24 **a very clear difference between what the policy stated**
 25 **and what the practice was on the ground, and that is**

Page 12

<p>1 a concern. It appeared almost as if the policy was over 2 there, practice was over there (indicating), and the 3 subject was somewhere in the middle. 4 Q. Were you able to glean from your investigation whether 5 those individuals were aware of the policy? Was it 6 a case of not being aware that these policies existed or 7 what they required, or a case of forgetting, ignoring, 8 deviating from those policies? Were you able to glean? 9 A. I commented on the fact that their approach to the 10 implementation of policy seemed to be a matter which was 11 entirely up to them; that there wasn't anybody within 12 the church -- within the church structure that actually 13 would hold them to account in any way against the stated 14 policies. So there needs to be a means by which, if you 15 have standards, and agreed standards, that there were 16 guardians of those standards that would actually hold 17 people to account and ensure what policy is being 18 followed here or is not being followed here. 19 Q. I think, linked to that, looking at paragraph 5 on 20 page 5 of your witness statement, you made the 21 observation that the diocesan structure was not helpful 22 and tended to isolate and negate the centre as a source 23 of monitoring the quality of practice: 24 "The sharing of information which would allow an 25 assessment of practice to be undertaken became more</p> <p style="text-align: center;">Page 13</p>	<p>1 difficult. Diocesan-based staff often look to their 2 bishop and local colleagues rather than to the centre. 3 It was not a model that I would have recommended. In my 4 view, it was often subject to the problem of deference 5 to the hierarchy." 6 A. Yes. 7 Q. If you can, I would like you to expand on that a little 8 bit. What do you see as the key structural problems 9 getting in the way of good safeguarding in the case that 10 you observed? 11 A. Well, you outlined some there, obviously, but there is 12 a major problem, I feel, in relation to -- this is based 13 not just on my experience within the Church of England 14 but also working with other churches that employ 15 a diocesan structure, and that's the problem of 16 deference to the hierarchy. 17 You know, you can have the best policies in the 18 world, but they can be skewed in terms of their 19 implementation by other factors which are not written 20 down as such, and one of those is deference to the 21 hierarchy. So although certain procedures may be in 22 place to be followed in a certain way, it doesn't 23 actually follow that that's what's going to happen in 24 real terms. I felt very strongly that the model that 25 needed to exist was one which allowed for a body such as</p> <p style="text-align: center;">Page 14</p>
<p>1 the NST to move away from a purely advisory role to 2 include within it the ability to challenge and confront 3 where it believed poor or bad or inadequate practice was 4 taking place anywhere within the church. 5 Q. We're going to come back to this again, because it is 6 a theme that sort of emerges through the papers that you 7 have written. I understand what you say about the 8 difficulties of having safeguarding within a purely 9 advisory role. 10 A. Yes. 11 Q. But why, specifically, do you think that safeguarding 12 needs to be empowered centrally or nationally, as 13 opposed to perhaps giving it greater power at a diocesan 14 level? What specifically was your concern about the 15 diocesan structure? 16 A. Simply because of its record: it has been shown 17 elsewhere not to work, to have difficulties in terms of 18 being of a consistently high standard across a large 19 body, such as the Church of England, or indeed the Roman 20 Catholic Church, in terms of its various territories 21 throughout the world. It is achieving the consistency 22 of practice and decision making which is necessary to 23 ensure that the vulnerable are kept safe within church 24 settings. 25 Q. I'm going to move forward -- we will keep coming back to</p> <p style="text-align: center;">Page 15</p>	<p>1 some of these themes -- to look at the report you did 2 actually prepare. Chair and panel, it is behind tab B1 3 in your bundles, and its reference is INQ000457_008. As 4 part of your report, you set out your view on the 5 safeguarding policy within the Church of England, and 6 some of that we have already looked at. I just want to 7 draw out what you have said in your report. Can we zoom 8 in on paragraph 26, please: 9 "This lack of authority and responsibility at the 10 centre is viewed as an important deficit in the current 11 structure. The lead officer within the National 12 Safeguarding Team is termed the 'national safeguarding 13 advisor'. Advice may be given but lack of compliance 14 with policy requires direction, rather than advice. 15 Currently, the structure cannot readily provide this." 16 Again, we have just explored a little bit of this. 17 But specifically on the role of the national 18 safeguarding advisor, what is your concern about them 19 being called the "national safeguarding advisor", or 20 what's the alternative? 21 A. That there is the opportunity -- in the first instance, 22 the individual involved, or the person who holds that 23 role, has the opportunity to access information, 24 relevant information, right across all of the church by 25 right of authority of the role that they hold and has</p> <p style="text-align: center;">Page 16</p>

<p>1 the authority also to intervene directly into situations 2 where they feel bad practice is involved. That's what 3 I'm looking at. They need to move beyond an advisory 4 role to a situation where they're taking actual 5 responsibility for ensuring that, if you like, the 6 guardians of the standards within the church are 7 complied with. 8 Q. When you say -- in the first sentence, you say there is 9 a lack of authority and responsibility at the centre. 10 By that, do you mean, then, within the National 11 Safeguarding Team, not "the centre" as in senior clergy? 12 A. And above, yes. I mean, I think it is really important 13 that matters that are relevant in relation to 14 safeguarding -- that is, the extent of abuse that is 15 known about within the whole church structure, that the 16 detail of that information is known at the highest level 17 within the church and is a matter of concern to them so 18 that they can apply whatever resources are available 19 within the church to addressing those issues and in 20 a very specific way. 21 So, in other words, they're not relying on one-off 22 processes, such as commissioned audits or reviews, to 23 give them that information. That information should be 24 available to them on a regular basis. It should be 25 monitored by them on a regular basis. They should be</p> <p style="text-align: center;">Page 17</p>	<p>1 aware of that and be able to speak to that at any time. 2 Q. I apologise in advance for jumping around your report 3 a little bit, but rather than take it sequentially, 4 I want to stick with this theme and turn you over to 5 page 11. It is page 10 of the internal numbering. At 6 paragraph 45, what you are saying in this paragraph is: 7 "The National Safeguarding Team and not separate 8 churches or dioceses should have the responsibility for 9 monitoring and reviewing." 10 You have just elaborated for us you think regular 11 monitoring and reviewing should be undertaken and 12 specifically within the National Safeguarding Team? 13 A. Yes. 14 Q. Sticking with this theme, if we go over to page 12, 15 paragraph 55, I think this is what you have just said to 16 us: 17 "It is important that practice is routinely 18 monitored by a body that is outside of the diocese but 19 within the church. This body needs to have the power to 20 intervene and seek change where this is considered 21 necessary. The present structure within the church does 22 not allow for this to occur." 23 Now, I would like to draw two features out of that, 24 if I may. The first is, why do you think it is 25 important that the review, the auditing, is happening</p> <p style="text-align: center;">Page 18</p>
<p>1 within the church, as opposed to the SCIE programme that 2 we have heard about and we are going to hear a little 3 bit more about, which are external audits. Why do you 4 think it is important that auditing happens from within 5 the church? 6 A. From my perspective, the ideal situation is one where it 7 is integral to the church to allow early intervention 8 into situations of concern that arise across the whole 9 body of the church. The church has a very diverse 10 structure, it is a very large institution. Concerns can 11 arise, as history has shown, in various places at 12 various times. It is very important that the church, at 13 the highest level, has an awareness of those concerns 14 and is able to respond to them. 15 If a bishop or if a senior religious superior is not 16 acting appropriately, in terms of intervening into 17 situations of concern within the diocese, then the 18 church should have an understanding that that is the 19 case and they should be able to intervene into that 20 situation and address it, and that should hopefully 21 happen without the requirement of external audits. 22 Q. So sort of a change from within and an informing the 23 corporate knowledge, all that kind of terminology that 24 we hear? 25 A. Absolutely, yes. External audits serve a purpose, but</p> <p style="text-align: center;">Page 19</p>	<p>1 they have to be commissioned, and they're episodic. 2 Whereas ultimately what you want to create is a church 3 body that is safe and, for it to know that it is safe, 4 then it has to be aware of what the risks are that are 5 present within the church at any time and what actions 6 are being taken to address and eliminate, reduce, those 7 risks at any time. 8 Q. The second aspect I wanted to draw out, you mentioned in 9 this paragraph and in your answer to my question you 10 have said several times about intervening? 11 A. Yes. 12 Q. What do you mean by "intervening"? What sort of 13 intervention do you have in mind that the church, either 14 through the National Safeguarding Team or through senior 15 clergy or both, should have available to them? 16 A. I think, ultimately, what I'm looking for and hoping to 17 see achieved is a situation where there are specific 18 standards that are defined in relation to safeguarding 19 practice, and that those safeguarding standards are 20 monitored, the criteria by which they would be judged, 21 the assessment of them in terms of their quality and 22 practice would also be defined, and where they fall 23 short, where those standards fall short, then there is 24 a second level, if you like, within the church which 25 will draw attention to the fact and look for change,</p> <p style="text-align: center;">Page 20</p>

<p>1 corrective measures. That's unacceptable. Because the 2 result of bad safeguarding practice is devastating for 3 individuals who are on the receiving end, and that's 4 a very important issue that needs to be taken very 5 seriously by churches. 6 Q. If we can go back to page 9, switching themes slightly, 7 to pastoral support, which we have already talked about 8 at some length today, that was the big theme within your 9 report in particular. At paragraphs 28 to 29 of your 10 report, you set out your comments on what happened in 11 the case of A4. What we heard yesterday from the 12 opening speech on behalf of the Ecclesiastical Insurance 13 Office is that they're a business, they're an insurance 14 company, dealing primarily with contracts. Was your 15 criticism here intended to be of the Ecclesiastical 16 Insurance Office or of the church in the way they 17 responded to that? 18 A. It was to be of the church, really, and not of 19 the Ecclesiastical Insurance Group. It was specifically 20 the church. The church has a responsibility to respond 21 and to provide pastoral support, and they also need to 22 move beyond the idea that that pastoral support is 23 simply defined by financial considerations. It is not. 24 And I very strongly believe that that's not the case. 25 The survivors that I have had contact with have</p> <p style="text-align: center;">Page 21</p>	<p>1 emphasised to me the importance of being heard, of being 2 listened to, of being respected, being valued, and also 3 being apologised to. That's very, very important. 4 Q. I will just bring up the paragraph that I think really 5 encapsulates what you are trying to say. Paragraph 33 6 on page 9. This is what you really were trying to say: 7 "This case well demonstrates the tension that exists 8 between safeguarding/pastoral concerns and potential 9 financial liability. If the church is unable to accept 10 the principles that it has said that it has adopted, it 11 would be important for it to state this." 12 A. Yes. 13 Q. So if you are going to have a policy, follow it. If 14 that policy isn't practical, please say so, essentially? 15 A. Exactly. That's the critical point. 16 Q. "If it has committed itself [which it has] to the 17 provision of 'informed pastoral care and support to 18 anyone who has suffered abuse'. It has to find a way of 19 delivering this ..." 20 A. Correct. There is no other option, as far as I'm 21 concerned: it either dispenses with the policy or it 22 abides by the policy. 23 Q. If we can look a little bit at your recommendations at 24 pages 14 and 15 of that document behind tab B1, you made 25 four recommendations about receiving disclosures. These</p> <p style="text-align: center;">Page 22</p>
<p>1 arose -- I'm trying not to repeat what we already heard 2 from A4 yesterday. He gave us a very detailed account 3 of the fact that he had disclosed his abuse to a number 4 of individuals within the church over the years, and 5 that, in his view, nothing had happened, and those 6 individuals, by the time you came to do your report, 7 didn't remember, in a lot of cases, having received the 8 disclosure. 9 A. Yes. 10 Q. The real thrust, is it fair to say, of your 11 recommendations on that is that, if you -- you need to 12 have proper policies and procedures in place for 13 managing disclosures, for recording them, for responding 14 to them, for making sure that something is done and that 15 people remember it and write it down? 16 A. Yes, that's right. The case was unusual, in my 17 experience, because it involved repeated disclosures 18 over an extended period of time, and that is unusual. 19 Quite often, you're dealing with one or two disclosures, 20 but to have the number of disclosures that A4 made, or 21 reports that he made, was unusual, and none of them were 22 recalled by the individuals to whom he made the 23 disclosures. 24 Q. The second area is the role of advisers, and I don't 25 want to repeat what we have been through, but these are</p> <p style="text-align: center;">Page 23</p>	<p>1 the recommendations where you deal with what we have 2 talked about, that it should have more bite to it than 3 purely providing advice? 4 A. Yes. 5 Q. They should have a stronger role within the church? 6 A. Yes, and also to remember that advice is advice. There 7 is a responsibility on the individual receiving the 8 advice to decide whether that advice should be followed 9 or should be set aside. 10 Q. At the very bottom of the page, the safeguarding 11 structure. Again, we have touched on this already, 12 which is that the church must create a means by which it 13 can inform itself about what is going on. You said that 14 external audits are all well and good, but the church 15 needs to be informing from within? 16 A. Yes, again, a general comment I would make from working 17 within this field, not just within the Church of England 18 but elsewhere, is that these issues tend to be managed 19 behind closed doors and that conversations that should 20 take place often don't take place and are skewed by 21 misunderstandings about confidentiality and "Nobody 22 needs to know this", and so on, and so information tends 23 not to travel very easily within the church structure. 24 So there needs to be specific decisions made, but 25 information should be sought, should be critically</p> <p style="text-align: center;">Page 24</p>

<p>1 analysed, stored and acted upon within the church 2 structure.</p> <p>3 Q. Over the page to page 15, please, you touch on, at the 4 top, the need to intervene where it is necessary, and we 5 have covered that. Number (ii), safeguarding decisions 6 as they occur across the church should be subject to 7 review by an independent body within the church?</p> <p>8 A. Yes.</p> <p>9 Q. Do you see that independent body within the church as 10 the National Safeguarding Team, in one form or another?</p> <p>11 A. In a very different form.</p> <p>12 Q. What form would you see it in?</p> <p>13 A. I also see it reporting directly to the highest level 14 within the church, because, ultimately, where the 15 information needs to be held, stored, considered is at 16 the highest level within the church. They need to have 17 an understanding, a comprehensive and detailed 18 understanding, of what the reality of the safeguarding 19 workload is across the whole of the church at any time, 20 and quite often --</p> <p>21 Q. So more than guidance, more than sort of procedural 22 support, more than putting in place policies; you mean 23 more hands-on knowledge and control over what's going on 24 across the church in terms of safeguarding?</p> <p>25 A. What would be in my mind would be a template, if you</p> <p style="text-align: center;">Page 25</p>	<p>1 like, detailing, for example, the number of credible 2 allegations that have been made against members of 3 the clergy that are currently referred to the statutory 4 authorities, that are currently in process, and so on. 5 That sort of template with probably not more than 10 or 6 12 topics on it, but that being available and being 7 considered within the highest level of the church at any 8 time.</p> <p>9 Q. Your final recommendation, which I think is fair to say 10 is by no means the least, is something that was very 11 much valued and emphasised by A4 in his evidence 12 yesterday. I paraphrase, as you say it much more 13 eloquently, the church has to recognise the wisdom and 14 benefit of listening to survivors; they have an 15 important contribution to give?</p> <p>16 A. Yes.</p> <p>17 Q. That's essentially a summary of what you are saying. 18 Why is that so important and, following on from that, 19 did you, at the time you were engaging with the church, 20 think that they had any recognition of the role that 21 survivors could play?</p> <p>22 A. No, I don't think they fully realised or appreciated the 23 valuable role that survivors could, and should, be 24 making in relation to safeguarding within the church as 25 a whole. I think what was not realised was an</p> <p style="text-align: center;">Page 26</p>
<p>1 appreciation of the wisdom that is held by survivors; 2 the fact that they can speak to, with authority, if you 3 like, the practice of the church in ways that someone 4 within the church cannot do to the same degree. That it 5 is a valuable resource that is available to them, and 6 all that needs to be created is a means by which that 7 can happen, in my view. And that's what I would like to 8 have seen happen.</p> <p>9 Q. What was your interpretation, or what was your 10 perception, of the way that the church viewed survivors 11 during the review that you carried out, not just the way 12 they perceived A4, but survivors in general, what was 13 their attitude towards them?</p> <p>14 A. I think they were misunderstood, that they were seen 15 often as a problem, as a potential nuisance, as 16 a possible liability, in terms of the resources, the 17 financial resources, of the church. What they weren't 18 seen as, as in a positive way, they weren't seen as 19 a resource and something that should be tapped into and 20 drawn upon, and certainly that was something that was 21 communicated to me on a number of instances.</p> <p>22 Q. So you produced your report. It was delivered to the 23 church?</p> <p>24 A. Yes.</p> <p>25 Q. What was your expectation, in terms of publication, when</p> <p style="text-align: center;">Page 27</p>	<p>1 you produced your report?</p> <p>2 A. Well, there were commitments given in the terms of 3 reference with regard to the publication. I understood 4 that -- obviously, it is not my report -- that it would 5 be published in full and that the findings would be -- 6 and recommendations would be seriously considered and 7 looked at across the whole of the church. I had no 8 control over, or influence on, what publication took 9 place with whom or by whom, but I was surprised that it 10 wasn't more widely distributed.</p> <p>11 Q. What was your perception of the church's attitude 12 towards your report? Was it welcomed?</p> <p>13 A. I'm influenced in my answer here by the fact that I was 14 requested to meet with Archbishop Welby and a number of 15 others to specifically discuss the report -- my report, 16 and when I was attending that meeting, he made it clear 17 that he had studied the report, he was in total 18 agreement with it, and that he gave me a commitment to 19 ensure that it would be implemented. So that was my 20 expectation, essentially it was based on that meeting 21 that took place. So I can't speak for what happened 22 after that.</p> <p>23 Q. Then you handed over your report, you made some 24 recommendations. Did you have any ongoing work -- did 25 you do any ongoing work, sorry, with the church in terms</p> <p style="text-align: center;">Page 28</p>

<p>1 of implementing those recommendations or advising upon 2 it?</p> <p>3 A. No, apart from providing a paper in relation to 4 developing the safeguarding structure of 5 the Church of England, I didn't do any further work 6 directly for them or with them.</p> <p>7 Q. The paper you refer to, is that the one we see at tab 2 8 of your bundle?</p> <p>9 A. Yes, I think that's right.</p> <p>10 Q. That's ACE026749. It is dated 15 April 2016. Who asked 11 you to produce this report and what was its purpose?</p> <p>12 A. I was asked to produce the report by the person with 13 whom I had covered the review, Jane Dodds, the senior 14 case worker for the Church of England. I wasn't 15 involved in any discussions within the NST in relation 16 to the report, but I assume that it was for the purpose 17 of facilitating the development and implementation of 18 the recommendations.</p> <p>19 Q. I'm just going to pull out some key paragraphs of this 20 report. Can we look at page 2, please, the third 21 paragraph from the bottom. We see here -- it is largely 22 what you have said to us today: 23 "The existence of policies, agreed nationally and 24 adopted locally ... is not in itself ... enough." 25 You go on to say:</p> <p style="text-align: center;">Page 29</p>	<p>1 "[There needs] to be a single, coherent body ... 2 There is a need to confirm independently that each part 3 of the church is complying with agreed policy and is 4 doing so in every case that it engages with." 5 A. Yes.</p> <p>6 Q. Over the page to 3, the last paragraph in the first 7 section, so just above the heading: 8 "... the safeguarding structure in the church should 9 be supported by a robust process of review and audit 10 that is located outside of the diocese. It would be my 11 strongly held belief that this process of audit and 12 belief should be established within the church but 13 independent of the safeguarding structure." 14 And we discussed that today. Over to page 4, the 15 third paragraph down: 16 "To establish what the quality of practice is in 17 reality requires information to flow from the diocese to 18 the centre of the church. Without this happening, you 19 cannot form an accurate view as to what practice is 20 across the church as a whole." 21 A. Yes.</p> <p>22 Q. Two paragraphs below that, please: 23 "Supplying information to the centre should not be 24 viewed as relinquishing any of the independence or 25 authority that is held by the diocese at present.</p> <p style="text-align: center;">Page 30</p>
<p>1 Rather, it should be seen as a positive step taken to 2 facilitate the improvement of practice ..."</p> <p>3 A. Yes.</p> <p>4 Q. Then the final page, page 6, you set some timescales. 5 If we can zoom on the whole of "The Way Forward", in the 6 second paragraph: 7 "The process of change has to proceed at a pace that 8 ensures that those who are both within and outside of 9 the church can see that a new approach is under way. 10 The introduction of a review and audit function should 11 be completed within a year. The introduction of 12 universal standards upon which a review function would 13 be based should not take more than six months. The 14 creation of an information system that ensures that 15 relevant safeguarding data flows to and from the centre 16 could be in place in three to four months." 17 It is quite a quick timescale you put in place 18 there. Were these steps you thought the church could, 19 and should, quickly and simply take?</p> <p>20 A. Yes, I made those proposals. I also emphasised the 21 importance of drawing on the experience and learning 22 from other churches across the world who have wrestled 23 with this issue and have made changes to try to address 24 them, so it is about -- which is something I'm very keen 25 on supporting, which is the sharing of information</p> <p style="text-align: center;">Page 31</p>	<p>1 across all churches to avoid mistakes being repeated, 2 people talking to each other, opening up and recognising 3 there is a problem.</p> <p>4 The reason there are short timescales as well is 5 because I saw the matters we were discussing as being 6 critical, that there were individuals who were at risk 7 as a consequence of those matters not being addressed, 8 so you needed to address them as quickly as possible.</p> <p>9 Q. Did you think the recommendations that you made together 10 with this report were going to be enough to make real 11 change within the church, or do you think it is going to 12 take something bigger?</p> <p>13 A. Drawing on experience elsewhere, there are arguments 14 which are based on, if you like, the giving of insight. 15 If you give insight into church structures, that will 16 facilitate change. From my experience in working 17 elsewhere, I have found that what you also need to focus 18 minds is some element of crisis, so they need to be 19 facing a crisis to bring them to a point where the 20 insight can actually be acted upon, minds can be focused 21 and change can happen. But in the absence of that 22 crisis, then there is a vulnerability to old habits 23 being held onto, and that resistances which exist within 24 church structures to, if you like, support the status 25 quo, for that not to be overcome. So I'm a strong</p> <p style="text-align: center;">Page 32</p>

<p>1 believer that you need some element of crisis for change 2 to happen. 3 Q. There was, in addition to sort of the practical response 4 to your report, a very public response to your report 5 actually in the press. What I want to do is take 6 a quick whistlestop tour through that before I ask for 7 your observations. This starts at tab 12 of the bundle, 8 EIO000139_004. Essentially, this was an article 9 produced in The Church Times which summarised the 10 findings as they were released by your report. We see 11 in the penultimate paragraph a press statement on behalf 12 of the Church of England that says: 13 "A spokeswoman for the Church of England said: 14 ""Advice was given to the bishop to cut off pastoral 15 contact with the survivor because he had started legal 16 action. We now recognise that proper provision needs to 17 be made for the pastoral needs of survivors in such 18 circumstances. We therefore published new guidance in 19 2015 to that effect ...!" 20 If we go over the tab to tab 13, EIO000135_002, we 21 have a response again in The Church Times on behalf of 22 the Ecclesiastical Insurance Office to your report and 23 to the statement. If we can look at the penultimate 24 paragraph, it says: 25 "Child abuse is reprehensible and traumatising. We</p> <p style="text-align: center;">Page 33</p>	<p>1 agree with the broad thrust of the Elliott Review in 2 promoting the needs of survivors and the importance of 3 listening to them. But its assertion that 4 Ecclesiastical instructed the Church of England to deny 5 a survivor pastoral care is untrue. Unfortunately, we 6 were not asked to participate in the review, and so had 7 no opportunity to provide the evidence that showed this. 8 On the contrary, we have always been clear that pastoral 9 care and counselling can, and should, continue in 10 parallel with an insurance claim. 11 "This inaccuracy has led to broader misconceptions 12 among victims and survivors about what actually 13 happened ..." 14 Overleaf, again, to tab 16, EIO000138_002. The EIO 15 issued in 2017, so another year later, a statement to 16 the BBC, the middle paragraph of which says: 17 "Specifically, we have documentary evidence showing 18 that the Church of England misunderstood legal advice it 19 received and which we were asked to confirm regarding 20 the claim made by solicitors acting for the survivor 21 resulting in the suspension of the survivor's pastoral 22 care. We quickly discovered this during our 23 investigation of the claim and without delay clarified 24 that counselling and pastoral care could continue during 25 the claims process. The misunderstanding lasted</p> <p style="text-align: center;">Page 34</p>
<p>1 14 days. If Mr Elliott had spoken to us, he would have 2 realised this was the case." 3 We have spoken already about the 14 days and the 4 relevance of that. The question I have for you is, did 5 you think that this was an appropriate public response 6 to the thrust of your report from both institutions? 7 A. I'm not responsible for either of them. 8 Q. No, of course not. 9 A. Nor did I reply directly to them. In fact, the issue of 10 the public response, both to my report and also to the 11 comments that were made by EIG, was one which caused me 12 great concern, because I felt that the work that I had 13 done was confidential and, therefore, I was not in 14 a position to speak publicly about any of these issues. 15 As you may know, in Northern Ireland social work is 16 a regulated profession and my professional body is the 17 Northern Ireland Health and Social Services Council. If 18 I had acted inappropriately and spoken publicly, then 19 I could be subject to a complaint, which could cause me 20 to be struck off. 21 I asked for guidance in relation to the Professional 22 Standards Committee of the Northern Ireland Health and 23 Social Services Council with regard to whether I would 24 be empowered to set the record straight, to defend my 25 work and to say, "Well, you know, this is what was said</p> <p style="text-align: center;">Page 35</p>	<p>1 to me and this is what I read and this is what caused me 2 to make the statements that I did", and they empowered 3 me to do that, and, therefore, I was able to give an 4 interview to the Sunday Programme for BBC Radio 4, which 5 I did, and that I think is the only time I have spoken 6 publicly on any of these matters. 7 Q. We have talked for almost an hour now, about 50 minutes, 8 about your conclusions and your comments through the 9 report, of which the insurance aspect is just one? 10 A. Absolutely. 11 Q. Do you think that there's been too much focus on that 12 one aspect of your report, perhaps to the detriment of 13 the others? 14 A. Yes, I do. I think that what I have -- what I felt 15 I was saying through the report covered much more than 16 just the role of advisors. The points that I made and 17 the findings and both the recommendations that 18 I emphasised, that they all had worth, they all had 19 value, and it was important that those should be taken 20 forward by the church, and that, to some degree, the 21 church was missing an opportunity by not doing so. 22 But, ultimately, that's the responsibility for the 23 church, not for me. 24 Q. Again, as somebody who has spent a lot of time speaking 25 with the individual A4 and about the support they</p> <p style="text-align: center;">Page 36</p>

1 require, do you think these public statements had
 2 sufficient regard to the effect it might have on him?
 3 **A. No, I most certainly do not. I felt that an**
 4 **insufficient consideration was being given to his**
 5 **feelings, to the situation that he found himself in. He**
 6 **did not choose to be in the situation he was in. That**
 7 **was something that was done to him. He had no control**
 8 **over it and has been suffering from it since. It is**
 9 **important that the balance was set straight.**
 10 Q. There are just two points there, mop-up points, for want
 11 of a better headline, that I couldn't shoehorn in
 12 anywhere else that I want to take up with you. The
 13 first is, you said in your witness statement -- page 6,
 14 paragraph 3, chair, if that assists -- that you would be
 15 in favour of removing work with survivors of clerical
 16 abuse from the church entirely. Why is that and, if it
 17 is not within the church, where should it be?
 18 **A. Because it is so incredibly important. It needs to be**
 19 **done and it needs to be done well and you need to have**
 20 **an understanding of that importance and a sympathy for**
 21 **it. Not everyone has. Not everybody is in that**
 22 **position. So if the church cannot provide it -- and it**
 23 **seems a shocking statement to make that -- then it**
 24 **should look at alternative ways in which that can be**
 25 **provided.**

Page 37

1 Q. -- there is no way for the Lead Bishop on Safeguarding
 2 to become involved with the diocesan bishop directly?
 3 **A. Yes.**
 4 Q. And that the only route to managing that bishop or to
 5 addressing the failings by a diocesan bishop might be
 6 through clergy discipline, which we have heard about.
 7 You said you had some concern about that and you thought
 8 there should be another approach, an alternative, and
 9 one of the things you mooted was perhaps some sort of
 10 Memorandum of Understanding?
 11 **A. Yes.**
 12 Q. We heard a lot in the previous hearings in Chichester
 13 about how do you deal with diocesan bishops. Can you
 14 explain for us what you meant by a Memorandum of
 15 Understanding and why that might address the concerns
 16 that you had?
 17 **A. Okay. It is a device that I have previously used.**
 18 **I used it in relation to the Irish Catholic Church. It**
 19 **is underpinned, first of all, by defining the standards**
 20 **of safeguarding that must be in place. We came up with**
 21 **seven standards, and we also identified the criteria by**
 22 **which we would judge performance against those**
 23 **standards. And then we asked for a Memorandum of**
 24 **Understanding to be signed by every single bishop and**
 25 **religious superior across the church, committing**

Page 39

1 Q. Do you have any ideas about how? I know that is such
 2 a broad question. I just wasn't sure if you had
 3 something in mind when you wrote that?
 4 **A. I think that you -- you know, if you identify an issue**
 5 **that has to be addressed and focus minds and apply**
 6 **resources to it, then there are ways in which it can**
 7 **happen. But the starting point is attaching the**
 8 **importance that the issue deserves, in the first**
 9 **instance, and actually saying, how we treat survivors of**
 10 **clerical abuse is a very important witness for us as**
 11 **a church body. It is incredibly important that we not**
 12 **only do it well, we do it exceptionally well, and that's**
 13 **what we need to do. We need to move to that position**
 14 **and we need to do it as quickly as possible and we need**
 15 **a dialogue and a means of doing it. They can draw on**
 16 **learning which has been acquired in other church bodies**
 17 **across the world, some of whom I have had contact with**
 18 **and worked with.**
 19 Q. Then, finally, it is sort of to double back, but you
 20 mentioned in a meeting with -- I don't need to bring it
 21 up, but you met with Bishop Paul Butler?
 22 **A. Yes.**
 23 Q. You said that one of the things you were concerned about
 24 is, if a bishop is not following practice --
 25 **A. Yes.**

Page 38

1 **themselves to ensuring that their safeguarding practice**
 2 **for the authority that they were responsible for at all**
 3 **times met those standards and also empowering the**
 4 **national board, as it was, for the Catholic Church, to**
 5 **intervene and to confirm that their practice is up to**
 6 **standard at any time. So it created the means by**
 7 **which -- and people were given the opportunity of not**
 8 **signing up. If they didn't wish to, then they didn't**
 9 **have to sign the Memorandum of Understanding. However,**
 10 **we said, as a national board, that we would publish the**
 11 **titles and names of all of the judicial bodies that --**
 12 **the dioceses and religious orders that were signed up.**
 13 **Something similar could happen in relation to the**
 14 **Church of England.**
 15 Q. So, "Here is a basic set of minimum standards I agree
 16 to, and if I don't, Bishop Peter, you can come in and
 17 deal with it"?
 18 **A. Absolutely, "I am committing to ... and I am giving**
 19 **power to ...", whatever, and you are going to find that**
 20 **the very fact there is risk of standards not being met**
 21 **empowers people to go and check, "Yes, it is being met",**
 22 **or, "No, it is not being met", and so on.**
 23 Q. Mr Elliott, thank you very much. That concludes my
 24 questions. Before I pass you over to the chair and
 25 panel, from your experience -- I know you asked me to

Page 40

1 check -- is there anything that you think could be done
 2 within the Church of England to address safeguarding
 3 concerns that you have identified that we have not
 4 already touched upon?
 5 **A. We have addressed a lot already and I have made mention**
 6 **of many, but one I would want to emphasise is the**
 7 **importance of mandatory reporting in the church.**
 8 **I think that's really important. I am a very strong**
 9 **supporter of mandatory reporting. And the reason why**
 10 **I am of that mind is because, having spent all of my**
 11 **working life, really, working within the child**
 12 **protection framework, the child protection framework is**
 13 **reactive in nature; it reacts to information which is**
 14 **shared with it. If that information is not shared with**
 15 **it, then it is rendered largely powerless. In the same**
 16 **way, within the church, applying that thinking to the**
 17 **church situation, then if there is knowledge of risk, if**
 18 **there is knowledge of allegations, of concern, then they**
 19 **should be passed on. There should be mandatory**
 20 **reporting within the church, and I would also add, there**
 21 **should be consequences if that mandatory reporting does**
 22 **not take place. So when somebody chooses not to report,**
 23 **then there will be a sanction applied as a result.**
 24 Q. And we have to be very careful: when we talk about
 25 mandatory reporting, what we are talking about, you are

Page 41

1 **be the right or appropriate decision, taking into**
 2 **consideration matters which were totally inappropriate.**
 3 THE CHAIR: Would you agree that's contrary to the accepted
 4 practice of achieving consensus within case review and
 5 case conference?
 6 **A. Yes, I would agree with that.**
 7 THE CHAIR: Just one final question: within the procedures,
 8 is there a process for dispute resolution in the church,
 9 in these cases?
 10 **A. In these cases, I'm not aware of one.**
 11 THE CHAIR: Thank you. Thank you very much.
 12 MS McNEILL: Chair, that conclude's Mr Elliott's evidence.
 13 Our next witness will be Mr David Bonehill of
 14 the Ecclesiastical Insurance Office. I'm mindful of
 15 the time. It is 11.05 am. I'm entirely in your hands,
 16 chair, as to whether you would prefer to get Mr Bonehill
 17 started and take our break around the usual time of
 18 11.30 am, or take your break now?
 19 THE CHAIR: I think we can continue and take the break at
 20 11.30 am.
 21 MS McNEILL: Okay.
 22 MR DAVID BONEHILL (sworn)
 23 Examination by MS SCOLDING
 24 MS SCOLDING: Good morning, Mr Bonehill.
 25 **A. Good morning.**

Page 43

1 saying mandatory reporting within the church, to whom?
 2 **A. Also, I would take mandatory reporting to the statutory**
 3 **authorities.**
 4 MS McNEILL: Chair, that concludes my questions. Do you or
 5 the panel have any questions for Mr Elliott?
 6 THE CHAIR: Yes, I have one or two, thank you.
 7 Questions by THE PANEL
 8 THE CHAIR: Mr Elliott, thank you for your statements. Do
 9 you think that the clergy, especially senior clergy at
 10 diocesan level, should have any role in decision making
 11 in individual cases of alleged abuse?
 12 **A. My opinion would be, no, they do not, but they will**
 13 **have -- and I have talked about the problem of**
 14 **deference. Deference exists at many different levels,**
 15 **but nobody should be contributing to safeguarding**
 16 **decisions unless they have the experience and knowledge**
 17 **that is required in order to make informed decisions.**
 18 THE CHAIR: Is it your view, from your experience, that
 19 senior clergy may, in practice, be the ultimate decision
 20 makers?
 21 **A. Yes. That would be very much my experience, and also**
 22 **that the decisions that they would take would not be**
 23 **informed by dialogue with other people; that they would**
 24 **tend to retain the information, consider the information**
 25 **themselves, and make a decision which they considered to**

Page 42

1 Q. Just a few introductory remarks. Firstly, just to say,
 2 this isn't a test of memory. You have provided us with
 3 three, I think, witness statements?
 4 **A. Yes.**
 5 Q. We don't expect you to remember every word of them.
 6 I will prompt you to the relevant paragraphs, if they do
 7 exist within your witness statement.
 8 **A. Thank you.**
 9 Q. Secondly, we can take a break at any time. As you have
 10 identified, we will be taking a break at around 11.30 am
 11 anyway.
 12 Thirdly, we can stop as often as we need to, and for
 13 any reason whatsoever. So please don't worry about
 14 that.
 15 Now, I have identified we have three witness
 16 statements from you. Chair and panel, just for your
 17 reference, they are behind tab A of the bundle. As your
 18 signature is blocked out on them, there is not much
 19 point asking you if you signed it.
 20 **A. Oh, right. I'm sure I did.**
 21 Q. Can I just identify: are these witness statements true,
 22 to the best of your knowledge and belief?
 23 **A. They are indeed.**
 24 Q. Thank you very much. Could you explain to us, first of
 25 all, Mr Bonehill -- and I know that whilst you will have

Page 44

1 sat in the back of a courtroom very many times,
 2 I suspect you may not have ever given evidence before?
 3 **A. Correct.**
 4 Q. So we accept that. Could you just explain to us briefly
 5 what the EIO is?
 6 **A. So Ecclesiastical Insurance Office is a subsidiary of**
 7 **EIG, which is the group, and that is owned by –**
 8 **ultimately by the All Churches Trust, which is a trust**
 9 **and registered charity. Ecclesiastical Insurance Office**
 10 **is an independent insurance company. It's regulated, as**
 11 **we heard yesterday, by the FCA and the PRA, and it**
 12 **operates independently of its owner. So the**
 13 **All Churches Trust has no involvement in the day-to-day**
 14 **activities of the insurance company.**
 15 Q. But the All Churches Trust -- but there are some clerics
 16 who are on the board of EIG; is that right?
 17 **A. There is one, I believe.**
 18 Q. Are there any individuals who are non-executive
 19 directors of the EIO who are also senior clerics?
 20 **A. There's the one non-executive director.**
 21 Q. Thank you. You're the claims director --
 22 **A. I am.**
 23 Q. -- as I understand it.
 24 **A. Yes.**
 25 Q. What does that mean?

Page 45

1 **number is 0.4 per cent of all the claims we deal with in**
 2 **a given period.**
 3 Q. Can I just confirm, once a claim has been made against
 4 the Church of England or the Church in Wales which is
 5 covered by insurance, who is then responsible for the
 6 conduct of that case, that claim, managing that claim?
 7 **A. I think it is important, initially, just to recognise**
 8 **that we don't insure the Church of England or the**
 9 **Church in Wales. We actually insure all the constituent**
 10 **parts of the churches. So, you know, we issue**
 11 **thousands -- many thousands of individual policies for**
 12 **the PCCs, for the cathedrals, et cetera, rather than,**
 13 **you know, an umbrella policy for the whole of**
 14 **the Church of England. They're all individual**
 15 **policyholders or customers of ours.**
 16 Q. You have things, I think, called Parish Plus and
 17 Diocese Plus?
 18 **A. Exactly, different products for different customers.**
 19 **When a claim arises, and when we talk about abuse**
 20 **claims, most of these, again, as we have seen from the**
 21 **data, are historical claims.**
 22 Q. Yes.
 23 **A. You know, they go back many years, often 20, 30,**
 24 **40 years. We have to -- first and foremost, what we**
 25 **have to do is establish whether or not there was**

Page 47

1 **A. Basically, I'm the UK claims director, so I lead the**
 2 **claims function across the Ecclesiastical Insurance**
 3 **company, looking to deliver the business objectives**
 4 **across all classes of business. So that's across**
 5 **property claims and liability claims, and under the**
 6 **liability policies that we issue, we have employers'**
 7 **liability and we have public liability, and abuse claims**
 8 **would fall to be dealt with under the public liability**
 9 **policies that we issue.**
 10 Q. Thank you.
 11 **A. What I would say also, in addition, I have said already**
 12 **that we are regulated; I have, in my role, regulatory**
 13 **responsibilities, and the company has a charitable**
 14 **purpose, and I think that's really quite important, in**
 15 **terms of -- across the whole group, in terms of**
 16 **the ethical approach we take to dealing with all**
 17 **parties. You know, an approach of fairness is our**
 18 **objective.**
 19 Q. But I think, as we have identified, and as we will come
 20 on to identify, the number of claims that you deal with
 21 in respect of sexual abuse are very small indeed, in
 22 comparison to the vast majority of work that you
 23 undertake?
 24 **A. Indeed. We heard yesterday the number of -- we call**
 25 **them PSA, physical and sexual abuse claims, and the**

Page 46

1 **a policy in force at the time the abuse took place.**
 2 Q. Yes.
 3 **A. And that's quite critical, because our policy wording is**
 4 **an occurring basis. So the policy will apply if there**
 5 **is a legal liability attaching during the period of**
 6 **the policy, not the time that the claim itself is made.**
 7 Q. Right.
 8 **A. If that makes sense.**
 9 Q. So, in other words, the policy -- you have to look to
 10 see if there was a policy in existence at the time that
 11 the abuse took place?
 12 **A. Yes.**
 13 Q. Rather than, is there a policy in existence now?
 14 **A. Exactly. Exactly that point. And of course, you know,**
 15 **with the passage of time, there's not always evidence**
 16 **available to support that, and what we do -- if there**
 17 **are gaps in documentation, that's either documentation**
 18 **that the customer holds or documentation that we hold,**
 19 **we review those on a case-by-case basis, and we take the**
 20 **view that, with the Church of England and the**
 21 **Church in Wales, we are not the only insurer -- I think**
 22 **that's an important point to make, there are other**
 23 **insurers that insure parts of the church. But we take**
 24 **the view that, on the balance of probabilities, were we**
 25 **likely to have been the insurer at the material time?**

Page 48

1 **So, rather than declining a claim on the basis that**
 2 **there is no evidence available, we do take a broader**
 3 **view of the insurance contract, and I'm not aware of**
 4 **a single case that we have actually declined because**
 5 **there's been a gap or a lack of evidence available.**
 6 Q. So, in other words, you take a sort of, shall we say,
 7 more generous interpretation, sort of assuming that
 8 there was probably cover, rather than taking what could
 9 be called a strict liability approach, which is, "Unless
 10 you can demonstrate to us there was cover, we're not
 11 covering you?"
 12 **A. Exactly that point, yes, thank you.**
 13 Q. Who is then responsible? So say you have a claim, you
 14 have decided that you are responsible for the conduct of
 15 that claim. Who has conduct of the case from that point
 16 onwards? Is it the Church of England or is it you as an
 17 insurer?
 18 **A. Okay. Where there's insurance in place, and, you know,**
 19 **I think the inquiry knows that there are cases or claims**
 20 **where there is no insurance, so the church deal with**
 21 **those themselves. Where we are involved as the insurer,**
 22 **then we have the right under the terms of the policy**
 23 **contract to step into the shoes of the insured and take**
 24 **over full conduct of that claim, and that's what we do.**
 25 Q. So, in other words, the church cannot have, and does not

Page 49

1 **having legal representation, to help them through and**
 2 **support them through the civil claims process.**
 3 **So -- sorry, I lost my track there.**
 4 Q. That's fine. I think I have lost my track too. I think
 5 it's all about sort of what the stages of the claims
 6 process --
 7 **A. Oh, sorry, you mentioned lawyers.**
 8 Q. When would you engage external solicitors?
 9 **A. On the vast majority of cases, we handle them with our**
 10 **in-house expert team, so they're our own employees,**
 11 **a specialist team to handle these types of claims. We**
 12 **will appoint lawyers to carry out field investigations,**
 13 **external investigations, for us. Because of**
 14 **the sensitivity and the confidentiality of these, we use**
 15 **lawyers to do that rather than other third party**
 16 **administrators. And we'd also use lawyers, of course,**
 17 **when legal proceedings are commenced, in terms of really**
 18 **protecting us from a procedural perspective. I would**
 19 **add that, when lawyers are instructed, they have no**
 20 **delegated authority, so the decisions and the**
 21 **instructions still come from Ecclesiastical.**
 22 Q. Because, on some occasions, what happens is, you would
 23 phone a solicitor up and say, "Just do whatever you
 24 want. I trust you. Do whatever you want". But in
 25 these sorts of cases, you don't do that?"

Page 51

1 have, any control over the decisions you may make about
 2 the way that you defend or don't defend any claim that's
 3 brought?
 4 **A. It has no control over the decisions, but obviously, you**
 5 **know, we work very closely with our insured when we are**
 6 **investigating the allegations that have been made,**
 7 **because they hold a lot of the evidence. But,**
 8 **ultimately, it's our decision.**
 9 Q. In some cases, you will instruct external solicitors --
 10 just to sort of identify the process of the claim,
 11 somebody makes a claim. They would usually do that by
 12 writing a letter to you, as the insurers, or to
 13 individuals, saying, "We want to bring a claim for
 14 damages", et cetera, et cetera.
 15 **A. Yes.**
 16 Q. You would then either deal with that internally or
 17 instruct solicitors; is that right?
 18 **A. Yes. The claims normally come from lawyers.**
 19 Q. Yes.
 20 **A. I think we have got -- I think it is in excess of**
 21 **95 per cent of the claims we have, the victim/survivor**
 22 **is legally represented, and I think that's a really**
 23 **important point. So when we get litigants in person,**
 24 **and we do get litigants in person, we do take a lot of**
 25 **time and care trying to explain to them the value of**

Page 50

1 **A. Well, I don't think we ever do that, to be honest.**
 2 **That's something we wouldn't do.**
 3 Q. In some fairyland --
 4 **A. The reason we don't do that is because we have**
 5 **a specialist team, and a very knowledgeable and**
 6 **experienced team, so we control the claim, not our**
 7 **lawyers. I think that is an important point.**
 8 Q. You say you have a specialist team. Would you like to
 9 tell us a bit about what experience and expertise they
 10 have?
 11 **A. We have handled these types of claims for many years,**
 12 **and the individuals that deal with these claims have**
 13 **that experience. So they have handled abuse claims for**
 14 **themselves for quite a long time. They have had a lot**
 15 **of experience working with claimant lawyers, reading**
 16 **medical evidence, some of which obviously is quite**
 17 **distressing for them. And it is important we support**
 18 **them through the process. And we also have this --**
 19 **I mentioned it in one of my statements. We have a PSA**
 20 **claims forum whereby we share best practice and we share**
 21 **learning. So each month, we come together and we**
 22 **discuss all the issues, all the topics, of the day, and**
 23 **we may come on to things like limitation and consent**
 24 **later on, but those would be topics that we discuss, to**
 25 **make sure that the right decisions are being made on**

Page 52

<p>1 those cases. And that's all part of that continuous 2 sort of learning that we strive to achieve. 3 Q. Let's maybe focus a tiny bit on the number of claims 4 that there are. Ralph, could you get up EIO000149_003, 5 paragraph 13. This is in your third witness statement. 6 You set out some statistics which I think are the most 7 up-to-date you have. 8 A. That's right. 9 Q. So this is claims which have involved the 10 Church of England that you have received -- 11 A. Yes. 12 Q. -- up until December 2018? 13 A. I would just add on that, those, as you rightly say, are 14 Church of England claims. We deal with many more abuse 15 claims for other customers. 16 Q. So these are claims which involve the Church of England? 17 A. Yes. 18 Q. Now, as I understand it, about half of them involved 19 abuse which was perpetrated by clerics? 20 A. Mmm-hmm. 21 Q. And about 37 per cent were nonclerics. This is in 22 (iii). 23 A. Yes. 24 Q. And a quarter of the allegations involved individuals 25 who were, in fact, deceased?</p> <p style="text-align: center;">Page 53</p>	<p>1 A. That's correct. 2 Q. So you're dealing with a large number of situations 3 where the alleged perpetrator is no longer alive? 4 A. Yes. 5 Q. I think we will come on to deal with some issues to do 6 with that a bit later. 7 A. Okay. 8 Q. Can I also ask about the Church in Wales at this point 9 in time. Ralph, could we go to the next page, please, 10 paragraph 14. There is some statistical data about 11 Wales you also provide us with, which is, as at the end 12 of December, there had been 14 claims made in respect of 13 some aspect or other of the Church in Wales? 14 A. Yes. 15 Q. The vast majority of which were about clerics, 12 of 16 them, and only one of those clerics, however, was 17 deceased in that case. So maybe a slight difference 18 from the Church of England? 19 A. That's correct. 20 Q. So although we are talking about some very complex and 21 difficult claims, they do, again, make up a relatively 22 small amount, I would imagine, of the work that you deal 23 with on a day-to-day basis; is that right? 24 A. That would be correct. Sorry, except for that 25 specialist team, who deal with these cases day in, day</p> <p style="text-align: center;">Page 54</p>
<p>1 out. 2 Q. Those cases and nothing else? 3 A. Well, they do other liability claims, but there is 4 a real focus on abuse, yes. 5 Q. We understand that over a number of years you have 6 developed some policies and practices internally, some 7 of which you have then publicised externally about 8 managing these sorts of cases. Ralph, would you mind 9 getting up EIO000129. It is behind tab B5, chair and 10 panel, which is the second volume, certainly, of my 11 documentation. It may not be the second volume of 12 yours. 13 Now, this is a document called "Ecclesiastical 14 Direct". I'm assuming this is advice that would be sent 15 to policyholders, is that right, which I understand was 16 produced in 1997? 17 A. That's correct. So it is general guidance and some 18 simple measures are included in there. 19 Q. Can we have a look at the relevant extract? This was 20 back in 1997. You were aware that these issues were 21 coming to the fore within the context of 22 the Church of England, and you provided some advice 23 about them to your policyholders, I'm assuming? 24 A. Yes. 25 Q. Can we go to page 5, please, Ralph. So this identifies</p> <p style="text-align: center;">Page 55</p>	<p>1 and sets out -- in fact, it is not -- yes, at the bottom 2 of the page, "Should an allegation arise": 3 "Should an allegation arise, it is important to 4 follow the procedures detailed in the HBPD." 5 Now, I think that's the House of Bishops policy 6 document, as I understand it. Now, that was the 7 document which the church had issued not long before 8 that. So, fundamentally, what you were saying is, you 9 have to implement the House of Bishops policy document. 10 Otherwise -- would that have voided insurance cover? 11 A. It could have done, potentially, if our position had 12 been prejudiced. I think in practice that didn't 13 happen, for the reasons I set out earlier. 14 Q. Then: 15 "Immediate notice should also be given to 16 Ecclesiastical, either via your bishop or directly to 17 the company." 18 A. Yes. 19 Q. Would it be via the bishop even if it was a parish 20 policy? 21 A. It could be via the bishop, or it could come in direct. 22 I think the key there is that we're notified immediately 23 of a claim, so that we could -- again, as I say, we 24 could step in and take conduct of it at an early stage. 25 Q. Could we move on to page 007, please, at the bottom of</p> <p style="text-align: center;">Page 56</p>

<p>1 the page, "Retention of records". So even in 1997, 2 there was recognition that incidents of abuse may only 3 come to light after a long period of time and therefore 4 retention of documents should be on an indefinite basis? 5 A. Yes. 6 Q. And arrangement for such long-term storage of documents 7 may be the subject of further guidance as child 8 protection procedures are developed? 9 A. Yes. 10 Q. So, even back then, I mean, we have heard various things 11 in the Chichester hearing about documents being filleted 12 because of when the Data Protection Act came in, in 13 2000, and various things being sent away, but your 14 understanding and your practice has always been that 15 documents to do with safeguarding should be kept 16 indefinitely? 17 A. Yes, that's absolutely right. 18 Q. Has that guidance or advice ever changed? 19 A. No. That's still the position today. 20 Q. But what this guidance doesn't do is set out any 21 principles about what would happen if a claim was 22 brought, does it? 23 A. No, it doesn't. And, you know, although, clearly, you 24 know, there was an awareness of these types of claims at 25 the time, there was no real volume in there. At that</p> <p style="text-align: center;">Page 57</p>	<p>1 time, I shouldn't imagine we really appreciated how this 2 would develop. 3 Q. You first prepared a protocol in 2009, as I understand 4 it. Ralph, could we get up B6, EIO000130. If I could 5 take you to page 4 of that, please. Again, this is 6 a general claims handling document, isn't it -- 7 A. Yes -- 8 Q. -- about the protocol for the Anglican Church. But then 9 it deals with sort of various other claims, like 10 employment claims, health and safety -- 11 A. Yes, I think this came around because there was 12 confusion on liability -- on all sorts of claims in 13 terms of when the church should notify the insurance 14 company. So the objective of this document was really 15 just to clarify that. So it was not abuse-specific, as 16 you rightly say. It covers a full range of the types of 17 claims, and really started to help the insured in terms 18 of their knowledge of when they should be telling us of 19 events that may bring rise to a claim. 20 Q. So you were getting lots of people phoning you up, 21 saying, "When should I tell you about when my roof's 22 fallen in" -- or probably, when the roof fell in, they'd 23 tell you? 24 A. Yes. 25 Q. Or other sorts of claims, shall we say more complicated</p> <p style="text-align: center;">Page 58</p>
<p>1 claims? 2 A. Yes, and primarily liability claims, you know, public 3 liability and employer liability claims, I think. 4 Q. If we go to the top there, it says: 5 "This may be abuse and stress harassment, physical 6 and verbal/sexual and it may have occurred very many 7 years earlier. The allegations may be made by any 8 individual in some way associated with the church, 9 whether an adult or a child." 10 A. Yes. 11 Q. Then it says: 12 "Ecclesiastical will" -- and identifies what it is 13 you are going to be doing -- "will involve 14 Beachcroft" -- who, I think, continue -- well, 15 Ms Jefferson, at any event, continues to be the 16 solicitor who you continue to use for the vast majority 17 of these sorts of cases? 18 A. And we use other lawyers as well. 19 Q. Other lawyers are available? 20 A. Indeed. 21 Q. "A copy of the letter of claim should be sent 22 immediately on receipt. EIG should be advised of the 23 same. EIG can also assist when issues arise, such as 24 media contact, offers of counselling, desire for 25 internal investigations. These cases will be handled by</p> <p style="text-align: center;">Page 59</p>	<p>1 senior EIG case handlers." 2 A. Yes. 3 Q. Did you have the PSA team in existence at that point? 4 A. No, we wouldn't have had that in place at that time. 5 But I think, almost by default, we would have had people 6 dealing with PSA claims as probably the bulk of 7 the work. 8 Q. But you say: 9 "EIG can also assist when issues arise such as media 10 contact, offers of counselling, desire for internal 11 investigations." 12 What sort of advice and issues would you have been 13 providing at that stage? 14 A. Well, that's really any support that the insured needs 15 from us. Particularly, there were concerns around, and 16 have been concerns around, you know, actions the church 17 may take, or the policyholder/customer may take, that 18 would prejudice the insurance contract. So, really, 19 this is around advice, things that they can and can't 20 do, to ensure that the position is not prejudiced. 21 Q. We will come on to what may or may not have happened in 22 A4's case a bit later. But just in general terms, in 23 2009, would the giving of an apology have voided an 24 insurance contract? 25 A. No.</p> <p style="text-align: center;">Page 60</p>

1 Q. Would an offer of counselling or the provision of
 2 counselling by the church or any church-related body
 3 have voided any insurance contract?
 4 **A. Absolutely not, and, in fact, you know, we've got**
 5 **a number of examples where we've funded such counselling**
 6 **and support.**
 7 Q. Would the desire for an internal investigation -- why
 8 would they need to report to you before doing that?
 9 Wouldn't that be a sensible thing to do before they get
 10 to you, so to speak?
 11 **A. I think that's absolutely right, and, you know, the**
 12 **learnings coming out of an internal inquiry can help us**
 13 **with particular claims. You know, if there's new**
 14 **information that comes to light, then I think that's**
 15 **quite right.**
 16 Q. Then if we look on the right-hand side, it says,
 17 "Beachcroft will", and I'm assuming this was something
 18 which was sent saying, "This is what the solicitors will
 19 be doing, this is what the insurers can do":
 20 "... will generally assist you in the investigation
 21 of issues, ascertain what information exists that either
 22 supports or contradicts the allegations. The historical
 23 nature of some of these claims may necessitate the
 24 interview of people whose knowledge will be of the life
 25 of the church from many years earlier. Old PCC minutes,

Page 61

1 was issued in 2012, behind tab B7, chair and panel, of
 2 your bundle, EIO000131. If I can take you to the bottom
 3 of that page, it says, "Where no formal claim has been
 4 made by the abused person". So can I just identify, is
 5 this a document that was circulated to your
 6 policyholders or is this an internal document?
 7 **A. No, this was an external document.**
 8 Q. What this does is, it says, "Check that they have
 9 personal support, some personal support, for the coming
 10 days."
 11 That's in the first bullet point, isn't it? What it
 12 says is:
 13 "It is important that the response ..."
 14 Just above that:
 15 "... is not experienced as negative, resistant or
 16 unhelpful because this can create relationship
 17 difficulties."
 18 What do you mean by that?
 19 **A. Fundamentally, what we are saying there is, when**
 20 **complaints are made that the insured respond in**
 21 **a positive way and provide whatever support they're able**
 22 **to -- well, whatever support is needed and whatever they**
 23 **are able to give. I think that was the objective and**
 24 **purpose of that.**
 25 Q. You then identify further down in that document what

Page 63

1 choir membership records, et cetera, will also be
 2 potentially relevant."
 3 **A. Yes. I think we're just trying to set out there the**
 4 **sort of direction that the investigation into legal**
 5 **liability would take and what we would need from the**
 6 **insured.**
 7 MS SCOLDING: Chair, I note it is 11.30 am.
 8 Mr Bonehill, if you don't mind -- chair, if this
 9 would be an appropriate moment to have a brief break?
 10 THE CHAIR: Yes, we will return at 11.45 am.
 11 MS SCOLDING: Mr Bonehill, don't forget that you are
 12 currently sworn and under oath.
 13 **A. Thank you.**
 14 **(11.30 am)**
 15 **(A short break)**
 16 **(11.48 am)**
 17 MS SCOLDING: Mr Bonehill, we were on the document that we
 18 find at EIO000130_004. This was the protocol that was
 19 issued in 2009. But, again, can I just emphasise, it
 20 doesn't actually provide any approach to how you will
 21 manage the claims or what your approach to counselling
 22 or support would be, or was, at that particular time?
 23 **A. That's correct. That was really around when the claims**
 24 **should be notified to us. That was the purpose of that.**
 25 Q. Can I take you now to the PSA-specific guidance which

Page 62

1 part 1 of the Compensation Act 2006 says, which is
 2 offering an apology shall not, in itself, amount to
 3 admission of negligence?
 4 **A. Correct.**
 5 Q. It says:
 6 "To therefore give an apology or just acknowledge
 7 will not normally prejudice the position that is
 8 mentioned above. Such action is best taken in
 9 conjunction with Ecclesiastical."
 10 I suppose the question I would ask is, why? Why
 11 would they need to consult you if it is no admission of
 12 liability?
 13 **A. If they are uncertain, because often there is**
 14 **uncertainty around, you know, any action they take --**
 15 **again, it comes back to it may prejudice the insurance**
 16 **contract. So what we're saying there is, "If you are**
 17 **unsure, come and talk to us". That was the purpose of**
 18 **that. But it does reinforce the point that apologies,**
 19 **you know, can be given under the Compensation Act**
 20 **without prejudice. But it is that confidence piece.**
 21 Q. Then it says again:
 22 "Offering to pay for some counselling or treatment
 23 would not in itself be deemed to be an admission of
 24 liability."
 25 Then it makes reference to something called the 2007

Page 64

<p>1 Rehabilitation Code. I think that's something that 2 deals with all sorts of personal injury -- 3 A. Yes, it is not specific to abuse. As you say, it is 4 personal injury. It is the Rehabilitation Code that's 5 been updated, 2015 now. It's something Ecclesiastical 6 are very supportive of and have been across all classes 7 of liability claim. 8 Q. Can I just double-check, would all your claims handlers 9 have had this information as well? 10 A. Yes. 11 Q. So no claims handler should have been saying, "Don't 12 apologise or don't give counselling" -- 13 A. Absolutely not. 14 Q. -- at any time? 15 A. Absolutely not. 16 Q. What it also says, if I could take you to that document 17 at page 4: 18 "In the vast majority of cases reported, we are 19 dealing with wrongdoing between 10-40 years old." 20 Can I first ask you about that: how do you manage, 21 practically, claims which are brought -- I think we have 22 seen on average -- at least 20 years. I think over 23 90 per cent of your cases are more than 20 years after 24 the abuse took place. What are the particular 25 difficulties of trying to manage those claims, from an</p> <p style="text-align: center;">Page 65</p>	<p>1 insurer's perspective? 2 A. Obviously, the age -- you know, the age of the claim 3 itself is a problem. You know, it does create its 4 complexities. So that's the availability of witnesses, 5 it is the availability of evidence. I think it is 6 really important that the letter of claim, when that 7 comes in, is very clear, it sets out specific 8 allegations, dates, names, et cetera, et cetera. So 9 then we can go and investigate those. 10 We work very closely with our insureds in the 11 investigation process. They hold the information, the 12 evidence. So we will work with them, we will talk to 13 them, we will look through their records with them. The 14 blue files I mentioned earlier on are important. Any 15 police -- 16 Q. Can I just identify, the blue files -- everyone in this 17 room probably has a blue file stamped on their heart, 18 but for anybody listening out there, these are the 19 private, confidential personnel files that are kept by 20 the clergy about the course of someone's clerical 21 career? 22 A. That's correct, yes. There may well be evidence in 23 those files that is helpful in terms of a specific 24 claim: previous complaints, number of complaints, any 25 disciplinary action, et cetera, et cetera, may be in the</p> <p style="text-align: center;">Page 66</p>
<p>1 file, it may not be. But that is part of our 2 investigation, to review that file where it's available. 3 Q. Do you find, on the whole, that the files are available? 4 A. Traditionally, they have been available, and they have 5 been released to us. We have identified a challenge in 6 recent times where these files are held by bishops and 7 it needs the authority of the bishop to release them. 8 As a consequence of GDPR, there are clearly concerns 9 around data protection and releasing information. So 10 currently that is causing us some challenges, but 11 I raised that with the legal team within the 12 Church of England to see whether we can overcome that. 13 That's really as a consequence of GDPR, nothing more. 14 Q. But my understanding is, as at the 1997 document which 15 you produced, which is things like clerical records, 16 safeguarding records, should be kept -- should (a) be 17 kept for a period of time; and (b) could, and should, be 18 released for the purposes of some form of legal action? 19 A. Yes. 20 Q. That's right, isn't it? 21 A. It is right. 22 Q. Can I also ask, you say that they have got to be 23 specific about dates and places and times. One of 24 the things that those who have been the victims of child 25 sexual abuse often find is, they can remember very</p> <p style="text-align: center;">Page 67</p>	<p>1 specific things about the way that a room might look, 2 the way that something might smell, but they don't 3 necessarily have a fantastic knowledge of, "It 4 was June 1972" or "It was July 1972"? 5 A. No. 6 Q. How do you deal with and manage that kind of problem? 7 A. It is just one of the complexities of this type of claim 8 because, you're absolutely right, that is a problem for 9 us. We have to ask for as much information as the 10 claimants is able to give us and we work with that. We 11 have to go and investigate based on the allegations that 12 have been provided to us. But, you're quite right, that 13 can bring some -- 14 Q. What do you do in that situation? Would you give 15 somebody the benefit of the doubt or say, "No, I'm 16 really sorry, unless you can tell me the month and the 17 year, I'm afraid I can't bring a claim -- you can't 18 bring a claim"? 19 A. We will look at, are there any other complainants, was 20 there any police involvement, any police prosecution. 21 But, ultimately, our view is, you know, it comes back 22 to, on the balance of probabilities, you know, is that 23 abuse likely to have occurred when we are being told it 24 occurred, and do the insured have a legal liability for 25 that abuse, are they vicariously liable for that abuse?</p> <p style="text-align: center;">Page 68</p>

1 Q. When --
 2 **A. So we do take quite a -- you know, quite a broad**
 3 **approach to the decision making.**
 4 Q. But there would be some situations in which you would
 5 say, "I'm sorry, this is just too vague. We can't ..."?
 6 **A. I'm not aware of any case of that nature, if I'm honest.**
 7 Q. Can I ask you about limitation, because here, again, it
 8 says -- now, this is back in obviously 2012, so it is
 9 prior to your guiding principles being issued?
 10 **A. Yes.**
 11 Q. But it does say the courts have power -- I think all of
 12 us in this room know about the Limitation Act would be
 13 three years, it can be equitably disapplied, shall we
 14 say, under the relevant provisions of the Limitation
 15 Act?
 16 **A. Yes.**
 17 Q. What is, or what was, the EIO's position on pleading
 18 limitation, because it is a defence. You can choose to
 19 plead it or choose not to plead it. What was EIO's
 20 position in 2012 about pleading limitation?
 21 **A. What we do is, once we have carried out a full**
 22 **investigation, ultimately -- you know, we have to make**
 23 **a judgment as to whether a fair trial is possible for**
 24 **all parties. You can see from the data that we have**
 25 **provided to the inquiry that the occasions we have used**

Page 69

1 **A. Well, just simply, you know, the availability of**
 2 **evidence and whether or not we felt a fair trial was**
 3 **possible.**
 4 Q. There is an argument, particularly if you are dealing
 5 with deceased clergy and things which happened 20 or
 6 30 years ago, that you can't ever have a fair trial in
 7 those circumstances because the person who is alleged to
 8 have committed the offence isn't there?
 9 **A. No, that's correct. And those types of claims do cause**
 10 **us challenges. But, of course, often -- I come back to**
 11 **it, you know, what's the available evidence on the**
 12 **files, are there other complainants? That's a good**
 13 **indicator. Was there any police involvement at the time**
 14 **or any other authorities involved at the time? And if,**
 15 **ultimately, after all that, there is still no evidence,**
 16 **we may decide to settle the claim without an admission**
 17 **of liability. So not necessarily run the defence of**
 18 **limitation, but settle it without accepting legal**
 19 **liability. We have done that on several occasions that**
 20 **I'm aware of.**
 21 Q. What does that mean? I mean, practically, what
 22 difference does that make?
 23 **A. Well, practically, very little, is the truth. So the**
 24 **claimant still receives compensation. But there is no**
 25 **acceptance of legal liability under the terms of**

Page 71

1 **limitation as a defence is really, you know, very small.**
 2 **I think it was less than 4 per cent.**
 3 Q. I think you say in your first witness statement that
 4 it's been pleaded in about 4 per cent of all cases?
 5 **A. Yes. So I think that is a good indicator of our**
 6 **approach to using limitation, and, of that 4 per cent,**
 7 **I think that was nine claims, eight of those claims we**
 8 **settled, and there's still one outstanding. So I think**
 9 **that's a good indicator of our approach to limitation,**
 10 **even then.**
 11 Q. But I'm asked to ask this question on behalf of
 12 the victims, survivors and complainants in respect of
 13 Switalskis Solicitors, and they identify that there has
 14 been a recent case which in fact went to trial
 15 in May 2019, where you did use limitation as a defence.
 16 **A. Yes.**
 17 Q. Why, if you indicate that you very rarely use it, did
 18 you choose to use it in that situation then?
 19 **A. I can't talk about the details of the claim, but, you**
 20 **know, we use it sparingly, is what we have said. It**
 21 **doesn't mean we don't use it. And on that particular**
 22 **case, you know, it was part of a wider defence of**
 23 **vicarious liability, which ultimately the courts found**
 24 **in our favour.**
 25 Q. But what factors would cause you to use limitation?

Page 70

1 **the policy contract.**
 2 Q. That acceptance of legal liability could be very
 3 important to the individual in those cases, however.
 4 **A. It could, yes. Yes, it could.**
 5 Q. Because it's seen as sort of, you know, paying people
 6 off, I think would be the term that might be used.
 7 "You're paying me for ..."?
 8 **A. Well, clearly there's a litigation risk. Inevitably.**
 9 **So if we were to argue limitation and the case proceeded**
 10 **to trial, then there's always a risk on both sides. So**
 11 **sometimes, in those unusual and extreme circumstances,**
 12 **you know, we would make a decision based on what we call**
 13 **the litigation risk. So the victim/survivor, the**
 14 **claimant, still receives compensation.**
 15 Q. How far do you factor in the fact that we know -- you
 16 know from your claims handling, and we all know, that
 17 there are particular barriers to reporting child sexual
 18 abuse until people are much older and, in particular,
 19 sort of the Truth Project analysis that I discussed
 20 yesterday identifies that particularly within the
 21 context of religious organisations there is a reluctance
 22 to report those individuals. So how much does that
 23 factor into your decision about limitation?
 24 **A. I think that's a really important point, and something**
 25 **that we are very aware of and, you know, we do factor**

Page 72

<p>1 that in and, you know, we worked with the Lucy Faithfull 2 Foundation not so very long ago, which was an excellent 3 day's awareness training on these -- exactly these 4 points, in terms of, you know: why is it that victims 5 and survivors find it difficult to make a civil claim or 6 even make a complaint against the institution; why is it 7 they can't remember the details -- to your point 8 exactly. So I think it is important that we are alert 9 to those and we do factor those into your decision 10 making process. I come back again: if you look at the 11 statistics that we have shared with the inquiry, I think 12 it demonstrates that we do that.</p> <p>13 Q. Can you tell me, are there any plans -- I understand the 14 Association of British Insurers, as Mr Phillips QC 15 mentioned yesterday, has published a document which 16 intimates a move towards not using limitation in these 17 cases.</p> <p>18 A. Yes.</p> <p>19 Q. Are there any plans for Ecclesiastical to change its 20 position on limitation from that which you have just 21 explained?</p> <p>22 A. We use limitation sparingly. The numbers are there, you 23 know. And we are currently reviewing to say, "Well, if 24 we use it sparingly, do we need to use it at all?", and, 25 you know, we are going through those -- having those</p> <p style="text-align: center;">Page 73</p>	<p>1 conversations internally at the moment. I think we will 2 land on that pretty soon. And we do welcome the ABI's 3 statement on limitation as well. I sit on the public 4 liability committee at the ABI, so I would like to think 5 I was influential to a small degree in that statement. 6 I rather suspect things will change whereby limitation 7 won't be used. Obviously we will share that with the 8 inquiry as and when that decision is made.</p> <p>9 Q. Can I also ask you, could I take you to EIO000132, 10 please, at page 6, tab B8, chair and panel.</p> <p>11 Now, this deals with the possibility of pleading 12 consent as a defence and says:</p> <p>13 "Currently, there is no set age of consent in civil 14 claims. Ecclesiastical recognises that somebody who is 15 under 16 should not be deemed to have consented to such 16 abuse. Ecclesiastical will be mindful of the power 17 imbalance that's present."</p> <p>18 Obviously, we heard evidence last year from 19 Professor Julie Macfarlane who did bring a claim which 20 engaged Ecclesiastical's insurance issues?</p> <p>21 A. Yes.</p> <p>22 Q. And you did plead consent as a defence in those 23 particular circumstances, despite the fact that she says 24 that she was coerced, shall we say, into the sexual 25 relationship. Can I ask, when do you use consent as</p> <p style="text-align: center;">Page 74</p>
<p>1 a defence?</p> <p>2 A. As part of our review on consent, we obviously look at 3 the power imbalance between the individuals involved. 4 We use it, you know, very, very rarely. I think we have 5 said in the numbers 0.3 per cent. So --</p> <p>6 Q. So is Professor Macfarlane's claim the only one then, if 7 it is 0.3?</p> <p>8 A. I suspect that is correct. What's interesting on that 9 case is, ultimately, yes, that was in the defence. We 10 didn't run it. It didn't go to trial. And we actually 11 settled that claim. But the advice was given to us -- 12 it was legal advice that was given to us at the time.</p> <p>13 Q. But, I mean, you -- to a large degree, I mean, speaking 14 as a lawyer, you, as claims handlers, often have a great 15 deal more expertise in these claims. Us lawyers will 16 come up, bumble along and say, "Ah, let's plead consent 17 as a defence"?</p> <p>18 A. Yes.</p> <p>19 Q. Whereas you are much closer to an understanding of what 20 would or wouldn't run in a court setting because you 21 have seen 200 or 300 of these claims rather than one or 22 two. So do you always take legal advice like that?</p> <p>23 A. No, we don't always take legal advice. It depends on 24 the complexities and the nature of the claim in 25 question. You know, we could get advice from</p> <p style="text-align: center;">Page 75</p>	<p>1 a solicitor, a panel firm, or we could get advice from 2 a barrister, depending on the case in question.</p> <p>3 Q. Neither those solicitors nor those barristers will have 4 the expertise and understanding, for example, that you 5 do from, I don't know, the Lucy Faithfull Foundation or 6 other individuals as to the particular sensitivities 7 that arise in these sorts of cases?</p> <p>8 A. Well, I think they probably do. You know, the lawyers 9 we use are very specialist in this area, and I don't 10 think we should underestimate that. And, ultimately, it 11 is a joint decision. We make the decision, but we work 12 very closely with our legal partners. But it is very 13 rare. You know, this is one claim out of hundreds. 14 I just make that point, in terms of, you know, when we 15 say, you know, we use it sparingly, that's factually 16 correct.</p> <p>17 Q. Can I also ask you about something else which a number 18 of victims and survivors have expressed upset, which is 19 the use of defence psychiatric reports and you going to 20 get your own psychiatric evidence --</p> <p>21 A. Yes.</p> <p>22 Q. -- which they often find a very difficult and traumatic 23 experience.</p> <p>24 A. Yes.</p> <p>25 Q. Because their credibility is, in some cases, put</p> <p style="text-align: center;">Page 76</p>

1 directly in issue by the defendant psychiatrist?

2 **A. Yes. We operate in a very adversarial system. I mean,**

3 **we all know that, I think. The civil justice system is,**

4 **by its nature, adversarial. Now, we make great efforts**

5 **with claimant lawyers to try and agree joint experts at**

6 **the outset, and in every response to the letter of claim**

7 **that we send out, we seek agreement from them to agree**

8 **a joint expert, because, you're quite right, we don't**

9 **want to put the victim/survivor through the process of**

10 **having to relive the events by going to another**

11 **specialist.**

12 **I think there's more work that needs to be done on**

13 **that, and I'm talking to various claimant lawyers at the**

14 **moment trying to agree a list of specialists, so we can**

15 **agree those upfront, and both sides are happy with that.**

16 **At the moment, that doesn't happen as routine, but,**

17 **having said that, the number of cases where we appoint**

18 **our own specialist is actually quite low, and a couple**

19 **of weeks ago, prior to coming to this, we did a quick**

20 **review on the last 30 cases that we had settled, the**

21 **Church of England cases that we had settled, and on 28**

22 **of those 30 cases we had accepted the claimant's expert**

23 **report and settled on that basis. So it is only the two**

24 **cases that we had actually had to go and get our own and**

25 **they were particularly complex cases.**

Page 77

1 **experts, and that's something we have contributed to**

2 **actively.**

3 **Q. So there is currently no -- just so that everybody**

4 **following along understands, a pre-action protocol is**

5 **there is usually a particular form of words that gets**

6 **used and you have to provide certain sorts of**

7 **information to -- if you are a claimant, to the**

8 **defendant lawyers at an early stage of the process in**

9 **order to try and enable everything to be settled?**

10 **A. That's right. There is a timetable. It is around**

11 **sharing evidence, sharing documentation. There is**

12 **a pre-action protocol in place for road traffic**

13 **accidents or other personal injury. There is not**

14 **a specific one in place for sexual abuse claims, and**

15 **that is something that we very much support, the need**

16 **for that, and that's why we have been working with the**

17 **ABI and Master McCloud and also with --**

18 **Q. Just to clarify, Master McCloud is the lead Master in**

19 **the Queen's Bench Division who would be dealing with the**

20 **vast majority of these cases?**

21 **A. I believe so, thank you. But, fundamentally, there is**

22 **a need -- there is a gap in the civil justice system at**

23 **the moment by not having pre-action protocols, and,**

24 **actually, you know, to my mind, not having the joint**

25 **medical experts. I think there is a real need for that.**

Page 79

1 **Q. What would be counted as a particularly complex case?**

2 **A. This could be, for example, where there has been**

3 **a number of events across different institutions or**

4 **abuse in the home, et cetera, et cetera, and what we are**

5 **trying to do is identify what our insured's legal**

6 **liability is for the abuse that was sustained -- for**

7 **which they are vicariously liable. So it could be**

8 **something like that.**

9 **Q. But that's something that victims and survivors find**

10 **very difficult to understand, because you're dealing**

11 **with complex ideas about causation. Whether or not**

12 **something made a material contribution, in the language**

13 **of tort law, is when it's important, but as far as the**

14 **victim and survivor is concerned, their life is just**

15 **ruined?**

16 **A. Yes.**

17 **Q. How far can you, as insurers, just think, well, you**

18 **know, it is not fair -- if you say that you operate**

19 **ethically, that it's not fair and not just to put**

20 **somebody through that process when the reality is, they**

21 **have suffered, an abuse has taken place?**

22 **A. I think this is why it is so important to have joint**

23 **experts, and I know Master McCloud is doing some work on**

24 **this in terms of a pre-action protocol for abuse claims,**

25 **and she was looking at the idea of having a register of**

Page 78

1 **Q. What work have you done with individuals like Mr Scorer**

2 **and Mr Greenwood to try and advance that proposal?**

3 **A. So we published our guiding principles, as you know, in**

4 **2016. That, for us, is just the start. What we don't**

5 **want is just to have a document that sits on a shelf and**

6 **collects dust.**

7 **So what we have been doing is a lot of work trying**

8 **to have a stronger and more strategic relationship with**

9 **a number of claimant lawyers, who are all members of**

10 **ACAL, and from where we get the majority of our**

11 **claims --**

12 **Q. ACAL, just to say, the Association of Child Abuse**

13 **Lawyers?**

14 **A. Thank you. Sorry, no, that's my fault. And, really,**

15 **what I'm trying to do here is build -- not wait for the**

16 **civil justice system to reform or to change, but almost**

17 **create our own bilateral agreements with claimant**

18 **lawyers. So that's things like having more dialogue**

19 **with claimant lawyers at an early stage, be it face to**

20 **face, be it on the telephone; trying to narrow any**

21 **issues that there are between us; exchange evidence,**

22 **exchange information, quicker. I mentioned joint**

23 **medicals. We are talking to a number of claimant firms**

24 **at the moment to say, "Which specialists do you use and**

25 **where's the matches?"**

Page 80

1 Q. It seems quite strange that that hasn't already
 2 happened. I have to be honest with you and say it is
 3 quite strange you don't already have a list. There is
 4 quite a small number of firms in this area who do this
 5 work. There are quite a small number of insurers who
 6 insure public liability for these sorts of claims?
 7 **A. It is not just having a list. It is having a list of**
 8 **experts that both sides are happy with and prepared to**
 9 **use. I think that is the key. And that really isn't**
 10 **there, and I think that's a symptom of the adversarial**
 11 **system. So it is those types of things.**
 12 **I am trying to break down, by working with those**
 13 **claimant lawyers -- apologies is another good example.**
 14 **It is not for Ecclesiastical to give the apology,**
 15 **obviously, but we do currently facilitate apologies. So**
 16 **at the joint settlement meeting, at the end of**
 17 **the claims process, if the victim/survivor wants an**
 18 **apology, we will go into the church and make that**
 19 **happen. You know, get somebody senior from the church**
 20 **to attend in person or give a written apology.**
 21 Q. And how difficult has the church found it to apologise?
 22 **A. Well, they haven't found it, as far as I'm aware,**
 23 **difficult at all to do that, when requested to do so.**
 24 **What I'm trying to do now is, rather than, at the back**
 25 **end of the claims process, bring it forward to the front**

Page 81

1 **will identify what support is required. We will fund**
 2 **that. This is before liability has been agreed. So**
 3 **this is right at day one, at the outset.**
 4 Q. So you get a notice of claim?
 5 **A. Yes.**
 6 Q. You will get a letter before action or pre-action,
 7 something that looks like a pre-action protocol letter
 8 although it isn't a pre-action protocol letter?
 9 **A. Correct.**
 10 Q. And you will then put this organisation in place. What
 11 discussion have you had with victims and survivors about
 12 the suitability of that organisation?
 13 **A. What I have done is I have had discussions with their**
 14 **legal representatives. So I have consulted on that**
 15 **before we introduced it to see whether it would add**
 16 **value, whether it would be taken up, et cetera,**
 17 **et cetera, and the feedback I have had is really quite**
 18 **positive, that it would add value. Again, as a standard**
 19 **now, we are offering that on all new claims.**
 20 Q. When you say you offer support, what sort of support do
 21 you mean?
 22 **A. That depends what the victim/survivor requires. I mean,**
 23 **you know, Moving Minds are a specialist firm so we rely**
 24 **on their expertise to --**
 25 Q. What sort of things would typically be offered?

Page 83

1 **end. So what I mean by that is, when we're doing our**
 2 **investigations into liability early on, where there is**
 3 **clearly a legal liability, we are talking to the church,**
 4 **to our insured, at that point and saying, "If requested,**
 5 **would you be prepared to provide an apology?" If they**
 6 **say yes, and, as I say, there is no reason why they**
 7 **won't, we will facilitate that. So we will write to the**
 8 **claimant lawyers saying that the church are prepared to**
 9 **give an apology if one would be welcomed and add value.**
 10 **So it is just shifting it from the end of the process to**
 11 **the beginning of the process.**
 12 Q. The problem is, if you are giving an apology at the end
 13 of the process, it is almost like somebody has had to
 14 fight for it and it becomes valueless. If you give it
 15 at the beginning of the process, it feels as if it might
 16 have some value?
 17 **A. I think that's right. And, you know, that's why we are**
 18 **doing the work in this way, it's to address that.**
 19 **Quite an important piece in terms of support for**
 20 **victims and survivors through the claims process, we**
 21 **have recently introduced a firm, an independent firm,**
 22 **called Moving Minds. The intention there is to provide**
 23 **psychological support to the victim/survivor. So under**
 24 **the Rehabilitation Code, we will appoint this firm**
 25 **jointly, between us and the claimant lawyers, and they**

Page 82

1 **A. It could be personal support, it could be listening**
 2 **support, it could be CBT-type support. There are**
 3 **various options that are offered. As I say, we agreed**
 4 **that we would fund that, even whilst our investigations**
 5 **are ongoing.**
 6 Q. Can I take you to your guiding principles, which you
 7 issued first in 2016, behind tab B8, chair and panel.
 8 Can I take you to EIO000132. Why were these, in
 9 particular, developed in 2016?
 10 **A. This came out of the joint settlement meeting we had**
 11 **with Professor Macfarlane. As part of her settlement,**
 12 **she asked us if we would produce a document that sets**
 13 **out how we handle abuse claims of this nature. Having**
 14 **listened to her, we agreed that was a good idea, and we**
 15 **adopted that. So we drafted -- we have called them**
 16 **guiding principles, because they are principles that**
 17 **guide us on every claim. We produced a draft. We then**
 18 **consulted wider with Professor Macfarlane, and we are**
 19 **very grateful (a) for her original idea and for her**
 20 **input into this. We also consulted with the**
 21 **Church of England and other stakeholders, because these**
 22 **are guiding principles not just for claims emanating**
 23 **from the church, but, again, for all our policyholders.**
 24 **The intention of this is just to make the process**
 25 **transparent and clear for everybody that's involved. So**

Page 84

<p>1 victims and survivors, they will know what the claims 2 process is. For claimant lawyers, they know what they 3 can expect. And also for our own staff, you know, it 4 just focuses everybody's minds around the principles 5 that we are endeavouring to adhere to. 6 Q. So if I can take -- if we can move to page 3 of that 7 document, that sets out really an overview of the claims 8 process. So what you are going to do, when you are 9 going to do it. 10 A. Yes. 11 Q. Then, on the next page, if we could go to the next page, 12 it then talks about the letters of claim and it 13 identifies, in the third paragraph down: 14 "In many cases, there will have been a previous 15 conviction which usually makes the investigation quicker 16 and simpler. The duration of the investigation is 17 usually much reduced where solicitors acting for the 18 claimant have provided a detailed and thorough letter of 19 claim." 20 I think you have already dealt with that? 21 A. I have alluded to that earlier. 22 Q. Yes, in your evidence. Then in the next paragraph, it 23 says: 24 "Where the liability of the policyholder is clear, 25 it is in everyone's interests for an early admission of</p> <p style="text-align: center;">Page 85</p>	<p>1 liability to be made once this is determined." 2 It says: 3 "Early admission of liability quickens the claim and 4 also helps to keep legal costs to a minimum." 5 A. Yes. 6 Q. Is that something which you try and adhere to as often 7 as possible? 8 A. Yes, I don't think it is in anybody's interests to delay 9 the decision on legal liability. That's why, you know, 10 it is important that the letter of claim is set out as 11 clearly as it can be. That's why, you know, we press on 12 and do our investigations as quickly as possible. And 13 we make a decision at the earliest opportunity. 14 Q. It then identifies the fact that, once liability has 15 been established, there would usually be something 16 called a joint settlement meeting? 17 A. Yes. 18 Q. Now, some victims and survivors in this investigation 19 have called those joint settlement meetings no better 20 than horse trading, because numbers do, as I understand 21 it -- or would go from one room to another room or 22 possibly in the same room. What do you do to try to 23 overcome the feeling that people are being sort of 24 auctioned like cattle? 25 A. Well, I think the negotiation is part of the process,</p> <p style="text-align: center;">Page 86</p>
<p>1 it's part of the system. The joint settlement meeting 2 is exactly what it says: you know, we bring the parties 3 to the table and we try and agree the claim and settle 4 the claim. It's for the -- obviously, it's for the 5 claimant lawyers to explain to their client what the 6 process involves, and it's most unusual for -- although 7 it does happen occasionally -- the victim/survivor, for 8 the claimant, to be in the room when those discussions 9 are taking place. Because -- for the very reason you 10 say: you know, that, in itself, could be quite 11 traumatic, in terms of, you know, the language you've 12 used. 13 But, unfortunately, the negotiation is part of 14 the process. 15 Q. You then, if I can just identify, set out at the bottom 16 of that page your principles of claims handling, 17 identifying the trauma and understanding that it is 18 important that policyholders understand that offering an 19 apology and/or counselling sessions can be extremely 20 important steps. So you would expect all your 21 policyholders to follow that. 22 If we could go to the top of the next page, 23 please -- 24 A. Sorry, if I can just go back to the point you just made, 25 when you say "expect them to follow", it is their</p> <p style="text-align: center;">Page 87</p>	<p>1 decision. We are just giving our advice to them and 2 trying to guide them. 3 Q. But, I mean, how forcefully are you able to transmit 4 your advice, shall I put it that way? 5 A. I'm not sure -- 6 Q. Particularly in this context to the Church of England, 7 because obviously you have a kind of weirdly symbiotic 8 relationship with them, ultimately? 9 A. We have shared these guiding principles and consulted 10 with the Church of England. They have accepted them. 11 I believe they have adopted them for their own claims 12 where there is no insurance. So I feel as though we are 13 pushing at an open door. 14 Q. Then it identifies on that page: 15 "Considering adopting these principles. Considering 16 an apology. Considering offering support and 17 counselling." 18 And it says: 19 "We are a strong supporter of the rehabilitation 20 approach." 21 Then you say: 22 "Our commitment to empathetic claims 23 investigations." 24 Now, some people would say that's an oxymoron: 25 "Ecclesiastical will approach any claims</p> <p style="text-align: center;">Page 88</p>

<p>1 investigation with sensitivity, empathy and integrity." 2 How do you do that? That's quite a difficult thing 3 to measure. 4 A. It could be things such as, you know, when we have got 5 specific allegations, you know, do we need to put those 6 allegations to the alleged perpetrator, for example? Or 7 do we have enough evidence from elsewhere -- and I have 8 explained where that evidence may come from -- to make 9 a decision on the balance of probabilities? Because, 10 you know, many victims and survivors would find it, you 11 know, quite traumatic if we are sharing information or 12 allegations against the perpetrator with that 13 individual. So that could be an example where, you 14 know, we're putting the victim at the heart of 15 the claims process. But it doesn't alter the ultimate 16 decision. 17 Q. But the difficulty is that empathy and claims aren't 18 necessarily happy bedfellows, are they? 19 A. They're not, but they can be, and that's what we are 20 trying to do. That's why all the work I'm doing with 21 claimant lawyers at the moment is trying to put the 22 victim at the heart of what we are doing and trying to 23 break down a lot of these, you know, traditional 24 barriers to claims settlement, and remove this 25 adversarial approach, because, personally, I don't think</p> <p style="text-align: center;">Page 89</p>	<p>1 it is necessary. 2 Q. I'm assuming these guidelines apply to all allegations, 3 whether they're recent, non-recent -- 4 A. They do. 5 Q. -- whether somebody is deceased or alive and kicking, so 6 to speak? 7 A. Yes. 8 Q. Do you think that your approach to claims has changed 9 subsequent to the issue of these guiding principles? 10 A. I think it's fair to say that we are learning as we go 11 along. We have got the guiding principles there. They 12 do guide us, there is no doubt about that. Do we make 13 errors? Yes, of course we do, but I think it is 14 important that we recognise that, we rectify that as 15 quickly as possible and we learn from that. But the 16 guiding principles themselves was really a form of 17 bringing together existing practices. So it wasn't 18 anything particularly new for us, but what it does do, 19 and, you know, it kind of -- and I hear it all the time 20 when I'm in the team; you know, they do talk about the 21 victim and survivor and about, you know, the claims 22 process and how it affects them, so, I think, yes, we 23 have learnt from it ourselves, if I'm honest. 24 Q. In respect of settlements, we have talked about the 25 joint settlement meeting, do you ever require there to</p> <p style="text-align: center;">Page 90</p>
<p>1 be a confidentiality agreement signed, when a settlement 2 is signed? 3 A. We don't, and we never have done. 4 Q. Why don't you? 5 A. Unless the claimant themselves wants us to, which 6 I think I'm aware of one occasion. But it's certainly 7 nothing that we would insist upon, ever. 8 Q. Why would you never insist upon it? 9 A. Because, to us, I mean, we will respect the 10 confidentiality. You know, obviously we don't share any 11 information. A confidentiality agreement to me actually 12 holds no water. It is unenforceable. It proves -- you 13 know, it is of no purpose. Also, again, from a victim 14 and survivor's perspective, if we are insisting on that, 15 that just casts further doubt, I think, on the whole 16 process: "Why are they insisting on a confidentiality 17 agreement?" You know, "What are they trying to hide?" 18 And we are not trying to hide anything. So the answer 19 is, we don't. 20 Q. So Lord Carlile in his report in respect of Bishop Bell 21 recommended that the church should use confidentiality 22 agreements where required. I'm assuming from your 23 previous statement you, on behalf of the EIO, don't 24 agree with that particular sentiment? 25 A. That's right. And in my second statement that responded</p> <p style="text-align: center;">Page 91</p>	<p>1 to Lord Carlile's report, and of course that wasn't one 2 of our claims, incidentally, that was an uninsured claim 3 but the inquiry asked me to comment on that, I made our 4 view, I think, very clear on that particular issue. 5 Q. You also identified that in reality it probably wouldn't 6 be ethical to try to enforce any confidentiality 7 agreement, even if you imposed one? 8 A. Absolutely. 9 Q. Can I just -- if there hasn't been a claim initiated, 10 what advice does EIO give? Does it give general advice 11 to the church on a number of occasions about approaching 12 these sorts of cases, even where claims haven't been 13 brought? 14 A. We have given the advice that you have already referred 15 to in the documentation. Beyond that, we don't give any 16 further advice to our insured. We get involved when -- 17 you know, when there is a formal claim. 18 Q. So you don't get involved in -- sometimes the church 19 operates something called core groups in more complex 20 processes. Now, obviously we know about core groups in 21 uninsured claims. I'm not going to ask you about those. 22 A. Okay. 23 Q. But in insured claims, have you ever been asked to be 24 part of a core group? 25 A. Yes, we have. We were involved in the core group for</p> <p style="text-align: center;">Page 92</p>

<p>1 A4. 2 Q. Right. 3 A. If I'm honest, I'm not really sure what the terms of 4 reference for the core group was or is. I understood it 5 to be almost a lessons learnt type meeting. The two 6 core group meetings that we were invited to, we 7 attended. Our lawyers attended for us. If we can help 8 and if we can provide any assistance, then, you know, 9 that's what we would do for any of our policyholders, 10 and they obviously felt we could. 11 I think our contribution at those meetings was 12 minimal, from what I understand. Although I have seen 13 no formal minutes. 14 Q. To be honest with you, it could be helpful, but, on the 15 other hand, it could also be quite unhelpful, in that 16 you are the insurer? 17 A. Yes. 18 Q. Your role is not -- as you have identified, your role is 19 to operate within the context of an adversarial process? 20 A. Yes. 21 Q. A core group, as I understand it, is about dealing with 22 the church's pastoral response, not really a legal 23 response they could choose to operate if they choose to 24 use their insurance policy? 25 A. I think this is one of the issues around, what is the</p> <p style="text-align: center;">Page 93</p>	<p>1 terms of reference for the core group. We are going 2 back -- I forget when those core group meetings were, 3 but a couple of years ago. So that may have developed. 4 I think they were fairly new, if I remember rightly, for 5 the church, at that time, in any event. But, you're 6 quite right: if that is the purpose of them, then we 7 would play no part. We would have no value to add to 8 those discussions. 9 Q. Can I move on to ask you now about the Elliott -- what 10 we are calling the Elliott Review. I understand that 11 the Ecclesiastical Insurance Office weren't directly 12 involved in the Elliott Review, in that you didn't 13 provide evidence or meet with Mr Elliott, and he's 14 confirmed that again this morning? 15 A. Yeah, we were never asked to contribute to that work. 16 Q. If we could just get up the summary of 17 the Elliott Review, please, could we get up 18 INQ000457_008, please, paragraph 28. It then said, "He 19 sought compensation for the inappropriate", et cetera, 20 et cetera, and then, on the next page, page 9, 21 paragraphs 29 to 30, so this is the withdrawal of 22 pastoral support to a survivor to avoid financial 23 liability. So it talks about the advice given by the 24 insurers, which I'm going to talk about in a moment. 25 A. Okay.</p> <p style="text-align: center;">Page 94</p>
<p>1 Q. But would you agree that the Elliott Review report is 2 largely focusing upon the church and is about the 3 Church of England rather than you as an insurer? 4 A. I think, in the round, it is, but there are assertions 5 within that report about Ecclesiastical that were wrong 6 and misinformed. I think the point we try to make there 7 is, because we were not party to any discussions, and 8 were not invited to contribute, it's -- well, as I said, 9 it's -- a couple of the recommendations are misinformed. 10 Q. Can I take you to paragraph 64(ii), INQ000457_014. 11 I think Ms McNeill may well have dealt with this with 12 Mr Elliott earlier, so I suspect you will have seen it 13 already. It is headed "The role of advisors": 14 "The church should create written down guidance with 15 regard to how it will respond to claims for 16 compensation. This guidance should be shared from an 17 early juncture. Every effort should be made to avoid an 18 adversarial approach placing emphasis on the provision 19 of financial compensation as an aid to healing and 20 closure." 21 Now, how far do you think it is within the gift of 22 the church to have guidance on claims for compensation 23 if they choose to use you as an insurer? 24 A. That's an important point. It's our insured's choice as 25 to who they buy the insurance from, if they have</p> <p style="text-align: center;">Page 95</p>	<p>1 insurance at all. That is a decision for them and them 2 alone. 3 When the -- we have said already, when a claim is 4 received and the -- an indemnity is requested from the 5 insured from us, then we do step into the shoes of 6 the insured and conduct that. So there is then no 7 influence over the way we handle that claim. 8 Q. The church could obviously seek, in and of itself, not 9 to use you as an insurer? 10 A. They could. 11 Q. And they could seek to issue their own -- pay 12 compensation from their own coffers, so to speak? 13 A. That's correct. 14 Q. But at the moment, they choose to use you as an insurer 15 in those circumstances? 16 A. Yes. 17 Q. Therefore, in a way, the church can't have written 18 guidance on how to deal with claims for compensation, or 19 certainly those can't be issued without agreement from 20 you? 21 A. No, that's correct, but, again, you know, we have got 22 the guiding principles, so I think that's part of this 23 as well, I think. It's not directly around 24 compensation, I accept that. But it -- 25 Q. Can I just double-check: did the Elliott Review postdate</p> <p style="text-align: center;">Page 96</p>

<p>1 or predate the issue of the guiding principles?</p> <p>2 A. It's a very good question. I think, if I remember</p> <p>3 rightly, the Elliott Review was August '16, from memory,</p> <p>4 and our guiding principles were June. I think they</p> <p>5 were June '16, that we first published them.</p> <p>6 Q. In your first witness statement, you identified that, as</p> <p>7 you have said again today, the conduct of AN-A4's claim</p> <p>8 you describe as incorrect, misinformed and did not</p> <p>9 reflect the circumstances of this case.</p> <p>10 A. Yes.</p> <p>11 Q. And so unhappy was the EIO that they took the step to</p> <p>12 publish a response on the website, tab B9, chair and</p> <p>13 panel. EIO000133_002, please, Ralph.</p> <p>14 Now, why did you feel the need to publish this on</p> <p>15 your website?</p> <p>16 A. I think the report itself had got into the public</p> <p>17 domain. Certainly when it was first published, we only</p> <p>18 received an executive summary of the report. But we did</p> <p>19 get the full report. So that was in the public domain.</p> <p>20 I think it was right and proper that we were able to</p> <p>21 respond to -- as I said, to the assertions made about</p> <p>22 it, and that's the reason we did that.</p> <p>23 Q. But can I identify that 002 -- can we just blow up, if</p> <p>24 you don't mind, "Ecclesiastical categorically refutes",</p> <p>25 from there onwards. Can I just say, it is a bit Sturm</p> <p style="text-align: center;">Page 97</p>	<p>1 und Drang, shall we put it that way? It is quite sort</p> <p>2 of over the top, "It refutes the Elliott Review, which</p> <p>3 misrepresents the facts", "wants to put the record</p> <p>4 straight", "We did not instruct the church". Do you not</p> <p>5 think, with the benefit of hindsight, you could possibly</p> <p>6 have made the same points using slightly quieter</p> <p>7 language?</p> <p>8 A. I think it is really important that, as I say, the</p> <p>9 criticism -- the report was in the public domain. What</p> <p>10 impact would that have on other victims and survivors?</p> <p>11 You know, if they are going through and thinking of</p> <p>12 making a formal claim, might it prevent them doing that,</p> <p>13 thinking that, you know, the pastoral care and support</p> <p>14 could not follow or could not operate in parallel to it?</p> <p>15 So I think it was quite an important point that we were</p> <p>16 trying to get across, to say that the support can still</p> <p>17 be provided alongside the civil claim. So it's not</p> <p>18 preventing victims and survivors coming forward.</p> <p>19 Q. But --</p> <p>20 A. I think it was quite an important point.</p> <p>21 Q. But A4 -- did anybody think about how A4 would feel</p> <p>22 about this, or did anybody discuss this with A4?</p> <p>23 A. We didn't do that.</p> <p>24 Q. Do you think maybe you should have done? Because it is</p> <p>25 about him. Ultimately, what you are saying is, a report</p> <p style="text-align: center;">Page 98</p>
<p>1 written about him is rubbish and wrong?</p> <p>2 A. Well, it is not the whole report, incidentally.</p> <p>3 A number of the recommendations we agree with, but</p> <p>4 I take your point about the consultation.</p> <p>5 Q. So, looking back on it, if you were to do this again,</p> <p>6 would you have consulted, or at least sought to consult,</p> <p>7 A4 to discuss your concerns with him prior to putting</p> <p>8 something like this on the website?</p> <p>9 A. I think that's right, yes.</p> <p>10 Q. Would you do the same again, or would you maybe let</p> <p>11 things blow over?</p> <p>12 A. I don't think it was right and proper to let things blow</p> <p>13 over, for the reasons I have already said. You know,</p> <p>14 I think we needed to put the record straight, that the</p> <p>15 assertions that had been made were inaccurate. You</p> <p>16 know, we had never instructed the church to withdraw</p> <p>17 pastoral care and support, and I think --</p> <p>18 Q. Now, I know that that is the subject of some</p> <p>19 considerable controversy between you and the church.</p> <p>20 Now, plainly, you could have come to this hearing</p> <p>21 waiving privilege over the various documents, so this</p> <p>22 dispute could have been clarified and/or cleared up</p> <p>23 and/or discussed. As it is, we, as an inquiry, are</p> <p>24 hampered from our ability, shall we say, to shed some</p> <p>25 light on this because of the claim of legal professional</p> <p style="text-align: center;">Page 99</p>	<p>1 privilege.</p> <p>2 A. Yes.</p> <p>3 Q. Can you explain why you have chosen to continue with</p> <p>4 that?</p> <p>5 A. I think the difficulty is, with legal privilege, you</p> <p>6 know, we need to be consistent in our approach. We</p> <p>7 can't, and won't, pick and choose what documents we</p> <p>8 choose to release and what we don't choose to release.</p> <p>9 Q. But the Church of England told us -- because the</p> <p>10 privilege is held both by you and by the</p> <p>11 Church of England. The Church of England identified to</p> <p>12 us that they would be willing to waive privilege in</p> <p>13 order to clarify this issue before this inquiry. Why</p> <p>14 have you taken a different approach?</p> <p>15 A. Well, simply from that consistency perspective, and</p> <p>16 nothing more than that.</p> <p>17 Q. Can I look at some of the underlying material, because</p> <p>18 you have always been clear that the church misunderstood</p> <p>19 any advice it was given. Obviously we can't talk in</p> <p>20 this context about what actually that advice was,</p> <p>21 because you haven't waived privilege.</p> <p>22 A. Yes.</p> <p>23 Q. But can we have a look through the Diocese of London's</p> <p>24 contact log which gives us some information around this</p> <p>25 which might help us on this issue. ACE027039, please,</p> <p style="text-align: center;">Page 100</p>

<p>1 Ralph. So page 35, can I take you to page 35 first. 2 That's 14/1/15: 3 "Ecclesiastical are fully aware of the allegation 4 and have been for some considerable time. In fact, they 5 have been covering the cost of AN-A4's counselling 6 sessions. Cover has been confirmed." 7 So that sort of identifies that you were, at least 8 at some point, funding the counselling sessions, if not 9 arranging them, for A4, whom we heard from yesterday. 10 So at 37 to 38, then the next day a letter of claim 11 was received from, I think, Mr Greenwood of Switalskis, 12 and that's all gone. But then, if one goes further on, 13 could I take you to 53. It says: 14 "Contact from AN-A4. He feels abandoned." 15 In those circumstances, whatever happened, AN-A4 16 felt extremely upset and unhappy? 17 A. Yes. 18 Q. And, you know, felt abandoned and identified that quite 19 clearly in a number of emails and telephone calls that 20 he made. We identify then -- can I take you to 56. 21 This is from Sheryl Kent, who was the Diocesan 22 Safeguarding Advisor in London who was dealing with 23 AN-A4, to Jill Sandham, who I believe is somebody in the 24 national safeguarding at the time. It said, 25 "Sensitivity: Confidential":</p> <p style="text-align: center;">Page 101</p>	<p>1 "I have just spoken to him, thank you, Jill. He had 2 the same experience two years ago." 3 Now, that's somebody called Colin Perkins who was 4 from the Diocese of Chichester, who's the Diocesan 5 Safeguarding Advisor in the Diocese of Chichester: 6 "He is going to contact the solicitor at Beachcroft 7 by email and try to get her to solve this one. Bless 8 him." 9 It identifies, 22 January, Jill then sends an email 10 to Sheryl saying: 11 "Dear Sheryl ... haven't yet been able to have 12 a conversation with Colin ... 13 "EIG advice is definitely at odds with what I know 14 has happened in other cases, in that independent 15 support, eg a listener, and contact to set this up, has 16 been offered. Colin has also had experience of this and 17 should be able to help." 18 So what I want to identify is, you say all your 19 claims handlers know, and the advice they're always 20 given is, not to stop the counselling, not to stop the 21 support. But yet, we have information here from the 22 Diocese of London and the Diocese of Chichester, both of 23 which, at the very least, intimate that what's going on 24 on the ground is not quite the same as what's set out in 25 your guiding principles?</p> <p style="text-align: center;">Page 102</p>
<p>1 A. Well, if I'm reading that correctly, I think that says 2 that Colin Perkins has experience of this -- sorry, let 3 me just read that. 4 Q. If I could take you to page 60, that might help. 5 A. Okay. 6 Q. Sorry, this isn't the most legible of documents. If we 7 could go down, down, down, yes. This is what 8 Colin Perkins wrote to someone: 9 "Just to confirm, I'm going to try and speak with 10 the person Sheryl has been dealing with at EIG, who is 11 the same person we work with ... I find the advice very 12 odd because we thrashed through this two years ago with 13 the EIG when Gemma Wordsworth arrived and both they and 14 Paula Jefferson ... were fine with us offering support 15 to victims through her, and indeed offering meetings 16 with Bishop Martin concurrent to an ongoing claim. We 17 obviously had to set parameters, but that didn't mean 18 keeping victims at arm's length. We will see what 19 happens in those conversations and hopefully we will be 20 able to come to a resolution." 21 A. That suggests, if I'm reading that, interpreting that, 22 correctly, that Colin Perkins had experience of us on 23 previous claims where the counselling and support, 24 pastoral support, had been continued through the life or 25 alongside the civil claim.</p> <p style="text-align: center;">Page 103</p>	<p>1 Q. But, I mean, that -- again, the language that Mr Perkins 2 used is indicating "we had to thrash this through". 3 That doesn't indicate that all was sweetness and light. 4 It indicates that there were some conversations, shall 5 I put it that way -- 6 A. I can't comment about the conversations themselves and 7 what that actually relates to. 8 Q. But doesn't that intimate, however, that whatever the 9 good intentions, those intentions have not necessarily 10 been realised and there were still, at least three years 11 ago, problems on the ground with what claims handlers 12 were telling people about the provision of counselling 13 and continuing support? 14 A. It could mean that. I genuinely don't know. I think 15 the reassuring thing for the inquiry is that that would 16 never happen again, because, you know, we now have the 17 guiding principles in place. It is absolutely clear and 18 transparent. So if that was the case, you know, prior 19 to -- and it looks as though it is 2015. 20 Q. Yes, that would have predated the issuance of 21 the guiding principles by about a year? 22 A. So if that were the case, then, as I say, going forward 23 from '16, that would never happen again. 24 Q. But the reality is that that happened, even though, as 25 I have taken you to, in 2012 and 2005 year you have been</p> <p style="text-align: center;">Page 104</p>

<p>1 clear for a long period of time on a kind of high-level 2 basis that these things can continue? 3 A. Yes, absolutely. And that's why, as I say, I don't know 4 the details of the example you're referring me to, 5 that's my concern. Hence I can't really elaborate. 6 Q. But, of course, we could have clarified this, had you 7 chosen to waive legal professional privilege? 8 A. Well, you could have clarified this on this particular 9 case. 10 Q. Thank you. So a year after the Elliott Review, the 11 matter was raised again because the Church of England 12 published a document setting out the progress it's made, 13 and that's behind tab B10, EIO000134_004 at number 5. 14 This just identifies that there were the guiding 15 principles, and then at the bottom: 16 "To help all policyholders understand through the 17 claims process." 18 Now, that then involved renewed press interest and, 19 again, you, in fact -- not you; somebody from the EIO 20 wrote an article in The Church Times. I don't think we 21 need to go to it. It is EIO000135_022, Ralph. So 22 The Church Times, "Putting abuse survivors first". It 23 says: 24 "Child abuse is reprehensible and traumatising. Its 25 assertion that the EIO instructed the Church of England</p> <p style="text-align: center;">Page 105</p>	<p>1 to deny survivor pastoral care is untrue." 2 Again, I suppose, what I would say is, we could 3 clarify this truth and you could have chosen to have 4 allowed us to put up the original documents which could 5 have clarified that, and waiving it in this circumstance 6 wouldn't necessarily mean waiving it for any other time, 7 would it, Mr Bonehill? You may or may not know that. 8 A. No, I don't, actually. 9 Q. Following on from that, you then received a letter from 10 three bishops in the Church of England. That's tab 13. 11 This was as a result of concerns that A4 had raised. It 12 is tab 13, EIO000136, please, Ralph, at 002/003. 13 Now, this identifies the new guiding principles. If 14 you wouldn't mind just drawing up and enlarging the bits 15 there, thank you: 16 "Our own hard experience within the 17 Church of England is this: it is much easier to put good 18 words on paper than it is to ensure they are fulfilled 19 in practice. As a significant policyholder with you, we 20 believe we need to ensure that you have clear, agreed 21 ways of guaranteeing that the guiding principles are 22 followed." 23 A. Yes. 24 Q. Then it sets out that there should be an ongoing 25 commitment to reviewing them, and, again, at the bottom</p> <p style="text-align: center;">Page 106</p>
<p>1 of that, it says: 2 "We also believe that further work needs to be done 3 between EIG and policyholders in ensuring ongoing 4 pastoral support for survivors after a claim has been 5 settled. Whilst the legal and technical task may have 6 been completed, the closure of the claim often feels 7 like an abandonment. So how might EIG consider a way of 8 building into future settlements an agreement about 9 ongoing support?" 10 It then says at the bottom of the page: 11 "Our own past experience has shown us that EIG has 12 not always offered consistent advice and has not always 13 practised in its response to survivors the way that we 14 have been given to believe would be the case." 15 They then move on to A4's case, and we looked at 16 this yesterday, which in effect asked you to re-open the 17 settlement? 18 A. Yes. 19 Q. Now, you then provided quite a detailed response to 20 this -- well, not you, yourself. 21 A. Yes. 22 Q. Mr Hughes, who was the chief executive officer of 23 the EIG. This is at EIO000137_002. Can I just check to 24 make sure, do you -- at any stage, did you consider 25 re-opening A4's claim?</p> <p style="text-align: center;">Page 107</p>	<p>1 A. The claimant was legally represented, I think that's 2 important. Any claim of this nature, once settled, is 3 in full and final settlement. So the claim would not be 4 re-opened. 5 Q. You say it wouldn't be. Technically, it could be. You 6 could decide to do so. But in the circumstances of this 7 case, you chose not to do so? 8 A. We did, that's correct. 9 Q. In fact, you wrote a letter which I would describe as 10 kind of more in sorrow than in anger, but there is 11 certainly an undercurrent of anger, shall we say, from 12 the EIG about it, and it says -- can I take you to the 13 third page, 004, which deals particularly with the 14 Elliott Review: 15 "We are, of course, aware of the long history of 16 the both private and public remonstrance about his 17 abuse. We are also aware of the Elliott Review. It 18 remains a source of considerable disappointment that we 19 were not invited to contribute, despite being liberally 20 referred to in it, and we did not have the opportunity 21 to set the record straight. The misconceptions it 22 contains we believe contribute to the continuing 23 misunderstanding of the fundamental issues involved in 24 handling historic abuse claims, potentially to the 25 detriment of survivors."</p> <p style="text-align: center;">Page 108</p>

<p>1 Then further down, if I could just go to the next --</p> <p>2 the one headed "The Elliott Review", please. It says:</p> <p>3 "We believe this is particularly regrettable as it</p> <p>4 has misled Mr ... about the true circumstances</p> <p>5 surrounding what happened to his claim when, after many</p> <p>6 years of trying to raise his abuse, he brought legal</p> <p>7 proceedings to make sure his voice was heard. It was</p> <p>8 entirely foreseeable that he would form an adverse</p> <p>9 opinion of Ecclesiastical as a result."</p> <p>10 So you were not happy, and I think -- I sense some</p> <p>11 frustration, shall we say, in your relationship with the</p> <p>12 Church of England about the way that they handled this</p> <p>13 entire issue?</p> <p>14 A. Well, in regards to this particular claim, it just comes</p> <p>15 back to the point that we didn't instruct them to</p> <p>16 withdraw the support. I think that's the fundamental</p> <p>17 issue here.</p> <p>18 Q. So I understand a meeting did ultimately take place</p> <p>19 between EIO and the three bishops concerned.</p> <p>20 A. Yes.</p> <p>21 Q. As a result of that, did anything happen?</p> <p>22 A. Well, that meeting was a confidential meeting. I wasn't</p> <p>23 there. So I'm not sure what -- you know, what was</p> <p>24 agreed, to be quite honest with you.</p> <p>25 Q. You published a second version of the guiding principles</p> <p style="text-align: center;">Page 109</p>	<p>1 in September 2018.</p> <p>2 A. We did, yes.</p> <p>3 Q. In particular, you amended the guidance in relation to</p> <p>4 pastoral support. It is behind tab B47, chair and</p> <p>5 panel, but, Ralph, EIO000147_002. I think, chair and</p> <p>6 panel, we can look at it probably on the screen because</p> <p>7 I think it is volume 3 of your documentation.</p> <p>8 Could I take you to paragraph 4, which I think is</p> <p>9 the new paragraph. I stand to be corrected. I think it</p> <p>10 looked the same other than paragraph 4, which is new,</p> <p>11 which identifies specifically that the making of any</p> <p>12 formal claim shouldn't prevent any policyholder</p> <p>13 continuing to support the claimant?</p> <p>14 A. Yes.</p> <p>15 Q. So I'm assuming that that might have come from the spat</p> <p>16 between you and the Church of England in respect of</p> <p>17 AN-A4?</p> <p>18 A. In terms of the guiding principles, we agreed to keep</p> <p>19 them up to date. You know, that was a commitment we</p> <p>20 made and, you know, we've delivered on that. Things are</p> <p>21 changing, we are learning, we are improving. So, you</p> <p>22 know, that just brings a bit more clarity, I think, for</p> <p>23 all of our insureds on this particular subject.</p> <p>24 Q. Can I ask you just a few questions about the</p> <p>25 Carlile Review. Now, we have got an entire witness</p> <p style="text-align: center;">Page 110</p>
<p>1 statement from you about it and about your view, but I'm</p> <p>2 just going to deal very, very quickly with a few things.</p> <p>3 Firstly, this is all about claims which are not</p> <p>4 insured. So you do not insure bishops?</p> <p>5 A. Correct.</p> <p>6 Q. Therefore, the George Bell claim, the Victor Whitsey</p> <p>7 case and the Peter Ball case, you would have had nothing</p> <p>8 to do with them?</p> <p>9 A. No involvement at all.</p> <p>10 Q. One of the things that Lord Carlile said was that, when</p> <p>11 considering the allegations, the Church of England would</p> <p>12 be assisted by some understanding of the criminal</p> <p>13 process and advice from a criminal lawyer, and that</p> <p>14 individuals should understand the criminal standard of</p> <p>15 proof. Is that something that you, as the EIO, would</p> <p>16 ever think about in cases which were insured?</p> <p>17 A. It really isn't. We operate within, you know, the civil</p> <p>18 justice system. The standard of proof there is on</p> <p>19 balance of probabilities. I actually think that, if</p> <p>20 that standard of proof was raised, it could (a) delay</p> <p>21 settlement of a claim or it could indeed prevent victims</p> <p>22 and survivors getting access to justice. So that is</p> <p>23 absolutely -- that is not a recommendation that we would</p> <p>24 agree with.</p> <p>25 Q. And, secondly, in respect of the question of limitation,</p> <p style="text-align: center;">Page 111</p>	<p>1 Lord Carlile again said, on the facts of that particular</p> <p>2 case, the abuse was meant to have occurred in the 1950s,</p> <p>3 and this was a claim which was happening, you know,</p> <p>4 a great deal of time later, and, therefore, the issue of</p> <p>5 limitation should have been explored and possibly</p> <p>6 raised.</p> <p>7 A. Mmm.</p> <p>8 Q. We have heard your view about that. What would be your</p> <p>9 view about Lord Carlile's recommendation in that</p> <p>10 respect?</p> <p>11 A. Well, in terms of limitation, I think our views are</p> <p>12 quite clear on that. You know, whether the claim was</p> <p>13 20 years ago or 50 years ago, it doesn't really make</p> <p>14 a great deal of difference, in terms of limitation, and,</p> <p>15 as we've articulated earlier, you know, our view on</p> <p>16 limitation itself may change very soon anyway. So,</p> <p>17 again, that wouldn't be something we would agree with.</p> <p>18 Q. Now, the other point that Lord Carlile made was that</p> <p>19 settlement was reached in the George Bell case without</p> <p>20 any admission of liability being made.</p> <p>21 A. That's right.</p> <p>22 Q. And, therefore, in his view, he says that there</p> <p>23 shouldn't have been an apology.</p> <p>24 A. Yes.</p> <p>25 Q. If a case was managed by the EIO, what would your view</p> <p style="text-align: center;">Page 112</p>

<p>1 have been about whether or not to issue an apology to 2 the victim/survivor even if you weren't admitting 3 liability? 4 A. Well, first and foremost, it is not for us to give the 5 apology, of course. 6 Q. Yes, of course. 7 A. That is for the insured and that is a decision for them 8 alone. It is not a decision for Ecclesiastical. 9 Q. But would you give any advice about -- I know it is not 10 a matter for you. 11 A. No. 12 Q. Would you ever give advice about that area? 13 A. No. 14 Q. As far as confidentiality is concerned, I think we are 15 absolutely clear what your position is about that. 16 Would your position change, as in the George Bell case, 17 because Lord Carlile said that there should be some 18 distinction where it's settled without liability, rather 19 than where it's settled -- 20 A. For us, there would be no distinction. We would never 21 use confidentiality agreements. 22 Q. Do you think, therefore, that the process which 23 Lord Carlile suggests should be adopted by the church in 24 these circumstances in fact sounds quite different to 25 the approach set out under the guiding principles?</p> <p style="text-align: center;">Page 113</p>	<p>1 A. Immensely different and something that certainly we 2 would not be able to support. 3 Q. Does that, therefore, create a risk that there will be 4 a two-tier process for victims and survivors, depending 5 on whether it is against a bishop or against anybody 6 else? 7 A. Well, I don't know what the church's views are, in terms 8 of the bishops' liability and how they handle claims. 9 But on the basis they -- I understand they're adopting 10 our guiding principles, then I would suggest that there 11 wouldn't be a two-tier approach. 12 Q. Obviously one of the issues that gets raised is whether 13 or not -- you have mentioned on several occasions the 14 fact that the civil justice system is adversarial in 15 nature and that adversarial nature is often inimical to 16 the well-being of people who have suffered emotionally 17 in the context of having been sexually abused during 18 their childhood. There have been discussions by various 19 victims and survivors, particularly Professor Macfarlane 20 advocated some form of redress scheme. How far would 21 insurance cover cover, so to speak, the setting up or 22 the implementation of some form of redress scheme, as 23 far as you're aware? 24 A. Obviously it depends on the structure of any redress 25 scheme and the funding of it, but the insurance</p> <p style="text-align: center;">Page 114</p>
<p>1 contracts, and, as I say, there are many thousands of 2 them that we issue within the Church of England, we 3 mustn't lose sight of that, they are reliant upon there 4 being a legal liability. So the question is, under 5 a redress scheme, would the policies be triggered and, 6 therefore, would we be able to provide an indemnity to 7 the insured, and -- 8 Q. So you would be able to provide an indemnity if it 9 looked like a civil claims type process? 10 A. If there's a legal liability attaching to it and -- so 11 the likelihood is that insurance would not fund 12 a redress scheme, but it really depends on the 13 circumstances. And if that is something that the church 14 are looking at for themselves, then we would gladly help 15 and consult with them on that. 16 Q. Do you have any experience, because I know EIO insure 17 people around the world? 18 A. Yes. 19 Q. Do you have any experience, in any other jurisdictions, 20 of the way that redress schemes have worked, or haven't 21 worked, in conjunction with insurance? 22 A. Yes, so Australia is the obvious one. So, you know, we 23 have exposures in Australia. That's a fairly new 24 redress scheme. So I don't think we've really seen how 25 that's working yet. I think it's too early to comment</p> <p style="text-align: center;">Page 115</p>	<p>1 on that. But that whole piece around redress in other 2 territories, I know that's something that the inquiry 3 are looking at through the Accountability and Reparation 4 Investigation, and, again, we have contributed to that 5 part of the investigation or the inquiry as well. 6 Q. The last question I have to ask you is, you have talked 7 quite a lot about wanting to develop a less adversarial 8 approach. 9 A. Yes. 10 Q. If there were to be some kind of mandated mediation or 11 some form of process which was less adversarial in terms 12 of that, would that be something that you, as EIO, would 13 support? 14 A. We need to understand it, of course, in terms of what 15 we're talking about and the implications on the 16 insurance contracts. We'd need to understand that. But 17 fundamentally, yes, because that's what I'm trying to 18 deliver now, through the existing civil justice system. 19 So, yes, in answer to your question, I'm sure we would. 20 MS SCOLDING: Thank you very much, Mr Bonehill, if you would 21 like to wait there in case the chair and panel have any 22 questions for you. 23 THE CHAIR: Ms Sharpling? 24 25</p> <p style="text-align: center;">Page 116</p>

<p>1 Questions by THE PANEL</p> <p>2 MS SHARPLING: Thank you, Mr Bonehill. One question from</p> <p>3 me. I don't know whether you can answer this, but I am</p> <p>4 going to try. Do you have an understanding of the time</p> <p>5 periods involved, say, from notifying that a claim has</p> <p>6 been made in a straightforward case to settlement?</p> <p>7 A. I don't have that number to hand, but I can certainly</p> <p>8 get that number for --</p> <p>9 MS SHARPLING: Can you, from your experience, give me a sort</p> <p>10 of indication?</p> <p>11 A. Probably 18 months to two years, something of that</p> <p>12 nature, would be my guess.</p> <p>13 MS SHARPLING: Thank you. And something of a greater</p> <p>14 complexity?</p> <p>15 A. It can take considerably longer.</p> <p>16 MS SHARPLING: Are we talking years?</p> <p>17 A. Possibly. One example we discussed earlier on is</p> <p>18 medical evidence --</p> <p>19 MS SHARPLING: Of course.</p> <p>20 A. -- and the availability of experts in that field and how</p> <p>21 long it takes them, et cetera, et cetera. So, you know,</p> <p>22 it can become quite a lengthy process, yes.</p> <p>23 MS SHARPLING: Thank you.</p> <p>24 THE CHAIR: Mr Frank?</p> <p>25 MR FRANK: The first thing is a point of just detail,</p> <p style="text-align: center;">Page 117</p>	<p>1 really, but if we could bring up EIO000110_002, it is</p> <p>2 just a diagram, I think, of the structure and</p> <p>3 directorate of the ATL and EIO group. It is</p> <p>4 dated April 2017. I don't know whether it is possible</p> <p>5 to ... perhaps it is not on your list of things to bring</p> <p>6 up.</p> <p>7 MS SCOLDING: I don't think it will be on the list, but it</p> <p>8 is available.</p> <p>9 MR FRANK: It is behind tab 16 of B. I don't know whether</p> <p>10 you have that there.</p> <p>11 A. Do you want me to go through these and try and locate</p> <p>12 it?</p> <p>13 MR FRANK: If you don't mind, very quickly.</p> <p>14 MS SCOLDING: I can give somebody my copy.</p> <p>15 A. Would you mind?</p> <p>16 MS SCOLDING: That's fine. It is probably easier.</p> <p>17 MR FRANK: I just really want to ask, because it is dated</p> <p>18 2017, I'm wondering whether you can confirm whether that</p> <p>19 is still current --</p> <p>20 A. Still current. I'll do my best.</p> <p>21 MR FRANK: -- or whether it's changed materially.</p> <p>22 A. Looking at that quickly, I would say that is still the</p> <p>23 current structure.</p> <p>24 MR FRANK: That's very helpful, thank you very much.</p> <p>25 The second thing I would like assistance with, if</p> <p style="text-align: center;">Page 118</p>
<p>1 I may, is in relation to a document we have already</p> <p>2 looked at. It's got two references, but I think you</p> <p>3 have a reference, again in bundle B -- it is dated</p> <p>4 14 September 2017. This is the letter from the bishops</p> <p>5 to Mark Hughes. Do you remember that letter, or you</p> <p>6 have seen that?</p> <p>7 A. I have seen that.</p> <p>8 MR FRANK: I just wonder if you could help us with what</p> <p>9 looks like an addendum or something that's been put on</p> <p>10 the bottom of the original, which was referred to</p> <p>11 briefly yesterday -- I think I drew attention to it.</p> <p>12 I have it as ANG000503_004.</p> <p>13 A. Is it possible to bring that up at all?</p> <p>14 MR FRANK: It should be possible. It may also be in another</p> <p>15 bundle.</p> <p>16 MS SCOLDING: If I can provide any assistance on this, we</p> <p>17 did -- that document that we saw yesterday, Mr Frank,</p> <p>18 that I said that I would -- I have investigated, and</p> <p>19 that document came from AN-A4, so the form of that</p> <p>20 letter and the information on the bottom would have</p> <p>21 been -- is something that's been supplied by A4 to us,</p> <p>22 and it is not on any of the other copies of the letters</p> <p>23 that we have received from other material providers, if</p> <p>24 that helps at all.</p> <p>25 MR FRANK: It may do. I just wanted Mr Bonehill to have the</p> <p style="text-align: center;">Page 119</p>	<p>1 opportunity to comment on the substance of it, because</p> <p>2 it appears to be --</p> <p>3 MS SCOLDING: We are just going to grab it for Mr Bonehill's</p> <p>4 reference.</p> <p>5 MR FRANK: It appears to at least be implicitly critical of</p> <p>6 EIG in relation to the handling of more than one aspect</p> <p>7 of this, not just in relation to the question of</p> <p>8 withdrawal of support for however short a period, but in</p> <p>9 relation to a broader criticism. It is only right that</p> <p>10 you should have the words in front of you. It starts</p> <p>11 with, "This is prosaic". I don't know who has written</p> <p>12 this and I don't think it is even a complete document --</p> <p>13 MS SCOLDING: It is not, because we have checked and that's</p> <p>14 all we have of it. We haven't got anything which</p> <p>15 obviously follows on the next page.</p> <p>16 MR FRANK: In any event, it starts, "This is prosaic". The</p> <p>17 sentence I want to draw to your attention is:</p> <p>18 "It is one thing to insure the Church of England</p> <p>19 against damage and loss, but quite another to ensure the</p> <p>20 Church of England offers justice, healing and</p> <p>21 reconciliation."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 MR FRANK: It would appear, on the face of it, to be an</p> <p>25 implicit criticism by the bishops that the EIO insurance</p> <p style="text-align: center;">Page 120</p>

1 facility was not providing them with an opportunity to
 2 offer justice, healing and reconciliation. I just
 3 wondered whether you wanted an opportunity to comment on
 4 that?
 5 **A. Yes, I think we just need to be clear that, you know, we**
 6 **come back to it, that we are dealing with a claim under**
 7 **a contract of insurance, and, as a consequence of that,**
 8 **we know it is restrictive, ie, it can provide**
 9 **compensation, but it may not necessarily provide what**
 10 **the victim and survivor expects it to provide or wants**
 11 **it to provide. Because, you know, we are limited by**
 12 **contract. So I think there's a difference there,**
 13 **I think, from a victim/survivor perspective what the**
 14 **insurance policy can deliver and what it can't, if that**
 15 **helps.**
 16 MR FRANK: That's helpful, thank you. My final question is
 17 this, since it is a question of contract: in relation to
 18 the responsibility for maintaining the record of
 19 insurance, that is to say the copy of the contract, does
 20 your contract, the EIO contract, specify that a copy of
 21 it should be kept by you, or the broker or by the --
 22 **A. No, it doesn't, but I think the responsibility does sit**
 23 **with the insured to maintain documentation, not just the**
 24 **church, anybody; ie, if an insured is saying,**
 25 **"Ecclesiastical, you were the insurer 40 years ago",**

Page 121

1 MS SCOLDING: Chair, I see the time. I don't know whether
 2 this is an appropriate moment to break for lunch.
 3 THE CHAIR: Thank you. We will return just after 2.00 pm.
 4 MS SCOLDING: Thank you very much.
 5 (1.09 pm)
 6 (The short adjournment)
 7 (2.08 pm)
 8 MS SCOLDING: Good afternoon, chair and panel. We now pass
 9 on to hear the evidence of Bishop Alan Wilson.
 10 BISHOP ALAN WILSON (sworn)
 11 Examination by MS SCOLDING
 12 MS SCOLDING: Please feel free to stand or sit.
 13 I understand you wish to be called Bishop Alan; is that
 14 right?
 15 **A. Yes, indeed.**
 16 Q. Just a few preliminary matters. Firstly, this isn't
 17 a test of memory. So please feel free to refer to your
 18 notes or to your witness statement at any time, if you
 19 are not clear.
 20 Secondly, we can have as many breaks as are needed.
 21 We will be having a break at about 3.15 pm, in any
 22 event, if you are still giving evidence at that time.
 23 Lastly, there is a screen in front of you, and
 24 I think, as you've seen, because I've seen you in the
 25 public gallery, Ralph here gets the documents up and

Page 123

1 **they would need to provide evidence of that. What we do**
 2 **is we do a thorough search of all of our records,**
 3 **because we do retain a lot of documentation, as you**
 4 **might expect. But the responsibility ultimately sits**
 5 **with the insured to demonstrate that we were the insurer**
 6 **at the material time. As I explained earlier, even**
 7 **where there's a gap in evidence, we have always accepted**
 8 **that we were the insurer.**
 9 MR FRANK: So where you say the responsibility remains with
 10 the insured, is that set out in your contract?
 11 **A. I don't believe it is.**
 12 MR FRANK: So the insured doesn't know that you are looking
 13 to them to keep their own documentation, unless and
 14 until you raise it with them?
 15 **A. Other than -- in terms of the church, obviously we put**
 16 **that advice out, telling them to keep all records, that**
 17 **counsel referred to earlier on.**
 18 MR FRANK: Nothing on the face of the contract that says it?
 19 **A. I don't think there is. I need to check that.**
 20 MR FRANK: Do you think there should be?
 21 **A. I think that may be helpful, yes.**
 22 MR FRANK: Thank you very much.
 23 THE CHAIR: Thank you, we have no further questions. Thank
 24 you, Mr Bonehill.
 25 (The witness withdrew)

Page 122

1 then enlarges them to whichever enlargement is
 2 preferable for you. I certainly know that mine is more
 3 than it usually is.
 4 You should also have a paper bundle in front of you
 5 with the witness statements and the relevant documents.
 6 **A. I have.**
 7 Q. Bishop Wilson, there is one witness statement from you
 8 which, just for the benefit of the record, is ANG000637.
 9 Chair and panel, it is behind the first tab in your
 10 bundle.
 11 I am not going to take you to your signature because
 12 it is covered over, but can I identify, have you had an
 13 opportunity to read this witness statement recently?
 14 **A. Yes, I have.**
 15 Q. Is it true, to the best of your knowledge and belief?
 16 **A. Yes.**
 17 Q. Thank you. Now, I am not going to go through every line
 18 of your witness statement, but I am just going to ask
 19 you some preliminary questions. You are currently the
 20 Bishop of Buckingham and you have been so since 2003; is
 21 that right?
 22 **A. Yes.**
 23 Q. You are an area bishop. Could you just briefly -- are
 24 you an area bishop or a suffragan bishop?
 25 **A. Both, but an area bishop is someone who has areas,**

Page 124

<p>1 usually geographical areas, committed into their care by 2 the diocesan bishop, using a legal instrument, and 3 particular functions, and I have 34 different things 4 that I do in my area, which are legally delegated. 5 Q. So you act in the shoes of the diocesan bishop about 6 a number of matters? 7 A. About a number of matters, yes. 8 Q. You are the bishop responsible, as I understand it, for 9 289 congregations, with around 200 clerics for whom you 10 are responsible, and 100 retired clergy; is that right? 11 A. Yes. 12 Q. Your area is Bishop of Buckingham. Is that roughly 13 congruent with what we would understand to be 14 Buckinghamshire? 15 A. Yes, it is Victorian Buckinghamshire, as in 1844, so 16 it's Slough and Milton Keynes and goes up into 17 Northamptonshire, yes. 18 Q. We have, at paragraphs 7 to 14 of your witness 19 statement, your career history, which is, you were 20 ordained in 1979 and spent until 1989 as a curate whilst 21 you were completing a doctorate in philosophy. You were 22 then the rector of Sandhurst, I wasn't sure whether that 23 was the army officers' facility -- 24 A. Yes, it was. 25 Q. -- and a prison chaplain as well as teaching in academe</p> <p style="text-align: center;">Page 125</p>	<p>1 in ethics and history at Reading University; is that 2 right? 3 A. Yes. 4 Q. You have been involved during your time in developing 5 training for clerics and leading training workshops in 6 supervision skills about managing clerics and clerical 7 behaviour; is that right? 8 A. Yes, indeed. 9 Q. After your period as a rector, you then became the area 10 dean from Sonning before becoming the Bishop of 11 Buckingham and, alongside your episcopal role, 12 I understand you're a school governor, the chair of 13 a diocesan board of education, the member of an academy 14 trust and you also chair charities concerning poverty 15 and education in the developing world; is that right? 16 A. Yes, that's correct. 17 Q. You also publish works. We are going to talk about your 18 most recent book which you have published along with one 19 of your colleagues, Rosie Harper, about sexual abuse in 20 the context of the church, but you have also published 21 work which advocates acceptance, for example, of 22 same-sex marriage; is that right? 23 A. Yes. 24 Q. As far as your child protection training and experience 25 is concerned, you were on the Diocesan -- what was then</p> <p style="text-align: center;">Page 126</p>
<p>1 called the Diocesan Child Protection Steering Group, now 2 known as the Diocesan Safeguarding Advisory Panel, from 3 2003 to 2010; is that right? 4 A. Yes. 5 Q. What role did you play within that organisation? 6 A. Well, I was invited to chair it, but it seemed to me 7 wrong that a bishop should be chairing such a body, so 8 I became a regular member, and the director of 9 the stewardship department in the diocese acted as 10 chair, at that time, of that group. 11 We reviewed disclosures that were questionable. 12 Anything was referred from -- up to that particular 13 group. There were representatives from Social Services 14 and police on that, and it covered all three counties of 15 Berks, Bucks & Oxon, and we met, I think, four times 16 a year and reviewed business as it was put up to us. 17 Q. One of your roles under the area scheme of delegation is 18 that you are responsible for managing blemished DBS 19 checks as they come back and the "safe to receive" 20 procedure. Would you just like to explain briefly what 21 the "safe to receive" procedure is and if you have got 22 any particular views about how effective it is as a way 23 of transferring adequate information about safeguarding 24 from one diocese to another? 25 A. Well, it's developed a lot during my time. In 2003,</p> <p style="text-align: center;">Page 127</p>	<p>1 there were what were called "safe to receive" references 2 that could be one-liners, and that was the opinion of 3 one bishop, that a cleric was "safe to receive", as the 4 phrase went. As long as those words were used, then the 5 cleric was safe to receive. 6 This developed a few years ago into a system called 7 clergy current status letters. These are formal 8 documents that are drafted in a standard form and, 9 before I sign one of these, I am required to look at the 10 blue file of the cleric concerned and to see whether 11 there are any concerns about any aspect of their work 12 that someone proposing to employ them should be aware 13 of, and there's also, of late, a sort of character 14 reference that goes in with that reference to their 15 work. 16 But the primary purpose is to certify to another 17 bishop that certain legal conditions are not true of 18 this cleric, and that could be a matter of proceedings 19 under Canon law, it could be proceedings in a family 20 court, it could be anything else that would lead 21 a sensible person to have doubts about the suitability 22 of this person to be in a sensitive job. 23 Q. Do you think that there is consistency of approach when 24 you have received letters from other dioceses in terms 25 of there being a full and frank exchange of views, which</p> <p style="text-align: center;">Page 128</p>

1 is what you would really hope?

2 **A. Usually, yes. It's got much better, in the last few**

3 **years. At one time, there was tremendous inconsistency**

4 **between other bishops. I think now that is much better**

5 **than it used to be.**

6 **What I would say is, there is a hole that has opened**

7 **up in the system, which is that, at one time, there was**

8 **reference to a Lambeth List of clergy who should not be**

9 **employed because they were thought to be a danger or**

10 **there was a reason why they should not. Now, that**

11 **system, as far as I'm concerned, from the ground, seems**

12 **to have broken down entirely. It's now over two years**

13 **since I saw a revision of that. It's not being sent**

14 **out. And it means that, when I do one of the 30-odd**

15 **appointments I do a year, I have no way of knowing**

16 **whether this person has been put on that list.**

17 **Q. I mean, as we understand it, the list still exists.**

18 **It's been renamed the Archbishops' List. But it is**

19 **still something which we understand -- the church has**

20 **told us that is circulated regularly. But it is not**

21 **something that --**

22 **A. It's not. And I have asked them when they will start**

23 **doing it and I have been told -- the last one I had was**

24 **in August 2017. I phoned soon -- the next year, phoned**

25 **Lambeth Palace and said, had there been a mistake**

Page 129

1 managing or dealing with child protection allegations or

2 child protection issues?

3 **A. Well, I had some personal briefing from the Diocesan**

4 **Safeguarding -- the Child Protection Advisor, as he was**

5 **at the time. So I had some personal support from him.**

6 **The only thing like safeguarding training I had was from**

7 **the world of education -- I was very involved with**

8 **various schools and therefore I did all the courses that**

9 **I was required to do, either as a school governor or as**

10 **chair of the board of education. But I didn't have**

11 **anything from the church until much more recently, and**

12 **I have listed the things which I have had since then in**

13 **my witness statement.**

14 **Q. You have identified that you have undertaken the C4**

15 **training, which is the senior leadership training,**

16 **recently?**

17 **A. Yes.**

18 **Q. And also training about mental health and schools, in**

19 **fact?**

20 **A. I have done the C4 training twice: once in its first**

21 **incarnation and once in its new, revised version, yes.**

22 **Q. You hadn't had any training between 2003 and 2016,**

23 **despite the fact, at that time, you and the Diocesan**

24 **Child Protection Advisor would liaise quite closely and**

25 **you would be responsible for making decisions about what**

Page 131

1 **because I hadn't been sent it. I was told it wasn't**

2 **being sent out because there had been a change of**

3 **personnel, Andrew Nunn had left and therefore it wasn't**

4 **quite certain who would be doing this, but be assured**

5 **I would have a new copy of the list by the autumn.**

6 **I didn't have a new copy of the list by the autumn.**

7 **I still haven't got one and it is almost two years since**

8 **the last list went out that I have.**

9 **Q. Could that be saved in some way by the blue files? Now,**

10 **you know, we all know quite a lot about blue files,**

11 **sitting in this room. How adequate are the blue files**

12 **to tell you the information you need to know about the**

13 **safety or otherwise of the person that you are going to**

14 **be recommending by way of a reference?**

15 **A. It depends on the blue file, really, and where it's come**

16 **from and how it's been looked after in the past. It**

17 **should be a reasonably reliable guide to most clerics,**

18 **but if, for example, a past case had arisen in respect**

19 **of a cleric in another diocese, I would have no way**

20 **right now of checking their safety.**

21 **Q. So it's wholly dependent upon records being kept**

22 **adequately in the past?**

23 **A. Yes.**

24 **Q. Can I just ask, during the entire period of 2003 to**

25 **2016, what training were you given by the church in**

Page 130

1 may or may not happen in individual cases?

2 **A. That is correct, yes.**

3 **Q. You also identify in your witness statement concerns**

4 **that you have about the operation of the Clergy**

5 **Discipline Measure. This is, chair and panel, at 50 to**

6 **52 of your witness statement. Can you identify why you**

7 **have concerns about the current workings of the Clergy**

8 **Discipline Measure, or CDM, as I may call it?**

9 **A. Well, I think there are phenomena that a large number of**

10 **people experience when they're dealing with the system**

11 **to do with delay and to do with the lack of**

12 **a whistleblowing policy, which means that witnesses are**

13 **quite often intimidated and don't want to make**

14 **statements because they're afraid that this will be**

15 **thrown back at them by the person about whom they're**

16 **complaining. So there's that sort of level of**

17 **operational difficulty.**

18 **I think, as a bishop, my problem with it is that it**

19 **puts bishops in the most extraordinary role, where they**

20 **are both expected to be judges, which they have no**

21 **particular training or yen for being or experience of**

22 **doing, and also pastors at the same time. I think that**

23 **that is, in itself, very problematic indeed. It means**

24 **that an enormous amount of work that happens under the**

25 **CDM is done in a hurry by people who aren't used to**

Page 132

<p>1 doing that sort of thing and who may make very quick 2 judgments which are not particularly secure. 3 And I also think that there are structural problems 4 with it. I think it's very difficult sometimes to 5 establish what has actually happened. I think a lot of 6 CDM proceedings are conducted in a dense cloak of 7 secrecy, so nobody knows what has happened. And, 8 therefore, in terms of the church learning from 9 disciplinary lapses by clergy, that can't possibly 10 happen, because nobody knows, when anything has gone 11 wrong, what it was. So there are lots of problems about 12 it. 13 Q. In fact, at paragraph 85 of your witness statement, just 14 for the chair and panel, you describe it as 15 "self-protective, inconsistent and opaque"? 16 A. Yes. 17 Q. That's page 15 of your witness statement. 18 A. I think that's how many survivors have experienced it. 19 It also contains some discretionary -- I have seen CDMs, 20 for example, where a witness was one day late with 21 a statement and therefore the whole thing has 22 unravalled. 23 Q. Could you tell me, at paragraph 86 -- maybe it would be 24 useful for us to get this up. It's ANG000637: 25 "The key problems with the current CDM ..."</p> <p style="text-align: center;">Page 133</p>	<p>1 There's quite a long list of them. I don't 2 necessarily ask you to go through all of them, but you 3 have already identified the compromise of bishops asking 4 to be "investigator, prosecutor, judge and pastor; the 5 reluctance of archdeacons to administer the process". 6 Can you tell me, what do you mean by "the reluctance 7 of archdeacons to administer the process", for those 8 people who are less familiar with the way the church 9 works? 10 A. Very often, the archdeacons are the people who have to 11 prepare the witness statements and do the donkey work, 12 really, of putting together a CDM complaint. They're in 13 a particularly difficult position because everybody 14 thinks that the church has responded to the problem by 15 sending in an archdeacon who's taken a witness 16 statement. They're then left hanging, sometimes for 17 months, if not years, on end, whilst nothing seemingly 18 happens, trying both to protect the witnesses and to 19 maintain the forward momentum in the procedure, but the 20 procedure very often simply goes round and round in 21 circles, really, at that point, and I think it's the 22 archdeacon who is often blamed for those delays, even 23 though in fact it's not the archdeacon's responsibility 24 to ensure they don't happen. I feel very deeply for the 25 role of archdeacons in CDM proceedings.</p> <p style="text-align: center;">Page 134</p>
<p>1 Q. You also identify an issue halfway down that page about 2 non-disclosure agreements. I think some people would be 3 quite surprised. We are used to NDAs, as I believe 4 they're called, in other situations, but is it the 5 position that clerics can have non-disclosure or 6 confidentiality agreements imposed as a result -- or can 7 ask for them to be imposed as a result of Clergy 8 Discipline Measure? 9 A. The way I have experienced it working is a bit like 10 this: a cleric may be caught doing something that she or 11 he should not have done. They then can have it dealt 12 with by their diocesan bishop, but only if they agree to 13 the penalty. 14 Q. So penalty by consent? 15 A. Yes. If they don't agree to the penalty, then they can 16 enter into a process of negotiation, really, about what 17 happens next. It's kicked upstairs to a tribunal, but 18 a tribunal is very unlikely to happen. In the 19 meanwhile, there will be a negotiating process between 20 the diocese, through the registrar, and the person being 21 complained about and their legal representatives. Very 22 often, the ideal solution, from some points of view, is 23 for the cleric to resign at that point. Because that 24 gets them out of the parish and saves embarrassment. 25 That means the diocese no longer has to go to the</p> <p style="text-align: center;">Page 135</p>	<p>1 trouble or expense of further CDM proceedings. And it 2 means that everybody really finds the thing has been 3 dealt with far more expeditiously than would have been 4 the case if it had gone to tribunal. 5 The problem is, if you're the victim, say the person 6 who has been abused by the cleric, part of that 7 negotiation will very often be a confidentiality 8 agreement, and that is a problem because it means that 9 the cleric can then apply for work, particularly if the 10 Lambeth List hasn't gone out, then nobody will know that 11 they were on that, at the other end, and they will feel, 12 as one cleric once felt, that I have compromised their 13 confidentiality by not giving them a reference for 14 another job, which they should not have had because 15 proceedings were being taken against them at the time 16 that they left our employment. 17 Q. The other point that you raise is that there was -- in 18 2003, deposition from Holy Orders was abolished in 19 respect of these sorts of complaints. In fact, it isn't 20 abolished in terms of breaches of ceremony and ritual. 21 I think it still exists -- 22 A. That's dealt with under the Ecclesiastical 23 Jurisdictional Measure which deals with matters of 24 doctrine and worship. 25 Q. Yes, but it was abolished and you describe that as</p> <p style="text-align: center;">Page 136</p>

1 fundamentally misguided?

2 **A. Yes.**

3 Q. Why do you think it needs to be reinstated?

4 **A. I think there are people who should not be in**

5 **Holy Orders. It's as simple as that. And I think that**

6 **not to have that red line sends up a very powerful**

7 **signal in any profession. If it was impossible to**

8 **strike off a doctor, all you could do was say, "We won't**

9 **give you a job and you'll go on a list which we don't**

10 **circulate to people anyway", that wouldn't be a very**

11 **powerful way of preventing someone who shouldn't be**

12 **a doctor from practising as a doctor.**

13 Q. You identify at paragraph 87, ANG000637_016, what you

14 think an effective disciplinary system should look like.

15 Chair and panel, it is behind tab A1 of yours.

16 So you say that it doesn't meet any of those tests

17 that you identify, which is: doesn't really fully

18 investigate and establish facts; doesn't communicate

19 expectations appropriately; it isn't consistent; and it

20 doesn't produce an action plan based on the act not the

21 person?

22 **A. Yes.**

23 Q. So it fails fundamentally, as far as you're concerned --

24 **A. Yes.**

25 Q. -- to meet basic requirements. Is that in respect of

Page 137

1 know what was actually being talked about.

2 **In terms of being consistent across the board, there**

3 **is a very widespread suspicion among survivors that**

4 **bishops get a much easier ride with CDM than other**

5 **clerics. Now, I don't see all the figures and I can't**

6 **comment on that, but that is often said, that people who**

7 **have entered CDMs against bishops feel that they get**

8 **lost in a dense fog where everything takes twice as long**

9 **and, at the end of it, nothing very much happens and, if**

10 **it did happen, you wouldn't know it had happened because**

11 **nothing is reported anyway. So just at a very basic**

12 **level, I would say that those are things that should be**

13 **addressed.**

14 Q. At the moment, it's the diocesan bishop that certainly

15 starts the process before it goes to a tribunal. You've

16 already identified some misgivings you have about that.

17 Would you be of the view -- I think you identify at

18 paragraph 92 of your witness statement that your

19 solution to that would be to have like a national body

20 that deals with discipline. So, in a way, extending the

21 remit of the current Clergy Discipline Commission so it

22 was responsible for all stages of the process?

23 **A. Well, I think most professions and teaching regulation**

24 **authority, that's how it works if something seriously**

25 **goes wrong, and that secures consistency across the**

Page 139

1 victims and survivors or also in respect of clerics,

2 from your role as the pastor of other members of

3 the clergy?

4 **A. Well, I think any organisation needs these bases to be**

5 **covered, if its disciplinary procedures are going to be**

6 **effective. If you can't investigate what actually**

7 **happened, you've got nothing to talk about, in a way,**

8 **and yet the investigation stage, penalties can be handed**

9 **out before an investigation has even happened. So there**

10 **are a large number of aspects of it that make it**

11 **a less-than-ideal system.**

12 Q. So what would be your solution, if you have one?

13 **A. To which?**

14 Q. To the current inadequacies of the system?

15 **A. How long have you got? I think that you have to begin**

16 **by investigating what actually happened. I think that**

17 **there has to be, at some point, a revelation of what**

18 **behaviour is actually being reacted to. Simply saying,**

19 **"Well, a decision has been reached that a cleric has**

20 **offended in a particular way", without saying how they**

21 **did that -- so that, for example, in a case of spiritual**

22 **abuse, nobody knows what spiritual abuse actually**

23 **happened, in the way that that is reported. So the**

24 **chance of another cleric realising that this behaviour**

25 **is unacceptable is very small because they will never**

Page 138

1 **board. It means it doesn't depend on which particular**

2 **one of 42 dioceses you are in; there is consistency**

3 **across the board about the kind of behaviour. Also,**

4 **since I'm involved in education, I can say there is much**

5 **more clarity in teachers' discipline about why**

6 **particular penalties have been involved, what factors**

7 **have been engaged, why they have been engaged, so that**

8 **someone studying the results of those tribunals would**

9 **know what to avoid and what not to avoid in terms of**

10 **their behaviour.**

11 **So, yes, I think that would be much better. But,**

12 **actually, a return to the system before the CDM came in,**

13 **where judgment was function -- was basically offered by**

14 **diocesan chancellors would be an improvement, because at**

15 **least diocesan chancellors are legally trained and are**

16 **used to exercising judicial function.**

17 Q. If you can just remind me, the diocesan chancellor, who

18 I think still exists under the Ecclesiastical

19 Jurisdictional Measure 1963, so that's doctrine and

20 church buildings and that kind of thing, they are people

21 who are appointed by each diocese but who have to have

22 a legal qualification?

23 **A. They are senior, qualified lawyers, many of whom are**

24 **used to exercising judicial functions. That's a much**

25 **better basis on which to do this than beginner's luck.**

Page 140

<p>1 Q. Just to take an example, have you ever had any training 2 on managing complaints or resolving things by way of 3 the Clergy Disciplinary Measure as a currently serving 4 bishop? 5 A. No. 6 Q. But yet, you would be expected, under your scheme of 7 delegation, to administer, and I suspect you do 8 administer, penalties and punishments as and when 9 appropriate? 10 A. Well, I have only done a very small number when there 11 have been vacancies in the See of Oxford in my time, 12 which has happened twice. What I would do, and what 13 I did do, is pick up the phone to the registrar, who is 14 the legal officer that deals, normally, with the affairs 15 of the diocese, and seek his advice as a layman in these 16 matters. That's how I would cover that base. But, no, 17 there is no systematic training. 18 Q. The other issue you raise at paragraph 93 of your 19 witness statement, at the top of the next page, also 20 identifies that one of the issues is, this is all well 21 and goods when it comes to clerics, the Clergy 22 Discipline Measure, but there is a lacuna at the moment 23 about what you do about lay people who hold office in 24 the church, or even hold voluntary positions, where 25 their behaviour has fallen below that which one would</p> <p style="text-align: center;">Page 141</p>	<p>1 expect in respect of child protection or safeguarding or 2 possibly other serious issues, for example, financial 3 misconduct? 4 A. Sure. 5 Q. What is your view? You say here that the regime must 6 have jurisdiction and capacity to deal with that or, at 7 the very least, to deal with lay people who hold office 8 within the church. Who are the sorts of people you 9 would be thinking envisaging that system should apply 10 to? 11 A. In terms of safeguarding, church musicians and youth 12 workers. It should be possible to identify individuals 13 who are a danger. Now, there is some small protection 14 given, of course, by the use of DBS procedures. 15 Q. Yes. 16 A. If an entry has been made at DBS, then something will be 17 done. 18 In terms of dishonesty and lay officers, if someone 19 is disqualified from being a trustee of a charity, there 20 is some protection there. But I think there are people 21 whose behaviour towards clerics is unacceptable -- 22 I mean bullying behaviour of one sort or another that in 23 other contexts would not be acceptable. There is no way 24 of flagging that up and there is no way of recording 25 that, and I believe that, in the fullness of time, it</p> <p style="text-align: center;">Page 142</p>
<p>1 would be worth considering a procedure for barring 2 particular people for particular periods from holding 3 office in the church if they have -- with proper appeal, 4 of course, all the way through. But I suppose it did 5 matter to say in the book that lay people bully clergy 6 as much as clergy bully lay people, and having very 7 little to do about it when that happens can lead to 8 a great sense of being bullied by some clergy in some 9 circumstances. 10 Q. Can I turn now to your views about the role of 11 the diocesan safeguarding officer, which you identify at 12 paragraph 53 of your witness statement. ANG000637_010. 13 At paragraph 53, you identify the concern that the 14 church must retain ownership of safeguarding, but -- and 15 you then identify something which other people have also 16 identified to us, which is that the Diocesan 17 Safeguarding Advisor is not a senior role and does not 18 sit on the bishop's staff. 19 I suppose the question I have as a layperson, 20 outside the church, is, well, why does that matter? If 21 somebody came to me and said, "I'm the safeguarding 22 officer for my set of chambers", I would take their 23 advice. Wouldn't a bishop do that automatically? 24 A. I think many bishops would most of the time. But 25 I think that the problem is that you cannot expect</p> <p style="text-align: center;">Page 143</p>	<p>1 somebody who is a mid-range employee of the bishop to 2 hold the bishop to account. 3 Q. Yes. 4 A. It simply doesn't work that way. There is no way that 5 that would ever happen adequately and structurally. 6 It's quite odd to expect that to work. 7 I mean, the point was made earlier by Mr Elliott 8 that advice is given, but advice is just advice. That's 9 what it is. But bishops have a responsibility for how 10 they handle that advice and how they respond to it. 11 Now, if they respond badly, who is to hold them 12 accountable for having responded badly? And the answer 13 is, probably not one of their mid-range employees. 14 Q. Now, you've written a book, which I have already 15 identified, which is called "To Heal and not to Hurt", 16 and you wrote it with Rosie Harper, who I know is here 17 today, who I understand is your chaplain. What was the 18 intention behind writing this book? Because it is all 19 about -- it is called "A fresh approach to safeguarding 20 in the church". Why did you write it and how is it 21 meant to be used? 22 A. Over the course of ten years or so working together as 23 bishop and chaplain, we have been approached by a large 24 number of people who have had bad experiences in church, 25 and have simply wanted to respond as a pastor to their</p> <p style="text-align: center;">Page 144</p>

1 **pastoral need. I think it is very important to retain**
 2 **a focus as a bishop on the primarily pastoral nature of**
 3 **my ministry and to allow other people to do their job**
 4 **but to try and create the space in which I can do mine.**
 5 **So that's very often a matter of simply picking up the**
 6 **phone, listening to people, giving them time, helping**
 7 **them to tell their story and then asking whether there**
 8 **is any particular way in which I can help and taking an**
 9 **interest in their cases and, in that context, we have**
 10 **met a fair number of people over the last ten years or**
 11 **so --**
 12 Q. I think you identify in your book over 60 individuals
 13 you've had long conversations with?
 14 **A. Yes. From all over the place, because people have told**
 15 **friends, you know, that if you were to phone these**
 16 **people, they might be willing to talk to you, and, in**
 17 **a sense, the role is that I have no role. I'm simply**
 18 **there to listen to people and to try and do what**
 19 **a decent pastor would do in those circumstances. But it**
 20 **has brought me into contact and friendship with a fair**
 21 **number of survivors and complainants, yes.**
 22 Q. So one of your practical recommendations that you
 23 identify at paragraph 27 of your witness statement --
 24 this is ANG000637_005-006 -- is you suggest something
 25 called a scheme of accompaniment for survivors. What do

Page 145

1 statement is there is an immense lag between what's
 2 understood theoretically and what happens in practice,
 3 as I understand it?
 4 **A. Yes.**
 5 Q. You also identify your concern that what tends to happen
 6 is that -- this is my words -- people go into the
 7 sausage machine of reparation and redress and they lose
 8 their individuality and they lose their autonomy and
 9 their control over their own situation.
 10 At paragraph 68, you identify ways in which you
 11 consider -- of your witness statement, this is
 12 ANG000637_012-013. You identify some things which you
 13 think would help?
 14 **A. Yes. I think it is impossible to do anything to protect**
 15 **anyone without some degree of mandatory reporting,**
 16 **because, if you never know what happened, you can't do**
 17 **anything about it. It really is as simple as that.**
 18 **That's why I think mandatory reporting is a very**
 19 **important concern indeed.**
 20 Q. What do you mean by "mandatory reporting"? Who is going
 21 to be reporting what to whom and when?
 22 **A. Personally, I would want an offence created of failing**
 23 **to report, in the same way as there is in**
 24 **Northern Ireland. But I'm aware that some professionals**
 25 **in the field view this in a different way to others.**

Page 147

1 you mean by that?
 2 **A. One of the big problems many survivors experience is**
 3 **a sense of being all alone, battling against a system**
 4 **which regards them as being some kind of danger or some**
 5 **kind of problem. It seems to me the best work that goes**
 6 **on in the church in this area, even though it's not**
 7 **fully effective, is to do with bishops' visitors, who**
 8 **are the people bishops appoint to accompany people when**
 9 **clergy marriages break up, where a named person will go**
 10 **and visit the person who is in trouble and will**
 11 **represent them in any processes and will have access to**
 12 **the people dealing with it so that the survivor can have**
 13 **confidence that there is somebody there to act as their**
 14 **friend at court who has access to the system, both to**
 15 **interpret them to the system and the system to them.**
 16 **I think an accompanied system is very important indeed.**
 17 I notice that in terms of the church practice, it's
 18 long been acknowledged that a system of accompaniment of
 19 some sort to be a good idea. But knowing survivors like
 20 AN-A4, who gave evidence yesterday, he still hasn't had
 21 one appointed and he's been here for five years or so.
 22 I can think of other people where they have got a long
 23 way through a very messy process with a sense that they
 24 are entirely isolated in their dealings with the church.
 25 Q. In fact, what you say at paragraph 59 of your witness

Page 146

1 **But I think that, as long as the normal position is,**
 2 **I have to say, if somebody makes a disclosure, "Do**
 3 **I think it is a good idea to tell anybody about it?",**
 4 **and then I go and tell somebody about it and they have**
 5 **to say, "Well, do I think it is a good idea to tell**
 6 **anybody about it?", it really should be the case that**
 7 **the normal position is to tell someone. Because it is**
 8 **not easy to handle disclosures. They are personally**
 9 **extremely taxing and I think that this is a real**
 10 **problem.**
 11 I think that if the normal position was that all
 12 disclosures should be reported and then handled
 13 responsibly -- and what I mean by "handled responsibly"
 14 is there is a fear many of our friends who are survivors
 15 have that they will be put on some kind of travelator
 16 where their privacy and control over their own story
 17 will somehow be taken out of their hands and they will
 18 find themselves, you know, being taken off into a ghost
 19 train ride through a lot of really abusive stuff which
 20 they have no control over.
 21 I think it is important that the principle is that
 22 there should be reporting and not just a duty to have
 23 regard to policy which, for many people, is not
 24 respected as perhaps it should be.
 25 Q. In fact, what you suggest at the bottom of your bullet

Page 148

<p>1 point and over to the next page is something which looks 2 like some kind of multi-disciplinary committee. So 3 something which might look slightly similar to what 4 currently happens in Social Services sometimes, where 5 there is Child Protection Committees made up of 6 multi-disciplinary members who make decisions about 7 risk, about safety, about what should happen to children 8 when allegations are being reported to them. Is that 9 the sort of idea of the kind of -- 10 A. I think that's the job that needs to be done. I mean, 11 reported concerns have to be responsibly received in 12 a way that is compassionate and proportionate to the 13 needs of the victim, the person at the middle of it all. 14 And that's not happening right now, very often. 15 Q. If I may now turn to one individual who you have had 16 quite a lot to do with, which is AN-A4. You set out 17 your dealings with him at paragraphs 29 to 33 of your 18 witness statement. Ralph, ANG000637. I don't think 19 I need to take you through this, but I think it is fair 20 to say that you have had quite a lengthy involvement 21 with him over a number of years, both yourself and 22 Ms Harper? 23 A. Yes. 24 Q. Reverend Harper, I apologise. That ultimately ended in 25 you attending a mediation meeting which you then</p> <p style="text-align: center;">Page 149</p>	<p>1 attended along with Bishop Paul Butler and 2 Bishop Tim Thornton, as I understand it, with AN-A4, and 3 we heard about the outcomes of that mediation meeting, 4 one of which was the letter that was written to the EIG 5 from yourself, Bishop Paul Butler and 6 Bishop Tim Thornton. 7 A. Yes. 8 Q. Would you mind getting that up, please, Ralph: 9 ACE026977. It is behind tab B4, chair and panel, if 10 that's of any assistance to you, which was the second 11 volume, certainly of the documentation that I had. 12 Can I just ask, why were you at the meeting and what 13 was the purpose of writing this letter? 14 A. I was at the meeting because AN-A4 had invited me to 15 support him personally through the process. In other 16 words, the other bishops were there to be the other side 17 of the counter, as it were. My role was with somebody 18 else, who was a layman, to support him personally 19 through the day that we spent together working through 20 that material. So it was entirely supportive to the 21 survivor, at his invitation. 22 Q. The EIO responded to this, and this is at EIO000137. 23 This was their response, which, in effect, said, "But we 24 are doing all those things". If I can take you to the 25 fourth page, the last page of that -- in fact, this page</p> <p style="text-align: center;">Page 150</p>
<p>1 here, which suggests that the Elliott Review was 2 factually inaccurate and states multiple times that the 3 church placed too much reliance on financial advisors: 4 "This is a surprising amount of emphasis. This is 5 regrettable as it has misled somebody about the true 6 circumstances which surrounded what happened." 7 So I think what EIG would say is that they feel very 8 unhappy that their position was misrepresented, and are 9 you clear that they themselves say, "We do everything we 10 can" -- and you have heard from Mr Bonehill this 11 morning -- "to try and be as empathetic as is possible 12 in the context of a very adversarial system"? 13 A. Yes, I think that is their understanding and, the 14 meeting that we subsequently had with them, that was 15 said. I think my concern is not so much with the 16 insurance company, who, when all is said and done, are 17 an insurance company. Most of the work I have got 18 involved in are about the losses that are not insurable, 19 in other words, the spiritual care of offenders, things 20 you could not expect an insurance company to do. And 21 that's been my concern -- pastoral, really, rather than, 22 you know, in terms of sorting out the insurance 23 industry. 24 I think that -- I don't -- the assertion that the 25 Elliott Review was factually inaccurate, I have never</p> <p style="text-align: center;">Page 151</p>	<p>1 been reassured on that point, because, even though there 2 was a meeting that was supposed to clarify that 3 question, it wasn't clarified to my satisfaction at that 4 meeting. It was evaded. And then another meeting was 5 set up to make sure the more senior bishops knew what 6 was going on. I'm afraid I was not privy to the answer 7 to that question, but I think there is every evidence 8 that there was an instruction not to engage pastorally 9 given to the people that said they were given that 10 instruction, and the question is whether they 11 misunderstood it and, if so, how they misunderstood it. 12 Even if it was only 14 days, which is the kindest way 13 you can look at it, 14 days is a very, very long time in 14 the life of a suffering survivor. 15 Q. Obviously, of course, that factual information you 16 aren't clear about? 17 A. I'm not clear about because it didn't arise from that 18 meeting I was at. 19 Q. You have also identified some concerns, if we can deal 20 briefly with this, in an advice given from Stephen Slack 21 in 2007 which I think sort of made its way into the 22 public domain, shall we say, at a somewhat later date. 23 That's ACE923703, tab A19. There is a witness statement 24 from Stephen Slack and the note. If fundamentally what 25 the note says -- can we get the note first, please,</p> <p style="text-align: center;">Page 152</p>

<p>1 which is ACE026700. This is the "Liability of bishops 2 to claims by victims of child abuse". So this is advice 3 that was given internally by Stephen Slack, who used to 4 be head of the legal office. The concern about this is 5 really, if we can go down -- in fact, it is really about 6 claims made against bishops, and then, if we can go down 7 to the next page, please: 8 "At some stage, the extent to which it might be 9 barred on the grounds of limitation in a case involving 10 abuse consistent with the understanding of best 11 practice." 12 If you could take it down to the next page, please: 13 "The bishop will understandably wish to express 14 their regret, but because of the possibility ..." 15 This is paragraph 13, this is the one I was looking 16 for: 17 "... that statements of regret might have the 18 unintended effect of accepting legal liability, it is 19 important that they are approved in advance by lawyers." 20 Now, actually, that's not legally correct? 21 A. I understand that, yes. 22 Q. And it wasn't legally correct at the time it was 23 written. 2007 is after the implementation -- 24 A. After the 2006 Act. 25 Q. After the 2006 Act. Although, don't forget, Acts are</p> <p style="text-align: center;">Page 153</p>	<p>1 often implemented months or years after the date upon 2 which they are given Royal assent. My understanding is 3 what Stephen Slack has said is that advice was wrong, 4 but that is advice which would have been circulated 5 internally within Church House at that time. Is that 6 right? Is this advice you would ever have seen as 7 a bishop? 8 A. Yes, I did see it. When the story about it broke in 9 The Telegraph, whenever that was -- 10 Q. 2016, I think. 11 A. -- I was aware of having seen that document, but I can't 12 remember what context it was in. It might have been 13 circulated to Oxford bishops and it may have been even 14 sent around, but I'm afraid I don't remember. That 15 would have been back in 2007/2008. So I can't say when 16 I did. It struck me as being rather like one of those 17 insurance disclaimers you see when you hire a car that 18 says, "If you have an accident, whatever you do, 19 don't ..". it struck me as that kind of document. 20 I understand Mr Slack himself says he wouldn't have 21 given that advice now. 22 Q. Yes. 23 A. And I agree with him. 24 Q. Can I ask, in your book, you deal in some detail with 25 a number of concerns you have about the church's current</p> <p style="text-align: center;">Page 154</p>
<p>1 practices and the way that they don't work. One of 2 the ideas you have is that the church, in and of itself, 3 hasn't adopted the right model of thinking about abuse, 4 and looking at them, it either adopts the sort of rotten 5 apple model, which is, "Well, they're really nothing to 6 do with us", but they haven't really understood why that 7 abuse might occur and, therefore, be in a position to 8 try and stop it happening again, or at least minimise 9 the risk, which is all one can ever hope for. Is that 10 right? 11 A. Yes. I think that the rotten apple theory is always 12 nonsense. There is never just one person involved in 13 abuse. It always happens in a context. And the context 14 is what makes it possible and what makes coverup 15 possible. Unless you understand that context, you won't 16 be understanding what actually happened and 17 understanding what actually happened is the beginning of 18 anything else you may then want to do by way of 19 response. 20 Q. In particular, you mention the idea of the fact that 21 there is positional inequality. Could you help me 22 understand what you mean by positional inequality in the 23 context of the church? 24 A. Well, in many church contexts, people are, for religious 25 purposes, unequal in the power they hold in particular</p> <p style="text-align: center;">Page 155</p>	<p>1 situations, whether that is a young server serving the 2 altar at mass for a clergyman or whether that's 3 a clergyman with her or his bishop, and there are many, 4 many inequalities nested within the life of the church, 5 and I think that when I was involved many years ago in 6 training training incumbents, there was a great tendency 7 among people to say, "I'm just a vicar, I haven't got 8 any power". But in fact, it is quite plain that clerics 9 have all sorts of power that they don't always 10 acknowledge in a way that would be much healthier, and, 11 therefore, it is very difficult for people to know what 12 to do when somebody who you're supposed to look up to 13 behaves in a way that is extremely discreditable, and 14 you may well be told by parents, who are proud of 15 the fact that you're an altar server, that you must be 16 making it up, because it is quite impossible that 17 Father So and So would have done something like that. 18 Many of the stories we have heard from people involve 19 those kinds of inequalities being handled extremely 20 poorly. 21 Q. As far as you're concerned, what work do you do within 22 your diocese now to try to recognise and to get clerics 23 to understand about that positional inequality? Do you 24 think enough is done within the church to make them 25 recognise the power that resides within them?</p> <p style="text-align: center;">Page 156</p>

<p>1 A. I think more is done than used to be, and that certainly 2 ordination training and initial ministerial education is 3 much, much more aware of power issues now than it was, 4 you know, 40 years ago when I was at that stage in 5 ministry. 6 I still think it is a problem, because somehow the 7 whole geometry of the church sets up a large number of 8 kind of iconic figures and inequalities of one sort or 9 another, and this is not just a matter of how people 10 think, it is a matter of how they think about themselves 11 and how they feel about themselves, and I think that's 12 why religion is such a holistic business and, therefore, 13 when things go wrong, they go very seriously wrong, 14 spiritually. 15 Q. We have obviously heard about the idea of inequality 16 within the church. The other -- I'm interested in how 17 much that inequality causes undue deference. You have 18 mentioned the concept of undue deference, but, as 19 a society, we are much less deferential to power 20 positions, people in positions of authority, than we 21 used to be, usually because some crisis has happened. 22 Has the same not happened with the church, or are there 23 still cultures of excessive deference, particularly to 24 episcopal figures such as yourself? 25 A. I think there are still situations in which excessive</p> <p style="text-align: center;">Page 157</p>	<p>1 deference is felt by people. It is very, very 2 difficult -- of course people don't like to take 3 responsibility for being excessively deferred to. But 4 I think it does go on at every level in the church, from 5 the General Synod, where, you know, a business committee 6 will just say, "Well, we weren't allowed to ask to talk 7 about what we wanted to talk about because we have been 8 told that we can't". Now, there are bodies, quasi 9 parliamentary bodies, where they wouldn't take that for 10 an answer. They would say, "What on earth is going on 11 here that we can't talk about what we need to talk 12 about?". So on that very high level it happens, but 13 I think it happens in parishes and on all kinds of 14 different levels, that clergy are sometimes put on 15 a pedestal, not necessarily one of their own wanting, 16 and that creates an inequality which in itself raises 17 questions about the security and safety of the people 18 involved. 19 Q. How much do you think doctrine and theology has been 20 used to either justify abuse or continues to be used to 21 justify and condone abuse, particularly sexual abuse, in 22 certain situations? 23 A. Well, a large amount of abuse in church is what I think 24 is now being termed spiritual abuse, and if -- if you 25 run a swimming pool, people might get drowned. If you</p> <p style="text-align: center;">Page 158</p>
<p>1 run a church, people may be spiritually abused. I'm 2 afraid it goes with the countryside, that you are 3 dealing with people on the level of identity and their 4 very deepest convictions about themselves and their 5 lives and who they are and the communities that give 6 them value in their lives and circles of friendship that 7 they rely on from day to day. This is a very powerful 8 web in which to find yourself, and when that web becomes 9 a means of exculpating somebody who has done something 10 wrong or covering up wrongdoing, it's remarkably 11 difficult for people to blow the whistle on that. 12 Q. You identify concerns that you have in your witness 13 statement about excessive centralisation of power. It 14 seems to me, on the one hand, you're advocating for 15 a national service which would, to a greater or lesser 16 degree, be a central service. On the other hand, you 17 identify concerns about the centralisation of power 18 within the church generally, even though the church has 19 told us that one of the problems there is is there isn't 20 any power, there is just a lot of what they would call 21 influence, so "soft power" I think might be the word 22 they choose to use? 23 A. Yes. 24 Q. Do you have any views about that? 25 A. Well, I think the centralisation of all sorts of things</p> <p style="text-align: center;">Page 159</p>	<p>1 on bishops is unhealthy and excessive, and that raises 2 the question of the accountability of bishops, really. 3 In terms of centralisation, there is unhealthy 4 centralisation and there is the fact that one or two 5 functions -- for example, dealing with people who drink 6 drive is best done by having a law that's the same for 7 everybody. So some things lend themselves to being 8 dealt with on a national basis and some things lend 9 themselves to be dealt with locally. But I think the 10 problem the Church of England has over this is, you have 11 over 40 dioceses and they tend to function as little 12 fiefdoms with their different routines and family 13 flavour and all the rest of it, and, therefore, it's 14 very unusual to find consistency across the piece about 15 the way a large number of things are dealt with. 16 Q. So you would be an advocate of a kind of national 17 safeguarding service; is that right? 18 A. Yes. I mean, the recommendation that really stirred my 19 heart was Dame Sally Cahill's, originally, in the case 20 of the Waddington case, where that was simply her first 21 recommendation. It seems to me, we have been winding 22 back from that ever since. But I think her judgment was 23 enormously helpful and acute. 24 Q. You talk about a national service but also an 25 independent service?</p> <p style="text-align: center;">Page 160</p>

1 **A. Yes.**
2 Q. Do you mean wholly independent of the church, ie, run by
3 the state, or do you mean paid for by the church but not
4 beholden to dioceses or bishops?
5 **A. I think it could be done either way. I think it is**
6 **extremely important that if diocesan safeguarding**
7 **advisors are the key to the whole system, that they have**
8 **the authority to be able to stand clear of their**
9 **employers and to call their employers to account.**
10 Q. I suppose the question is -- I mean, the model of
11 the Church of England has always been diocesan. So the
12 bishop is in charge of his fiefdom, as you have
13 described it. How can you create a cross-jurisdictional
14 service in the context of a structural organisation
15 which is very much decentralised, shall we say?
16 **A. Well, I think it needs to be taken out of the whole**
17 **world of being in-house. I mean, there are a large**
18 **number of things that the church deals with, like fire**
19 **regulations and drink driving clergy, without having to**
20 **control it. I don't understand the argument that,**
21 **unless we do it on an ad hoc basis with 42 different**
22 **dioceses, we can't own the importance of this. I mean,**
23 **for example, churches have standards of reporting**
24 **practice for their accounts that apply to every church**
25 **and charity in the country. There is no sense that if**

Page 161

1 expect the very graphic phrase that's been used before
2 this inquiry, you know, the church to carry on marking
3 its own homework, because if we do that, then we will
4 not win the confidence of the most vulnerable people who
5 have been damaged in church, let alone society at large.
6 Q. Now, as far as restoration and redress is concerned, at
7 paragraphs 78 through to 81 of your witness statement,
8 you observe various things which you say have happened
9 to survivors. In particular, you identify -- Ralph,
10 would you mind just expanding that slightly for us all,
11 please -- that, in a way, the compensation and redress
12 package at the moment is sort of focusing the wrong way
13 up. So it's relying, as you have identified before,
14 a bit too much on insurers and not enough on --
15 **A. Yes.**
16 Q. -- what would be called the spiritual response and
17 a more holistic response. Is that right?
18 **A. One of the most shocking aspects of some of**
19 **the survivors' experience that we have worked with is**
20 **people who have said, "You know, I've seen four diocesan**
21 **safeguarding advisors, three bishops, two archdeacons,**
22 **nobody in all of this has had any concern at all**
23 **about -- nobody has offered to pray for me, nobody has**
24 **offered me any sense of healing. It has all been dealt**
25 **with entirely as an administrative matter to be dealt**

Page 163

1 **you didn't have a special Diocese of Oxford accounting**
2 **standard for churches that somehow we couldn't own**
3 **financial honesty. I just don't understand the argument**
4 **that somehow, when it comes to protecting people, it has**
5 **to be done on an ad hoc, amateur and bitty basis that**
6 **depends on the postcode of where you live.**
7 Q. Can I ask about auditing. At paragraph 72 of your
8 witness statement, ANG000637, you express some
9 scepticism about the auditing work which has been
10 undertaken by SCIE. Can you tell us why that is?
11 **A. Yes. I don't think that it is bad work, but I think**
12 **it's been commissioned by the church and, in the end,**
13 **those who pay the piper call the tune.**
14 Q. Would you consider that as part and parcel of any
15 national safeguarding service there would have to be
16 completely independent scrutiny and auditing of that
17 service?
18 **A. Yes. Because I think, otherwise, survivors will find it**
19 **very difficult to believe in the honesty of what's going**
20 **on. If I say, "Well, I believe that I've done nothing**
21 **wrong and I'm a bishop so I should know", that's much**
22 **less convincing than somebody who is not a bishop having**
23 **actually looked into the matter and decided that I have**
24 **done nothing wrong. So, whatever the answer is, I think**
25 **that question is extremely significant, and you can't**

Page 162

1 **with through lawyers and insurers". These are people**
2 **who have sometimes looked to the church to offer some**
3 **kind of spiritual ministry, not simply to put them in**
4 **a siding which is labelled, "Lawyers, insurance**
5 **companies and social workers", and deal with that there,**
6 **and then, when all that is over, to pay them off and**
7 **expect them to go away, which is ...**
8 Q. In fact, what you're saying is the legal process is just
9 the start of the process?
10 **A. Yes.**
11 Q. And that there should be a lot more care to do with
12 pastoral support and spiritual support for such
13 individuals?
14 **A. And it would be much easier to offer that if bishops**
15 **weren't also trying to act in a legal capacity at that**
16 **time.**
17 Q. Can I also ask, you also identify -- at paragraph 81,
18 you raise an interesting idea, which is that each member
19 of the clergy should have proper professional liability
20 insurance. So similar to the ways that other
21 professionals like myself, doctors, even individual
22 social workers, if they do independent work, would have
23 to have their own professional liability insurance. Why
24 do you think that would make any difference?
25 **A. Well, I think it makes the professional aware that what**

Page 164

1 they are doing has a capacity to harm, in a way that --
 2 the assumption that everything costs nothing and you're
 3 just a nice little vicar, so somebody from somewhere
 4 will cover you if things go wrong, is a much less
 5 healthy way to think of yourself than realising that you
 6 do have power and, if that power is badly used, that
 7 there would be consequences and those could include
 8 financial consequences.

9 Q. But surely what would happen is the church would end up
 10 having to pay it anyway, so it just would be a boon for
 11 Mr Bonehill and his friends in that there would be
 12 another sort of -- I don't know how many clerics there
 13 are, but probably at least 20,000, individual insurance
 14 policies. Do you think, however, the salutary -- that
 15 it would, in effect, the advantages of it would outweigh
 16 the financial disadvantages?

17 A. I think they would. I don't think -- I mean, as
 18 a teacher, it's 200 a year, isn't it?

19 Q. Something like that, yes.

20 A. I don't think we're talking something which is entirely
 21 unrealistic. And I think that clergy who are accused of
 22 things should have proper legal representation, for
 23 example. I think they have exactly the same needs as
 24 any other professional and these should be properly met.
 25 And I have no objection to Mr Bonehill having more

Page 165

1 A. I would have thought so. I'm quite amazed at the extent
 2 to which people cannot see things which you would think
 3 would be obvious, and I have no explanation except that
 4 I have had the same experience as you that very often it
 5 seems to happen and it is a very powerful argument for
 6 mandatory reporting, so that the normal position would
 7 be that someone would disclose rather than feel that
 8 they had to push the boat out if they did disclose.

9 MS SHARPLING: May I press you slightly on it to ask your
 10 view, really, more than anything else. Some of
 11 the disclosures we have heard about are very serious
 12 criminal allegations which could amount to life
 13 imprisonment if found convicted. Does that not
 14 influence the minds of those who receive such
 15 disclosures?

16 A. I think that it should, and in some instances it has,
 17 but I think that, as long as all reporting is
 18 discretionary, people feel that they're doing something
 19 unusual if they do report it. But I'm quite amazed at
 20 exactly the phenomenon you're reporting in the case of
 21 abuse of public schoolboys in the Iwerne camps incidents
 22 with John Smyth, for example. Some of the most
 23 intelligent people in the country were subjected to what
 24 were plainly criminal acts and the whole thing was
 25 hushed up for 30 years. I think it is an extraordinary

Page 167

1 business. It is not that I don't like him or something.
 2 I think that obviously that would have to be covered on
 3 a proper assessed basis. But among other things,
 4 because we never assess the basis, we have no idea of
 5 what the cost is of the way we are carrying on right
 6 now. What we seem to do is stagger on in a rather
 7 ad hoc way from crisis to crisis, wondering what it is
 8 all costing. That's much more unsatisfactory way to
 9 carry on than to have needs and requirements properly
 10 assessed and paid for.

11 MS SCOLDING: That's extremely helpful, Bishop Alan. I have
 12 no further questions, but if you wait there, the chair
 13 and panel might have.

14 THE CHAIR: Ms Sharpling?

15 Questions by THE PANEL

16 MS SHARPLING: Just a couple of questions, I think one
 17 question from me, actually: we have heard a lot in
 18 previous hearings, and indeed this hearing, of victims
 19 and survivors making disclosures to members of
 20 the clergy, some junior, some senior, and nothing ever
 21 happening, no onward reporting is ever made. What's the
 22 barrier to it? Is it not easier to telephone
 23 a statutory authority and say, "I'm really concerned
 24 about this individual. He's made a very important
 25 complaint and the matter needs to be dealt with"?

Page 166

1 cultural phenomenon, and I'm glad to say that I think
 2 people's reluctance is less than it used to be, but
 3 I think it is still there.

4 I think, in religious institutions, people are
 5 anxious that they will somehow bring shame on the
 6 church. I mean, my experience is they bring far more
 7 shame on the church by doing nothing than they would
 8 have brought on if they had done the obvious thing in
 9 the first place. But that's a personal reflection. I'm
 10 not really into their minds enough to comment on the
 11 psychology that covers up.

12 But I think that churches are institutions which
 13 place a very high value on loyalty, and sometimes this
 14 tribal loyalty becomes more important in the minds of
 15 some people than the truth, and I think that's extremely
 16 reprehensible when that happens. But I think that's why
 17 churches become places where people sometimes will not
 18 report or will not be believed or people feel they have
 19 some need to sort of -- you know, just to hush things up
 20 and pray quietly for people without telling anybody.

21 MS SHARPLING: Thank you.

22 THE CHAIR: Thank you. Just following on from
 23 Ms Sharpling's question, I want to ask you -- I suspect
 24 I know the answer, but could you confirm, it's the same
 25 question I asked Mr Elliott earlier, do you believe that

Page 168

<p>1 clergy and senior clergy, including bishops, should have 2 any role in decision making in individual cases of abuse 3 allegations? 4 A. No. Emphatically, no. And that's one of 5 the fundamental problems with where we are right now. 6 THE CHAIR: Thank you. Thank you very much. There are no 7 further questions. 8 MS SCOLDING: Thank you very much, chair and panel. 9 (The witness withdrew) 10 MS SCOLDING: We are due to have a break in five minutes. 11 I don't know whether or not it would be sensible to have 12 a break slightly earlier and we will start with 13 Sir Roger Singleton after the break. 14 THE CHAIR: We will return at 3.20 pm. 15 MS SCOLDING: Thank you very much. 16 (3.09 pm) 17 (A short break) 18 (3.26 pm) 19 MS SCOLDING: Now, chair, we pass over to 20 Sir Roger Singleton to give some evidence. 21 SIR ROGER SINGLETON (sworn) 22 Examination by MS SCOLDING 23 MS SCOLDING: Good afternoon, Sir Roger. Thank you very 24 much for coming back to give evidence to us for the 25 second time. It is much appreciated.</p> <p style="text-align: center;">Page 169</p>	<p>1 A few introductory remarks from myself: this isn't 2 a test of memory. Please feel free to refer to your 3 notes. We can stop as often as is needed and we are 4 under no time pressure. You have the screen next to 5 you. Ralph, the evidence handler, will bring up pieces 6 of paper as and when we need you to look at particular 7 documents. And there are also three bundles in front of 8 you, if you prefer to look at paper. 9 If I could ask you, we have two witness statements 10 from you, one of which you spoke to within the context 11 of the Diocese of Chichester hearing, the second one of 12 which is dated April 2019. Just to confirm, did you 13 sign this witness statement? 14 A. I did. 15 Q. Is it true, to the best of your knowledge and belief? 16 A. It is. 17 Q. Obviously, we have heard evidence from you before, but 18 just to refresh all our memories, you have had a long 19 career in public service, including as chief executive 20 of Barnardo's for over 20 years, and then chairing the 21 Independent Safeguarding Authority, which is the 22 forerunner of what we now know as the Disclosure and 23 Barring Service, and you were the author of several 24 reports about how the vetting and barring system should 25 work during the first decade of this century; is that</p> <p style="text-align: center;">Page 170</p>
<p>1 right? 2 A. That's right. 3 Q. You've also been the independent chair of the Diocesan 4 Safeguarding Advisory Group for Chelmsford and are 5 a member of the National Safeguarding Panel, and, as 6 I understand it, this is a family affair, in that your 7 wife, at least, was, at one period of time, a Parish 8 Safeguarding Officer and your daughter was -- or, at 9 least, was, or is, a Diocesan Safeguarding Advisor; is 10 that right? 11 A. That's right. 12 Q. Since we have last met, you have had a change in role, 13 in that you are now the Interim National Director of 14 Safeguarding. Could you tell us what that means? 15 A. Towards the end of last year, the Archbishops' Council 16 decided that it would engage in some restructuring and 17 reorganisation of the National Safeguarding Team 18 arrangements, and this involved the appointment -- a new 19 post of director of safeguarding. 20 It was believed that it would take some time for an 21 externally advertised and recruited person to be 22 appointed, and so the Secretary General asked me if 23 I would fill the role in an interim capacity until 24 a permanent appointment had been made and could 25 commence.</p> <p style="text-align: center;">Page 171</p>	<p>1 Q. So what do you view your role within the context of 2 the church? What are you primarily there to do? 3 A. I think the role is about leading the National 4 Safeguarding Team, giving it maybe a higher profile, 5 and, if I may say so, perhaps a perception of greater 6 clout and authority within the safeguarding work of 7 the church. 8 Q. Has the Interim Director of Safeguarding been given any 9 different authority or powers in respect of what it can 10 or cannot do in respect of the church? 11 A. There have been no formal changes to the powers. 12 I think that the -- on an informal basis, it would be 13 said that there is perhaps greater authority. 14 Q. As I understand it, one of the rules of the Director is 15 they therefore report to the General Secretary and not 16 to somebody else, and therefore they're slightly -- 17 sorry to use the word -- higher up the food chain in 18 terms of who you report to and the conversations you 19 have; is that right? 20 A. Yes. The post is on a level with the leaders of similar 21 operational tasks within the church, such as the 22 Director of Education, the Director of Ministry, and so 23 on. 24 Q. Now, you've identified, as part of your role, that there 25 needs to be some changes made to the National</p> <p style="text-align: center;">Page 172</p>

<p>1 Safeguarding Team's structure, and you set this out at 2 paragraphs 92 to 94 of your witness statement, 3 identifying -- and, Ralph, if you wouldn't mind getting 4 that up, please, that's ACE026964, paragraphs 92 to 94. 5 It is behind A3, chair and panel, of your bundle, 6 pages 29 over to 30. So the last two paragraphs. 7 So you identify, at the bottom of that page, you 8 have been asked to propose various changes to the 9 structure of the National Safeguarding Team, and then, 10 Ralph if you wouldn't mind getting the next page up, 11 please, your current thinking is that there should be 12 two deputy directors, one responsible for case work, one 13 responsible for survivors, and then a team and a staff 14 that would deal with either a combination of those roles 15 or all those individual roles. 16 Is this a large-scale restructure? Because one of 17 the things that's always concerning -- I think the 18 Health and Social Care Act may be an example of this -- 19 is, people are unhappy with the system so they change 20 the structure, but the underlying problems still exist. 21 How will your changes enable clarification of the work 22 that the National Safeguarding Team is doing? 23 A. I think they will give particular focus to some of 24 the key tasks. The tier below the deputy director is, 25 I think, a critical one, in that it would enable</p> <p style="text-align: center;">Page 173</p>	<p>1 specialists to be provided, and, indeed, we have gone 2 some way towards implementing that, in, for example, the 3 area of training and development, of complex case work, 4 of work with survivors. 5 The deputy directors would clearly have a leadership 6 function in relation to two clusters of those 7 responsibilities, and I think my thinking since I wrote 8 the witness statement has developed a little. I think 9 the survivor engagement has now, quite rightly, assumed 10 such a significant proportion of what the NST should be 11 doing that I think that that would be an appropriate 12 task for the director to lead personally, and perhaps if 13 I could just add, in that connection, the person who has 14 been appointed to this role does bring with her some 15 significant experience of working with survivors in the 16 dreadful Grenfell Tower disaster. 17 Q. You say that the issue of the support of survivors has 18 reached critical importance, is what you said, since 19 you've written this witness statement. Why is that and 20 what do you think the church should be doing differently 21 to what it's doing at the moment? 22 A. I think the issue of priority is probably the greatest 23 one, and, quite clearly, there's evidence galore that 24 many survivors, although not all, but many survivors are 25 dissatisfied with the service that they have received in</p> <p style="text-align: center;">Page 174</p>
<p>1 the past and which they continue to find the church 2 unresponsive. 3 Now, the National Safeguarding Team has developed 4 a range of actions which it hopes will begin to address 5 some of those issues. But I don't think this is the 6 sort of thing that you can have a few short-term 7 initiatives and the whole thing is then finished. It 8 is -- people have been abused by the church over many, 9 many years. I think it is not unreasonable to assume 10 that there are many people still suffering who have not 11 yet come forward and disclosed the experiences that they 12 have. 13 So my view is that this is a long-term task and it's 14 one which really should be given the greatest priority 15 for the team. 16 Q. To take a practical example of that, there's been lots 17 of discussion about the Safe Spaces Project. There's 18 been discussion about that in one way, shape or form for 19 the past six years, but yet, you're still not off the 20 starting blocks, so to speak, or, rather, you're at the 21 procuring phase. But that's taken an enormous amount of 22 time. What lessons has the church learnt about setting 23 things like that up from Safe Spaces, do you think? 24 A. I think it is difficult for me to talk about what hasn't 25 been done prior to January, because, quite frankly,</p> <p style="text-align: center;">Page 175</p>	<p>1 I don't really know. But one of the issues which we 2 have considered to be important, I think, over the last 3 12 months is to try and engage in a process of codesign 4 and coproduction of initiatives like Safe Spaces. That 5 involves finding mechanisms whereby survivors can be 6 involved in all stages of the development. And, to be 7 fair, some survivors have got lives other than being 8 survivors of church abuse. They have employment, they 9 have families, they have other interests. Therefore, 10 things can take longer than if somebody sat down in 11 Church House, Westminster, and simply wrote them. Now, 12 that sounds as if I'm blaming survivors for lack of 13 progress over the past six years, and that is certainly 14 not the case. But you asked me what lessons were 15 learned. I think one of the lessons to be learned is 16 that, if these mechanisms and proposals and services are 17 going to be well received by survivors, then there needs 18 to be a substantial input from them. 19 And one final point, if one takes the Ombudsperson 20 service, which has also been talked about for a little 21 while, we are learning there that thinking within the 22 church was just not on the same wavelength, as it were, 23 as compared with what survivors themselves were actually 24 looking for. So I think that's one of the bits of 25 learning.</p> <p style="text-align: center;">Page 176</p>

<p>1 Q. I mean, to sort of move on to that, I don't think I need 2 to get the document up, but the discussion that has 3 taken place at national level is a sort of ombudsman 4 scheme in the way that we might recognise one in other 5 fields. So you undergo an internal complaints process, 6 and that obviously involves the church having complaints 7 processes generally, which, as I understand it, isn't 8 always the case. Some of them do, some of them don't. 9 But it is not a mandatory requirement, as I understand 10 it. Do you know, Sir Roger, whether it is or isn't? 11 A. My understanding is that both dioceses now have 12 complaints procedures. I think the returns that we got 13 in relation to 2017 – I may not have the number 14 precisely accurate, but I think it was 37 out of 42 15 already had them, and I would hope that by now all of 16 them did. 17 But that is really quite a good illustration of 18 where the initial scheme which the church produced was 19 very much based on Ombudsman or Ombudsperson schemes 20 elsewhere. But, as you say, it does rely on other 21 processes being exhausted before you go to the 22 Ombudsman. 23 The survivor evidence on that was that trailing 24 through the long process of exhausting all other 25 procedures before you got to the Ombudsperson was part</p> <p style="text-align: center;">Page 177</p>	<p>1 of the problem, and what they were looking for was 2 something that could avoid that. 3 Q. The other issue is that it often entrenches views rather 4 than brings people together, because by the time you 5 spend two or three years complaining about something, 6 even if you weren't very cross about it at the 7 beginning, at the end of three years, you usually are 8 very cross, and therefore it makes it more difficult 9 sometimes to try and resolve the underlying issues which 10 go behind the complaint in the first place. Is that 11 right? 12 A. I think the longer these things drag on, the more 13 difficult they become to resolve. 14 Q. Talking a little bit about some other work you have been 15 doing, I understand from the witness statement of 16 Graham Tilby there is some discussion about the 17 development of what are going to be called national 18 safeguarding standards. Are you involved in that work 19 at all and, if so, would you like to tell us a little 20 bit about it? 21 A. I wish we were involved in the work. In actual fact, it 22 is one of those things that is on the "to do" list. But 23 certainly we will be heavily involved, and I hope with 24 survivor interests, in the development of safeguarding 25 standards which would provide, as it were, I think,</p> <p style="text-align: center;">Page 178</p>
<p>1 a clear base against which quality of work could be 2 measured, against which inspections could be conducted. 3 So it's an important initiative which is yet to 4 begin. 5 Q. So you would view them as being a bit like an area which 6 you might be familiar with in children's social care, 7 you have the national minimum standards? 8 A. Absolutely. 9 Q. So you have a headline which says you must make sure 10 that children are protected and then you have a set of 11 detailed points against which Ofsted, in fact, is the 12 relevant person in England, would then examine, have you 13 done those various things? 14 A. That is certainly the model that I would bring to it. 15 But to link back with the point that one was making 16 a few moments ago, victims and survivors will also have 17 different perspectives to bear. So those need to be 18 merged in the creation of those standards. 19 Q. Now, as far as the interim director of safeguarding is 20 concerned, one of the issues you might be concerned 21 about is data collection and whether or not the church 22 is collecting the right sort of data about what's going 23 on in dioceses. Now, there's a whole -- there are pages 24 and pages of data that Mr Tilby has given us, so it 25 seems clear that there is better data than there was.</p> <p style="text-align: center;">Page 179</p>	<p>1 Is the data analysis and data collection good enough 2 now for you to be able to track trends or see where 3 things might be going quite badly wrong in the context 4 of a diocese? 5 A. To answer the first part of the question, we now have 6 a three-year trend, and, in fact, almost as I speak, the 7 invitation or the request to dioceses to supply 8 information from last year is going out. 9 In order to see trends, you tend to have to ask the 10 same questions, but at the same time, we have developed 11 further the questions that we have been -- that we are 12 asking in order to try and elaborate further. For 13 example, we have, in the past, asked questions about the 14 number of referrals which dioceses have made to 15 statutory authorities. What we have not asked is the 16 number of referrals which statutory authorities have 17 made to dioceses, because the statutory threshold has 18 not been met and the person is known to be linked in 19 with the church in some way. 20 So there is an annual improvement process in the 21 data collection. 22 The latter part of your question is, would you be 23 able to spot that things were going wrong? I think that 24 is more difficult, for two reasons. The first reason is 25 that these are, at the end of the day, self-declarations</p> <p style="text-align: center;">Page 180</p>

1 by dioceses, and, therefore, subject to interpretation,
 2 if I can put it like that. I think the second reason is
 3 that accompanying data collection needs to be a capacity
 4 to be able to ask questions, because, very often, the
 5 numbers promote more questions than they resolve, and so
 6 I think the vision for that is data collection,
 7 interrogation, and then a capacity to do what I think
 8 have been called deep-dive audits, where in fact the
 9 evidence, or prima facie it appears there are problems.
 10 That would require the support of the House of Bishops
 11 to do it, but that is what our current thinking is.

12 Q. As far as you are aware and concerned, is it the
 13 intention of the National Safeguarding Team to continue
 14 with some form of external auditing process for dioceses
 15 on a fairly regular basis?

16 A. I think that is the intention. There is no firm plan at
 17 the moment, as far as repeat of diocesan audits are
 18 concerned. We are partway through a programme of
 19 cathedral audits.

20 Q. But from your personal perspective, do you think that
 21 form of external auditing is a good idea?

22 A. I think that is essential. I mean, if I think -- if one
 23 looks at what is the range of independent insights that
 24 the church can get and hopefully act upon, then
 25 a completely independent system of auditing must be part

Page 181

1 problems is not quite one that I recognise, if I'm
 2 honest.

3 My sense, over the past six months, is that dioceses
 4 have either sought assistance or have been cooperative
 5 when it's been offered -- how shall I put it? -- with
 6 a little bit of edge. In other words, we know there's
 7 an issue there.

8 I mean, the procedures do require certain things to
 9 be notified centrally, and they provide the basis on
 10 which offers of help, with varying degrees of push, can
 11 be made. I can only think, actually, of only one
 12 instance where a diocese has felt that it wanted to sort
 13 of push back on the involvement of the national team.

14 So, in short, I don't think I'd put at the top of my
 15 list of things to do the necessity for formalising
 16 greater powers in that context.

17 Q. So what is on your list of things to do? What are the
 18 top five things that you want to do or you want your
 19 successor to do in terms of improving safeguarding
 20 within the church?

21 A. Right. Well, I think in relation to my successor,
 22 because, you know, I am in the swan song of my time,
 23 is -- and I have already referred to it, is to take the
 24 lead on survival work. I think when I come to reflect
 25 on the eight months that I will have been in the role,

Page 183

1 of that menu.

2 Q. Do you view SCIE as sufficiently independent? You may
 3 or may not have heard what Bishop Alan Wilson said. He
 4 said the difficulty is it's taken its orders from the
 5 church to date, rather than come in independently. Do
 6 you think that one of the ways that that problem might
 7 be avoided is if you had a set of national safeguarding
 8 standards, so you're judging them against those
 9 standards?

10 A. Yes. I mean, I think that in part is a fair point, that
 11 a set of standards would provide a benchmark that was
 12 probably a little more independent than writing the
 13 brief for a particular range of audits.

14 Q. Can I also ask you about what you have done in terms
 15 of -- there was lots of discussion certainly at some of
 16 the previous hearings about providing support, advice
 17 and assistance to dioceses where safeguarding was going
 18 wrong by way of -- if necessary, by way of enforcement
 19 powers, by bringing other people in, by parachuting
 20 people in. Now, I understand that there has been some
 21 development of things called support offers and
 22 safeguarding progress reviews. What are they designed
 23 to do and are they good enough in terms of parachuting
 24 people in to try and fix problems?

25 A. I think the image of parachuting people in to fix

Page 182

1 I will be disappointed that I have not been able to have
 2 any impact at all on the need for culture change within
 3 the church. That was one of the things I had hoped to
 4 be able to contribute. It is one of the few things
 5 where there is collective agreement on the need for
 6 change. The sticky bit is how you do it. I had hoped
 7 that I might have been able to contribute towards that,
 8 but the general pressure of day-to-day work has
 9 prevented that.

10 Q. I don't want to interrupt your list, but I would like to
 11 ask you a question about cultural change. When you came
 12 last time, you said that's the most important thing.

13 A. Yes.

14 Q. But that's made up of, really, policies, practices,
 15 procedures and the implementation of them, really. So
 16 is it that difficult to effect -- why is it so difficult
 17 to effect cultural change? Because you would say, we've
 18 got the policies, we've got the people. So why are
 19 there still these problems?

20 A. If I may say so, I think you've only given part of what
 21 cultural change is about. I think cultural change is
 22 about bringing -- about fundamental alterations in the
 23 way people think, feel and act. And you need more than
 24 agreed policies and prods in the back to be able to do
 25 that.

Page 184

<p>1 I mean, it is much more, I think, a process for -- 2 every small part of the church, from the province down 3 to the most tiny rural parish, reflecting on how it can 4 make its immediate environment safe and welcoming, 5 especially for children and vulnerable adults. Now, 6 that involves a process of engagement, and these may 7 sound rather woolly words, but unless people really 8 debate and understand what on earth this whole 9 safeguarding thing is about, then I'm afraid we shall 10 continue to have the attitude which I encountered in 11 a parish church, not my own, just a few weeks ago: 12 "Can't understand why on earth we have to do all this 13 checking and this DBS stuff and so on. Look at Cedric 14 over there. I've known him for 40 years. We were at 15 Winchester together. He's as safe as houses". Well, 16 the statistical chances are that Cedric probably is as 17 safe as houses, but we just don't know. So I think, 18 until you get that change of mind-set, which will take 19 years, but which dioceses and parishes all, I think, 20 need further encouragement and help with. Of course, 21 good recruitment, training, procedures have their part 22 to play as well. But that was the second thing which 23 I think I failed to do, as it were. 24 I think, on the third thing, and this was 25 a recommendation that we made in the Past Cases Review,</p> <p style="text-align: center;">Page 185</p>	<p>1 was the promotion of a whole-church approach to 2 safeguarding. I've been much exercised about the 3 relationship between cathedrals and dioceses on 4 safeguarding recently, but there are many other 5 organisations that have links with the 6 Church of England, but are not part of its governance 7 structure, where I think there needs to be a reaching 8 out and a collective commitment towards the same 9 safeguarding goals. I'm thinking of organisations such 10 as the Royal School of Church Music, the bell ringers, 11 the Scripture Union. All of those organisations have 12 their own governing arrangements, and I hoped that 13 during my time we could have done more to reach out to 14 those organisations and to bring together a collective 15 commitment. It's too bitty and scrappy at the moment. 16 Q. Just on that note, Ian Elliott gave us some evidence 17 this morning where he said one of the things that 18 happened in the Roman Catholic Church of Ireland was 19 everybody -- well, you didn't have to sign up to it, but 20 I suspect there was a degree of pressure to sign up to 21 it, informal or otherwise. You signed up to a sort of 22 Memorandum of Understanding where there was a series of 23 set standards, you agreed you would abide by those 24 standards and you agreed you would be regulated by an 25 independent body which would look at whether you were</p> <p style="text-align: center;">Page 186</p>
<p>1 abiding by them or not, and if you didn't abide by them, 2 well, then, disciplinary consequences would follow. 3 What do you think about that as an idea? If you are 4 talking about things being bitty and scrappy, that might 5 be one way around that impasse, mightn't it? 6 A. Yes, indeed, it might be. I mean, within the episcopal 7 part of the church, I think that's more or less what 8 happens now, apart from the monitoring body not being, 9 as it were, separate and independent. 10 We're hoping to make a small start by -- at the 11 moment, we have out for consultation an information 12 sharing agreement about how data -- about safeguarding 13 issues can be shared within the Church of England. Our 14 hope is that that can be expanded out to other such 15 organisations and, if we have that as a base, then 16 I think there is hope and prospect for our being able to 17 extend that further into common safeguarding standards 18 which could be met. 19 I think it would be pushing it too far to add to 20 that a disciplining mechanism for those people who 21 failed in that respect, but I think the process for 22 moving in that direction, which is one I agree with, is 23 starting. 24 Q. However, a lot of the critics of the way that 25 safeguarding is currently run within the church view the</p> <p style="text-align: center;">Page 187</p>	<p>1 problem essentially as being the fact that the diocesan 2 bishop is still in charge of -- well, has ultimate 3 responsibility for safeguarding, and you've heard what 4 Bishop Alan Wilson said, and what he says replicates 5 what lots of other people have said, including SCIE, for 6 example, have hinted at that, albeit not said it, is 7 that there shouldn't be any role for a diocesan bishop 8 in the context of managing or dealing with safeguarding. 9 What's your view about that? 10 A. I think my view is that I'd want to look quite 11 critically at what the alternatives are and unpack a bit 12 what you say about dealing with safeguarding. Are we 13 talking about the investigation? Are we talking about 14 the process of findings of fact? Are we talking about 15 the process of deciding what penalties or sanctions 16 should be implemented? Are we talking about who or what 17 should provide the essential support to victims and 18 survivors? 19 So I think, in terms of looking at who else or what 20 else might provide some of the functions for which the 21 bishop is currently responsible, then in fact we need to 22 be able to unpack and answer those questions. 23 Q. Can I ask, in respect of that, Colin Perkins, who is the 24 Diocesan Safeguarding Advisor, has produced a paper 25 which he sent to us and I believe yourselves. Chair and</p> <p style="text-align: center;">Page 188</p>

<p>1 panel, I believe it is behind tab B55. I have to be 2 honest, I'm not holding out much hope because it is not 3 behind my tab B55. Hopefully, it has found a way into 4 your bundles. If not, it's ANQ000647. If it is behind 5 your bundles, chair and panel, it will be volume 3, but 6 it wasn't in my bundle when I looked at it in the break. 7 We will have to get it up on the screen. If it is not 8 647, then try 645. 9 Mr Frank has it. Yes, and here we have it. 10 What he's saying, in essence, is -- and if I could 11 take you to the suggested model, which is on the fifth 12 page along, please. It starts at paragraph 4. If 13 I could get that up. He's saying that the Diocesan 14 Safeguarding Advisor should become a Diocesan 15 Safeguarding Officer and then they should really be able 16 to run -- well, not run everything, but certainly in 17 respect of safeguarding, they should be able to report 18 matters to the statutory authority, suspend clergy, 19 commission safeguarding investigations, commission risk 20 assessments, ensure that adequate support is in place, 21 report matters to the National Safeguarding Team, report 22 to the Charity Commission, commission Lessons Learned 23 Case Reviews. If we could go to the next page, please, 24 the DSA should be compelled and allowed to act on their 25 own authority to report matters to statutory agencies,</p> <p style="text-align: center;">Page 189</p>	<p>1 whereas, at the moment, it's the diocesan bishop who 2 ultimately has the responsibility, and the 3 independence -- what he says: 4 "It creates the independence from episcopal 5 authority whilst avoiding dislodging safeguarding 6 practitioners from the mainstream of diocesan and local 7 authority life." 8 That's what he says at (d). Obviously I know you 9 haven't had a lot of time to think about this paper, 10 although I believe Mr Perkins sent it to you in advance 11 of this hearing. What do you think about this as 12 a possible solution? 13 A. I think there is merit in considering this. With the 14 exception of the power to suspend clergy, I think it is 15 more of a shift of the balance than a change. I think 16 a diocesan safeguarding advisor, if permitted to do so 17 by his or her bishop, does have authority to do all 18 those things, apart from suspend clergy and, even if the 19 diocesan bishop disagrees with making a referral to the 20 statutory authorities, then the DSA can now do that. 21 So I think that is well worth considering. It is 22 a sort of beefing up, really, of the power of 23 the current DSA. 24 Where I think a point is not addressed is in 25 paragraph (f):</p> <p style="text-align: center;">Page 190</p>
<p>1 "The suggestion also allows diocesan bishops to 2 exercise their pastoral and spiritual responsibilities 3 whilst knowing that the necessary safeguarding actions 4 are undertaken." 5 Well, the question I've got in relation to that is, 6 if the bishop nevertheless remains as being the judge in 7 matters of the Clergy Discipline Measure, then that 8 surely would conflict with a pastoral role in relation 9 to the same person. So I think it -- they're good 10 ideas, but they're not yet complete. 11 Q. One of the other things that you talked about last year 12 is, you felt that the National Safeguarding Panel should 13 have more powers, so it should be able to come in and 14 act less like an advisory body and have more powers of 15 enforcement, for example, if things were going wrong or 16 if it felt that the church was going seriously awry, it 17 should be able to intervene in some way. Have you been 18 able to introduce those powers? I know that's a bit 19 like saying, "Has something been able to be introduced 20 in this parliamentary session that isn't to do with 21 Brexit?", but have you had an opportunity to do that? 22 A. I don't think I can claim full credit for the changes. 23 I think Meg Munn, the independent chair, who 24 I understand you will be hearing from -- 25 Q. Yes, we will be.</p> <p style="text-align: center;">Page 191</p>	<p>1 A. -- deserves greater credit. I have worked with her, 2 really, on two things. First of all, looking at what 3 the National Safeguarding Panel actually does, and, as 4 a former MP and junior minister, Meg brought with her 5 the model of the Select Committee but without the bear 6 baiting and the barracking that goes on in there. 7 Q. It depends which Select Committee you're talking about? 8 A. It does indeed depend. Indeed, perhaps even more so who 9 the members are. But we are experimenting with that 10 approach, and so far it has proved to be satisfactory 11 from the point of view of the panel and the people 12 who've given evidence. 13 Two subjects have so far been covered: one, training 14 and development; and the second, the interface between 15 the Clergy Discipline Measure and safeguarding. I think 16 that will prove to be a more effective means whereby the 17 National Safeguarding Panel can articulate its specific 18 views to the National Safeguarding Team and expect 19 a proper response from them, rather than just chewing 20 over, in general terms, a paper. 21 The second thing is that the membership of the panel 22 has been revised to make sure that the four members of 23 the panel are all independent of the church, whereas, of 24 course, representatives of the archbishop and bishops 25 still attend. But if it came to a vote, as it were, and</p> <p style="text-align: center;">Page 192</p>

<p>1 a clear view and a clear decision, it would just be the</p> <p>2 independent members who would have the say.</p> <p>3 Q. Can I ask you another question: one of the things you</p> <p>4 said last time was that -- and you have reiterated it</p> <p>5 again today -- safeguarding should take place in the</p> <p>6 parish, and you're passionate about the need to engage</p> <p>7 at a parish level in order to avoid Cedric causing</p> <p>8 problems, although I'm sure he wouldn't. Now, one of</p> <p>9 the things that's happened is there's been a production</p> <p>10 of what's called a Parish Handbook. It is behind B38,</p> <p>11 chairman. Just to identify, Ralph, ACE026718. B38.</p> <p>12 I think that's bundle 3, chair and panel, but I can't be</p> <p>13 entirely clear?</p> <p>14 MR FRANK: That is correct. I should indicate that what was</p> <p>15 behind B55 was indeed 645, but it is a completely</p> <p>16 different document from the one you referred to.</p> <p>17 MS SCOLDING: Thank you very much. I think that's what we</p> <p>18 found, it was a letter from John Yates about something.</p> <p>19 Thank you very much, Mr Frank.</p> <p>20 I don't think we really need to go through it in any</p> <p>21 detail, but has this helped you, or do you think it is</p> <p>22 helpful in terms of explaining things at a parish level</p> <p>23 in a simple and accessible manner?</p> <p>24 A. I think it has. I can claim no credit whatsoever</p> <p>25 personally for the Parish Handbook. It had been printed</p> <p style="text-align: center;">Page 193</p>	<p>1 by the time I arrived. But I think it has been, for</p> <p>2 most people, especially at parish level, and perhaps</p> <p>3 particularly for the parish safeguarding officers, and</p> <p>4 here I do include my wife, it has been a useful and much</p> <p>5 simplified document.</p> <p>6 Yes, there have been a few criticisms of it. One</p> <p>7 diocese didn't really want to circulate it because they</p> <p>8 said, "Oh, well, things will change and it will be out</p> <p>9 of date and people will be using the old version.</p> <p>10 Therefore, it's far better put on the internet". Well,</p> <p>11 it is on the website. But I think, generally, people</p> <p>12 have welcomed something that they can clutch.</p> <p>13 Q. I would particularly suggest, as you discussed on the</p> <p>14 previous occasion, people who are, shall we say, older</p> <p>15 often don't like reading things -- for example, I don't</p> <p>16 like -- I like to print things out, and I would suggest</p> <p>17 that I might be towards maybe the median age of</p> <p>18 individuals who attended parish churches within the</p> <p>19 Church of England. So the idea of things just being on</p> <p>20 the internet, that causes problems for a significant</p> <p>21 minority of parishioners, I would imagine?</p> <p>22 A. That is true. I think that is one of the reasons why</p> <p>23 it's been -- well, there are two reasons why it has been</p> <p>24 welcomed: one, it has distilled hundreds of pages of</p> <p>25 guidance into a much more readable document; and,</p> <p style="text-align: center;">Page 194</p>
<p>1 secondly, it's been more accessible than a web-based</p> <p>2 production.</p> <p>3 Q. Can I also ask, last time, you talked about the fact</p> <p>4 that there needed to be as much of an emphasis on the</p> <p>5 prevention of abuse as of managing risks when abuse has</p> <p>6 occurred. Have you had any opportunity in your eight</p> <p>7 months in post to do anything about that?</p> <p>8 A. Limited opportunity. We are supporting financially an</p> <p>9 initiative in Gloucestershire which is about working</p> <p>10 with children in churches to help them experience what</p> <p>11 is good to feel safe, not who you're frightened of, but</p> <p>12 really putting the emphasis on knowing confidently what</p> <p>13 a safe place looks and feels like so that that can be</p> <p>14 hopefully created by those responsible at the parish.</p> <p>15 Very early stages yet, but I think it's going to be --</p> <p>16 I think the success of that is going to be by the</p> <p>17 promotion and encouragement of a number of small</p> <p>18 initiatives that people will be able to sort of pick and</p> <p>19 mix on, which will contribute along, of course, with</p> <p>20 making sure that you keep unsuitable people out by good</p> <p>21 recruitment procedures, and so on, of which -- which</p> <p>22 exist.</p> <p>23 Q. Can I ask, in your role as Interim Director of</p> <p>24 Safeguarding, you have issued two Clergy Discipline</p> <p>25 Measure complaints against two bishops this year. Can</p> <p style="text-align: center;">Page 195</p>	<p>1 I ask you, firstly, in respect of the Diocese of</p> <p>2 Lincoln, I know there's only a limited amount that we</p> <p>3 can discuss about this, and we haven't got anything to</p> <p>4 put up on the screen, firstly, because it is new;</p> <p>5 secondly, because it is sub judice, so to speak. But</p> <p>6 can I identify that the Archbishop of Canterbury</p> <p>7 suspended the Bishop of Lincoln in May as a result of</p> <p>8 a report you wrote to him? Are you able to tell us</p> <p>9 anything about the reasons why you felt the need to</p> <p>10 write a report and recommend his suspension from office,</p> <p>11 in broad and general terms?</p> <p>12 A. Could I just correct one thing you said? In fact,</p> <p>13 I brought CDM proceedings against the Bishop of Chester</p> <p>14 and the Dean of Lincoln.</p> <p>15 Q. I do apologise. It the Dean of Lincoln, not the Bishop</p> <p>16 of Lincoln. I apologise and the transcript will</p> <p>17 recognise that it should be the Dean rather than the</p> <p>18 Bishop of Lincoln. The Dean of Lincoln Cathedral?</p> <p>19 A. Yes, and the archbishop then subsequently suspended the</p> <p>20 Bishop of Lincoln. I find, if I may say so, I need to</p> <p>21 tread a careful path between wanting to be helpful to</p> <p>22 the inquiry and not prejudicing in any way enquiries</p> <p>23 which the police or the church discipline proceedings</p> <p>24 may be going on.</p> <p>25 But having said that, in relation to Lincoln, there</p> <p style="text-align: center;">Page 196</p>

<p>1 was a fairly contemporary disclosure of abuse that 2 happened some years ago, which was not reported either 3 to the police or to the diocesan safeguarding team, and 4 I took the view that that inaction was a breach of the 5 relevant clergy's obligation to have due regard to the 6 House of Bishops' guidance. 7 Q. So the 2016 measure which says that due regard has to be 8 given, you used that as the mechanism for which to issue 9 the Clergy Discipline Measure? 10 A. I did. I felt that there was not only an historic 11 issue, but a contemporary concern as well. That was, 12 broadly speaking, without going into the detail, the 13 circumstances in Lincoln. 14 Q. Can I ask about the circumstances in Chester? We can 15 get some documents up about that. So can I identify, 16 Cheshire Constabulary wrote to the Church of England, 17 and that document is at ACE027158. Chair and panel, you 18 don't have this in your bundles. Ralph, ACE027158. It 19 is page 3, over to 4, that I think are the important 20 factors. 21 Just to identify, that Cheshire Police carried out 22 or conducted a criminal review into the current Bishop 23 of Chester, and that review concluded. They in fact 24 investigated whether or not he should be the subject of 25 a prosecution for misconduct in public office, but</p> <p style="text-align: center;">Page 197</p>	<p>1 decided to take no further action. This identified 2 various factors, the first one of which is set out at 1, 3 that Bishop Peter actively sought to conduct his own 4 investigations prior to police contact, despite knowing 5 that the Diocesan Safeguarding Advisor had said, "Please 6 don't do that", and then, number two, he then -- this is 7 on the next page, "Bishop Peter then sought to speak 8 with certain persons associated with the Chester 9 Diocese" and one of those individuals at the very least 10 is an individual who's subsequently been convicted of 11 criminal sexual offending. There was then direct 12 discussions in 2017 during meetings of police and no 13 past events concerning -- this is at paragraph 3 -- 14 Reverend Dickenson, no obligation to inform the police. 15 He chose not to disclose any information which 16 identified -- I think there was a letter which at the 17 very least intimated that abuse had occurred at that 18 time. In paragraph 4, it says: 19 "The letter from Dickenson contained within his 20 clergy file clearly states he was involved in the 21 indecent assault of a child. This was reported at the 22 time in 1974 but not acted upon. And it was raised 23 again in 2009 with no formal action." 24 Then the Cheshire Constabulary then further on go on 25 to say:</p> <p style="text-align: center;">Page 198</p>
<p>1 "Based on known information, I have the opinion 2 Bishop Peter breached the church's policy and practice 3 guidance on safeguarding. As such, we raised these 4 concerns with the National Safeguarding Team." 5 Then on the next page, 005, please, Ralph, just to 6 be clear: 7 "It's the belief of the police investigation that if 8 issues regarding Dickenson's offending had been brought 9 to light, he would have been brought to justice before 10 his conviction in March 2019. His victim would have 11 been supported earlier. It is the failure of the church 12 that Dickenson's abuse went unchallenged for 45 years." 13 As a result of that, as I understand it, you 14 prepared and laid a Clergy Discipline Measure complaint 15 which we have at ACE027156_003, and this is in summary. 16 If you would like to tell us, the Clergy Discipline 17 Measure conduct complaint that you have brought, if you 18 would like to articulate that to us whilst Ralph gets 19 something up on screen? 20 A. The basis of my complaint under the measure was the 21 information which the police had supplied. I took the 22 view that they were professional investigators and that 23 the information that they had provided should be 24 subjected to formal testing and proceedings. The 25 measure did require me to apply for an "out of time"</p> <p style="text-align: center;">Page 199</p>	<p>1 submission, which the President of Tribunals agreed to, 2 and then there was a certain convoluted church process 3 that had to be embarked on whereby the Archbishop of 4 Canterbury, on behalf of the Archbishop of York, 5 consulted his provincial registrar on whether I had 6 a legitimate interest in the issue and whether the 7 complaint was of substance. 8 The provincial registrar advised the archbishop that 9 it was and that the Bishop of Chester should be required 10 to answer the points that had been made. 11 That was the last I heard of it. I think the 12 bishop's answer is awaited. 13 Q. So we have now had an opportunity to get up that 14 documentation, and if you wouldn't mind expanding in 15 summary. So, in effect, it is translating what Cheshire 16 Police have told you into clergy misconduct language, 17 isn't it? 18 A. It is. 19 Q. You talked about a convoluted process. So, on the one 20 hand, it shows the 2016 measure working in respect of 21 the due regard; on the other hand, there's still quite 22 a lot of faffing around, shall we say, before matters 23 actually get going under the Clergy Discipline Measure? 24 A. That would be the case. I don't know whether the 25 hearing wishes me to explain what was gone through. I'm</p> <p style="text-align: center;">Page 200</p>

<p>1 far from being knowledgeable about the CDM, but I have 2 put a wet towel around my head and tried to understand 3 this. 4 Q. It would be useful. 5 A. Very well. I had to submit to the President of 6 Tribunals an application for my complaint to be heard 7 and to be considered out of time, because it was more -- 8 because the critical events had occurred more than 9 12 months ago. The President of Tribunals then 10 considered it and agreed that it could be brought out of 11 time. 12 Because Chester Diocese is in the northern province, 13 I had to then submit my complaint to the Archbishop of 14 York. The Archbishop of York considered that, as he had 15 had some contact with the Bishop of Chester about this 16 matter, he would recuse himself from the process and 17 referred it to the Archbishop of Canterbury. 18 The Archbishop of Canterbury then had to consult 19 with the provincial registrar for the See of Canterbury 20 in order to get his advice on whether I had a legitimate 21 interest in the matter and, secondly, whether the 22 complaint had substance. 23 If I can put brackets around, I understand some CDMs 24 are brought on matters which lack substance, such as, 25 people don't like the hymns.</p> <p style="text-align: center;">Page 201</p>	<p>1 Q. Yes, "I don't like it, because we haven't had 'All 2 Things Bright and Beautiful' for at least a year"? 3 A. That's right. The registrar considered this matter and 4 agreed on both counts that I did have a legitimate 5 interest and that the matter was of substance. He so 6 advised the Archbishop of Canterbury. The Archbishop of 7 Canterbury would then invite the Bishop of Chester to 8 provide an answer to the complaints that I had laid and 9 that, at the moment, is where it rests. 10 Q. And the dairymaid is coming next, isn't it, "The king 11 asked the queen and the queen asked the dairymaid". It 12 sounds as if it is still a fairly convoluted process. 13 Chair, I note the time. I have probably got around 14 10 minutes more questions for this witness, and 15 I understand you may well have some questions for him. 16 We have got a very full day tomorrow. Are you happy for 17 me to continue for the next ten minutes? 18 THE CHAIR: Yes. 19 MS SCOLDING: Just a few questions, Sir Roger, on the Past 20 Cases Review. Now, you gave very extensive evidence on 21 the previous occasion about your concerns about the Past 22 Cases Review, and whilst calling it a curate's egg, 23 I think it would be fair to say that you felt it didn't 24 do what it said on the tin, it didn't actually provide 25 any assurance or any assurance that anybody could safely</p> <p style="text-align: center;">Page 202</p>
<p>1 rely on that everybody had been caught up, and certainly 2 what was told to the public about who had -- what had 3 been looked at, there were some significant deficiencies 4 and omissions. I don't really want to take you through 5 that evidence which we have already heard. You already 6 identify and set that out in some great detail, firstly 7 in the report that you and others gave before the 8 independent safeguarding tribunal and, secondly, within 9 the context of a large amount of your report. 10 However, I would like to take you to paragraph 74 of 11 your witness statement, which are the recommendations of 12 the report. This was the report into, was the Past 13 Cases Review, in effect, adequate or any good. 14 Chair and panel, that's page 23 of Sir Roger's 15 witness statement. Ralph, ACE026964_023, please. If 16 you could get up 74 onwards. 17 These are the recommendations. In effect, could you 18 just briefly identify that these are: in effect, all 19 relevant files not known to have been examined in 2008 20 have to be reexamined; all dioceses have to check 21 various matters towards volunteers; there needs to be an 22 updated version of the PCR in seven dioceses. Could you 23 identify what those seven dioceses are, that there's 24 going to be a whole -- the Past Cases Review is going to 25 be completely redone? I think they're Rochester, Ely,</p> <p style="text-align: center;">Page 203</p>	<p>1 Lichfield, Sheffield, Winchester and Sodor & Man, in 2 fact? 3 A. Thank you. 4 Q. Just briefly, why is that? 5 A. We were not satisfied, and, indeed, to be fair to six of 6 the seven dioceses, they themselves, as a result of our 7 review, had come to the conclusion that the Past Cases 8 Review in 2008 was flawed in their dioceses. 9 So we were in fact endorsing their own view that it 10 needed to be repeated. 11 Q. You then identify, in effect, at 4, 5, 6, 7 and 8 -- 12 I mean, you talk about the whole-church approach to 13 safeguarding. Ralph, it's the next page, please. 14 So you recommend that approaches are made to those 15 parts of the church with their own decision-making 16 bodies to get them to carry out an equivalent to a PCR. 17 So those are those sorts of institutions you have 18 mentioned earlier -- the Scripture Union, the Church 19 Music Society, those sorts of matters. Co-operation for 20 a whole-church approach; responses to victims and 21 survivors should receive enhanced priority; all dioceses 22 given continued attention to maintain improvements in 23 the quality of recording and record keeping. Can we 24 just identify and maybe stress yet again, one of 25 the major issues, both of the Past Cases Review at the</p> <p style="text-align: center;">Page 204</p>

<p>1 time and subsequently, has been poor record keeping of 2 what happened, why it happened and what -- any action 3 that was then taken. Is that right? 4 A. That is true, and, indeed, in the case of the Past Cases 5 Review, actually where the records were. 6 Q. Because they were all sort of in people's garages and 7 above people's sheds -- 8 A. People's homes. 9 Q. -- and had to be dug out of various people's homes. We 10 talked about that in quite some detail on the past 11 occasion? 12 A. We did. 13 Q. But what you then identified and what you identify here 14 is that, as a result of this report, you are, in effect, 15 running the Past Cases Review Part 2, and you identify 16 that at paragraphs 79 onwards of your witness statement, 17 and that's 026, please, Ralph. 18 So, in effect, can -- Ralph, would you mind getting 19 up ACE027696, which is behind tab B53. This is a note 20 provided -- drafted by you and others, which you 21 presented to the National Safeguarding Steering Group. 22 So this is, in effect, your view about how the Past 23 Cases Review No 2 is going to work. 24 A. Yes. 25 Q. I don't think I expect you in any great detail to go</p> <p style="text-align: center;">Page 205</p>	<p>1 through it. I'm especially conscious of the time. But, 2 roughly, what's going to happen? 3 A. We want the Past Cases Review Phase 2 to do three 4 things. 5 First of all, to make good the deficiencies in Past 6 Cases Review 1, which were, in effect, the first two 7 recommendations that you mentioned. 8 Secondly, to cover the period from when the Past 9 Cases Review finished in 2009 to the current day. We 10 thought it rather odd that the church should want to say 11 that up until 2009 it was satisfied that there was 12 nothing relevant lurking in its files, but it couldn't 13 say anything for the past ten years. So that needed to 14 be filled. 15 Then, although it wasn't a recommendation of our 16 report, there were strong views, both from diocesan 17 safeguarding advisers and from the National Safeguarding 18 Panel, that in fact the scope of phase 2 should be quite 19 considerably extended to include reviews of files in 20 relation to vulnerable adults. 21 Those are the three areas which the background note, 22 in rather greater detail, seeks to cover. 23 Q. As I understand the process, and, again, this is very 24 much skipping over -- this document sets it out in quite 25 some detail. In effect, all the records are going to be</p> <p style="text-align: center;">Page 206</p>
<p>1 reviewed initially by the DSA. They will then pass to 2 an independent reviewer. You're currently in the 3 process, I think, of looking at the independent 4 reviewer. The independent reviewer will then look at 5 them, have a discussion with the DSA and the independent 6 reviewer about what's going to happen, and then, if 7 there's any cover up or poor allegation management, or 8 anything like that, there is then going to be a project 9 management board sitting above that at a national level 10 to whom all those concerns and complaints go? 11 A. Yes, that's broadly it. There is just one thing that is 12 not quite right in your first sentence: it will be an 13 independent reviewer that will review the files. The 14 Diocesan Safeguarding Advisor will say, "Look, these are 15 the cases that we know about", but then the independent 16 reviewer will go through the totality of the files. 17 Q. Now, I have been asked by Mr Greenwood, on behalf of 18 the victims and survivors from Switalskis, two things. 19 Firstly, will live individuals be prioritised in this, 20 or is it just all records, whether those individuals are 21 alive or deceased? 22 A. I think the answer to that is, partly yes. But, I mean, 23 we will take that point. One of the difficulties, of 24 course, is whether the church will actually know who is 25 alive and who is dead. That will only be the case if,</p> <p style="text-align: center;">Page 207</p>	<p>1 in fact, people are in contact with the church. That's, 2 you know, a self-evident logistic, really. 3 Q. Will any group be excluded from consideration? So is 4 this going to involve lay people, volunteers, retired 5 clergy, live clergy; anyone who there is some sort of 6 personnel file about? 7 A. It will include everyone for whom there has been, either 8 as a volunteer or as a member of staff, holding, as it 9 were, a church office. 10 Q. Church office, yes. 11 A. It would not include just, for example, a regular member 12 of the congregation, because there would be no file. 13 Q. So it wouldn't include Cedric, for example, because 14 there wouldn't be a file about Cedric unless there had 15 been a complaint or a concern about him? 16 A. Indeed not. 17 Q. Fine. One of the issues that might come up in this 18 matter is dealing with what happens if the alleged 19 perpetrator is deceased, and, in particular, what you 20 are going to do about that. Are you going to -- what's 21 the intention? Are you going to run a sort of core 22 group process in a similar way that you did in 23 Bishop Bell, if matters are found for those who are 24 deceased? 25 A. At the moment, in relation to complaints against</p> <p style="text-align: center;">Page 208</p>

<p>1 deceased persons, then we do apply, as far as we can,</p> <p>2 the current procedure as if they were alive. But there</p> <p>3 is, again, on the "to do" list a commitment to produce</p> <p>4 advice on investigating complaints which are made</p> <p>5 against deceased people. But we will shortly, I hope,</p> <p>6 within a matter of days, be announcing who will be</p> <p>7 conducting a review in the case of people who were</p> <p>8 abused, and I can name the person without difficulty,</p> <p>9 a man called John Smyth. We will be announcing who will</p> <p>10 be conducting that review. Survivors are currently</p> <p>11 being invited to comment on the terms of reference for</p> <p>12 the review.</p> <p>13 But on your substantive point, there is a real</p> <p>14 difficult issue about investigating complaints which are</p> <p>15 made against deceased persons, but it is something we</p> <p>16 must do.</p> <p>17 MS SCOLDING: Thank you very much, Sir Roger. I have no</p> <p>18 further questions. The chair -- if you would like to</p> <p>19 wait there, the chair and panel may have questions for</p> <p>20 you.</p> <p>21 THE CHAIR: No, we have no questions. Thank you very much,</p> <p>22 Sir Roger.</p> <p>23 MS SCOLDING: Thank you very much, Sir Roger. Thank you for</p> <p>24 coming.</p> <p>25 (The witness withdrew)</p> <p style="text-align: center;">Page 209</p>	<p>1 MS SCOLDING: Chair, that is the end of today's proceedings.</p> <p>2 I think we are due to start again tomorrow at 10.00 am?</p> <p>3 Is that correct?</p> <p>4 THE CHAIR: Thank you.</p> <p>5 MS SCOLDING: Thank you very much.</p> <p>6 (4.32 pm)</p> <p>7 (The hearing was adjourned to</p> <p>8 Wednesday, 3 July 2019 at 10.00 am)</p> <p>9</p> <p>10</p> <p>11 I N D E X</p> <p>12</p> <p>13 MR IAN ELLIOTT (sworn)1</p> <p>14</p> <p>15 Examination by MS McNEILL1</p> <p>16</p> <p>17 Questions by THE PANEL42</p> <p>18</p> <p>19 MR DAVID BONEHILL (sworn)43</p> <p>20</p> <p>21 Examination by MS SCOLDING43</p> <p>22</p> <p>23 Questions by THE PANEL117</p> <p>24</p> <p>25 BISHOP ALAN WILSON (sworn)123</p> <p style="text-align: center;">Page 210</p>
<p>1</p> <p>2 Examination by MS SCOLDING123</p> <p>3</p> <p>4 Questions by THE PANEL166</p> <p>5</p> <p>6 SIR ROGER SINGLETON (sworn)169</p> <p>7</p> <p>8 Examination by MS SCOLDING169</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 211</p>	

<p>A</p> <p>A1 137:15</p> <p>A19 152:23</p> <p>A3 173:5</p> <p>A4 2:18,24 3:6,25 3:25 4:14 5:3,18 6:2,21 7:15 8:4,16 8:20,25 9:5,11,14 9:18,18 10:5,7 11:6 21:11 23:2 23:20 26:11 27:12 36:25 93:1 98:21 98:21,22 99:7 101:9 106:11 119:21</p> <p>A4's 3:16 12:12 60:22 107:15,25</p> <p>A6 1:14 3:10</p> <p>abandoned 101:14 101:18</p> <p>abandonment 107:7</p> <p>ABI 74:4 79:17</p> <p>ABI's 74:2</p> <p>abide 186:23 187:1</p> <p>abides 22:22</p> <p>abiding 187:1</p> <p>ability 15:2 99:24</p> <p>able 13:4,8 18:1 19:14,19 36:3 63:21,23 68:10 88:3 97:20 102:11 102:17 103:20 114:2 115:6,8 161:8 180:2,23 181:4 184:1,4,7 184:24 187:16 188:22 189:15,17 191:13,17,18,19 195:18 196:8</p> <p>abolished 136:18 136:20,25</p> <p>absence 32:21</p> <p>absolutely 10:12 11:5 12:11 19:25</p>	<p>36:10 40:18 57:17 61:4,11 65:13,15 68:8 92:8 104:17 105:3 111:23 113:15 179:8</p> <p>abuse 17:14 23:3 33:25 37:16 38:10 42:11 46:7,21,25 47:19 48:1,11 52:13 53:14,19 55:4 57:2 59:5 65:3,24 67:25 68:23,25,25 72:18 74:16 78:4,6,21 78:24 79:14 80:12 84:13 105:22,24 108:17,24 109:6 112:2 126:19 138:22,22 153:2 153:10 155:3,7,13 158:20,21,21,23 158:24 167:21 169:2 176:8 195:5 195:5 197:1 198:17 199:12</p> <p>abuse' 22:18</p> <p>abuse-specific 58:15</p> <p>abused 63:4 114:17 136:6 159:1 175:8 209:8</p> <p>abusive 148:19</p> <p>academe 125:25</p> <p>academy 126:13</p> <p>ACAL 80:10,12</p> <p>accept 22:9 45:4 96:24</p> <p>acceptable 5:20 142:23</p> <p>acceptance 71:25 72:2 126:21</p> <p>accepted 12:17 43:3 77:22 88:10 122:7</p> <p>accepting 71:18</p>	<p>153:18</p> <p>access 16:23 111:22 146:11,14</p> <p>accessible 193:23 195:1</p> <p>accident 154:18</p> <p>accidents 79:13</p> <p>accompanied 146:16</p> <p>accompaniment 145:25 146:18</p> <p>accompany 146:8</p> <p>accompanying 181:3</p> <p>account 13:13,17 23:2 144:2 161:9</p> <p>accountability 116:3 160:2</p> <p>accountable 144:12</p> <p>accounting 162:1</p> <p>accounts 161:24</p> <p>accurate 30:19 177:14</p> <p>accused 165:21</p> <p>ACE026700 153:1</p> <p>ACE026718 193:11</p> <p>ACE026749 29:10</p> <p>ACE026964 173:4</p> <p>ACE026964_023 203:15</p> <p>ACE026968_026 5:10</p> <p>ACE026977 150:9</p> <p>ACE027039 100:25</p> <p>ACE027156_003 199:15</p> <p>ACE027158 197:17 197:18</p> <p>ACE027696 205:19</p> <p>ACE923703 152:23</p> <p>achieve 53:2</p> <p>achieved 20:17</p> <p>achieving 15:21 43:4</p> <p>acknowledge 64:6</p>	<p>156:10</p> <p>acknowledged 5:23 146:18</p> <p>acquired 38:16</p> <p>act 7:24 57:12 64:1 64:19 69:12,15 125:5 137:20 146:13 153:24,25 164:15 173:18 181:24 184:23 189:24 191:14</p> <p>acted 2:11 8:21 25:1 32:20 35:18 127:9 198:22</p> <p>acting 3:1 19:16 34:20 85:17</p> <p>action 5:23 33:16 64:8,14 66:25 67:18 83:6 137:20 198:1,23 205:2</p> <p>actions 20:5 60:16 175:4 191:3</p> <p>actively 79:2 198:3</p> <p>activities 8:23 45:14</p> <p>acts 153:25 167:24</p> <p>actual 17:4 178:21</p> <p>acute 160:23</p> <p>ad 161:21 162:5 166:7</p> <p>add 41:20 51:19 53:13 82:9 83:15 83:18 94:7 174:13 187:19</p> <p>addendum 119:9</p> <p>addition 33:3 46:11</p> <p>additional 7:4</p> <p>address 19:20 20:6 31:23 32:8 39:15 41:2 82:18 175:4</p> <p>addressed 32:7 38:5 41:5 139:13 190:24</p> <p>addressing 17:19 39:5</p>	<p>adequate 127:23 130:11 189:20 203:13</p> <p>adequately 130:22 144:5</p> <p>adhere 85:5 86:6</p> <p>adjourned 210:7</p> <p>adjournment 123:6</p> <p>administer 134:5,7 141:7,8</p> <p>administrative 163:25</p> <p>administrators 51:16</p> <p>admission 64:3,11 64:23 71:16 85:25 86:3 112:20</p> <p>admitting 113:2</p> <p>adopted 22:10 29:24 84:15 88:11 113:23 155:3</p> <p>adopting 88:15 114:9</p> <p>adopts 155:4</p> <p>adult 59:9</p> <p>adults 185:5 206:20</p> <p>advance 18:2 80:2 153:19 190:10</p> <p>advantages 165:15</p> <p>adversarial 77:2,4 81:10 89:25 93:19 95:18 114:14,15 116:7,11 151:12</p> <p>adverse 109:8</p> <p>advertised 171:21</p> <p>advice 4:14 6:6,10 6:12 7:8,11,12,13 7:14,24,24 16:13 16:14 24:3,6,6,8,8 33:14 34:18 55:14 55:22 57:18 60:12 60:19 75:11,12,22 75:23,25 76:1 88:1,4 92:10,10 92:14,16 94:23</p>
---	--	--	--	--

100:19,20 102:13 102:19 103:11 107:12 111:13 113:9,12 122:16 141:15 143:23 144:8,8,8,10 152:20 153:2 154:3,4,6,21 182:16 201:20 209:4 advised 5:1 59:22 200:8 202:6 advisers 23:24 206:17 advising 29:1 advisor 4:6 5:12 10:11 16:18,19 101:22 102:5 131:4,24 143:17 171:9 188:24 189:14 190:16 198:5 207:14 advisor' 16:13 advisors 4:16 7:11 11:12 36:16 95:13 151:3 161:7 163:21 advisory 15:1,9 17:3 127:2 171:4 191:14 advocate 160:16 advocated 114:20 advocates 126:21 advocating 159:14 affair 171:6 affairs 141:14 afforded 11:15 afraid 68:17 132:14 152:6 154:14 159:2 185:9 afternoon 123:8 169:23 age 66:2,2 74:13 194:17 agencies 189:25	ago 71:6 73:2 77:19 94:3 102:2 103:12 104:11 112:13,13 121:25 128:6 156:5 157:4 179:16 185:11 197:2 201:9 agree 34:1 40:15 43:3,6 77:5,7,14 77:15 87:3 91:24 95:1 99:3 111:24 112:17 135:12,15 154:23 187:22 agreed 13:15 29:23 30:3 83:2 84:3,14 106:20 109:24 110:18 184:24 186:23,24 200:1 201:10 202:4 agreement 28:18 77:7 91:1,11,17 92:7 96:19 107:8 136:8 184:5 187:12 agreements 80:17 91:22 113:21 135:2,6 Ah 75:16 ahead 8:1 aid 95:19 Alan 123:9,10,13 166:11 182:3 188:4 210:25 albeit 188:6 alert 73:8 alive 54:3 90:5 207:21,25 209:2 allegation 56:2,3 101:3 207:7 allegations 2:17,24 26:2 41:18 50:6 53:24 59:7 61:22 66:8 68:11 89:5,6 89:12 90:2 111:11 131:1 149:8	167:12 169:3 alleged 3:25 42:11 54:3 71:7 89:6 208:18 allocated 3:24 allow 13:24 18:22 19:7 145:3 allowed 14:25 106:4 158:6 189:24 allows 191:1 alluded 85:21 alongside 98:17 103:25 126:11 altar 156:2,15 alter 89:15 alterations 184:22 alternative 16:20 37:24 39:8 alternatives 188:11 amateur 162:5 amazed 167:1,19 amended 110:3 amount 2:5 54:22 64:2 132:24 151:4 158:23 167:12 175:21 196:2 203:9 AN-A4 101:14,15 101:23 110:17 119:19 146:20 149:16 150:2,14 AN-A4's 97:7 101:5 analysed 25:1 analysis 72:19 180:1 and/or 87:19 99:22 99:23 Andrew 130:3 ANG000503_004 119:12 ANG000529 1:21 ANG000637 124:8 133:24 149:18	162:8 ANG000637_005... 145:24 ANG000637_010 143:12 ANG000637_012... 147:12 ANG000637_016 137:13 anger 108:10,11 Anglican 58:8 announcing 209:6 209:9 annual 180:20 ANQ000647 189:4 answer 20:9 28:13 91:18 116:19 117:3 144:12 152:6 158:10 162:24 168:24 180:5 188:22 200:10,12 202:8 207:22 anxious 168:5 anybody 13:11 66:18 98:21,22 114:5 121:24 148:3,6 168:20 202:25 anybody's 86:8 anyway 44:11 112:16 137:10 139:11 165:10 apart 29:3 187:8 190:18 apologies 64:18 81:13,15 apologise 18:2 65:12 81:21 149:24 196:15,16 apologised 22:3 apology 60:23 64:2 64:6 81:14,18,20 82:5,9,12 87:19 88:16 112:23	113:1,5 appeal 143:3 appear 120:24 appeared 13:1 appears 120:2,5 181:9 apple 155:5,11 application 201:6 applied 41:23 apply 17:18 38:5 48:4 90:2 136:9 142:9 161:24 199:25 209:1 applying 41:16 appoint 51:12 77:17 82:24 146:8 appointed 140:21 146:21 171:22 174:14 appointment 171:18,24 appointments 129:15 appreciated 26:22 58:1 169:25 appreciation 27:1 approach 12:22 13:9 31:9 39:8 46:16,17 49:9 62:20,21 69:3 70:6,9 88:20,25 89:25 90:8 95:18 100:6,14 113:25 114:11 116:8 128:23 144:19 186:1 192:10 204:12,20 approached 144:23 approaches 3:19 204:14 approaching 92:11 appropriate 35:5 43:1 62:9 123:2 141:9 174:11 appropriately
--	---	---	--	--

<p>19:16 137:19 approved 153:19 April 1:15 29:10 118:4 170:12 archbishop 10:17 28:14 192:24 196:6,19 200:3,4 200:8 201:13,14 201:17,18 202:6,6 Archbishops' 129:18 171:15 archdeacon 134:15 134:22 archdeacon's 134:23 archdeacons 134:5 134:7,10,25 163:21 area 23:24 76:9 81:4 113:12 124:23,24,25 125:4,12 126:9 127:17 146:6 174:3 179:5 areas 124:25 125:1 206:21 argue 72:9 argued 5:19 argument 71:4 161:20 162:3 167:5 arguments 32:13 arisen 130:18 arises 2:15 47:19 arising 1:22 arm's 103:18 army 125:23 arose 23:1 arrangement 57:6 arrangements 171:18 186:12 arranging 101:9 arrived 103:13 194:1 article 33:8 105:20</p>	<p>articulate 192:17 199:18 articulated 112:15 ascertain 61:21 aside 24:9 asked 2:25 29:10 29:12 34:6,19 35:21 39:23 40:25 70:11 84:12 92:3 92:23 94:15 107:16 129:22 168:25 171:22 173:8 176:14 180:13,15 202:11 202:11 207:17 asking 44:19 134:3 145:7 180:12 aspect 20:8 36:9,12 54:13 120:6 128:11 aspects 138:10 163:18 assault 198:21 assent 154:2 assertion 34:3 105:25 151:24 assertions 95:4 97:21 99:15 assess 166:4 assessed 166:3,10 assessment 13:25 20:21 assessments 189:20 assist 59:23 60:9 61:20 assistance 93:8 118:25 119:16 150:10 182:17 183:4 assisted 111:12 assists 9:2 37:14 associated 59:8 198:8 Association 73:14 80:12</p>	<p>assume 29:16 175:9 assumed 174:9 assuming 49:7 55:14,23 61:17 90:2 91:22 110:15 assumption 165:2 assurance 202:25 202:25 assured 130:4 ATL 118:3 attaching 38:7 48:5 115:10 attempted 10:12 attend 8:24 81:20 192:25 attendance 9:19 10:24 attended 6:20 9:4,6 10:1,20 93:7,7 150:1 194:18 attending 28:16 149:25 attention 20:25 119:11 120:17 204:22 attitude 27:13 28:11 185:10 auctioned 86:24 audit 30:9,11 31:10 auditing 18:25 19:4 162:7,9,16 181:14 181:21,25 audits 17:22 19:3 19:21,25 24:14 181:8,17,19 182:13 August 97:3 129:24 Australia 115:22 115:23 author 170:23 authorities 26:4 42:3 71:14 180:15 180:16 190:20 authority 16:9,25 17:1,9 27:2 30:25</p>	<p>40:2 51:20 67:7 139:24 157:20 161:8 166:23 170:21 172:6,9,13 189:18,25 190:5,7 190:17 automatically 143:23 autonomy 147:8 autumn 130:5,6 availability 66:4,5 71:1 117:20 available 17:18,24 20:15 26:6 27:5 48:16 49:2,5 59:19 67:2,3,4 71:11 118:8 average 65:22 avoid 32:1 94:22 95:17 140:9,9 178:2 193:7 avoided 182:7 avoiding 190:5 awaited 200:12 aware 11:7 13:5,6 18:1 20:4 43:10 49:3 55:20 69:6 71:20 72:25 81:22 91:6 101:3 108:15 108:17 114:23 128:12 147:24 154:11 157:3 164:25 181:12 awareness 19:13 57:24 73:3 awry 191:16</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>b 67:17 118:9 119:3 B1 16:2 22:24 B10 105:13 B3 5:9 B38 193:10,11 B4 150:9 B47 110:4</p>	<p>B5 55:9 B53 205:19 B55 189:1,3 193:15 B6 58:4 B7 63:1 B8 74:10 84:7 B9 97:12 back 5:13 8:2 15:5 15:25 21:6 38:19 45:1 47:23 55:20 57:10 64:15 68:21 69:8 71:10 73:10 81:24 87:24 94:2 99:5 109:15 121:6 127:19 132:15 154:15 160:22 169:24 179:15 183:13 184:24 background 1:25 2:1 206:21 bad 15:3 17:2 21:2 144:24 162:11 badly 144:11,12 165:6 180:3 baiting 192:6 balance 37:9 48:24 68:22 89:9 111:19 190:15 Ball 111:7 Barnardo's 170:20 barracking 192:6 barred 153:9 barrier 166:22 barriers 72:17 89:24 barring 143:1 170:23,24 barrister 76:2 barristers 76:3 base 141:16 179:1 187:15 based 14:12 28:20 31:13 32:14 68:11 72:12 137:20 177:19 199:1</p>
--	--	---	--	---

<p>bases 138:4 basic 40:15 137:25 139:11 basically 46:1 140:13 basis 17:24,25 48:4 48:19 49:1 54:23 57:4 77:23 105:2 114:9 140:25 160:8 161:21 162:5 166:3,4 172:12 181:15 183:9 199:20 battling 146:3 BBC 34:16 36:4 Beachcroft 59:14 61:17 102:6 bear 179:17 192:5 bearing 7:6 11:10 Beautiful' 202:2 becoming 126:10 bedfellows 89:18 beefing 190:22 beginner's 140:25 beginning 82:11,15 155:17 178:7 behalf 2:16 21:12 33:11,21 70:11 91:23 200:4 207:17 behaves 156:13 behaviour 126:7 138:18,24 140:3 140:10 141:25 142:21,22 beholden 161:4 belief 1:18 30:11,12 44:22 124:15 170:15 199:7 believe 2:8 21:24 45:17 79:21 88:11 101:23 106:20 107:2,14 108:22 109:3 122:11 135:3 142:25</p>	<p>162:19,20 168:25 188:25 189:1 190:10 believed 15:3 168:18 171:20 believer 33:1 bell 91:20 111:6 112:19 113:16 186:10 208:23 Bench 79:19 benchmark 182:11 benefit 26:14 68:15 98:5 124:8 Berks 127:15 best 1:18 9:14 14:17 44:22 52:20 64:8 118:20 124:15 146:5 153:10 160:6 170:15 better 8:14 37:11 86:19 129:2,4 140:11,25 179:25 194:10 beyond 17:3 21:22 92:15 big 21:8 146:2 bigger 32:12 bilateral 80:17 bishop 4:2,4,5,23 5:4 6:4,9 14:2 19:15 33:14 38:21 38:24 39:1,2,4,5 39:24 40:16 56:16 56:19,21 67:7 91:20 103:16 114:5 123:9,10,13 124:7,20,23,24,24 124:25 125:2,5,8 125:12 126:10 127:7 128:3,17 132:18 135:12 139:14 141:4 143:23 144:1,2,23 145:2 150:1,2,5,6</p>	<p>153:13 154:7 156:3 161:12 162:21,22 166:11 182:3 188:2,4,7 188:21 190:1,17 190:19 191:6 196:7,13,15,18,20 197:22 198:3,7 199:2 200:9 201:15 202:7 208:23 210:25 bishop's 143:18 200:12 bishops 10:20 39:13 56:5,9 67:6 106:10 109:19 111:4 119:4 120:25 129:4 132:19 134:3 139:4,7 143:24 144:9 146:8 150:16 152:5 153:1,6 154:13 160:1,2 161:4 163:21 164:14 169:1 181:10 191:1 192:24 195:25 bishops' 114:8 146:7 197:6 bit 1:24 4:12 5:24 8:2 12:3 14:8 16:16 18:3 19:3 22:23 52:9 53:3 54:6 60:22 97:25 110:22 135:9 163:14 178:14,20 179:5 183:6 184:6 188:11 191:18 bite 24:2 bits 106:14 176:24 bitterly 6:5 bitty 162:5 186:15 187:4 blamed 134:22</p>	<p>blaming 176:12 blemished 127:18 Bless 102:7 blocked 44:18 blocks 175:20 blow 97:23 99:11 99:12 159:11 blue 66:14,16,17 128:10 130:9,10 130:11,15 board 2:12 40:4,10 45:16 126:13 131:10 139:2 140:1,3 207:9 boat 167:8 bodies 38:16 40:11 158:8,9 204:16 body 14:25 15:19 18:18,19 19:9 20:3 25:7,9 30:1 35:16 38:11 61:2 127:7 139:19 186:25 187:8 191:14 Bonehill 43:13,16 43:22,24 44:25 62:8,11,17 106:7 116:20 117:2 119:25 122:24 151:10 165:11,25 210:19 Bonehill's 120:3 book 126:18 143:5 144:14,18 145:12 154:24 boon 165:10 bottom 24:10 29:21 56:1,25 63:2 87:15 105:15 106:25 107:10 119:10,20 148:25 173:7 brackets 201:23 breach 197:4 breached 199:2</p>	<p>breaches 136:20 break 43:17,18,19 44:9,10 62:9,15 81:12 89:23 123:2 123:21 146:9 169:10,12,13,17 189:6 breaks 123:20 Brexit 191:21 brief 2:22 62:9 182:13 briefing 12:18 131:3 briefly 45:4 119:11 124:23 127:20 152:20 203:18 204:4 Bright 202:2 bring 22:4 32:19 38:20 50:13 58:19 68:13,17,18 74:19 81:25 87:2 118:1 118:5 119:13 168:5,6 170:5 174:14 179:14 186:14 bringing 90:17 182:19 184:22 brings 110:22 178:4 brink 7:22 British 73:14 broad 34:1 38:2 69:2 196:11 broader 34:11 49:2 120:9 broadly 197:12 207:11 broke 154:8 broken 129:12 broker 121:21 brought 50:3 57:22 65:21 92:13 109:6 145:20 168:8 192:4 196:13</p>
---	---	--	--	--

199:8,9,17 201:10 201:24 Buckingham 124:20 125:12 126:11 Buckinghamshire 125:14,15 Bucks 127:15 build 80:15 building 107:8 buildings 140:20 bulk 60:6 bullet 63:11 148:25 bullied 143:8 bully 143:5,6 bullying 142:22 bumble 75:16 bundle 1:14 5:9 29:8 33:7 44:17 63:2 119:3,15 124:4,10 173:5 189:6 193:12 bundles 16:3 170:7 189:4,5 197:18 business 9:16 10:2 10:22 21:13 46:3 46:4 127:16 157:12 158:5 166:1 Butler 4:4,5,23 5:4 6:4,9 38:21 150:1 150:5 buy 95:25	128:1,6 135:4 144:15,19 145:25 163:16 178:17 181:8 182:21 193:10 209:9 calling 94:10 202:22 calls 101:19 camp 167:21 Canon 128:19 Canterbury 196:6 200:4 201:17,18 201:19 202:6,7 capacity 142:6 164:15 165:1 171:23 181:3,7 car 154:17 care 9:10,17 10:5,7 10:14 11:12 22:17 34:5,9,22,24 50:25 98:13 99:17 106:1 125:1 151:19 164:11 173:18 179:6 career 66:21 125:19 170:19 careful 41:24 196:21 Carlile 91:20 110:25 111:10 112:1,18 113:17 113:23 Carlile's 92:1 112:9 carried 27:11 69:21 197:21 carry 51:12 163:2 166:9 204:16 carrying 166:5 case 1:19 3:6,7,16 4:10,18 5:3,18 6:21 8:25 9:4,8 11:13 12:12 13:6 13:7 14:9 19:19 21:11,24 22:7 23:16 29:14 30:4	35:2 43:4,5 47:6 49:4,15 54:17 60:1,22 69:6 70:14,22 72:9 75:9 76:2 78:1 97:9 104:18,22 105:9 107:14,15 108:7 111:7,7 112:2,19,25 113:16 116:21 117:6 130:18 136:4 138:21 148:6 153:9 160:19,20 167:20 173:12 174:3 176:14 177:8 189:23 200:24 205:4 207:25 209:7 case-by-case 48:19 cases 23:7 42:11 43:9,10 49:19 50:9 51:9,25 53:1 54:25 55:2,8 59:17,25 65:18,23 70:4 72:3 73:17 76:7,25 77:17,20 77:21,22,24,25 79:20 85:14 92:12 102:14 111:16 132:1 145:9 169:2 185:25 202:20,22 203:13,24 204:7 204:25 205:4,15 205:23 206:3,6,9 207:15 casts 91:15 categorically 97:24 cathedral 181:19 196:18 cathedrals 47:12 186:3 Catholic 2:13 15:20 39:18 40:4 186:18 cattle 86:24	caught 135:10 203:1 causation 78:11 cause 7:22 35:19 70:25 71:9 caused 7:15 35:11 36:1 causes 157:17 194:20 causing 67:10 193:7 CBT-type 84:2 CCPAS 2:25 3:1 CDM 132:8,25 133:6,25 134:12 134:25 136:1 139:4 140:12 196:13 201:1 CDMs 133:19 139:7 201:23 ceased 8:6,11 Cedric 185:13,16 193:7 208:13,14 cent 47:1 50:21 53:21 65:23 70:2 70:4,6 75:5 central 159:16 centralisation 159:13,17,25 160:3,4 centrally 15:12 183:9 centre 13:22 14:2 16:10 17:9,11 30:18,23 31:15 century 170:25 CEO 2:11 ceremony 136:20 certain 14:21,22 79:6 128:17 130:4 158:22 183:8 198:8 200:2 certainly 7:16 10:12 27:20 37:3 55:10 91:6 96:19	97:17 108:11 114:1 117:7 124:2 139:14 150:11 157:1 176:13 178:23 179:14 182:15 189:16 203:1 certify 128:16 cetera 47:12 50:14 50:14 62:1 66:8,8 66:25,25 78:4,4 83:16,17 94:19,20 117:21,21 chain 172:17 chair 1:3,5,14,20 3:10 5:9 8:25 16:2 37:14 40:24 42:4,6,8,18 43:3,7 43:11,12,16,19 44:16 55:9 62:7,8 62:10 63:1 74:10 84:7 97:12 110:4 110:5 116:21,23 117:24 122:23 123:1,3,8 124:9 126:12,14 127:6 127:10 131:10 132:5 133:14 137:15 150:9 166:12,14 168:22 169:6,8,14,19 171:3 173:5 188:25 189:5 191:23 193:12 197:17 202:13,18 203:14 209:18,19 209:21 210:1,4 chairing 127:7 170:20 chairman 193:11 challenge 15:2 67:5 challenged 5:21 challenges 67:10 71:10 chambers 143:22
C				
C4 131:14,20 Cahill's 160:19 call 5:3 46:24 72:12 132:8 159:20 161:9 162:13 called 16:19 47:16 49:9 55:13 64:25 82:22 84:15 86:16 86:19 92:19 102:3 123:13 127:1				

<p>chance 138:24 chancellor 140:17 chancellors 140:14 140:15 chances 185:16 change 18:20 19:22 20:25 31:7 32:11 32:16,21 33:1 73:19 74:6 80:16 112:16 113:16 130:2 171:12 173:19 184:2,6,11 184:17,21,21 185:18 190:15 194:8 changed 57:18 90:8 118:21 changes 31:23 172:11,25 173:8 173:21 191:22 changing 110:21 chaplain 125:25 144:17,23 character 128:13 charge 161:12 188:2 charitable 46:13 charities 126:14 charity 45:9 142:19 161:25 189:22 check 40:21 41:1 63:8 107:23 122:19 203:20 checked 120:13 checking 130:20 185:13 checks 127:19 Chelmsford 171:4 Cheshire 197:16,21 198:24 200:15 Chester 196:13 197:14,23 198:8 200:9 201:12,15 202:7 chewing 192:19</p>	<p>Chichester 39:12 57:11 102:4,5,22 170:11 chief 107:22 170:19 child 2:1 33:25 41:11,12 57:7 59:9 67:24 72:17 80:12 105:24 126:24 127:1 131:1,2,4,24 142:1 149:5 153:2 198:21 childhood 114:18 children 2:12 149:7 179:10 185:5 195:10 children's 179:6 choice 95:24 choir 62:1 choose 37:6 69:18 69:19 70:18 93:23 93:23 95:23 96:14 100:7,8,8 159:22 chooses 41:22 chose 108:7 198:15 chosen 100:3 105:7 106:3 chronology 8:4 church 2:11,13,16 3:17 4:1,3,16,17 5:23 6:2 7:7 8:4 10:5 12:9,14,16 12:19 13:12,12 14:13 15:4,19,20 15:23 16:5,24 17:6,15,17,19 18:19,21 19:1,5,7 19:9,9,12,18 20:2 20:5,13,24 21:16 21:18,20,20 22:9 23:4 24:5,12,14 24:17,23 25:1,6,7 25:9,14,16,19,24 26:7,13,19,24 27:3,4,10,17,23</p>	<p>28:7,25 29:5,14 30:3,8,12,18,20 31:9,18 32:11,15 32:24 33:9,12,13 33:21 34:4,18 36:20,21,23 37:16 37:17,22 38:11,16 39:18,25 40:4,14 41:2,7,16,17,20 42:1 43:8 47:4,4,8 47:9,14 48:20,21 48:23 49:16,20,25 53:10,14,16 54:8 54:13,18 55:22 56:7 58:8,13 59:8 60:16 61:2,25 67:12 77:21 81:18 81:19,21 82:3,8 84:21,23 88:6,10 91:21 92:11,18 94:5 95:2,3,14,22 96:8,17 98:4 99:16,19 100:9,11 100:11,18 105:11 105:20,22,25 106:10,17 109:12 110:16 111:11 113:23 115:2,13 120:18,20 121:24 122:15 126:20 129:19 130:25 131:11 133:8 134:8,14 140:20 141:24 142:8,11 143:3,14,20 144:20,24 146:6 146:17,24 151:3 154:5 155:2,23,24 156:4,24 157:7,16 157:22 158:4,23 159:1,18,18 160:10 161:2,3,11 161:18,24 162:12 163:2,5 164:2 165:9 168:6,7</p>	<p>172:2,7,10,21 174:20 175:1,8,22 176:8,11,22 177:6 177:18 179:21 180:19 181:24 182:5 183:20 184:3 185:2,11 186:6,10,18 187:7 187:13,25 191:16 192:23 194:19 196:23 197:16 199:11 200:2 204:15,18 206:10 207:24 208:1,9,10 church's 28:11 93:22 114:7 154:25 199:2 church-related 61:2 churches 14:14 18:8 21:5 31:22 32:1 45:8,13,15 47:10 161:23 162:2 168:12,17 194:18 195:10 cipher 3:24 circles 134:21 159:6 circulate 137:10 194:7 circulated 63:5 129:20 154:4,13 circumstance 106:5 circumstances 33:18 71:7 72:11 74:23 96:15 97:9 101:15 108:6 109:4 113:24 115:13 143:9 145:19 151:6 197:13,14 civil 51:2 73:5 74:13 77:3 79:22 80:16 98:17 103:25 111:17</p>	<p>114:14 115:9 116:18 claim 34:10,20,23 47:3,6,6,19 48:6 49:1,13,15,24 50:2,10,11,13 52:6 56:23 57:21 58:19 59:21 63:3 65:7 66:2,6,24 68:7,17,18 70:19 71:16 73:5 74:19 75:6,11,24 76:13 77:6 83:4 84:17 85:12,19 86:3,10 87:3,4 92:2,9,17 96:3,7 97:7 98:12 98:17 99:25 101:10 103:16,25 107:4,6,25 108:2 108:3 109:5,14 110:12 111:6,21 112:3,12 117:5 121:6 191:22 193:24 claimant 52:15 71:24 72:14 77:5 77:13 79:7 80:9 80:17,19,23 81:13 82:8,25 85:2,18 87:5,8 89:21 91:5 108:1 110:13 claimant's 77:22 claimants 68:10 claims 34:25 45:21 46:1,2,5,5,7,20,25 47:1,20,21 49:19 50:18,21 51:2,5 51:11 52:11,12,13 52:20 53:3,9,14 53:15,16 54:12,21 55:3 57:24 58:6,9 58:10,12,17,25 59:1,2,3 60:6 61:13,23 62:21,23 65:8,11,21,25</p>
--	---	--	---	--

70:7,7 71:9 72:16 74:14 75:14,15,21 78:24 79:14 80:11 81:6,17,25 82:20 83:19 84:13,22 85:1,7 87:16 88:11,22,25 89:15 89:17,24 90:8,21 92:2,12,21,23 95:15,22 96:18 102:19 103:23 104:11 105:17 108:24 111:3 114:8 115:9 153:2 153:6 clarification 173:21 clarified 34:23 99:22 105:6,8 106:5 152:3 clarify 58:15 79:18 100:13 106:3 152:2 clarity 110:22 140:5 classes 46:4 65:6 clear 12:24 28:16 34:8 66:7 84:25 85:24 92:4 100:18 104:17 105:1 106:20 112:12 113:15 121:5 123:19 151:9 152:16,17 161:8 179:1,25 193:1,1 193:13 199:6 cleared 99:22 clearly 57:23 67:8 72:8 82:3 86:11 101:19 174:5,23 198:20 clergy 17:11 20:15 26:3 39:6 42:9,9 42:19 66:20 71:5 125:10 128:7	129:8 132:4,7 133:9 135:7 138:3 139:21 141:3,21 143:5,6,8 146:9 158:14 161:19 164:19 165:21 166:20 169:1,1 189:18 190:14,18 191:7 192:15 195:24 197:9 198:20 199:14,16 200:16,23 208:5,5 clergy's 197:5 clergyman 156:2,3 cleric 128:3,5,10,18 130:19 135:10,23 136:6,9,12 138:19 138:24 clerical 37:15 38:10 66:20 67:15 126:6 clerics 45:15,19 53:19 54:15,16 125:9 126:5,6 130:17 135:5 138:1 139:5 141:21 142:21 156:8,22 165:12 client 87:5 cloak 133:6 closed 24:19 closely 50:5 66:10 76:12 131:24 closer 75:19 closure 95:20 107:6 clout 172:6 clusters 174:6 clutch 194:12 Co-operation 204:19 co-ordinate 9:12 Code 65:1,4 82:24 codesign 176:3 coerced 74:24 coffers 96:12 coherent 30:1	Colin 102:3,12,16 103:2,8,22 188:23 colleagues 14:2 126:19 collecting 179:22 collection 179:21 180:1,21 181:3,6 collective 184:5 186:8,14 collects 80:6 combination 173:14 come 9:11 15:5 40:16 46:19 50:18 51:21 52:21,23 54:5 56:21 57:3 60:21 64:17 71:10 73:10 75:16 89:8 99:20 103:20 110:15 121:6 127:19 130:15 175:11 182:5 183:24 191:13 204:7 208:17 comes 61:14 64:15 66:7 68:21 109:14 141:21 162:4 coming 15:25 55:21 61:12 63:9 77:19 98:18 169:24 202:10 209:24 commence 171:25 commenced 51:17 comment 5:19 24:16 92:3 104:6 115:25 120:1 121:3 139:6 168:10 209:11 commented 12:19 13:9 comments 12:4 21:10 35:11 36:8 commission 139:21 189:19,19,22,22 commissioned	17:22 20:1 162:12 commitment 28:18 88:22 106:25 110:19 186:8,15 209:3 commitments 28:2 committed 22:16 71:8 125:1 committee 35:22 74:4 149:2 158:5 192:5,7 Committees 149:5 committing 39:25 40:18 common 187:17 comms 10:21 communicate 137:18 communicated 8:16,20 27:21 communities 159:5 companies 164:5 company 5:16 21:14 45:10,14 46:3,13 56:17 58:14 151:16,17 151:20 compared 176:23 comparison 46:22 compassionate 149:12 compelled 189:24 compensation 64:1 64:19 71:24 72:14 94:19 95:16,19,22 96:12,18,24 121:9 163:11 complainant 3:24 5:2 complainants 68:19 70:12 71:12 145:21 complained 135:21 complaining 132:16 178:5	complaint 35:19 73:6 134:12 166:25 178:10 199:14,17,20 200:7 201:6,13,22 208:15 complaints 63:20 66:24,24 136:19 141:2 177:5,6,12 195:25 202:8 207:10 208:25 209:4,14 complete 7:5 120:12 191:10 completed 31:11 107:6 completely 162:16 181:25 193:15 203:25 completing 125:21 complex 54:20 77:25 78:1,11 92:19 174:3 complexities 66:4 68:7 75:24 complexity 117:14 compliance 16:13 complicated 58:25 complied 17:7 complying 30:3 comprehensive 25:17 compromise 134:3 compromised 136:12 concept 157:18 concern 13:1 15:14 16:18 17:17 19:8 19:17 35:12 39:7 41:18 105:5 143:13 147:5,19 151:15,21 153:4 163:22 197:11 208:15 concerned 7:23
--	--	--	---	---

<p>22:21 38:23 78:14 109:19 113:14 126:25 128:10 129:11 137:23 156:21 163:6 166:23 179:20,20 181:12,18 concerning 126:14 173:17 198:13 concerns 19:10,13 22:8 39:15 41:3 60:15,16 67:8 99:7 106:11 128:11 132:3,7 149:11 152:19 154:25 159:12,17 199:4 202:21 207:10 conclude's 43:12 concluded 197:23 concludes 40:23 42:4 conclusion 204:7 conclusions 6:11 8:1 12:4 36:8 concurrent 103:16 conditions 128:17 condone 158:21 conduct 47:6 49:14 49:15,24 56:24 96:6 97:7 198:3 199:17 conducted 3:11 133:6 179:2 197:22 conducting 209:7 209:10 conference 9:8 11:13,14,16 43:5 confidence 64:20 146:13 163:4 confidential 35:13 66:19 101:25 109:22 confidentiality</p>	<p>24:21 51:14 91:1 91:10,11,16,21 92:6 113:14,21 135:6 136:7,13 confidently 195:12 confirm 1:17,19 30:2 34:19 40:5 47:3 103:9 118:18 168:24 170:12 confirmed 4:24 94:14 101:6 conflict 191:8 confront 15:2 confusion 58:12 congregation 208:12 congregations 125:9 congruent 125:13 conjunction 64:9 115:21 connection 174:13 conscious 206:1 consensus 43:4 consent 52:23 74:12,13,22,25 75:2,16 135:14 consented 74:15 consequence 32:7 67:8,13 121:7 consequences 7:16 41:21 165:7,8 187:2 consider 3:12 42:24 107:7,24 147:11 162:14 considerable 99:19 101:4 108:18 considerably 117:15 206:19 consideration 37:4 43:2 208:3 considerations 21:23 considered 12:8</p>	<p>18:20 25:15 26:7 28:6 42:25 176:2 201:7,10,14 202:3 considering 88:15 88:15,16 111:11 143:1 190:13,21 consistency 15:21 100:15 128:23 139:25 140:2 160:14 consistent 100:6 107:12 137:19 139:2 153:10 consistently 15:18 Constabulary 197:16 198:24 constituent 47:9 consult 64:11 99:6 115:15 201:18 consultant 3:1 consultation 99:4 187:11 consulted 83:14 84:18,20 88:9 99:6 200:5 contact 4:15 5:4,18 21:25 33:15 38:17 59:24 60:10 100:24 101:14 102:6,15 145:20 198:4 201:15 208:1 contacted 5:22 contained 198:19 contains 108:22 133:19 contemporary 197:1,11 context 55:21 72:21 88:6 93:19 100:20 114:17 126:20 145:9 151:12 154:12 155:13,13 155:15,23 161:14 170:10 172:1</p>	<p>180:3 183:16 188:8 203:9 contexts 142:23 155:24 continue 34:9,24 43:19 59:14,16 100:3 105:2 175:1 181:13 185:10 202:17 continued 103:24 204:22 continues 59:15 158:20 continuing 104:13 108:22 110:13 continuous 53:1 contract 12:17 49:3 49:23 60:18,24 61:3 64:16 72:1 121:7,12,17,19,20 121:20 122:10,18 contracts 21:14 115:1 116:16 contradicts 61:22 contrary 34:8 43:3 contribute 94:15 95:8 108:19,22 184:4,7 195:19 contributed 79:1 116:4 contributing 11:15 42:15 contribution 26:15 78:12 93:11 control 25:23 28:8 37:7 50:1,4 52:6 147:9 148:16,20 161:20 controversy 99:19 conversation 4:20 102:12 conversations 4:9 6:21 24:19 74:1 103:19 104:4,6 145:13 172:18</p>	<p>convicted 167:13 198:10 conviction 85:15 199:10 convictions 159:4 convincing 162:22 convoluted 200:2 200:19 202:12 cooperative 183:4 copies 4:15 119:22 coproduction 176:4 copy 59:21 118:14 121:19,20 130:5,6 core 6:20 8:24 9:4,6 9:7,23,25 10:23 12:1 92:19,20,24 92:25 93:4,6,21 94:1,2 208:21 corporate 19:23 correct 2:3,4,9,14 2:21 3:9 4:5 22:20 45:3 54:1 54:19,24 55:17 62:23 64:4 66:22 71:9 75:8 76:16 83:9 96:13,21 108:8 111:5 126:16 132:2 153:20,22 193:14 196:12 210:3 corrected 110:9 corrective 21:1 correctly 103:1,22 correspondence 10:17 cost 101:5 166:5 costing 166:8 costs 86:4 165:2 Council 35:17,23 171:15 counsel 122:17 counselling 34:9,24 59:24 60:10 61:1 61:2,5 62:21</p>
---	--	---	---	---

64:22 65:12 87:19 88:17 101:5,8 102:20 103:23 104:12 counted 78:1 counter 150:17 counties 127:14 country 161:25 167:23 countryside 159:2 counts 202:4 couple 77:18 94:3 95:9 166:16 course 35:8 48:14 51:16 66:20 71:10 90:13 92:1 105:6 108:15 113:5,6 116:14 117:19 142:14 143:4 144:22 152:15 158:2 185:20 192:24 195:19 207:24 courses 131:8 court 75:20 128:20 146:14 courtroom 45:1 courts 69:11 70:23 cover 49:8,10 56:10 101:6 114:21,21 141:16 165:4 206:8,22 covered 25:5 29:13 36:15 47:5 124:12 127:14 138:5 166:2 192:13 covering 49:11 101:5 159:10 covers 58:16 168:11 coverup 155:14 207:7 create 20:2 24:12 63:16 66:3 80:17 95:14 114:3 145:4	161:13 created 3:15 27:6 40:6 147:22 195:14 creates 158:16 190:4 creation 31:14 179:18 credibility 76:25 credible 26:1 credit 191:22 192:1 193:24 criminal 111:12,13 111:14 167:12,24 197:22 198:11 crisis 32:18,19,22 33:1 157:21 166:7 166:7 criteria 20:20 39:21 critical 12:15 22:15 32:6 48:3 120:5 173:25 174:18 201:8 critically 24:25 188:11 criticism 6:13 21:15 98:9 120:9 120:25 criticisms 194:6 critics 187:24 cross 178:6,8 cross-jurisdictio... 161:13 cultural 168:1 184:11,17,21,21 culture 184:2 cultures 157:23 curate 125:20 curate's 202:22 current 16:10 118:19,20,23 128:7 132:7 133:25 138:14 139:21 154:25	173:11 181:11 190:23 197:22 206:9 209:2 currently 16:15 26:3,4 62:12 67:10 73:23 74:13 79:3 81:15 124:19 141:3 149:4 187:25 188:21 207:2 209:10 customer 48:18 customers 47:15,18 53:15 cut 33:14 <hr/> D <hr/> d 190:8 210:11 dairymaid 202:10 202:11 damage 120:19 damaged 163:5 damages 50:14 Dame 160:19 danger 129:9 142:13 146:4 data 31:15 47:21 54:10 57:12 67:9 69:24 179:21,22 179:24,25 180:1,1 180:21 181:3,6 187:12 date 110:19 152:22 154:1 182:5 194:9 dated 1:15 3:2 29:10 118:4,17 119:3 170:12 dates 66:8 67:23 daughter 171:8 David 43:13,22 210:19 day 1:3 8:18 52:22 54:25,25 83:3 101:10 133:20 150:19 159:7,7 180:25 202:16	206:9 day's 73:3 day-to-day 45:13 54:23 184:8 days 35:1,3 63:10 152:12,13 209:6 DBS 127:18 142:14 142:16 185:13 dead 207:25 deal 24:1 39:13 40:17 46:20 47:1 49:20 50:16 52:12 53:14 54:5,22,25 68:6 75:15 96:18 111:2 112:4,14 142:6,7 152:19 154:24 164:5 173:14 dealing 21:14 23:19 46:16 54:2 60:6 65:19 71:4 78:10 79:19 93:21 101:22 103:10 121:6 131:1 132:10 146:12 159:3 160:5 188:8 188:12 208:18 dealings 146:24 149:17 deals 58:9 65:2 74:11 108:13 136:23 139:20 141:14 161:18 dealt 46:8 85:20 95:11 135:11 136:3,22 160:8,9 160:15 163:24,25 166:25 dean 126:10 196:14 196:15,17,18 Dear 102:11 debate 185:8 decade 170:25 deceased 3:25 53:25 54:17 71:5	90:5 207:21 208:19,24 209:1,5 209:15 December 53:12 54:12 decent 145:19 decentralised 161:15 decide 24:8 71:16 108:6 decided 49:14 162:23 171:16 198:1 deciding 188:15 decision 15:22 42:10,19,25 43:1 50:8 69:3 72:12 72:23 73:9 74:8 76:11,11 86:9,13 88:1 89:9,16 96:1 113:7,8 138:19 169:2 193:1 decision-making 204:15 decisions 24:24 25:5 42:16,17,22 50:1,4 51:20 52:25 131:25 149:6 declined 49:4 declining 49:1 deemed 64:23 74:15 deep-dive 181:8 deepest 159:4 deeply 134:24 default 60:5 defence 69:18 70:1 70:15,22 71:17 74:12,22 75:1,9 75:17 76:19 defend 35:24 50:2 50:2 defendant 77:1 79:8
---	---	---	---	---

<p>deference 14:4,16 14:20 42:14,14 157:17,18,23 158:1 deferential 157:19 deferred 158:3 deficiencies 203:3 206:5 deficit 16:10 defined 20:18,22 21:23 defining 39:19 definitely 102:13 degree 10:3 27:4 36:20 74:5 75:13 147:15 159:16 186:20 degrees 183:10 delay 34:23 86:8 111:20 132:11 delays 134:22 delegated 51:20 125:4 delegation 127:17 141:7 deliver 46:3 116:18 121:14 delivered 27:22 110:20 delivering 22:19 demonstrate 49:10 122:5 demonstrates 22:7 73:12 dense 133:6 139:8 deny 34:4 106:1 department 127:9 depend 140:1 192:8 dependent 130:21 depending 76:2 114:4 depends 75:23 83:22 114:24 115:12 130:15 162:6 192:7</p>	<p>deposition 136:18 deputy 173:12,24 174:5 describe 97:8 108:9 133:14 136:25 described 161:13 deserves 38:8 192:1 designed 182:22 desire 59:24 60:10 61:7 despite 74:23 108:19 131:23 198:4 detail 17:16 117:25 154:24 193:21 197:12 203:6 205:10,25 206:22 206:25 detailed 2:23 23:2 25:17 56:4 85:18 107:19 179:11 detailing 26:1 details 70:19 73:7 105:4 determined 86:1 detriment 36:12 108:25 devastating 21:2 develop 58:2 116:7 developed 55:6 57:8 84:9 94:3 127:25 128:6 174:8 175:3 180:10 developing 29:4 126:4,15 development 29:17 174:3 176:6 178:17,24 182:21 192:14 deviating 13:8 device 39:17 diagram 118:2 dialogue 11:23 38:15 42:23 80:18</p>	<p>Dickenson 198:14 198:19 Dickenson's 199:8 199:12 difference 12:24 54:17 71:22 112:14 121:12 164:24 different 9:20 25:11 42:14 47:18 47:18 78:3 100:14 113:24 114:1 125:3 147:25 158:14 160:12 161:21 172:9 179:17 193:16 differently 174:20 difficult 14:1 54:21 73:5 76:22 78:10 81:21,23 89:2 133:4 134:13 156:11 158:2 159:11 162:19 175:24 178:8,13 180:24 184:16,16 209:14 difficulties 15:8,17 63:17 65:25 207:23 difficulty 89:17 100:5 132:17 182:4 209:8 diocesan 5:12 10:10 13:21 14:15 15:13,15 39:2,5 39:13 42:10 101:21 102:4 125:2,5 126:13,25 127:1,2 131:3,23 135:12 139:14 140:14,15,17 143:11,16 161:6 161:11 163:20 171:3,9 181:17 188:1,7,24 189:13</p>	<p>189:14 190:1,6,16 190:19 191:1 197:3 198:5 206:16 207:14 Diocesan-based 14:1 diocese 4:8 5:5 18:18 19:17 30:10 30:17,25 47:17 100:23 102:4,5,22 102:22 127:9,24 130:19 135:20,25 140:21 141:15 156:22 162:1 170:11 180:4 183:12 194:7 196:1 198:9 201:12 dioceses 18:8 40:12 128:24 140:2 160:11 161:4,22 177:11 179:23 180:7,14,17 181:1 181:14 182:17 183:3 185:19 186:3 203:20,22 203:23 204:6,8,21 direct 6:23 55:14 56:21 198:11 directed 3:13 direction 16:14 62:4 187:22 directly 6:25 8:6 10:14,25 17:1 25:13 29:6 35:9 39:2 56:16 77:1 94:11 96:23 director 2:7 45:20 45:21 46:1 127:8 171:13,19 172:8 172:14,22,22 173:24 174:12 179:19 195:23 directorate 118:3 directors 45:19</p>	<p>173:12 174:5 disadvantages 165:16 disagrees 190:19 disapplied 69:13 disappointed 184:1 disappointment 108:18 disaster 174:16 disciplinary 66:25 133:9 137:14 138:5 141:3 187:2 discipline 39:6 132:5,8 135:8 139:20,21 140:5 141:22 191:7 192:15 195:24 196:23 197:9 199:14,16 200:23 disciplining 187:20 disclaimers 154:17 disclose 167:7,8 198:15 disclosed 23:3 175:11 disclosure 23:8 148:2 170:22 197:1 disclosures 22:25 23:13,17,19,20,23 127:11 148:8,12 166:19 167:11,15 discovered 34:22 discreditable 156:13 discretionary 133:19 167:18 discuss 28:15 52:22 52:24 98:22 99:7 196:3 discussed 8:25 10:6 11:10 30:14 72:19 99:23 117:17 194:13 discussing 32:5</p>
--	---	---	---	--

<p>discussion 83:11 175:17,18 177:2 178:16 182:15 207:5 discussions 29:15 83:13 87:8 94:8 95:7 114:18 198:12 dishonesty 142:18 dislodging 190:5 dispenses 22:21 dispute 43:8 99:22 disqualified 142:19 dissatisfied 174:25 disservice 2:5 distilled 194:24 distinction 113:18 113:20 distressing 52:17 distributed 28:10 diverse 19:9 Division 79:19 doctor 137:8,12,12 doctorate 125:21 doctors 164:21 doctrine 136:24 140:19 158:19 document 5:10 12:20 22:24 55:13 56:6,7,9 58:6,14 62:17 63:5,6,7,25 65:16 67:14 73:15 80:5 84:12 85:7 105:12 119:1,17 119:19 120:12 154:11,19 177:2 193:16 194:5,25 197:17 206:24 documentary 34:17 documentation 3:14 48:17,17,18 55:11 79:11 92:15 110:7 121:23 122:3,13 150:11 200:14</p>	<p>documents 57:4,6 57:11,15 99:21 100:7 103:6 106:4 123:25 124:5 128:8 170:7 197:15 Dodds 4:10 29:13 doing 9:13,13 30:4 36:21 38:15 59:13 61:8,19 78:23 80:7 82:1,18 89:20,22 98:12 129:23 130:4 132:22 133:1 135:10 150:24 165:1 167:18 168:7 173:22 174:11,20,21 178:15 domain 97:17,19 98:9 152:22 donkey 134:11 door 88:13 doors 24:19 double 8:1 38:19 double-check 65:8 96:25 doubt 68:15 90:12 91:15 doubts 128:21 draft 84:17 drafted 84:15 128:8 205:20 drag 178:12 Drang 98:1 draw 16:7 18:23 20:8,25 38:15 120:17 drawing 31:21 32:13 106:14 drawn 27:20 dreadful 174:16 drew 119:11 drink 160:5 161:19 drive 160:6</p>	<p>driving 161:19 drowned 158:25 DSA 4:7,8,19 189:24 190:20,23 207:1,5 due 169:10 197:5,7 200:21 210:2 dug 205:9 duration 85:16 dust 80:6 duty 148:22</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 210:11 earlier 56:13 59:7 61:25 66:14 85:21 95:12 112:15 117:17 122:6,17 144:7 168:25 169:12 199:11 204:18 earliest 86:13 early 19:7 56:24 79:8 80:19 82:2 85:25 86:3 95:17 115:25 195:15 earth 158:10 185:8 185:12 easier 106:17 118:16 139:4 164:14 166:22 easily 24:23 easy 148:8 Ecclesiastical 6:14 7:5 8:10 21:12,15 21:19 33:22 34:4 43:14 45:6,9 46:2 51:21 55:13 56:16 59:12 64:9 65:5 73:19 74:14,16 81:14 88:25 94:11 95:5 97:24 101:3 109:9 113:8 121:25 136:22 140:18</p>	<p>Ecclesiastical's 74:20 edge 183:6 education 126:13 126:15 131:7,10 140:4 157:2 172:22 effect 8:6 33:19 37:2 107:16 150:23 153:18 165:15 184:16,17 200:15 203:13,17 203:18 204:11 205:14,18,22 206:6,25 effective 127:22 137:14 138:6 146:7 192:16 effort 95:17 efforts 77:4 egg 202:22 EIG 5:1,25 6:23,24 35:11 45:7,16 59:22,23 60:1,9 102:13 103:10,13 107:3,7,11,23 108:12 120:6 150:4 151:7 eight 70:7 183:25 195:6 EIO 6:25 34:14 45:5,19 91:23 92:10 97:11 105:19,25 109:19 111:15 112:25 115:16 116:12 118:3 120:25 121:20 150:22 EIO's 69:17,19 EIO000110_002 118:1 EIO000129 55:9 EIO000130 58:4 EIO000130_004 62:18</p>	<p>EIO000131 63:2 EIO000132 74:9 84:8 EIO000133_002 97:13 EIO000134_004 105:13 EIO000135_002 33:20 EIO000135_022 105:21 EIO000136 106:12 EIO000137 150:22 EIO000137_002 107:23 EIO000138_002 34:14 EIO000139_004 33:8 EIO000147_002 110:5 EIO000149_003 53:4 either 20:13 22:21 35:7 48:17 50:16 56:16 61:21 131:9 155:4 158:20 161:5 173:14 183:4 197:2 208:7 elaborate 105:5 180:12 elaborated 18:10 element 32:18 33:1 eliminate 20:6 Elliott 1:6,8,10,24 9:2 34:1 35:1 40:23 42:5,8 94:9 94:10,12,13,17 95:1,12 96:25 97:3 98:2 105:10 108:14,17 109:2 144:7 151:1,25 168:25 186:16 210:13 Elliott's 43:12</p>
---	---	--	--	--

<p>eloquently 26:13 Ely 203:25 email 102:7,9 emailed 5:23 emails 101:19 emanating 84:22 embarked 200:3 embarrassment 135:24 emerges 15:6 emotionally 114:16 empathetic 88:22 151:11 empathy 89:1,17 emphasis 95:18 151:4 195:4,12 emphasise 7:25 41:6 62:19 emphasised 22:1 26:11 31:20 36:18 Emphatically 169:4 employ 3:4 14:14 128:12 employed 6:24 129:9 employee 6:23 144:1 employees 51:10 144:13 employer 59:3 employers 161:9,9 employers' 46:6 employment 58:10 136:16 176:8 empowered 15:12 35:24 36:2 empowering 40:3 empowers 40:21 enable 79:9 173:21 173:25 encapsulates 22:5 encountered 185:10 encouragement</p>	<p>185:20 195:17 endeavouring 85:5 ended 149:24 endorsing 204:9 enforce 92:6 enforcement 182:18 191:15 engage 3:19 6:15 51:8 152:8 171:16 176:3 193:6 engaged 74:20 140:7,7 engagement 174:9 185:6 engages 30:4 engaging 8:4,5 26:19 England 2:16 3:17 4:3 12:16 14:13 15:19 16:5 24:17 29:5,14 33:12,13 34:4,18 40:14 41:2 47:4,8,14 48:20 49:16 53:10 53:14,16 54:18 55:22 67:12 77:21 84:21 88:6,10 95:3 100:9,11,11 105:11,25 106:10 106:17 109:12 110:16 111:11 115:2 120:18,20 160:10 161:11 179:12 186:6 187:13 194:19 197:16 England's 12:9,14 enhanced 204:21 enlargement 124:1 enlarges 124:1 enlarging 106:14 enlightened 12:22 enormous 132:24 175:21 enormously 160:23</p>	<p>enquiries 196:22 ensure 13:17 15:23 28:19 60:20 106:18,20 120:19 134:24 189:20 ensures 31:8,14 ensuring 17:5 40:1 107:3 enter 135:16 entered 139:7 entire 109:13 110:25 130:24 entirely 13:11 37:16 43:15 109:8 129:12 146:24 150:20 163:25 165:20 193:13 entrenches 178:3 entry 4:18 142:16 environment 185:4 envisaging 142:9 episcopal 126:11 157:24 187:6 190:4 episodic 20:1 equitably 69:13 equivalent 204:16 error 6:7 errors 90:13 especially 42:9 185:5 194:2 206:1 essence 12:12 189:10 essential 181:22 188:17 essentially 9:9 10:2 11:18 22:14 26:17 28:20 33:8 188:1 establish 9:22 30:16 47:25 133:5 137:18 established 30:12 86:15 et 47:12 50:14,14 62:1 66:8,8,25,25</p>	<p>78:4,4 83:16,17 94:19,20 117:21 117:21 ethical 46:16 92:6 ethically 78:19 ethics 126:1 evaded 152:4 event 7:21 59:15 94:5 120:16 123:22 events 58:19 77:10 78:3 198:13 201:8 everybody 37:21 79:3 84:25 134:13 136:2 160:7 186:19 203:1 everybody's 85:4 everyone's 85:25 evidence 2:15 26:11 34:7,17 43:12 45:2 48:15 49:2,5 50:7 52:16 66:5,12,22 71:2 71:11,15 74:18 76:20 79:11 80:21 85:22 89:7,8 94:13 117:18 122:1,7 123:9,22 146:20 152:7 169:20,24 170:5 170:17 174:23 177:23 181:9 186:16 192:12 202:20 203:5 exactly 9:23 22:15 47:18 48:14,14 49:12 73:3,8 87:2 165:23 167:20 Examination 1:9 43:23 123:11 169:22 210:15,21 211:2,8 examine 179:12 examined 203:19 example 26:1 76:4</p>	<p>78:2 81:13 89:6 89:13 105:4 117:17 126:21 130:18 133:20 138:21 141:1 142:2 160:5 161:23 165:23 167:22 173:18 174:2 175:16 180:13 188:6 191:15 194:15 208:11,13 examples 61:5 excellent 12:23 73:2 exception 190:14 exceptionally 38:12 excess 50:20 excessive 157:23,25 159:13 160:1 excessively 158:3 exchange 80:21,22 128:25 excluded 208:3 exculpating 159:9 executive 97:18 107:22 170:19 exercise 191:2 exercised 186:2 exercising 140:16 140:24 exhausted 177:21 exhausting 177:24 exist 14:25 32:23 44:7 173:20 195:22 existed 13:6 existence 29:23 48:10,13 60:3 existing 90:17 116:18 exists 22:7 42:14 61:21 129:17 136:21 140:18 expand 14:7</p>
---	--	---	--	---

<p>expanded 187:14 expanding 163:10 200:14 expect 10:23 44:5 85:3 87:20,25 122:4 142:1 143:25 144:6 151:20 163:1 164:7 192:18 205:25 expectation 27:25 28:20 expectations 137:19 expected 9:21 132:20 141:6 expecting 9:7 expects 121:10 expeditiously 136:3 expense 136:1 experience 2:2,6,10 7:16 14:13 23:17 31:21 32:13,16 40:25 42:16,18,21 52:9,13,15 76:23 102:2,16 103:2,22 106:16 107:11 115:16,19 117:9 126:24 132:10,21 146:2 163:19 167:4 168:6 174:15 195:10 experienced 11:25 52:6 63:15 133:18 135:9 experiences 144:24 175:11 experimenting 192:9 expert 51:10 77:8 77:22 expertise 52:9 75:15 76:4 83:24 experts 77:5 78:23 79:1,25 81:8</p>	<p>117:20 explain 39:14 44:24 45:4 50:25 87:5 100:3 127:20 200:25 explained 73:21 89:8 122:6 explaining 193:22 explanation 167:3 explored 16:16 112:5 exposures 115:23 express 153:13 162:8 expressed 6:3,9 76:18 extend 187:17 extended 23:18 206:19 extending 139:20 extensive 202:20 extent 17:14 153:8 167:1 external 19:3,21,25 24:14 50:9 51:8 51:13 63:7 181:14 181:21 externally 55:7 171:21 extract 5:11 55:19 extraordinary 132:19 167:25 extreme 72:11 extremely 87:19 101:16 148:9 156:13,19 161:6 162:25 166:11 168:15</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>f 190:25 face 80:19,20 120:24 122:18 facie 181:9 facilitate 31:2</p>	<p>32:16 81:15 82:7 facilitating 29:17 facility 121:1 125:23 facing 32:19 fact 2:25 3:25 6:5 6:23 7:13 8:15 9:6 12:19 13:9 20:25 23:3 27:2 28:13 35:9 40:20 53:25 56:1 61:4 70:14 72:15 74:23 86:14 101:4 105:19 108:9 113:24 114:14 131:19,23 133:13 134:23 136:19 146:25 148:25 150:25 153:5 155:20 156:8,15 160:4 164:8 178:21 179:11 180:6 181:8 188:1 188:14,21 195:3 196:12 197:23 204:2,9 206:18 208:1 factor 72:15,23,25 73:9 factors 8:9 14:19 70:25 140:6 197:20 198:2 facts 98:3 112:1 137:18 factual 152:15 factually 76:15 151:2,25 faffing 200:22 failed 185:23 187:21 failing 147:22 failings 39:5 fails 137:23 failure 199:11 fair 2:20 23:10 26:9</p>	<p>69:23 71:2,6 78:18,19 90:10 145:10,20 149:19 176:7 182:10 202:23 204:5 fairly 94:4 115:23 181:15 197:1 202:12 fairness 46:17 fairyland 52:3 Faithfull 73:1 76:5 fall 20:22,23 46:8 fallen 58:22 141:25 familiar 9:9 11:13 134:8 179:6 families 176:9 family 128:19 160:12 171:6 fantastic 68:3 far 22:20 72:15 78:13,17 81:22 95:21 113:14 114:20,23 126:24 129:11 136:3 137:23 156:21 163:6 168:6 179:19 181:12,17 187:19 192:10,13 194:10 201:1 209:1 Father 156:17 fault 80:14 favour 37:15 70:24 FCA 45:11 fear 148:14 features 18:23 feedback 83:17 feel 7:4 14:12 17:2 88:12 97:14 98:21 123:12,17 134:24 136:11 139:7 151:7 157:11 167:7,18 168:18 170:2 184:23 195:11</p>	<p>feeling 86:23 feelings 37:5 feels 82:15 101:14 107:6 195:13 fell 58:22 felt 6:6 7:10 9:16 12:21 14:24 35:12 36:14 37:3 71:2 93:10 101:16,18 136:12 158:1 183:12 191:12,16 196:9 197:10 202:23 fiefdom 161:12 fiefdoms 160:12 field 2:3 24:17 51:12 117:20 147:25 fields 177:5 fifth 189:11 fight 82:14 figures 139:5 157:8 157:24 file 66:17 67:1,2 128:10 130:15 198:20 208:6,12 208:14 files 66:14,16,19,23 67:3,6 71:12 130:9,10,11 203:19 206:12,19 207:13,16 fill 171:23 filled 206:14 filleted 57:11 final 26:9 31:4 43:7 108:3 121:16 176:19 finally 38:19 financial 21:23 22:9 27:17 94:22 95:19 142:2 151:3 162:3 165:8,16 financially 195:8 find 22:18 40:19</p>
--	---	--	---	---

62:18 67:3,25 73:5 76:22 78:9 89:10 103:11 148:18 159:8 160:14 162:18 175:1 196:20 finding 176:5 findings 28:5 33:10 36:17 188:14 finds 136:2 fine 51:4 103:14 118:16 208:17 finished 175:7 206:9 fire 161:18 firm 6:24 76:1 82:21,21,24 83:23 181:16 firms 80:23 81:4 first 1:5 16:21 17:8 18:24 30:6 37:13 38:8 39:19 44:24 47:24 58:3 63:11 65:20 70:3 84:7 97:5,6,17 101:1 105:22 113:4 117:25 124:9 131:20 152:25 160:20 168:9 170:25 178:10 180:5,24 192:2 198:2 206:5,6 207:12 firstly 44:1 111:3 123:16 196:1,4 203:6 207:19 five 2:8 146:21 169:10 183:18 fix 182:24,25 flagging 142:24 flavour 160:13 flawed 204:8 flow 30:17 flows 31:15 focus 1:22 7:6 9:17	10:2 32:17 36:11 38:5 53:3 55:4 145:2 173:23 focused 3:5 32:20 focuses 85:4 focusing 3:7 95:2 163:12 fog 139:8 follow 6:10 7:13 14:23 22:13 56:4 87:21,25 98:14 187:2 followed 6:6 7:9,14 13:18,18 14:22 24:8 106:22 following 4:14 6:12 9:21 26:18 38:24 79:4 106:9 168:22 follows 120:15 food 172:17 force 48:1 forcefully 88:3 fore 55:21 foremost 47:24 113:4 forerunner 170:22 foreseeable 109:8 forget 62:11 94:2 153:25 forgetting 13:7 form 25:10,11,12 30:19 67:18 79:5 90:16 109:8 114:20,22 116:11 119:19 128:8 175:18 181:14,21 formal 63:3 92:17 93:13 98:12 110:12 128:7 172:11 198:23 199:24 formalising 183:15 format 11:25 former 192:4 fortnight 8:19	forum 52:20 forward 15:25 31:5 36:20 81:25 98:18 104:22 134:19 175:11 found 9:20 12:23 32:17 37:5 70:23 81:21,22 167:13 189:3 193:18 208:23 Foundation 73:2 76:5 four 22:25 31:16 127:15 163:20 192:22 fourth 150:25 framework 41:12 41:12 frank 117:24,25 118:9,13,17,21,24 119:8,14,17,25 120:5,16,24 121:16 122:9,12 122:18,20,22 128:25 189:9 193:14,19 frankly 175:25 free 123:12,17 170:2 fresh 144:19 friend 146:14 friends 145:15 148:14 165:11 friendship 145:20 159:6 frightened 195:11 front 1:11 81:25 120:10 123:23 124:4 170:7 frustration 109:11 fulfilled 106:18 full 28:5 49:24 58:16 69:21 97:19 108:3 128:25 191:22 202:16	fullness 142:25 fully 26:22 101:3 137:17 146:7 function 31:10,12 46:2 140:13,16 160:11 174:6 functions 125:3 140:24 160:5 188:20 fund 83:1 84:4 115:11 fundamental 108:23 109:16 169:5 184:22 fundamentally 56:8 63:19 79:21 116:17 137:1,23 152:24 funded 61:5 funding 101:8 114:25 further 29:5 57:7 63:25 91:15 92:16 101:12 107:2 109:1 122:23 136:1 166:12 169:7 180:11,12 185:20 187:17 198:1,24 209:18 future 107:8	184:8 192:20 196:11 generally 61:20 159:18 177:7 194:11 generous 49:7 genuinely 104:14 geographical 125:1 geometry 157:7 George 111:6 112:19 113:16 getting 14:9 55:9 58:20 111:22 150:8 173:3,10 205:18 ghost 148:18 gift 95:21 give 17:23 26:15 32:15 36:3 63:23 64:6 65:12 68:10 68:14 81:14,20 82:9,14 92:10,10 92:15 113:4,9,12 117:9 118:14 137:9 159:5 169:20,24 173:23 given 3:1 6:6 7:9,11 11:18 16:13 28:2 33:14 37:4 40:7 45:2 47:2 56:15 64:19 75:11,12 92:14 94:23 100:19 102:20 107:14 130:25 142:14 144:8 152:9,9,20 153:3 154:2,21 172:8 175:14 179:24 184:20 192:12 197:8 204:22 gives 100:24 giving 15:13 32:14 40:18 60:23 82:12 88:1 123:22 136:13 145:6
G				
			G4 5:1 gallery 123:25 galore 174:23 gap 49:5 79:22 122:7 gaps 48:17 garages 205:6 GDPR 67:8,13 Gemma 103:13 general 24:16 27:12 55:17 58:6 60:22 92:10 158:5 171:22 172:15	

<p>172:4 glad 168:1 gladly 115:14 glean 13:4,8 gleaned 6:1 Gloucestershire 195:9 go 5:13 18:14 21:6 29:25 33:20 40:21 47:23 54:9 55:25 59:4 66:9 68:11 75:10 77:24 81:18 85:11 86:21 87:22 87:24 90:10 103:7 105:21 109:1 118:11 124:17 134:2 135:25 137:9 146:9 147:6 148:4 153:5,6 157:13,13 158:4 164:7 165:4 177:21 178:10 189:23 193:20 198:24 205:25 207:10,16 goals 186:9 goes 101:12 125:16 128:14 134:20 139:15,25 146:5 159:2 192:6 going 6:11 14:23 15:5,25 19:2 22:13 24:13 25:23 29:19 32:10,11 40:19 59:13 73:25 76:19 77:10 85:8 85:9 92:21 94:1 94:24 98:11 102:6 102:23 103:9 104:22 111:2 117:4 120:3 124:11,17,18 126:17 130:13 138:5 147:20 152:6 158:10</p>	<p>162:19 176:17 178:17 179:22 180:3,8,23 182:17 191:15,16 195:15 195:16 196:24 197:12 200:23 203:24,24 205:23 206:2,25 207:6,8 208:4,20,20,21 good 1:3,5 12:10,21 14:9 24:14 43:24 43:25 70:5,9 71:12 81:13 84:14 97:2 104:9 106:17 123:8 146:19 148:3,5 169:23 177:17 180:1 181:21 182:23 185:21 191:9 195:11,20 203:13 206:5 goods 141:21 governance 186:6 governing 186:12 governor 126:12 131:9 grab 120:3 Graham 4:6,23 178:16 graphic 163:1 grateful 84:19 great 2:5 12:22 35:12 75:14 77:4 112:4,14 143:8 156:6 203:6 205:25 greater 15:13 117:13 159:15 172:5,13 183:16 192:1 206:22 greatest 174:22 175:14 greatly 7:23 Greenwood 80:2 101:11 207:17</p>	<p>Grenfell 174:16 ground 12:25 102:24 104:11 129:11 grounds 153:9 group 8:24 9:4,6,7 9:23,25 10:23 11:12 12:1 21:19 45:7 46:15 92:24 92:25 93:4,6,21 94:1,2 118:3 127:1,10,13 171:4 205:21 208:3,22 groups 6:20 92:19 92:20 guaranteeing 106:21 guardians 13:16 17:6 guess 117:12 guidance 25:21 33:18 35:21 55:17 57:7,18,20 62:25 95:14,16,22 96:18 110:3 194:25 197:6 199:3 guide 84:17 88:2 90:12 130:17 guidelines 90:2 guiding 69:9 80:3 84:6,16,22 88:9 90:9,11,16 96:22 97:1,4 102:25 104:17,21 105:14 106:13,21 109:25 110:18 113:25 114:10</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>habits 32:22 half 53:18 halfway 135:1 hampered 99:24 hand 93:15 117:7 159:14,16 200:20</p>	<p>200:21 Handbook 193:10 193:25 handed 28:23 138:8 handle 51:9,11 84:13 96:7 114:8 144:10 148:8 handled 52:11,13 59:25 109:12 148:12,13 156:19 handler 65:11 170:5 handlers 60:1 65:8 75:14 102:19 104:11 handling 2:24 58:6 72:16 87:16 108:24 120:6 hands 43:15 148:17 hands-on 25:23 hanging 134:16 happen 14:23 19:21 27:7,8 32:21 33:2 38:7 40:13 56:13 57:21 77:16 81:19 87:7 104:16,23 109:21 132:1 133:10 134:24 135:18 139:10 144:5 147:5 149:7 165:9 167:5 206:2 207:6 happened 21:10 23:5 28:21 34:13 60:21 71:5 81:2 101:15 102:14 104:24 109:5 133:5,7 138:7,9 138:16,23 139:10 141:12 147:16 151:6 155:16,17 157:21,22 163:8 186:18 193:9 197:2 205:2,2</p>	<p>happening 9:15 11:7 18:25 30:18 112:3 149:14 155:8 166:21 happens 19:4 51:22 103:19 132:24 134:18 135:17 139:9 143:7 147:2 149:4 155:13 158:12,13 168:16 187:8 208:18 happy 77:15 81:8 89:18 109:10 202:16 harassment 59:5 hard 106:16 harm 165:1 Harper 126:19 144:16 149:22,24 HBPD 56:4 head 153:4 201:2 headed 95:13 109:2 heading 30:7 headline 37:11 179:9 Heal 144:15 healing 95:19 120:20 121:2 163:24 health 35:17,22 58:10 131:18 173:18 healthier 156:10 healthy 165:5 hear 5:24 19:2,24 90:19 123:9 heard 4:12 19:2 21:11 22:1 23:1 39:6,12 45:11 46:24 57:10 74:18 101:9 109:7 112:8 150:3 151:10 156:18 157:15 166:17 167:11 170:17 182:3</p>
---	--	---	--	---

<p>188:3 200:11 201:6 203:5 hearing 1:4 57:11 99:20 166:18 170:11 190:11 191:24 200:25 210:7 hearings 39:12 166:18 182:16 heart 66:17 89:14 89:22 160:19 heavily 178:23 held 6:20 25:15 27:1 30:11,25 32:23 67:6 100:10 help 51:1 58:17 61:12 93:7 100:25 102:17 103:4 105:16 115:14 119:8 145:8 147:13 155:21 183:10 185:20 195:10 helped 193:21 helpful 13:21 66:23 93:14 118:24 121:16 122:21 160:23 166:11 193:22 196:21 helping 145:6 helps 86:4 119:24 121:15 hide 91:17,18 hierarchy 14:5,16 14:21 high 15:18 158:12 168:13 high-level 105:1 higher 172:4,17 highest 17:16 19:13 25:13,16 26:7 hindsight 98:5 hinted 188:6 hire 154:17 historic 108:24</p>	<p>197:10 historical 47:21 61:22 history 19:11 108:15 125:19 126:1 hoc 161:21 162:5 166:7 hold 13:13,16 16:25 48:18 50:7 66:11 141:23,24 142:7 144:2,11 155:25 holding 143:2 189:2 208:8 holds 16:22 48:18 91:12 hole 129:6 holistic 157:12 163:17 Holy 136:18 137:5 home 78:4 homes 205:8,9 homework 163:3 honest 52:1 69:6 81:2 90:23 93:3 93:14 109:24 183:2 189:2 honesty 162:3,19 hope 129:1 155:9 177:15 178:23 187:14,16 189:2 209:5 hoped 184:3,6 186:12 hopefully 19:20 103:19 181:24 189:3 195:14 hopes 175:4 hoping 20:16 187:10 horse 86:20 hour 36:7 House 56:5,9 154:5 176:11 181:10</p>	<p>197:6 houses 185:15,17 Hughes 107:22 119:5 hundreds 76:13 194:24 hurry 132:25 Hurt 144:15 hush 168:19 hushed 167:25 hymns 201:25</p> <hr/> <p style="text-align: center;">I</p> <p>Ian 1:6,8 186:16 210:13 iconic 157:8 idea 21:22 78:25 84:14,19 146:19 148:3,5 149:9 155:20 157:15 164:18 166:4 181:21 187:3 194:19 ideal 19:6 135:22 ideas 38:1 78:11 155:2 191:10 identified 3:17 10:18 39:21 41:3 44:10,15 46:19 67:5 92:5 93:18 97:6 100:11 101:18 131:14 134:3 139:16 143:16 144:15 152:19 163:13 172:24 198:1,16 205:13 identifies 55:25 59:12 72:20 85:13 86:14 88:14 101:7 102:9 105:14 106:13 110:11 141:20 identify 38:4 44:21 46:20 50:10 63:4</p>	<p>63:25 66:16 70:13 78:5 83:1 87:15 97:23 101:20 102:18 124:12 132:3,6 135:1 137:13,17 139:17 142:12 143:11,13 143:15 145:12,23 147:5,10,12 159:12,17 163:9 164:17 173:7 193:11 196:6 197:15,21 203:6 203:18,23 204:11 204:24 205:13,15 identifying 87:17 173:3 identity 159:3 ignoring 13:7 ii 25:5 iii 53:22 illustration 177:17 image 182:25 imagine 54:22 58:1 194:21 imbalance 74:17 75:3 immediate 56:15 185:4 immediately 56:22 59:22 immense 147:1 Immensely 114:1 impact 98:10 184:2 impasse 187:5 implement 56:9 implementation 13:10 14:19 29:17 114:22 153:23 184:15 implemented 28:19 154:1 188:16 implementing 29:1 174:2 implications</p>	<p>116:15 implicit 120:25 implicitly 120:5 importance 22:1 31:21 34:2 37:20 38:8 41:7 161:22 174:18 important 16:10 17:12 18:17,25 19:4,12 21:4 22:3 22:11 26:15,18 36:19 37:9,18 38:10,11 41:8 46:14 47:7 48:22 50:23 52:7,17 56:3 63:13 66:6 66:14 72:3,24 73:8 78:13,22 82:19 86:10 87:18 87:20 90:14 95:24 98:8,15,20 108:2 145:1 146:16 147:19 148:21 153:19 161:6 166:24 168:14 176:2 179:3 184:12 197:19 imposed 92:7 135:6 135:7 impossible 137:7 147:14 156:16 impressed 12:20 impression 9:3 imprisonment 167:13 improve 11:1 improvement 31:2 140:14 180:20 improvements 204:22 improving 110:21 183:19 in-depth 12:16 in-house 51:10 161:17</p>
---	--	---	---	--

<p>inaccuracy 34:11 inaccurate 99:15 151:2,25 inaction 197:4 inadequacies 138:14 inadequate 15:3 inappropriate 43:2 94:19 inappropriately 35:18 incarnation 131:21 incidentally 92:2 99:2 incidents 57:2 167:21 include 15:2 165:7 194:4 206:19 208:7,11,13 included 55:18 including 169:1 170:19 188:5 inconsistency 129:3 inconsistent 133:15 incorrect 97:8 incredibly 37:18 38:11 incumbents 156:6 indecent 198:21 indefinite 57:4 indefinitely 57:16 indemnity 96:4 115:6,8 independence 30:24 190:3,4 independent 25:7,9 30:13 45:10 82:21 102:14 160:25 161:2 162:16 164:22 170:21 171:3 181:23,25 182:2,12 186:25 187:9 191:23 192:23 193:2</p>	<p>203:8 207:2,3,4,5 207:13,15 independently 30:2 45:12 182:5 indicate 70:17 104:3 193:14 indicated 12:7 indicates 104:4 indicating 13:2 104:2 indication 117:10 indicator 70:5,9 71:13 individual 2:17 5:3 11:11 16:22 24:7 36:25 42:11 47:11 47:14 59:8 72:3 89:13 132:1 149:15 164:21 165:13 166:24 169:2 173:15 198:10 individuality 147:8 individuals 3:18,20 3:22,23 4:1,16,22 5:7 13:5 21:3 23:4,6,22 32:6 45:18 50:13 52:12 53:24 72:22 75:3 76:6 80:1 111:14 142:12 145:12 164:13 194:18 198:9 207:19,20 industry 151:23 inequalities 156:4 156:19 157:8 inequality 155:21 155:22 156:23 157:15,17 158:16 Inevitably 72:8 influence 28:8 96:7 159:21 167:14 influenced 28:13 influential 74:5 inform 24:13</p>	<p>198:14 informal 172:12 186:21 information 1:25 4:13 6:1 7:4 13:24 16:23,24 17:16,23,23 24:22 24:25 25:15 30:17 30:23 31:14,25 41:13,14 42:24,24 61:14,21 65:9 66:11 67:9 68:9 79:7 80:22 89:11 91:11 100:24 102:21 119:20 127:23 130:12 152:15 180:8 187:11 198:15 199:1,21,23 informed 5:17 22:17 42:17,23 informing 19:22 24:15 inimical 114:15 initial 157:2 177:18 initially 6:17 9:7 47:7 207:1 initiated 7:20 92:9 initiative 179:3 195:9 initiatives 175:7 176:4 195:18 injury 65:2,4 79:13 input 84:20 176:18 INQ000457_008 16:3 94:18 INQ000457_014 95:10 inquiry 1:13 49:19 61:12 69:25 73:11 74:8 92:3 99:23 100:13 104:15 116:2,5 163:2 196:22 insight 32:14,15,20</p>	<p>insights 181:23 insist 91:7,8 insisting 91:14,16 inspections 179:2 instance 16:21 38:9 183:12 instances 27:21 167:16 institution 10:4 19:10 73:6 institutions 35:6 78:3 168:4,12 204:17 instruct 50:9,17 98:4 109:15 instructed 34:4 51:19 99:16 105:25 instruction 152:8 152:10 instructions 51:21 instrument 125:2 insufficient 37:4 insurable 151:18 insurance 5:16 6:14 7:5 8:10 21:12,13,16,19 33:22 34:10 36:9 43:14 45:6,9,10 45:14 46:2 47:5 49:3,18,20 56:10 58:13 60:18,24 61:3 64:15 74:20 88:12 93:24 94:11 95:25 96:1 114:21 114:25 115:11,21 116:16 120:25 121:7,14,19 151:16,17,20,22 154:17 164:4,20 164:23 165:13 insure 47:8,9 48:23 81:6 111:4 115:16 120:18 insured 49:23 50:5</p>	<p>58:17 60:14 62:6 63:20 68:24 82:4 92:16,23 96:5,6 111:4,16 113:7 115:7 121:23,24 122:5,10,12 insured's 78:5 95:24 insureds 66:10 110:23 insurer 48:21,25 49:17,21 93:16 95:3,23 96:9,14 121:25 122:5,8 insurer's 66:1 insurers 48:23 50:12 61:19 73:14 78:17 81:5 94:24 163:14 164:1 integral 19:7 integrity 89:1 intelligent 167:23 intended 21:15 intention 82:22 84:24 144:18 181:13,16 208:21 intentions 104:9,9 interest 105:18 145:9 200:6 201:21 202:5 interested 157:16 interesting 75:8 164:18 interests 85:25 86:8 176:9 178:24 interface 192:14 interim 171:13,23 172:8 179:19 195:23 internal 18:5 59:25 60:10 61:7,12 63:6 177:5 internally 50:16 55:6 74:1 153:3 154:5</p>
---	---	---	---	--

<p>internet 194:10,20 interpret 146:15 interpretation 27:9 49:7 181:1 interpreting 103:21 interrogation 181:7 interrupt 184:10 intervene 17:1 18:20 19:19 25:4 40:5 191:17 intervening 19:16 20:10,12 intervention 19:7 20:13 interview 3:18,21 4:22 36:4 61:24 interviewed 3:20 4:7 interviews 3:19 intimate 102:23 104:8 intimated 198:17 intimates 73:16 intimidated 132:13 introduce 191:18 introduced 82:21 83:15 191:19 introduction 31:10 31:11 introductory 44:1 170:1 investigate 66:9 68:11 137:18 138:6 investigated 119:18 197:24 investigating 50:6 138:16 209:4,14 investigation 8:24 13:4 34:23 61:7 61:20 62:4 66:11 67:2 69:22 85:15 85:16 86:18 89:1</p>	<p>116:4,5 138:8,9 188:13 199:7 investigations 51:12,13 59:25 60:11 82:2 84:4 86:12 88:23 189:19 198:4 investigator 134:4 investigators 199:22 invitation 150:21 180:7 invite 202:7 invited 11:8 93:6 95:8 108:19 127:6 150:14 209:11 involve 53:16 59:13 156:18 208:4 involved 5:16,17 9:10 10:14,25 11:20 16:22 17:2 23:17 29:15 39:2 49:21 53:9,18,24 71:14 75:3 84:25 92:16,18,25 94:12 105:18 108:23 117:5 126:4 131:7 140:4,6 151:18 155:12 156:5 158:18 171:18 176:6 178:18,21 178:23 198:20 involvement 45:13 68:20 71:13 111:9 149:20 183:13 involves 87:6 176:5 177:6 185:6 involving 153:9 Ireland 2:8,13 35:15,17,22 147:24 186:18 Irish 39:18 isolate 13:22 isolated 146:24 issuance 104:20</p>	<p>issue 8:17,19,20 21:4 31:23 35:9 38:4,8 46:6,9 47:10 77:1 90:9 92:4 96:11 97:1 100:13,25 109:13 109:17 112:4 113:1 115:2 135:1 141:18 174:17,22 178:3 183:7 197:8 197:11 200:6 209:14 issued 34:15 56:7 62:19 63:1 69:9 84:7 96:19 195:24 issues 1:22 17:19 24:18 35:14 52:22 54:5 55:20 59:23 60:9,12 61:21 74:20 80:21 93:25 108:23 114:12 131:2 141:20 142:2 157:3 175:5 176:1 178:9 179:20 187:13 199:8 204:25 208:17 Iwerne 167:21</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>Jane 4:10 29:13 January 4:21 102:9 175:25 Jefferson 6:19 59:15 103:14 Jill 101:23 102:1,9 job 128:22 136:14 137:9 145:3 149:10 John 167:22 193:18 209:9 joint 76:11 77:5,8 78:22 79:24 80:22 81:16 84:10 86:16 86:19 87:1 90:25</p>	<p>jointly 82:25 judge 39:22 134:4 191:6 judged 20:20 judges 132:20 judging 182:8 judgment 69:23 140:13 160:22 judgments 133:2 justice 196:5 judicial 40:11 140:16,24 Julie 74:19 July 1:1 3:2 68:4 210:8 jumped 8:1 jumping 18:2 junction 95:17 June 68:4 97:4,5 junior 166:20 192:4 jurisdiction 142:6 Jurisdictional 136:23 140:19 jurisdictions 115:19 justice 77:3 79:22 80:16 111:18,22 114:14 116:18 120:20 121:2 199:9 justify 158:20,21</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>keen 31:24 keep 1:11 15:25 86:4 110:18 122:13,16 195:20 keeping 103:18 204:23 205:1 Kent 4:7,19 5:5,11 6:10 10:9 101:21 kept 15:23 57:15 66:19 67:16,17 121:21 130:21</p>	<p>key 3:18 4:1 7:8 14:8 29:19 56:22 81:9 133:25 161:7 173:24 Keynes 125:16 kicked 135:17 kicking 90:5 kind 19:23 68:6 88:7 90:19 105:1 108:10 116:10 140:3,20 146:4,5 148:15 149:2,9 154:19 157:8 160:16 164:3 kindest 152:12 kinds 156:19 158:13 king 202:10 knew 152:5 know 2:18,22 7:11 8:3 10:13 11:6 12:15 14:17 20:3 24:22 35:15,25 38:1,4 40:25 44:25 46:17 47:10 47:13,23 48:14 49:18 50:5 57:23 57:24 59:2 60:16 61:4,11,13 64:14 64:19 66:2,3 68:21,22 69:2,12 69:22 70:1,20,22 71:1,11 72:5,12 72:15,16,16,25 73:1,4,23,25 75:4 75:25 76:5,8,13 76:14,15 77:3 78:18,23 79:24 80:3 81:19 82:17 83:23 85:1,2,3 86:9,11 87:2,10 87:11 89:4,5,10 89:11,14,23 90:19 90:20,21 91:10,13 91:17 92:17,20</p>
--	--	---	--	---

93:8 96:21 98:11 98:13 99:13,16,18 100:6 101:18 102:13,19 104:14 104:16,18 105:3 106:7 109:23 110:19,20,22 111:17 112:3,12 112:15 113:9 114:7 115:16,22 116:2 117:3,21 118:4,9 120:11 121:5,8,11 122:12 123:1 124:2 130:10,10,12 136:10 139:1,10 140:9 144:16 145:15 147:16 148:18 151:22 156:11 157:4 158:5 162:21 163:2,20 165:12 168:19,24 169:11 170:22 176:1 177:10 183:6,22 185:17 190:8 191:18 196:2 200:24 207:15,24 208:2 knowing 129:15 146:19 191:3 195:12 198:4 knowledge 1:18 12:16 19:23 25:23 41:17,18 42:16 44:22 58:18 61:24 68:3 124:15 170:15 knowledgeable 52:5 201:1 known 17:15,16 127:2 180:18 185:14 199:1 203:19 knows 49:19 133:7	133:10 138:22 <hr/> L <hr/> labelled 164:4 lack 16:9,13 17:9 49:5 132:11 176:12 201:24 lacuna 141:22 lag 147:1 laid 199:14 202:8 Lambeth 129:8,25 136:10 land 74:2 language 78:12 87:11 98:7 104:1 200:16 lapses 133:9 large 15:18 19:10 54:2 75:13 132:9 138:10 144:23 157:7 158:23 160:15 161:17 163:5 203:9 large-scale 173:16 largely 2:15 29:21 41:15 95:2 lasted 34:25 Lastly 123:23 late 128:13 133:20 law 6:23 78:13 128:19 160:6 lawyer 6:18 75:14 111:13 lawyers 7:2 10:21 50:18 51:7,12,15 51:16,19 52:7,15 59:18,19 75:15 76:8 77:5,13 79:8 80:9,13,18,19 81:13 82:8,25 85:2 87:5 89:21 93:7 140:23 153:19 164:1,4 lay 141:23 142:7,18 143:5,6 208:4	layman 141:15 150:18 layperson 143:19 lead 4:2 16:11 39:1 46:1 79:18 128:20 143:7 174:12 183:24 leaders 172:20 leadership 131:15 174:5 leading 126:5 172:3 learn 90:15 learned 176:15,15 189:22 learning 31:21 38:16 52:21 53:2 90:10 110:21 133:8 176:21,25 learnings 61:12 learnt 90:23 93:5 175:22 led 34:11 left 130:3 134:16 136:16 legal 5:24 7:19 11:3 11:11 33:15 34:18 48:5 51:1,17 62:4 67:11,18 68:24 71:18,25 72:2 75:12,22,23 76:12 78:5 82:3 83:14 86:4,9 93:22 99:25 100:5 105:7 107:5 109:6 115:4 115:10 125:2 128:17 135:21 140:22 141:14 153:4,18 164:8,15 165:22 legally 50:22 108:1 125:4 140:15 153:20,22 legible 103:6 legitimate 200:6 201:20 202:4	lend 160:7,8 length 9:22 21:8 103:18 lengthy 117:22 149:20 less-than-ideal 138:11 lesser 159:15 lessons 93:5 175:22 176:14,15 189:22 let's 53:3 75:16 letter 50:12 59:21 66:6 77:6 83:6,7,8 85:18 86:10 101:10 106:9 108:9 119:4,5,20 150:4,13 193:18 198:16,19 letters 85:12 119:22 128:7,24 level 15:14 17:16 19:13 20:24 25:13 25:16 26:7 42:10 132:16 139:12 158:4,12 159:3 172:20 177:3 193:7,22 194:2 207:9 levels 42:14 158:14 liability 22:9 27:16 46:5,6,7,7,8 48:5 49:9 55:3 58:12 59:2,3,3 62:5 64:12,24 65:7 68:24 70:23 71:17 71:19,25 72:2 74:4 78:6 81:6 82:2,3 83:2 85:24 86:1,3,9,14 94:23 112:20 113:3,18 114:8 115:4,10 153:1,18 164:19 164:23 liable 68:25 78:7 liaise 131:24	liberally 108:19 Lichfield 204:1 life 41:11 61:24 78:14 103:24 152:14 156:4 167:12 190:7 light 57:3 61:14 99:25 104:3 199:9 likelihood 115:11 limit 3:4 limitation 52:23 69:7,12,14,18,20 70:1,6,9,15,25 71:18 72:9,23 73:16,20,22 74:3 74:6 111:25 112:5 112:11,14,16 153:9 limited 121:11 195:8 196:2 Lincoln 196:2,7,14 196:15,16,18,18 196:20,25 197:13 line 124:17 137:6 link 179:15 linked 13:19 180:18 links 186:5 list 77:14 81:3,7,7 118:5,7 129:8,16 129:17,18 130:5,6 130:8 134:1 136:10 137:9 178:22 183:15,17 184:10 209:3 listed 131:12 listen 145:18 listened 22:2 84:14 listener 102:15 listening 26:14 34:3 66:18 84:1 145:6 litigants 50:23,24 litigation 72:8,13 little 1:24 5:24 8:2 12:3 14:7 16:16
--	--	---	---	--

<p>18:3 19:2 22:23 71:23 143:7 160:11 165:3 174:8 176:20 178:14,19 182:12 183:6 live 162:6 207:19 208:5 lives 159:5,6 176:7 local 14:2 190:6 locally 29:24 160:9 locate 118:11 located 30:10 log 100:24 logistic 208:2 London 4:8,19 5:5 10:11 101:22 102:22 London's 100:23 long 8:12 52:14 56:7 57:3 73:2 105:1 108:15 117:21 128:4 134:1 138:15 139:8 145:13 146:18,22 148:1 152:13 167:17 170:18 177:24 long-term 57:6 175:13 longer 54:3 117:15 135:25 176:10 178:12 look 5:14 8:2 14:1 16:1 20:25 22:23 29:20 33:23 37:24 48:9 55:19 61:16 66:13 68:1,19 73:10 75:2 100:17 100:23 110:6 128:9 137:14 149:3 152:13 156:12 170:6,8 185:13 186:25 188:10 207:4,14</p>	<p>looked 3:16 4:12 16:6 28:7 107:15 110:10 115:9 119:2 130:16 162:23 164:2 189:6 203:3 looking 9:2 13:19 17:3 20:16 46:3 78:25 99:5 115:14 116:3 118:22 122:12 153:15 155:4 176:24 178:1 188:19 192:2 207:3 looks 83:7 104:19 119:9 149:1 181:23 195:13 Lord 91:20 92:1 111:10 112:1,9,18 113:17,23 lose 115:3 147:7,8 loss 120:19 losses 151:18 lost 51:3,4 139:8 lot 23:7 36:24 39:12 41:5 50:7 50:24 52:14 80:7 89:23 116:7 122:3 127:25 130:10 133:5 148:19 149:16 159:20 164:11 166:17 187:24 190:9 200:22 lots 58:20 133:11 175:16 182:15 188:5 low 77:18 loyalty 168:13,14 luck 140:25 Lucy 73:1 76:5 lunch 123:2 lurking 206:12</p> <hr/> <p style="text-align: center;">M</p> <hr/>	<p>Macfarlane 74:19 84:11,18 114:19 Macfarlane's 75:6 machine 147:7 magnify 1:12 mainstream 190:6 maintain 121:23 134:19 204:22 maintaining 121:18 major 6:7,7 14:12 204:25 majority 46:22 51:9 54:15 59:16 65:18 79:20 80:10 makers 42:20 making 7:10 15:22 23:14 26:24 42:10 69:3 73:10 98:12 110:11 131:25 156:16 166:19 169:2 179:15 190:19 195:20 man 204:1 209:9 manage 62:21 65:20,25 68:6 managed 12:13 24:18 112:25 management 3:15 207:7,9 managing 23:13 39:4 47:6 55:8 126:6 127:18 131:1 141:2 188:8 195:5 mandated 116:10 mandatory 41:7,9 41:19,21,25 42:1 42:2 147:15,18,20 167:6 177:9 manner 193:23 March 5:17 199:10 Mark 119:5 marking 163:2 marriage 126:22</p>	<p>marriages 146:9 Martin 103:16 mass 156:2 Master 78:23 79:17 79:18,18 matches 80:25 material 3:11,13 48:25 78:12 100:17 119:23 122:6 150:20 materially 118:21 matter 4:21 13:10 17:17 105:11 113:10 128:18 143:5,20 145:5 157:9,10 162:23 163:25 166:25 201:16,21 202:3,5 208:18 209:6 matters 11:10 17:13 32:5,7 36:6 43:2 123:16 125:6 125:7 136:23 141:16 189:18,21 189:25 191:7 200:22 201:24 203:21 204:19 208:23 McCloud 78:23 79:17,18 McNeill 1:4,5,9,10 42:4 43:12,21 95:11 210:15 mean 17:10,12 20:12 25:22 45:25 57:10 63:18 70:21 71:21,21 75:13,13 77:2 82:1 83:21 83:22 88:3 91:9 103:17 104:1,14 106:6 129:17 134:6 142:22 144:7 146:1 147:20 148:13 149:10 155:22</p>	<p>160:18 161:2,3,10 161:17,22 165:17 168:6 177:1 181:22 182:10 183:8 185:1 187:6 204:12 207:22 means 13:14 24:12 26:10 27:6 38:15 40:6 129:14 132:12,23 135:25 136:2,8 140:1 159:9 171:14 192:16 meant 39:14 112:2 144:21 measure 89:3 132:5 132:8 135:8 136:23 140:19 141:3,22 191:7 192:15 195:25 197:7,9 199:14,17 199:20,25 200:20 200:23 measured 179:2 measures 21:1 55:18 mechanism 187:20 197:8 mechanisms 176:5 176:16 media 59:24 60:9 median 194:17 mediation 116:10 149:25 150:3 medical 52:16 79:25 117:18 medicals 80:23 meet 28:14 94:13 137:16,25 meeting 5:11 8:24 9:7,9,16,16,21,23 10:2,6,22 11:12 28:16,20 38:20 81:16 84:10 86:16 87:1 90:25 93:5</p>
--	--	---	---	---

<p>109:18,22,22 149:25 150:3,12 150:14 151:14 152:2,4,4,18 meetings 9:6,25 12:1 86:19 93:6 93:11 94:2 103:15 198:12 Meg 191:23 192:4 member 126:13 127:8 164:18 171:5 208:8,11 members 9:22 26:2 80:9 138:2 149:6 166:19 192:9,22 193:2 membership 62:1 192:21 Memorandum 39:10,14,23 40:9 186:22 memories 170:18 memory 44:2 97:3 123:17 170:2 mental 131:18 mention 41:5 155:20 mentioned 6:18 20:8 38:20 51:7 52:19 64:8 66:14 73:15 80:22 114:13 157:18 204:18 206:7 menu 182:1 merged 179:18 merit 190:13 message 8:20 messy 146:23 met 6:19 11:22 38:21 40:3,20,21 40:22 127:15 145:10 165:24 171:12 180:18 187:18 methodology 3:3</p>	<p>microphone 1:11 mid-range 144:1 144:13 middle 13:3 34:16 149:13 mightn't 187:5 Milton 125:16 mind 7:6 11:10 20:13 25:25 38:3 41:10 55:8 62:8 79:24 97:24 106:14 118:13,15 150:8 163:10 173:3,10 200:14 205:18 mind-set 185:18 mindful 43:14 74:16 minds 32:18,20 38:5 82:22 83:23 85:4 167:14 168:10,14 mine 124:2 145:4 minimal 93:12 minimise 155:8 minimum 40:15 86:4 179:7 minister 192:4 ministerial 157:2 ministry 145:3 157:5 164:3 172:22 minority 194:21 minutes 36:7 61:25 93:13 169:10 202:14,17 misconceptions 34:11 108:21 misconduct 142:3 197:25 200:16 misgivings 139:16 misguided 137:1 misinformed 95:6 95:9 97:8 misled 109:4 151:5</p>	<p>misrepresented 151:8 misrepresents 98:3 missing 36:21 mistake 6:7 7:14 129:25 mistakes 32:1 misunderstanding 34:25 108:23 misunderstandin... 24:21 misunderstood 27:14 34:18 100:18 152:11,11 mitigation 8:13 mix 195:19 Mmm 112:7 Mmm-hmm 10:19 53:20 model 9:8 11:13 14:3,24 155:3,5 161:10 179:14 189:11 192:5 moment 62:9 74:1 77:14,16 79:23 80:24 89:21 94:24 96:14 123:2 139:14 141:22 163:12 174:21 181:17 186:15 187:11 190:1 202:9 208:25 moments 179:16 momentum 134:19 monitored 17:25 18:18 20:20 monitoring 13:23 18:9,11 187:8 month 8:19 52:21 68:16 months 3:5 31:13 31:16 117:11 134:17 154:1 176:3 183:3,25 195:7 201:9</p>	<p>mooted 39:9 mop-up 37:10 morning 1:3,5 43:24,25 94:14 151:11 186:17 move 15:1,25 17:3 21:22 38:13 56:25 73:16 85:6 94:9 107:15 177:1 moving 82:22 83:23 187:22 MP 192:4 multi-disciplinary 149:2,6 multiple 151:2 Munn 191:23 Music 186:10 204:19 musicians 142:11 mustn't 115:3</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>N 210:11 name 3:22,23 209:8 named 4:23 146:9 names 40:11 66:8 narrow 80:20 national 2:12 4:6 4:11 5:22 16:11 16:12,17,19 17:10 18:7,12 20:14 25:10 40:4,10 101:24 139:19 159:15 160:8,16 160:24 162:15 171:5,13,17 172:3 172:25 173:9,22 175:3 177:3 178:17 179:7 181:13 182:7 183:13 189:21 191:12 192:3,17 192:18 199:4 205:21 206:17 207:9</p>	<p>nationally 15:12 29:23 nature 41:13 61:23 69:6 75:24 77:4 84:13 108:2 114:15,15 117:12 145:2 NDAs 135:3 necessarily 68:3 71:17 89:18 104:9 106:6 121:9 134:2 158:15 necessary 15:22 18:21 25:4 90:1 182:18 191:3 necessitate 61:23 necessity 183:15 need 17:3 21:21 23:11 25:4,16 30:2 32:17,18 33:1 37:19 38:13 38:13,14,14,20 44:12 61:8 62:5 64:11 73:24 79:15 79:22,25 89:5 97:14 100:6 105:21 106:20 116:14,16 121:5 122:1,19 130:12 145:1 149:19 158:11 168:19 170:6 177:1 179:17 184:2,5,23 185:20 188:21 193:6,20 196:9,20 needed 7:4 14:25 32:8 63:22 99:14 123:20 170:3 195:4 204:10 206:13 needs 11:20,21 13:14 15:12 18:19 21:4 24:15,22,24 25:15 27:6 30:1 33:16,17 34:2</p>
--	---	---	--	--

<p>37:18,19 60:14 67:7 77:12 107:2 137:3 138:4 149:10,13 161:16 165:23 166:9,25 172:25 176:17 181:3 186:7 203:21 negate 13:22 negative 63:15 negligence 64:3 negotiating 135:19 negotiation 86:25 87:13 135:16 136:7 Neither 76:3 nested 156:4 never 91:3,8 94:15 99:16 104:16,23 113:20 138:25 147:16 151:25 155:12 166:4 nevertheless 191:6 new 31:9 33:18 61:13 83:19 90:18 94:4 106:13 110:9 110:10 115:23 130:5,6 131:21 171:18 196:4 nice 165:3 nine 70:7 no-one 9:19 non-disclosure 135:2,5 non-executive 45:18,20 non-recent 90:3 nonclerics 53:21 nonsense 155:12 normal 148:1,7,11 167:6 normally 50:18 64:7 141:14 Northamptonshire 125:17</p>	<p>northern 2:8 35:15 35:17,22 147:24 201:12 note 62:7 152:24,25 152:25 186:16 202:13 205:19 206:21 notes 5:11 123:18 170:3 notice 56:15 83:4 146:17 notified 56:22 62:24 183:9 notify 58:13 notifying 117:5 NSPCC 2:7 NST 9:22 15:1 29:15 174:10 nuisance 27:15 number 23:3,20 25:5 26:1 27:21 28:14 46:20,24 47:1 53:3 54:2 55:5 61:5 66:24 76:17 77:17 78:3 80:9,23 81:4,5 92:11 99:3 101:19 105:13 117:7,8 125:6,7 132:9 138:10 141:10 144:24 145:10,21 149:21 154:25 157:7 160:15 161:18 177:13 180:14,16 195:17 198:6 numbering 18:5 numbers 73:22 75:5 86:20 181:5 Nunn 130:3</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 62:12 objection 165:25 objective 46:18</p>	<p>58:14 63:23 objectives 46:3 obligation 197:5 198:14 observation 13:21 observations 33:7 observe 163:8 observed 14:10 obvious 115:22 167:3 168:8 obviously 14:11 28:4 50:4 52:16 66:2 69:8 74:7,18 75:2 81:15 87:4 88:7 91:10 92:20 93:10 96:8 100:19 103:17 114:12,24 120:15 122:15 152:15 157:15 166:2 170:17 177:6 190:8 occasion 91:6 194:14 202:21 205:11 occasionally 87:7 occasions 6:19 51:22 69:25 71:19 92:11 114:13 occur 18:22 25:6 155:7 occurred 59:6 68:23,24 112:2 195:6 198:17 201:8 occurring 48:4 odd 103:12 144:6 206:10 odds 102:13 offence 71:8 147:22 offended 138:20 offender 3:25 offenders 151:19 offending 198:11 199:8 offer 61:1 83:20</p>	<p>121:2 164:2,14 offered 83:25 84:3 102:16 107:12 140:13 163:23,24 183:5 offering 64:2,22 83:19 87:18 88:16 103:14,15 offers 59:24 60:10 120:20 182:21 183:10 office 6:14 7:5 8:10 21:13,16 33:22 43:14 45:6,9 94:11 141:23 142:7 143:3 153:4 196:10 197:25 208:9,10 officer 16:11 107:22 141:14 143:11,22 171:8 189:15 officers 142:18 194:3 officers' 125:23 Ofsted 179:11 Oh 44:20 51:7 194:8 Okay 39:17 43:21 49:18 54:7 92:22 94:25 103:5 old 32:22 61:25 65:19 194:9 older 72:18 194:14 ombudsman 177:3 177:19,22 Ombudsperson 176:19 177:19,25 omissions 203:4 once 47:3 69:21 86:1,14 108:2 131:20,21 136:12 one-liners 128:2 one-off 17:21 ongoing 28:24,25</p>	<p>84:5 103:16 106:24 107:3,9 onward 166:21 onwards 49:16 97:25 203:16 205:16 opaque 133:15 open 88:13 opened 129:6 opening 21:12 32:2 operate 77:2 78:18 93:19,23 98:14 111:17 operates 45:12 92:19 operation 132:4 operational 132:17 172:21 opinion 42:12 109:9 128:2 199:1 opportunity 9:12 11:15,19 16:21,23 34:7 36:21 40:7 86:13 108:20 120:1 121:1,3 124:13 191:21 195:6,8 200:13 opposed 10:5 15:13 19:1 option 22:20 options 84:3 ordained 125:20 order 7:5 42:17 79:9 100:13 180:9 180:12 193:7 201:20 orders 40:12 136:18 137:5 182:4 ordination 157:2 organisation 83:10 83:12 127:5 138:4 161:14 organisations 72:21 186:5,9,11</p>
--	--	---	--	--

<p>186:14 187:15 original 84:19 106:4 119:10 originally 160:19 ought 11:12 outcomes 150:3 outlined 14:11 outset 77:6 83:3 outside 18:18 30:10 31:8 143:20 outstanding 70:8 outweigh 165:15 overcome 32:25 67:12 86:23 Overleaf 34:14 overview 85:7 owned 45:7 owner 45:12 ownership 143:14 Oxford 141:11 154:13 162:1 Oxon 127:15 oxymoron 88:24</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>pace 31:7 package 163:12 page 5:13,13 9:1 12:2,7 13:20 18:5 18:5,14 21:6 22:6 24:10 25:3,3 29:20 30:6,14 31:4,4 37:13 54:9 55:25 56:2,25 57:1 58:5 63:3 65:17 74:10 85:6 85:11,11 87:16,22 88:14 94:20,20 101:1,1 103:4 107:10 108:13 120:15 133:17 135:1 141:19 149:1 150:25,25 150:25 153:7,12 173:7,10 189:12</p>	<p>189:23 197:19 198:7 199:5 203:14 204:13 pages 22:24 173:6 179:23,24 194:24 paid 161:3 166:10 Palace 129:25 panel 1:5,15 8:25 16:2 40:25 42:5,7 44:16 55:10 63:1 74:10 76:1 84:7 97:13 110:5,6 116:21 117:1 123:8 124:9 127:2 132:5 133:14 137:15 150:9 166:13,15 169:8 171:5 173:5 189:1 189:5 191:12 192:3,11,17,21,23 193:12 197:17 203:14 206:18 209:19 210:17,23 211:4 paper 29:3,7 106:18 124:4 170:6,8 188:24 190:9 192:20 papers 15:6 parachuting 182:19,23,25 paragraph 9:2 13:19 16:8 18:6,6 18:15 20:9 22:4,5 29:21 30:6,15 31:6 33:11,24 34:16 37:14 53:5 54:10 85:13,22 94:18 95:10 110:8 110:9,10 133:13 133:23 137:13 139:18 141:18 143:12,13 145:23 146:25 147:10 153:15 162:7</p>	<p>164:17 189:12 190:25 198:13,18 203:10 paragraphs 5:14 21:9 29:19 30:22 44:6 94:21 125:18 149:17 163:7 173:2,4,6 205:16 parallel 34:10 98:14 parameters 103:17 paraphrase 26:12 parcel 162:14 parents 156:14 parish 47:16 56:19 135:24 171:7 185:3,11 193:6,7 193:10,22,25 194:2,3,18 195:14 parishes 158:13 185:19 parishioners 194:21 parliamentary 158:9 191:20 part 11:17 16:4 30:2 53:1 64:1 67:1 70:22 75:2 84:11 86:25 87:1 87:13 92:24 94:7 96:22 116:5 136:6 162:14 172:24 177:25 180:5,22 181:25 182:10 184:20 185:2,21 186:6 187:7 205:15 participate 34:6 particular 2:10 3:5 7:18 21:9 61:13 62:22 65:24 70:21 72:17,18 74:23 76:6 79:5 84:9 91:24 92:4 105:8 109:14 110:3,23</p>	<p>112:1 125:3 127:12,22 132:21 138:20 140:1,6 143:2,2 145:8 155:20,25 163:9 170:6 173:23 182:13 208:19 particularly 7:19 12:20 60:15 71:4 72:20 77:25 78:1 88:6 90:18 108:13 109:3 114:19 133:2 134:13 136:9 157:23 158:21 194:3,13 parties 46:17 69:24 87:2 partly 207:22 partners 76:12 parts 47:10 48:23 204:15 partway 181:18 party 51:15 95:7 pass 40:24 123:8 169:19 207:1 passage 48:15 passed 41:19 passionate 193:6 pastor 134:4 138:2 144:25 145:19 pastoral 4:14,25 6:2 7:20 8:7 10:25 21:7,21,22 22:17 33:14,17 34:5,8,21,24 93:22 94:22 98:13 99:17 103:24 106:1 107:4 110:4 145:1,2 151:21 164:12 191:2,8 pastorally 152:8 pastors 132:22 path 196:21 Paul 4:4,5,23 5:4 6:4,9 38:21 150:1</p>	<p>150:5 Paula 6:19 103:14 pay 64:22 96:11 162:13 164:6 165:10 paying 72:5,7 PCC 61:25 PCCs 47:12 PCR 203:22 204:16 pedestal 158:15 penalties 138:8 140:6 141:8 188:15 penalty 135:13,14 135:15 penultimate 33:11 33:23 people 10:25 13:17 23:15 32:2 40:7 40:21 42:23 58:20 60:5 61:24 72:5 72:18 86:23 88:24 104:12 114:16 115:17 132:10,25 134:8,10 135:2 137:4,10 139:6 140:20 141:23 142:7,8,20 143:2 143:5,6,15 144:24 145:3,6,10,14,16 145:18 146:8,8,12 146:22 147:6 148:23 152:9 155:24 156:7,11 156:18 157:9,20 158:1,2,17,25 159:1,3,11 160:5 162:4 163:4,20 164:1 167:2,18,23 168:4,15,17,18,20 173:19 175:8,10 178:4 182:19,20 182:24,25 184:18 184:23 185:7 187:20 188:5</p>
--	--	---	---	---

<p>192:11 194:2,9,11 194:14 195:18,20 201:25 208:1,4 209:5,7 people's 168:2 205:6,7,8,9 perceived 27:12 perception 27:10 28:11 172:5 performance 39:22 period 3:8 4:9 8:5 23:18 47:2 48:5 57:3 67:17 105:1 120:8 126:9 130:24 171:7 206:8 periods 117:5 143:2 Perkins 102:3 103:2,8,22 104:1 188:23 190:10 permanent 171:24 permitted 190:16 perpetrated 53:19 perpetrator 54:3 89:6,12 208:19 person 4:2 16:22 29:12 50:23,24 63:4 71:7 81:20 103:10,11 128:21 128:22 129:16 130:13 132:15 135:20 136:5 137:21 146:9,10 149:13 155:12 171:21 174:13 179:12 180:18 191:9 209:8 personal 63:9,9 65:2,4 79:13 84:1 131:3,5 168:9 181:20 personally 89:25 147:22 148:8 150:15,18 174:12</p>	<p>193:25 personnel 10:21 66:19 130:3 208:6 persons 198:8 209:1,15 perspective 19:6 51:18 66:1 91:14 100:15 121:13 181:20 perspectives 179:17 Peter 40:16 111:7 198:3,7 199:2 phase 175:21 206:3 206:18 phenomena 132:9 phenomenon 167:20 168:1 Phillips 73:14 philosophy 125:21 phone 51:23 141:13 145:6,15 phoned 129:24,24 phoning 58:20 phrase 128:4 163:1 physical 46:25 59:5 pick 100:7 141:13 195:18 picking 145:5 piece 64:20 82:19 116:1 160:14 pieces 170:5 piper 162:13 place 3:17 4:21 11:23 12:9 14:22 15:4 23:12 24:20 24:20 25:22 28:9 28:21 31:16,17 39:20 41:22 48:1 48:11 49:18 60:4 65:24 78:21 79:12 79:14 83:10 87:9 104:17 109:18 145:14 168:9,13 177:3 178:10</p>	<p>189:20 193:5 195:13 placed 151:3 places 19:11 67:23 168:17 placing 95:18 plain 156:8 plainly 99:20 167:24 plan 137:20 181:16 plans 73:13,19 play 26:21 94:7 127:5 185:22 plead 69:19,19 74:22 75:16 pleaded 70:4 pleading 69:17,20 74:11 please 1:6,16 5:13 16:8 22:14 25:3 29:20 30:22 44:13 54:9 55:25 56:25 58:5 74:10 87:23 94:17,18 97:13 100:25 106:12 109:2 123:12,17 150:8 152:25 153:7,12 163:11 170:2 173:4,11 189:12,23 198:5 199:5 203:15 204:13 205:17 Plus 47:16,17 pm 123:3,5,7,21 169:14,16,18 210:6 point 7:8,8,10 8:17 12:15 22:15 32:19 38:7 44:19 48:14 48:22 49:12,15 50:23 52:7 54:8 60:3 63:11 64:18 72:24 73:7 76:14 82:4 87:24 95:6 95:24 98:15,20</p>	<p>99:4 101:8 109:15 112:18 117:25 134:21 135:23 136:17 138:17 144:7 149:1 152:1 176:19 179:15 182:10 190:24 192:11 207:23 209:13 points 36:16 37:10 37:10 73:4 98:6 135:22 179:11 200:10 police 66:15 68:20 68:20 71:13 127:14 196:23 197:3,21 198:4,12 198:14 199:7,21 200:16 policies 3:16 12:9 12:10,14,18 13:6 13:8,14 14:17 23:12 25:22 29:23 46:6,9 47:11 55:6 115:5 165:14 184:14,18,24 policy 12:24 13:1,5 13:10,17 16:5,14 22:13,14,21,22 30:3 47:13 48:1,3 48:4,6,9,10,13 49:22 56:5,9,20 72:1 93:24 121:14 132:12 148:23 199:2 policyholder 85:24 106:19 110:12 policyholder/cust... 60:17 policyholders 47:15 55:15,23 63:6 84:23 87:18 87:21 93:9 105:16 107:3 pool 158:25</p>	<p>poor 15:3 205:1 207:7 poorly 156:20 position 35:14 37:22 38:13 56:11 57:19 60:20 64:7 69:17,20 73:20 113:15,16 134:13 135:5 148:1,7,11 151:8 155:7 167:6 positional 155:21 155:22 156:23 positions 141:24 157:20,20 positive 27:18 31:1 63:21 83:18 possibility 74:11 153:14 possible 9:14 27:16 32:8 38:14 69:23 71:3 86:7,12 90:15 118:4 119:13,14 142:12 151:11 155:14,15 190:12 possibly 86:22 98:5 112:5 117:17 133:9 142:2 post 171:19 172:20 195:7 postcode 162:6 postdate 96:25 potential 22:8 27:15 potentially 56:11 62:2 108:24 poverty 126:14 power 15:13 18:19 40:19 69:11 74:16 75:3 155:25 156:8 156:9,25 157:3,19 159:13,17,20,21 165:6,6 190:14,22 powerful 137:6,11 159:7 167:5</p>
--	---	---	--	---

<p>powerless 41:15 powers 172:9,11 182:19 183:16 191:13,14,18 PRA 45:11 practical 22:14 33:3 145:22 175:16 practically 65:21 71:21,23 practice 12:25 13:2 13:23,25 15:3,22 17:2 18:17 20:19 20:22 21:2 27:3 30:16,19 31:2 38:24 40:1,5 42:19 43:4 52:20 56:12 57:14 106:19 146:17 147:2 153:11 161:24 199:2 practices 55:6 90:17 155:1 184:14 practised 107:13 practising 137:12 practitioners 190:6 pray 163:23 168:20 pre-action 78:24 79:4,12,23 83:6,7 83:8 precisely 177:14 predate 97:1 predated 104:20 prefer 43:16 170:8 preferable 124:2 prejudice 60:18 64:7,15,20 prejudiced 56:12 60:20 prejudicing 196:22 preliminary 123:16 124:19 preparation 6:15 prepare 16:2</p>	<p>134:11 prepared 58:3 81:8 82:5,8 199:14 present 9:11 10:9 10:13,16 11:12,16 11:17,25 18:21 20:5 30:25 74:17 presented 205:21 President 200:1 201:5,9 press 33:5,11 86:11 105:18 167:9 pressure 7:18 170:4 184:8 186:20 pretty 74:2 prevent 98:12 110:12 111:21 prevented 184:9 preventing 98:18 137:11 prevention 195:5 previous 39:12 66:24 85:14 91:23 103:23 166:18 182:16 194:14 202:21 previously 7:17 10:18 39:17 prima 181:9 primarily 21:14 59:2 145:2 172:2 primary 128:16 principle 148:21 principles 22:10 57:21 69:9 80:3 84:6,16,16,22 85:4 87:16 88:9 88:15 90:9,11,16 96:22 97:1,4 102:25 104:17,21 105:15 106:13,21 109:25 110:18 113:25 114:10 print 194:16</p>	<p>printed 193:25 prior 69:9 77:19 99:7 104:18 175:25 198:4 prioritised 207:19 priority 174:22 175:14 204:21 prison 125:25 privacy 148:16 private 66:19 108:16 privilege 99:21 100:1,5,10,12,21 105:7 privy 152:6 probabilities 48:24 68:22 89:9 111:19 probably 26:5 49:8 58:22 60:6 66:17 76:8 92:5 110:6 117:11 118:16 144:13 165:13 174:22 182:12 185:16 202:13 problem 14:4,12,15 27:15 32:3 42:13 66:3 68:6,8 82:12 132:18 134:14 136:5,8 143:25 146:5 148:10 157:6 160:10 178:1 182:6 188:1 problematic 132:23 problems 14:8 104:11 133:3,11 133:25 146:2 159:19 169:5 173:20 181:9 182:24 183:1 184:19 193:8 194:20 procedural 25:21 51:18 procedure 127:20 127:21 134:19,20</p>	<p>143:1 209:2 procedures 14:21 23:12 43:7 56:4 57:8 138:5 142:14 177:12,25 183:8 184:15 185:21 195:21 proceed 31:7 proceeded 72:9 proceedings 7:19 51:17 109:7 128:18,19 133:6 134:25 136:1,15 196:13,23 199:24 210:1 process 12:5 26:4 30:9,11 31:7 34:25 43:8 50:10 51:2,6 52:18 66:11 73:10 77:9 78:20 79:8 81:17 81:25 82:10,11,13 82:15,20 84:24 85:2,8 86:25 87:6 87:14 89:15 90:22 91:16 93:19 105:17 111:13 113:22 114:4 115:9 116:11 117:22 134:5,7 135:16,19 139:15 139:22 146:23 150:15 164:8,9 176:3 177:5,24 180:20 181:14 185:1,6 187:21 188:14,15 200:2 200:19 201:16 202:12 206:23 207:3 208:22 processes 17:22 92:20 146:11 177:7,21 procuring 175:21 prods 184:24</p>	<p>produce 29:11,12 84:12 137:20 209:3 produced 1:13 27:22 28:1 33:9 55:16 67:15 84:17 177:18 188:24 production 193:9 195:2 products 47:18 profession 35:16 137:7 professional 1:25 2:1 35:16,21 99:25 105:7 164:19,23,25 165:24 199:22 professionals 11:19 147:24 164:21 professions 139:23 Professor 74:19 75:6 84:11,18 114:19 profile 172:4 programme 19:1 36:4 181:18 progress 105:12 176:13 182:22 project 72:19 175:17 207:8 promote 181:5 promoting 34:2 promotion 186:1 195:17 prompt 44:6 proof 111:15,18,20 proper 23:12 33:16 97:20 99:12 143:3 164:19 165:22 166:3 192:19 properly 165:24 166:9 property 46:5 proportion 174:10 proportionate</p>
---	--	--	--	---

<p>149:12 proposal 80:2 proposals 31:20 176:16 propose 173:8 proposing 128:12 prosaic 120:11,16 prosecution 68:20 197:25 prosecutor 134:4 prospect 187:16 protect 134:18 147:14 protected 179:10 protecting 51:18 162:4 protection 2:1 10:4 10:4 41:12,12 57:8,12 67:9 126:24 127:1 131:1,2,4,24 142:1,13,20 149:5 protocol 58:3,8 62:18 78:24 79:4 79:12 83:7,8 protocols 79:23 proud 156:14 prove 192:16 proved 192:10 proves 91:12 provide 16:15 21:21 34:7 37:22 54:11 62:20 63:21 79:6 82:5,22 93:8 94:13 115:6,8 119:16 121:8,9,10 121:11 122:1 178:25 182:11 183:9 188:17,20 202:8,24 provided 9:14 37:25 44:2 55:22 68:12 69:25 85:18 98:17 107:19 174:1 199:23</p>	<p>205:20 providers 119:23 providing 9:10 11:24 24:3 29:3 60:13 121:1 182:16 province 185:2 201:12 provincial 200:5,8 201:19 provision 22:17 33:16 61:1 95:18 104:12 provisions 69:14 PSA 46:25 52:19 60:3,6 PSA-specific 62:25 psychiatric 76:19 76:20 psychiatrist 77:1 psychological 82:23 psychology 168:11 public 1:4 33:4 35:5,10 37:1 46:7 46:8 59:2 74:3 81:6 97:16,19 98:9 108:16 123:25 152:22 167:21 170:19 197:25 203:2 publication 27:25 28:3,8 publicised 55:7 publicly 35:14,18 36:6 publish 40:10 97:12,14 126:17 published 1:21 28:5 33:18 73:15 80:3 97:5,17 105:12 109:25 126:18,20 pull 29:19 punishments 141:8</p>	<p>purely 15:1,8 24:3 purpose 9:23,25 19:25 29:11,16 46:14 62:24 63:24 64:17 91:13 94:6 128:16 150:13 purposes 67:18 155:25 push 7:21 167:8 183:10,13 pushed 5:22 pushing 88:13 187:19 put 31:17 76:25 77:9 78:19 83:10 88:4 89:5,21 98:1 98:3 99:14 104:5 106:4,17 119:9 122:15 127:16 129:16 148:15 158:14 164:3 181:2 183:5,14 194:10 196:4 201:2,23 puts 132:19 putting 25:22 89:14 99:7 105:22 134:12 195:12</p> <hr/> <p style="text-align: center;">Q</p> <p>QC 73:14 qualification 140:22 qualified 2:6 140:23 quality 13:23 20:21 30:16 179:1 204:23 quarter 53:24 quasi 158:8 queen 202:11,11 Queen's 79:19 question 20:9 35:4 38:2 43:7 64:10 70:11 75:25 76:2</p>	<p>97:2 111:25 115:4 116:6,19 117:2 120:7 121:16,17 143:19 152:3,7,10 160:2 161:10 162:25 166:17 168:23,25 180:5 180:22 184:11 191:5 193:3 questionable 127:11 questions 40:24 42:4,5,7 110:24 116:22 117:1 122:23 124:19 158:17 166:12,15 166:16 169:7 180:10,11,13 181:4,5 188:22 202:14,15,19 209:18,19,21 210:17,23 211:4 quick 31:17 33:6 77:19 133:1 quicken 86:3 quicker 80:22 85:15 quickly 31:19 32:8 34:22 38:14 86:12 90:15 111:2 118:13,22 quieter 98:6 quietly 168:20 quite 9:18,20 23:19 25:20 31:17 46:14 48:3 52:14,16 61:15 68:12 69:2 69:2 77:8,18 81:1 81:3,4,5 82:19 83:17 87:10 89:2 89:11 93:15 94:6 98:1,15,20 101:18 102:24 107:19 109:24 112:12 113:24 116:7</p>	<p>117:22 120:19 130:4,10 131:24 132:13 134:1 135:3 144:6 149:16,20 156:8 156:16 167:1,19 174:9,23 175:25 177:17 180:3 183:1 188:10 200:21 205:10 206:18,24 207:12 quo 32:25</p> <hr/> <p style="text-align: center;">R</p> <p>Radio 36:4 raise 109:6 122:14 136:17 141:18 164:18 raised 4:21 8:9 11:6 67:11 105:11 106:11 111:20 112:6 114:12 198:22 199:3 raises 158:16 160:1 Ralph 5:13 53:4 54:9 55:8,25 58:4 97:13 101:1 105:21 106:12 110:5 123:25 149:18 150:8 163:9 170:5 173:3 173:10 193:11 197:18 199:5,18 203:15 204:13 205:17,18 range 58:16 175:4 181:23 182:13 rare 76:13 rarely 70:17 75:4 re-open 107:16 re-opened 108:4 re-opening 107:25 reach 186:13 reached 12:4 112:19 138:19</p>
---	---	---	--	---

<p>174:18 reaching 186:7 reacted 138:18 reactive 41:13 reacts 41:13 read 4:18 12:18 36:1 103:3 124:13 readable 194:25 readily 16:15 reading 52:15 103:1,21 126:1 194:15 real 14:24 23:10 32:10 55:4 57:25 79:25 148:9 209:13 realised 6:17,22 26:22,25 35:2 104:10 realising 138:24 165:5 reality 25:18 30:17 78:20 92:5 104:24 really 17:12 21:18 22:4,6 41:8,11 46:14 50:22 51:17 58:1,14,17 60:14 60:18 62:23 66:6 67:13 68:16 70:1 72:24 80:14 81:9 83:17 85:7 90:16 93:3,22 98:8 105:5 111:17 112:13 115:12,24 118:1,17 129:1 130:15 134:12,21 135:16 136:2 137:17 147:17 148:6,19 151:21 153:5,5 155:5,6 160:2,18 166:23 167:10 168:10 175:14 176:1 177:17 184:14,15 185:7 189:15</p>	<p>190:22 192:2 193:20 194:7 195:12 203:4 208:2 reason 32:4 41:9 44:13 52:4 82:6 87:9 97:22 129:10 180:24 181:2 reasonably 130:17 reasons 56:13 99:13 180:24 194:22,23 196:9 reassured 152:1 reassuring 104:15 recalled 23:22 receipt 59:22 receive 8:7 127:19 127:21 128:1,3,5 167:14 204:21 received 4:15 23:7 34:19 53:10 96:4 97:18 101:11 106:9 119:23 128:24 149:11 174:25 176:17 receiver 7:12 receives 71:24 72:14 receiving 7:23 21:3 22:25 24:7 recognise 26:13 33:16 47:7 90:14 156:22,25 177:4 183:1 196:17 recognises 74:14 recognising 32:2 recognition 26:20 57:2 recommend 196:10 204:14 recommendation 26:9 111:23 112:9 160:18,21 185:25 206:15 recommendations</p>	<p>22:23,25 23:11 24:1 28:6,24 29:1 29:18 32:9 36:17 95:9 99:3 145:22 203:11,17 206:7 recommended 14:3 91:21 recommending 130:14 reconciliation 120:21 121:2 record 1:12 4:19 10:10 15:16 35:24 98:3 99:14 108:21 121:18 124:8 204:23 205:1 recording 23:13 142:24 204:23 records 57:1 62:1 66:13 67:15,16 122:2,16 130:21 205:5 206:25 207:20 recruited 171:21 recruitment 185:21 195:21 rectify 90:14 rector 125:22 126:9 recuse 201:16 red 137:6 redone 203:25 redress 114:20,22 114:24 115:5,12 115:20,24 116:1 147:7 163:6,11 reduce 20:6 reduced 85:17 reexamined 203:20 refer 29:7 123:17 170:2 reference 1:20 3:2 3:14 4:20 5:10 16:3 28:3 44:17 64:25 93:4 94:1 119:3 120:4</p>	<p>128:14,14 129:8 130:14 136:13 209:11 references 119:2 128:1 referencing 2:23 referral 190:19 referrals 180:14,16 referred 26:3 92:14 108:20 119:10 122:17 127:12 183:23 193:16 201:17 referring 105:4 reflect 12:13 97:9 183:24 reflecting 185:3 reflection 168:9 reform 80:16 refresh 170:18 refutes 97:24 98:2 regard 11:21 28:3 35:23 37:2 95:15 148:23 197:5,7 200:21 regarding 34:19 199:8 regards 109:14 146:4 regime 142:5 register 78:25 registered 45:9 registrar 135:20 141:13 200:5,8 201:19 202:3 regret 5:20 153:14 153:17 regrettable 109:3 151:5 regretted 6:5 regular 17:24,25 18:10 127:8 181:15 208:11 regularly 129:20 regulated 35:16</p>	<p>45:10 46:12 186:24 regulation 139:23 regulations 161:19 regulatory 46:12 rehabilitation 65:1 65:4 82:24 88:19 reinforce 64:18 reinstated 137:3 reiterated 193:4 relates 104:7 relation 3:15 6:20 14:12 17:13 20:18 26:24 29:3,15 35:21 39:18 40:13 110:3 119:1 120:6 120:7,9 121:17 174:6 177:13 183:21 191:5,8 196:25 206:20 208:25 relationship 63:16 74:25 80:8 88:8 109:11 186:3 relatively 54:21 release 67:7 100:8 100:8 released 33:10 67:5 67:18 releasing 67:9 relevance 35:4 relevant 8:15 16:24 17:13 31:15 44:6 55:19 62:2 69:14 124:5 179:12 197:5 203:19 206:12 reliable 130:17 reliance 151:3 reliant 115:3 religion 157:12 religious 19:15 39:25 40:12 72:21 155:24 168:4 relinquishing</p>
--	--	---	---	--

<p>30:24 relive 77:10 reluctance 72:21 134:5,6 168:2 rely 83:23 159:7 177:20 203:1 relying 17:21 163:13 remains 108:18 122:9 191:6 remarkably 159:10 remarks 44:1 170:1 remember 23:7,15 24:6 44:5 67:25 73:7 94:4 97:2 119:5 154:12,14 remind 140:17 remit 139:21 remonstration 108:16 remove 89:24 removing 37:15 renamed 129:18 rendered 41:15 renewed 105:18 reorganisation 171:17 reparation 116:3 147:7 repeat 23:1,25 181:17 repeated 23:17 32:1 204:10 replicates 188:4 reply 35:9 report 6:16 7:6 16:1,4,7 18:2 21:9 21:10 23:6 27:22 28:1,4,12,15,15 28:17,23 29:11,12 29:16,20 32:10 33:4,4,10,22 35:6 35:10 36:9,12,15 41:22 61:8 72:22 77:23 91:20 92:1</p>	<p>95:1,5 97:16,18 97:19 98:9,25 99:2 147:23 167:19 168:18 172:15,18 189:17 189:21,21,25 196:8,10 203:7,9 203:12,12 205:14 206:16 reported 65:18 138:23 139:11 148:12 149:8,11 197:2 198:21 reporting 25:13 41:7,9,20,21,25 42:1,2 72:17 147:15,18,20,21 148:22 161:23 166:21 167:6,17 167:20 reports 23:21 76:19 170:24 reprehensible 33:25 105:24 168:16 represent 146:11 representation 51:1 165:22 representatives 5:25 11:4,7 83:14 127:13 135:21 192:24 represented 50:22 108:1 representing 9:19 request 180:7 requested 28:14 81:23 82:4 96:4 require 37:1 90:25 181:10 183:8 199:25 required 13:7 42:17 83:1 91:22 128:9 131:9 200:9 requirement 19:21</p>	<p>177:9 requirements 137:25 166:9 requires 16:14 30:17 83:22 resides 156:25 resign 135:23 resistances 32:23 resistant 63:15 resolution 43:8 103:20 resolve 178:9,13 181:5 resolving 141:2 resource 27:5,19 resources 17:18 27:16,17 38:6 respect 46:21 54:12 70:12 90:24 91:9 91:20 110:16 111:25 112:10 130:18 136:19 137:25 138:1 142:1 172:9,10 187:21 188:23 189:17 196:1 200:20 respected 22:2 148:24 respond 8:13 19:14 21:20 63:20 95:15 97:21 144:10,11 144:25 responded 21:17 91:25 134:14 144:12 150:22 responding 12:21 23:13 response 2:17 7:7 33:3,4,21 35:5,10 63:13 77:6 93:22 93:23 97:12 107:13,19 150:23 155:19 163:16,17 192:19</p>	<p>responses 204:20 responsibilities 46:13 174:7 191:2 responsibility 16:9 17:5,9 18:8 21:20 24:7 36:22 121:18 121:22 122:4,9 134:23 144:9 158:3 188:3 190:2 responsible 35:7 40:2 47:5 49:13 49:14 125:8,10 127:18 131:25 139:22 173:12,13 188:21 195:14 responsibly 148:13 148:13 149:11 rest 160:13 restoration 163:6 restrictive 121:8 restructure 173:16 restructuring 171:16 rests 202:9 result 21:2 41:23 106:11 109:9,21 135:6,7 196:7 199:13 204:6 205:14 resulting 34:21 results 140:8 retain 42:24 122:3 143:14 145:1 retention 57:1,4 retired 125:10 208:4 return 62:10 123:3 140:12 169:14 returns 177:12 revelation 138:17 Reverend 149:24 198:14 review 2:15,24,25 3:3,11 4:10 18:25 25:7 27:11 29:13</p>	<p>30:9 31:10,12 34:1,6 43:4 48:19 67:2 75:2 77:20 94:10,12,17 95:1 96:25 97:3 98:2 105:10 108:14,17 109:2 110:25 151:1,25 185:25 197:22,23 202:20 202:22 203:13,24 204:7,8,25 205:5 205:15,23 206:3,6 206:9 207:13 209:7,10,12 reviewed 127:11,16 207:1 reviewer 207:2,4,4 207:6,13,16 reviewing 18:9,11 73:23 106:25 reviews 17:22 182:22 189:23 206:19 revised 131:21 192:22 revision 129:13 ride 139:4 148:19 right 16:24,25 23:16 29:9 43:1 44:20 45:16 48:7 49:22 50:17 52:25 53:8 54:23 55:15 57:17 61:11,15 67:20,21 68:8,12 77:8 79:10 82:17 83:3 91:25 93:2 94:6 97:20 99:9 99:12 112:21 120:9 123:14 124:21 125:10 126:2,7,15,22 127:3 130:20 149:14 154:6 155:3,10 160:17 163:17 166:5</p>
---	---	--	--	--

<p>169:5 171:1,2,10 171:11 172:19 178:11 179:22 183:21 202:3 205:3 207:12 right-hand 61:16 rightly 53:13 58:16 94:4 97:3 174:9 ringers 186:10 rise 58:19 risk 7:15 8:21 32:6 40:20 41:17 72:8 72:10,13 114:3 149:7 155:9 189:19 risks 20:4,7 195:5 ritual 136:20 road 79:12 robust 30:9 Rochester 203:25 Roger 169:13,20,21 169:23 177:10 202:19 209:17,22 209:23 211:6 Roger's 203:14 role 12:18 15:1,9 16:17,23,25 17:4 23:24 24:5 26:20 26:23 36:16 42:10 46:12 93:18,18 95:13 126:11 127:5 132:19 134:25 138:2 143:10,17 145:17 145:17 150:17 169:2 171:12,23 172:1,3,24 174:14 183:25 188:7 191:8 195:23 roles 127:17 173:14 173:15 Roman 15:19 186:18 roof 58:22 roof's 58:21</p>	<p>room 66:17 68:1 69:12 86:21,21,22 87:8 130:11 Rosie 126:19 144:16 rotten 155:4,11 roughly 125:12 206:2 round 95:4 134:20 134:20 route 39:4 routine 77:16 routinely 18:17 routines 160:12 Royal 154:2 186:10 rubbish 99:1 ruined 78:15 rules 172:14 run 71:17 75:10,20 158:25 159:1 161:2 187:25 189:16,16 208:21 running 205:15 rural 185:3</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>safe 15:23 20:3,3 127:19,21 128:1,3 128:5 175:17,23 176:4 185:4,15,17 195:11,13 safeguarding 2:2 2:10,12 4:2,6,11 5:12 10:10 14:9 15:8,11 16:5,12 16:12,18,19 17:11 17:14 18:7,12 20:14,18,19 21:2 24:10 25:5,10,18 25:24 26:24 29:4 30:8,13 31:15 39:1,20 40:1 41:2 42:15 57:15 67:16 101:22,24 102:5 127:2,23 131:4,6</p>	<p>142:1,11 143:11 143:14,17,21 144:19 160:17 161:6 162:15 163:21 170:21 171:4,5,8,9,14,17 171:19 172:4,6,8 173:1,9,22 175:3 178:18,24 179:19 181:13 182:7,17 182:22 183:19 185:9 186:2,4,9 187:12,17,25 188:3,8,12,24 189:14,15,17,19 189:21 190:5,16 191:3,12 192:3,15 192:17,18 193:5 194:3 195:24 197:3 198:5 199:3 199:4 203:8 204:13 205:21 206:17,17 207:14 safeguarding/pas... 22:8 safely 202:25 safety 58:10 130:13 130:20 149:7 158:17 Sally 160:19 salutary 165:14 same-sex 126:22 sanction 41:23 sanctions 188:15 Sandham 101:23 Sandhurst 125:22 sat 45:1 176:10 satisfaction 152:3 satisfactory 192:10 satisfied 204:5 206:11 sausage 147:7 saved 130:9 saves 135:24 saw 32:5 119:17</p>	<p>129:13 saying 18:6 26:17 36:15 38:9 42:1 50:13 56:8 58:21 61:18 63:19 64:16 65:11 82:4,8 98:25 102:10 121:24 138:18,20 164:8 189:10,13 191:19 says 5:12 33:12,24 34:16 59:4,11 61:16 63:3,8,12 64:1,5,21 65:16 69:8 74:12,23 85:23 86:2 87:2 88:18 101:13 103:1 105:23 107:1,10 108:12 109:2 112:22 122:18 152:25 154:18,20 179:9 188:4 190:3,8 197:7 198:18 septicism 162:9 scheme 114:20,22 114:25 115:5,12 115:24 127:17 141:6 145:25 177:4,18 schemes 115:20 177:19 school 126:12 131:9 186:10 schoolboys 167:21 schools 131:8,18 SCIE 19:1 162:10 182:2 188:5 SCOLDING 43:23 43:24 62:7,11,17 116:20 118:7,14 118:16 119:16 120:3,13 123:1,4 123:8,11,12 166:11 169:8,10</p>	<p>169:15,19,22,23 193:17 202:19 209:17,23 210:1,5 210:21 211:2,8 scope 2:23 3:3 206:18 Scorer 80:1 scrappy 186:15 187:4 screen 5:10 110:6 123:23 170:4 189:7 196:4 199:19 Scripture 186:11 204:18 scrutiny 162:16 search 122:2 second 20:8,24 23:24 31:6 55:10 55:11 91:25 109:25 118:25 150:10 169:25 170:11 181:2 185:22 192:14,21 secondly 44:9 111:25 123:20 195:1 196:5 201:21 203:8 206:8 secrecy 133:7 secretary 10:17 171:22 172:15 section 30:7 secure 133:2 secures 139:25 security 158:17 see 5:10 14:8 20:17 25:9,12,13 29:7 29:21 31:9 33:10 48:10 67:12 69:24 83:15 103:18 120:22 123:1 128:10 139:5 141:11 154:8,17 167:2 180:2,9</p>
--	---	---	--	---

<p>201:19 seek 18:20 77:7 96:8,11 141:15 seeks 206:22 seemingly 134:17 seen 27:8,14,18,18 31:1 47:20 65:22 72:5 75:21 93:12 95:12 115:24 119:6,7 123:24,24 133:19 154:6,11 163:20 Select 192:5,7 self-declarations 180:25 self-evident 208:2 self-harm 7:22 self-protective 133:15 send 77:7 sending 134:15 sends 102:9 137:6 senior 4:10 17:11 19:15 20:14 29:13 42:9,19 45:19 60:1 81:19 131:15 140:23 143:17 152:5 166:20 169:1 sense 48:8 109:10 143:8 145:17 146:3,23 161:25 163:24 183:3 sensible 61:9 128:21 169:11 sensitive 128:22 sensitivities 76:6 sensitivity 51:14 89:1 101:25 sent 55:14 57:13 59:21 61:18 129:13 130:1,2 154:14 188:25 190:10 sentence 17:8</p>	<p>120:17 207:12 sentiment 91:24 sentiments 6:3,8 separate 18:7 187:9 September 110:1 119:4 sequentially 18:3 series 186:22 serious 142:2 167:11 seriously 21:5 28:6 139:24 157:13 191:16 serve 19:25 server 156:1,15 service 9:14 159:15 159:16 160:17,24 160:25 161:14 162:15,17 170:19 170:23 174:25 176:20 services 11:24 35:17,23 127:13 149:4 176:16 servicing 141:3 156:1 session 191:20 sessions 87:19 101:6,8 set 3:3 12:13 16:4 21:10 24:9 31:4 35:24 37:9 40:15 53:6 56:13 57:20 62:3 74:13 86:10 87:15 102:15,24 103:17 108:21 113:25 122:10 143:22 149:16 152:5 173:1 179:10 182:7,11 186:23 198:2 203:6 sets 56:1 66:7 84:12 85:7 106:24 157:7 206:24 setting 2:11 75:20</p>	<p>105:12 114:21 175:22 settings 15:24 settle 71:16,18 87:3 settled 70:8 75:11 77:20,21,23 79:9 107:5 108:2 113:18,19 settlement 81:16 84:10,11 86:16,19 87:1 89:24 90:25 91:1 107:17 108:3 111:21 112:19 117:6 settlements 90:24 107:8 seven 39:21 203:22 203:23 204:6 sexual 46:21,25 67:25 72:17 74:24 79:14 126:19 158:21 198:11 sexually 114:17 shame 168:5,7 shape 175:18 share 52:20,20 74:7 91:10 shared 41:14,14 73:11 88:9 95:16 187:13 sharing 13:24 31:25 79:11,11 89:11 187:12 Sharpling 116:23 117:2,9,13,16,19 117:23 166:14,16 167:9 168:21 Sharpling's 168:23 shed 99:24 sheds 205:7 Sheffield 204:1 shelf 80:5 Sheryl 4:7,19 5:5 5:11,19,20,22 6:4 6:10 10:9 101:21</p>	<p>102:10,11 103:10 shift 190:15 shifting 82:10 shocked 9:18 shocking 37:23 163:18 shoehorn 37:11 shoes 49:23 96:5 125:5 short 2:6 5:2 20:23 20:23 32:4 62:15 120:8 123:6 169:17 183:14 short-term 175:6 shortly 209:5 showed 34:7 showing 34:17 shown 15:16 19:11 107:11 shows 200:20 sic 5:1 side 61:16 150:16 sides 72:10 77:15 81:8 siding 164:4 sight 115:3 sign 40:9 128:9 170:13 186:19,20 signal 137:7 signature 44:18 124:11 signed 1:15 39:24 40:12 44:19 91:1 91:2 186:21 significant 106:19 162:25 174:10,15 194:20 203:3 signing 40:8 similar 6:3,8 7:17 9:8 40:13 149:3 164:20 172:20 208:22 simple 55:18 137:5 147:17 193:23 simpler 85:16</p>	<p>simplified 194:5 simply 15:16 21:23 31:19 71:1 100:15 134:20 138:18 144:4,25 145:5,17 160:20 164:3 176:11 single 30:1 39:24 49:4 Singleton 169:13 169:20,21 211:6 Sir 169:13,20,21,23 177:10 202:19 203:14 209:17,22 209:23 211:6 sit 74:3 121:22 123:12 143:18 sits 80:5 122:4 sitting 130:11 207:9 situation 3:6 11:2 17:4 19:6,20 20:17 37:5,6 41:17 68:14 70:18 147:9 situations 7:18 17:1 19:8,17 54:2 69:4 135:4 156:1 157:25 158:22 six 31:13 175:19 176:13 183:3 204:5 skewed 14:18 24:20 skills 126:6 skipping 206:24 Slack 152:20,24 153:3 154:3,20 slight 54:17 slightly 21:6 98:6 149:3 163:10 167:9 169:12 172:16 Slough 125:16 small 46:21 54:22 70:1 74:5 81:4,5</p>
---	--	---	--	---

138:25 141:10 142:13 185:2 187:10 195:17 smell 68:2 Smyth 167:22 209:9 social 2:7 35:15,17 35:23 127:13 149:4 164:5,22 173:18 179:6 society 157:19 163:5 204:19 Sodor 204:1 soft 159:21 solicitor 51:23 59:16 76:1 102:6 solicitors 34:20 50:9,17 51:8 61:18 70:13 76:3 85:17 solution 135:22 138:12 139:19 190:12 solve 102:7 somebody 36:24 41:22 50:11 68:15 74:14 78:20 81:19 82:13 90:5 101:23 102:3 105:19 118:14 143:21 144:1 146:13 148:2,4 150:17 151:5 156:12 159:9 162:22 165:3 172:16 176:10 someone's 66:20 somewhat 152:22 song 183:22 Sonning 126:10 soon 74:2 112:16 129:24 sorrow 108:10 sorry 28:25 51:3,7 54:24 68:16 69:5	80:14 87:24 103:2 103:6 172:17 sort 15:6 19:22 20:12 25:21 26:5 33:3 38:19 39:9 49:6,7 50:10 51:5 53:2 58:9 60:12 62:4 72:5,19 83:20,25 86:23 98:1 101:7 117:9 128:13 132:16 133:1 142:22 146:19 149:9 152:21 155:4 157:8 163:12 165:12 168:19 175:6 177:1,3 179:22 183:12 186:21 190:22 195:18 205:6 208:5,21 sorting 151:22 sorts 51:25 55:8 58:12,25 59:17 65:2 76:7 79:6 81:6 92:12 136:19 142:8 156:9 159:25 204:17,19 sought 24:25 94:19 99:6 183:4 198:3 198:7 sound 185:7 sounds 113:24 176:12 202:12 source 8:21 13:22 108:18 space 145:4 Spaces 175:17,23 176:4 sparingly 70:20 73:22,24 76:15 spat 110:15 speak 6:14,25 7:2 11:19 18:1 27:2 28:21 35:14 61:10	90:6 96:12 103:9 114:21 175:20 180:6 196:5 198:7 speaking 36:24 75:13 197:12 special 162:1 specialist 51:11 52:5,8 54:25 76:9 77:11,18 83:23 specialists 77:14 80:24 174:1 specific 17:20 20:17 24:24 65:3 66:7,23 67:23 68:1 79:14 89:5 192:17 specifically 3:5,15 4:18 9:17 15:11 15:14 16:17 18:12 21:19 28:15 34:17 110:11 specify 121:20 speech 21:12 spend 178:5 spent 9:21 36:24 41:10 125:20 150:19 spiritual 138:21,22 151:19 158:24 163:16 164:3,12 191:2 spiritually 157:14 159:1 spoke 4:1,5 5:7 170:10 spoken 6:18 35:1,3 35:18 36:5 102:1 spokeswoman 33:13 spot 180:23 staff 14:1 85:3 143:18 173:13 208:8 stage 56:24 60:13 79:8 80:19 107:24	138:8 153:8 157:4 stages 51:5 139:22 176:6 195:15 stagger 166:6 stakeholders 84:21 stamped 66:17 stand 110:9 123:12 161:8 standard 15:18 40:6 83:18 111:14 111:18,20 128:8 162:2 standards 13:15,15 13:16 17:6 20:18 20:19,23 31:12 35:22 39:19,21,23 40:3,15,20 161:23 178:18,25 179:7 179:18 182:8,9,11 186:23,24 187:17 start 1:24 80:4 129:22 164:9 169:12 187:10 210:2 started 33:15 43:17 58:17 starting 38:7 175:20 187:23 starts 33:7 120:10 120:16 139:15 189:12 state 22:11 161:3 stated 5:19 6:4,4 12:24 13:13 statement 1:13,15 1:16,17,20 3:10 9:1 12:2,8 13:20 33:11,23 34:15 37:13,23 44:7 53:5 70:3 74:3,5 91:23,25 97:6 111:1 123:18 124:7,13,18 125:19 131:13 132:3,6 133:13,17	133:21 134:16 139:18 141:19 143:12 145:23 147:1,11 149:18 152:23 159:13 162:8 163:7 170:13 173:2 174:8,19 178:15 203:11,15 205:16 statements 36:2 37:1 42:8 44:3,16 44:21 52:19 124:5 132:14 134:11 153:17 170:9 states 151:2 198:20 statistical 54:10 185:16 statistics 53:6 73:11 status 32:24 128:7 statutory 26:3 42:2 166:23 180:15,16 180:17 189:18,25 190:20 Steering 127:1 205:21 step 31:1 49:23 56:24 96:5 97:11 Stephen 152:20,24 153:3 154:3 steps 31:18 87:20 stewardship 127:9 stick 18:4 Sticking 18:14 sticky 184:6 stirred 160:18 stop 44:12 102:20 102:20 155:8 170:3 stopped 8:5 storage 57:6 stored 25:1,15 stories 156:18 story 145:7 148:16 154:8
---	--	---	---	--

<p>straight 35:24 37:9 98:4 99:14 108:21</p> <p>straightforward 117:6</p> <p>strange 81:1,3</p> <p>strategic 80:8</p> <p>stress 59:5 204:24</p> <p>strict 49:9</p> <p>strike 137:8</p> <p>strive 53:2</p> <p>strong 32:25 41:8 88:19 206:16</p> <p>stronger 24:5 80:8</p> <p>strongly 7:10 14:24 21:24 30:11</p> <p>struck 35:20 154:16,19</p> <p>structural 14:8 133:3 161:14</p> <p>structurally 144:5</p> <p>structure 13:12,21 14:15 15:15 16:11 16:15 17:15 18:21 19:10 24:11,23 25:2 29:4 30:8,13 114:24 118:2,23 173:1,9,20 186:7</p> <p>structures 32:15,24</p> <p>studied 28:17</p> <p>studying 140:8</p> <p>stuff 148:19 185:13</p> <p>Sturm 97:25</p> <p>sub 196:5</p> <p>subject 11:14,23 13:3 14:4 25:6 35:19 57:7 99:18 110:23 181:1 197:24</p> <p>subjected 167:23 199:24</p> <p>subjects 192:13</p> <p>submission 200:1</p> <p>submit 201:5,13</p> <p>subsequent 90:9</p> <p>subsequently</p>	<p>151:14 196:19 198:10 205:1</p> <p>subsidiary 45:6</p> <p>substance 120:1 200:7 201:22,24 202:5</p> <p>substantial 176:18</p> <p>substantive 209:13</p> <p>success 195:16</p> <p>successor 183:19 183:21</p> <p>suffered 22:18 78:21 114:16</p> <p>suffering 37:8 152:14 175:10</p> <p>sufficient 37:2</p> <p>sufficiently 182:2</p> <p>suffragan 124:24</p> <p>suggest 114:10 145:24 148:25 194:13,16</p> <p>suggested 189:11</p> <p>suggestion 191:1</p> <p>suggests 103:21 113:23 151:1</p> <p>suitability 83:12 128:21</p> <p>summarise 5:2</p> <p>summarised 33:9</p> <p>summary 26:17 94:16 97:18 199:15 200:15</p> <p>Sunday 36:4</p> <p>superior 19:15 39:25</p> <p>supervision 126:6</p> <p>supplied 119:21 199:21</p> <p>supply 180:7</p> <p>Supplying 30:23</p> <p>support 4:14,25 6:2 7:21 8:7,11 9:11 11:1 21:7,21,22 22:17 25:22 32:24 36:25 48:16 51:2</p>	<p>52:17 60:14 61:6 62:22 63:9,9,21 63:22 79:15 82:19 82:23 83:1,20,20 84:1,2,2 88:16 94:22 98:13,16 99:17 102:15,21 103:14,23,24 104:13 107:4,9 109:16 110:4,13 114:2 116:13 120:8 131:5 150:15,18 164:12 164:12 174:17 181:10 182:16,21 188:17 189:20</p> <p>supported 30:9 199:11</p> <p>supporter 41:9 88:19</p> <p>supporting 31:25 195:8</p> <p>supportive 65:6 150:20</p> <p>supports 61:22</p> <p>suppose 64:10 106:2 143:4,19 161:10</p> <p>supposed 152:2 156:12</p> <p>sure 1:11 23:14 38:2 44:20 52:25 88:5 93:3 107:24 109:7,23 116:19 125:22 142:4 152:5 179:9 192:22 193:8 195:20</p> <p>surely 165:9 191:8</p> <p>surprised 28:9 135:3</p> <p>surprising 151:4</p> <p>surrounded 151:6</p> <p>surrounding 109:5</p> <p>survival 183:24</p>	<p>survivor 11:1,3 33:15 34:5,20 78:14 90:21 94:22 106:1 121:10 146:12 150:21 152:14 174:9 177:23 178:24</p> <p>survivor's 34:21 91:14</p> <p>survivors 7:17 21:25 26:14,21,23 27:1,10,12 33:17 34:2,12 37:15 38:9 70:12 73:5 76:18 78:9 82:20 83:11 85:1 86:18 89:10 98:10,18 105:22 107:4,13 108:25 111:22 114:4,19 133:18 138:1 139:3 145:21,25 146:2 146:19 148:14 162:18 163:9 166:19 173:13 174:4,15,17,24,24 176:5,7,8,12,17 176:23 179:16 188:18 204:21 207:18 209:10</p> <p>survivors' 163:19</p> <p>suspect 45:2 74:6 75:8 95:12 141:7 168:23 186:20</p> <p>suspend 189:18 190:14,18</p> <p>suspended 196:7 196:19</p> <p>suspension 34:21 196:10</p> <p>suspicion 139:3</p> <p>sustained 78:6</p> <p>swan 183:22</p> <p>sweetness 104:3</p> <p>swimming 158:25</p>	<p>Switalskis 70:13 101:11 207:18</p> <p>switching 21:6</p> <p>sworn 1:7,8 43:22 62:12 123:10 169:21 210:13,19 210:25 211:6</p> <p>sybiotic 88:7</p> <p>sympathy 37:20</p> <p>symptom 81:10</p> <p>Synod 158:5</p> <p>system 31:14 77:2,3 79:22 80:16 81:11 87:1 111:18 114:14 116:18 128:6 129:7,11 132:10 137:14 138:11,14 140:12 142:9 146:3,14,15 146:15,16,18 151:12 161:7 170:24 173:19 181:25</p> <p>systematic 141:17</p>
T				
<p>tab 1:14 3:10 5:9 16:2 22:24 29:7 33:7,20,20 34:14 44:17 55:9 63:1 74:10 84:7 97:12 105:13 106:10,12 110:4 118:9 124:9 137:15 150:9 152:23 189:1,3 205:19</p> <p>table 87:3</p> <p>take 11:23 18:3 24:20,20 31:13,19 32:12 33:5 37:12 41:22 42:2,22 43:17,18,19 44:9 46:16 48:19,23 49:2,6,23 50:24 56:24 58:5 60:17</p>				

60:17 62:5,25 63:2 64:14 65:16 69:2 74:9 75:22 75:23 84:6,8 85:6 95:10 99:4 101:1 101:13,20 103:4 108:12 109:18 110:8 117:15 124:11 141:1 143:22 149:19 150:24 153:12 158:2,9 171:20 175:16 176:10 183:23 185:18 189:11 193:5 198:1 203:4,10 207:23 taken 20:6 21:4 31:1 36:19 64:8 78:21 83:16 100:14 104:25 134:15 136:15 148:17,18 161:16 175:21 177:3 182:4 205:3 takes 117:21 139:8 176:19 talk 12:3 41:24 47:19 64:17 66:12 70:19 90:20 94:24 100:19 126:17 138:7 145:16 158:6,7,11,11 160:24 175:24 204:12 talked 21:7 24:2 36:7 42:13 90:24 116:6 139:1 176:20 191:11 195:3 200:19 205:10 talking 8:3 9:22 32:2 41:25 54:20 77:13 80:23 82:3 116:15 117:16	165:20 178:14 187:4 188:13,13 188:14,16 192:7 talks 85:12 94:23 tapped 27:19 task 107:5 174:12 175:13 tasks 172:21 173:24 taxing 148:9 teacher 165:18 teachers' 140:5 teaching 125:25 139:23 team 4:11 16:12 17:11 18:7,12 20:14 25:10 51:10 51:11 52:5,6,8 54:25 60:3 67:11 90:20 171:17 172:4 173:9,13,22 175:3,15 181:13 183:13 189:21 192:18 197:3 199:4 Team's 173:1 technical 107:5 Technically 108:5 Telegraph 154:9 telephone 4:20 80:20 101:19 166:22 tell 2:22 9:3 52:9 58:21,23 68:16 73:13 130:12 133:23 134:6 145:7 148:3,4,5,7 162:10 171:14 178:19 196:8 199:16 telling 58:18 104:12 122:16 168:20 template 25:25 26:5	ten 144:22 145:10 202:17 206:13 tend 24:18 42:24 160:11 180:9 tended 13:22 tendency 156:6 tends 24:22 147:5 tension 22:7 term 72:6 termed 16:12 158:24 terminology 19:23 terms 2:22,23 3:1 3:11,14,20 8:3 14:18,24 15:17,20 19:16 20:21 25:24 27:16,25 28:2,25 46:15,15 49:22 51:17 58:13,17 60:22 66:23 71:25 73:4 76:14 78:24 82:19 87:11 93:3 94:1 110:18 112:11,14 114:7 116:11,14 122:15 128:24 133:8 136:20 139:2 140:9 142:11,18 146:17 151:22 160:3 172:18 182:14,23 183:19 188:19 192:20 193:22 196:11 209:11 territories 15:20 116:2 test 44:2 123:17 170:2 testing 199:24 tests 137:16 thank 1:10 40:23 42:6,8 43:11,11 44:8,24 45:21 46:10 49:12 62:13 79:21 80:14 102:1	105:10 106:15 116:20 117:2,13 117:23 118:24 121:16 122:22,23 122:23 123:3,4 124:17 168:21,22 169:6,6,8,15,23 193:17,19 204:3 209:17,21,23,23 210:4,5 theme 15:6 18:4,14 21:8 themes 16:1 21:6 theology 158:19 theoretically 147:2 theory 155:11 thereabouts 8:12 they'd 58:22 thing 61:9 89:2 104:15 117:25 118:25 120:18 131:6 133:1,21 136:2 140:20 167:24 168:8 175:6,7 184:12 185:9,22,24 192:21 196:12 207:11 things 4:12 11:6 38:23 39:9 47:16 52:23 57:10,13 60:19 67:15,24 68:1 71:5 74:6 80:18 81:11 83:25 89:4 99:11,12 105:2 110:20 111:2,10 118:5 125:3 131:12 139:12 141:2 147:12 150:24 151:19 157:13 159:25 160:7,8,15 161:18 163:8 165:4,22 166:3 167:2 168:19	173:17 175:23 176:10 178:12,22 179:13 180:3,23 182:21 183:8,15 183:17,18 184:3,4 186:17 187:4 190:18 191:11,15 192:2 193:3,9,22 194:8,15,16,19 202:2 206:4 207:18 think 3:2 8:15 9:15 10:3,18 11:11 13:19 15:11 17:12 18:10,15,24 19:4 20:16 22:4 26:9 26:20,22,25 27:14 29:9 32:9,11 35:5 36:5,11,14 37:1 38:4 41:1,8 42:9 43:19 44:3 46:14 46:19 47:7,16 48:21 49:19 50:20 50:20,22 51:4,4 52:1,7 53:6 54:5 56:5,12,22 58:11 59:3,14 60:5 61:11,14 62:3 63:23 65:1,21,22 66:5 69:11 70:2,3 70:5,7,8 72:6,24 73:8,11 74:1,4 75:4 76:8,10 77:3 77:12 78:17,22 79:25 81:9,10 82:17 85:20 86:8 86:25 89:25 90:8 90:10,13,22 91:6 91:15 92:4 93:11 93:25 94:4 95:4,6 95:11,21 96:22,23 97:2,4,16,20 98:5 98:8,15,20,21,24 99:9,12,14,17 100:5 101:11
---	--	---	---	--

103:1 104:14	178:25 180:23	178:5,7 206:3,21	40:3 45:1 67:6,23	training 73:3 126:5
105:20 108:1	181:2,6,7,16,20	three-month 3:8	105:20,22 127:15	126:5,24 130:25
109:10,16 110:5,7	181:22,22 182:6	three-year 180:6	151:2	131:6,15,15,18,20
110:8,9,22 111:16	182:10,25 183:11	threshold 180:17	timescale 31:17	131:22 132:21
111:19 112:11	183:14,21,24	thrown 132:15	timescales 31:4	141:1,17 156:6,6
113:14,22 115:24	184:20,21,23	thrust 23:10 34:1	32:4	157:2 174:3
115:25 118:2,7	185:1,17,19,23,24	35:6	timetable 79:10	185:21 192:13
119:2,11 120:12	186:7 187:3,7,16	tier 173:24	tin 202:24	transcript 196:16
121:5,12,13,22	187:19,21 188:10	Tilby 4:6,23 178:16	tiny 53:3 185:3	transferring
122:19,20,21	188:19 190:9,11	179:24	titles 40:11	127:23
123:24 127:15	190:13,14,15,21	Tim 150:2,6	today 1:6,22 2:15	translating 200:15
128:23 129:4	190:24 191:9,22	time 3:4 4:4 6:22	21:8 29:22 30:14	transmit 88:3
132:9,18,22 133:3	191:23 192:15	9:21 11:17,18	57:19 97:7 144:17	transparent 84:25
133:4,5,18 134:21	193:12,17,20,21	12:10,14 18:1	193:5	104:18
135:2 136:21	193:24 194:1,11	20:5,7 23:6,18	today's 210:1	trauma 87:17
137:3,4,5,14	194:22 195:15,16	25:19 26:8,19	told 5:4,15 68:23	traumatic 76:22
138:4,15,16	197:19 198:16	36:5,24 40:6	100:9 129:20,23	87:11 89:11
139:17,23 140:11	200:11 202:23	43:15,17 44:9	130:1 145:14	traumatising 33:25
140:18 142:20	203:25 205:25	48:1,6,10,15,25	156:14 158:8	105:24
143:24,25 145:1	207:3,22 210:2	50:25 52:14 54:9	159:19 200:16	travel 24:23
145:12 146:16,22	thinking 41:16	57:3,25 58:1 60:4	203:2	travelator 148:15
147:13,14,18	98:11,13 142:9	62:22 65:14 67:17	tomorrow 202:16	tread 196:21
148:1,3,5,9,11,21	155:3 173:11	71:13,14 75:12	210:2	treat 38:9
149:10,18,19	174:7 176:21	90:19 94:5 101:4	top 12:7 25:4 59:4	treatment 64:22
151:7,13,15,24	181:11 186:9	101:24 105:1	87:22 98:2 141:19	tremendous 129:3
152:7,21 154:10	thinks 134:14	106:6 112:4 117:4	183:14,18	trend 180:6
155:11 156:5,24	third 29:20 30:15	122:6 123:1,18,22	topics 26:6 52:22	trends 180:2,9
157:1,6,10,10,11	51:15 53:5 85:13	126:4 127:10,25	52:24	trial 69:23 70:14
157:25 158:4,13	108:13 185:24	129:3,7 131:5,23	tort 78:13	71:2,6 72:10
158:19,23 159:21	Thirdly 44:12	132:22 136:15	total 28:17	75:10
159:25 160:9,22	Thornton 150:2,6	141:11 142:25	totality 207:16	tribal 168:14
161:5,5,16 162:11	thorough 85:18	143:24 145:6	totally 43:2	tribunal 135:17,18
162:11,18,24	122:2	152:13 153:22	touch 25:3	136:4 139:15
164:24,25 165:5	thought 12:10	154:5 164:16	touched 24:11 41:4	203:8
165:14,17,17,20	31:18 39:7 129:9	169:25 170:4	tour 33:6	tribunals 140:8
165:21,23 166:2	167:1 206:10	171:7,20 175:22	towel 201:2	200:1 201:6,9
166:16 167:2,16	thousands 47:11,11	178:4 180:10	Tower 174:16	tried 201:2
167:17,25 168:1,3	115:1	183:22 184:12	track 51:3,4 180:2	triggered 115:5
168:4,12,15,16	thrash 104:2	186:13 190:9	trading 86:20	trouble 136:1
172:3,12 173:17	thrashed 103:12	193:4 194:1 195:3	traditional 89:23	146:10
173:23,25 174:7,8	three 3:4 31:16	198:18,22 199:25	Traditionally 67:4	true 1:17 44:21
174:11,20,22	44:3,15 69:13	201:7,11 202:13	traffic 79:12	109:4 124:15
175:5,9,23,24	104:10 106:10	205:1 206:1	trailing 177:23	128:17 151:5
176:2,15,24 177:1	109:19 127:14	times 7:19 19:12	train 148:19	170:15 194:22
177:12,14 178:12	163:21 170:7	20:10 33:9,21	trained 140:15	205:4

<p>trust 45:8,8,13,15 51:24 126:14 trustee 142:19 truth 1:16 71:23 72:19 106:3 168:15 try 31:23 77:5 79:9 80:2 86:6,22 87:3 92:6 95:6 102:7 103:9 117:4 118:11 145:4,18 151:11 155:8 156:22 176:3 178:9 180:12 182:24 189:8 trying 22:5,6 23:1 50:25 62:3 65:25 77:14 78:5 80:7 80:15,20 81:12,24 88:2 89:20,21,22 91:17,18 98:16 109:6 116:17 134:18 164:15 Tuesday 1:1 tune 162:13 turn 5:9 6:11 12:2 18:4 143:10 149:15 turned 3:8 twice 131:20 139:8 141:12 two 6:19 8:11 9:6 18:23 23:19 30:22 37:10 42:6 75:22 77:23 93:5 102:2 103:12 117:11 119:2 129:12 130:7 160:4 163:21 170:9 173:6,12 174:6 178:5 180:24 192:2,13 194:23 195:24,25 198:6 206:6 207:18 two-tier 114:4,11</p>	<p>type 68:7 93:5 115:9 types 51:11 52:11 57:24 58:16 71:9 81:11 typically 83:25</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>UK 46:1 ultimate 42:19 89:15 188:2 ultimately 6:11 7:12 11:20 20:2 20:16 25:14 36:22 45:8 50:8 68:21 69:22 70:23 71:15 75:9 76:10 88:8 98:25 109:18 122:4 149:24 190:2 umbrella 47:13 unable 22:9 unacceptable 21:1 138:25 142:21 uncertain 64:13 uncertainty 64:14 unchallenged 199:12 und 98:1 undercurrent 108:11 underestimate 76:10 undergo 177:5 underlying 100:17 173:20 178:9 underpinned 39:19 understand 15:7 45:23 53:18 55:5 55:15 56:6 58:3 73:13 78:10 86:20 87:18 93:12,21 94:10 105:16 109:18 111:14 114:9 116:14,16</p>	<p>123:13 125:8,13 126:12 129:17,19 144:17 147:3 150:2 153:21 154:20 155:15,22 156:23 161:20 162:3 171:6 172:14 177:7,9 178:15 182:20 185:8,12 191:24 199:13 201:2,23 202:15 206:23 understandably 153:13 understanding 4:25 19:18 25:17 25:18 37:20 39:10 39:15,24 40:9 57:14 67:14 75:19 76:4 87:17 111:12 117:4 151:13 153:10 154:2 155:16,17 177:11 186:22 understands 79:4 understood 28:3 93:4 147:2 155:6 undertake 46:23 undertaken 13:25 18:11 131:14 162:10 191:4 undertook 2:16 8:23 undue 157:17,18 unenforceable 91:12 unequal 155:25 unfortunately 34:5 87:13 unhappy 97:11 101:16 151:8 173:19 unhealthy 160:1,3 unhelpful 63:16 93:15</p>	<p>uninsured 92:2,21 unintended 153:18 Union 186:11 204:18 universal 31:12 University 126:1 unpack 188:11,22 unpleasant 7:15 unravelling 133:22 unrealistic 165:21 unreasonable 175:9 unresponsive 175:2 unsatisfactory 166:8 unsuitable 195:20 unsure 64:17 untrue 34:5 106:1 unusual 23:16,18 23:21 72:11 87:6 160:14 167:19 up-to-date 53:7 updated 65:5 203:22 upfront 77:15 upset 76:18 101:16 upstairs 135:17 use 9:12 51:14,16 59:16,18 70:15,17 70:18,20,21,25 73:22,24,24 74:25 75:4 76:9,15,19 80:24 81:9 91:21 93:24 95:23 96:9 96:14 113:21 142:14 159:22 172:17 useful 133:24 194:4 201:4 usual 43:17 usually 50:11 79:5 85:15,17 86:15 124:3 125:1 129:2 157:21 178:7</p>	<p style="text-align: center;">V</p> <hr/> <p>vacancies 141:11 vague 69:5 valuable 26:23 27:5 value 36:19 50:25 82:9,16 83:16,18 94:7 159:6 168:13 valued 22:2 26:11 valueless 82:14 various 15:20 19:11,12 57:10,13 58:9 77:13 84:3 99:21 114:18 131:8 163:8 173:8 179:13 198:2 203:21 205:9 varying 183:10 vast 46:22 51:9 54:15 59:16 65:18 79:20 verbal/sexual 59:6 version 109:25 131:21 194:9 203:22 vetting 170:24 vicar 156:7 165:3 vicarious 70:23 vicariously 68:25 78:7 victim 78:14 89:14 89:22 90:21 91:13 121:10 136:5 149:13 199:10 victim/survivor 50:21 72:13 77:9 81:17 82:23 83:22 87:7 113:2 121:13 victims 34:12 67:24 70:12 73:4 76:18 78:9 82:20 83:11 85:1 86:18 89:10 98:10,18 103:15 103:18 111:21 114:4,19 138:1 153:2 166:18</p>
--	---	---	--	---

<p>179:16 188:17 204:20 207:18 Victor 111:6 Victorian 125:15 view 7:14 14:4 16:4 23:5 27:7 30:19 42:18 48:20,24 49:3 68:21 92:4 111:1 112:8,9,15 112:22,25 135:22 139:17 142:5 147:25 167:10 172:1 175:13 179:5 182:2 187:25 188:9,10 192:11 193:1 197:4 199:22 204:9 205:22 viewed 16:10 27:10 30:24 views 9:3 11:21 112:11 114:7 127:22 128:25 143:10 159:24 178:3 192:18 206:16 vision 181:6 visit 146:10 visitors 146:7 voice 1:11 109:7 voided 56:10 60:23 61:3 volume 55:10,11 57:25 110:7 150:11 189:5 voluntary 141:24 volunteer 208:8 volunteers 203:21 208:4 vote 192:25 vulnerability 32:22 vulnerable 15:23 163:4 185:5 206:20</p>	<p style="text-align: center;">W</p> <hr/> <p>Waddington 160:20 wait 80:15 116:21 166:12 209:19 waive 100:12 105:7 waived 100:21 waiving 99:21 106:5,6 Wales 47:4,9 48:21 54:8,11,13 want 6:2 8:13 12:3 16:6 18:4 20:2 23:25 33:5 37:10 37:12 41:6 50:13 51:24,24 77:9 80:5 102:18 118:11,17 120:17 132:13 147:22 155:18 168:23 183:18,18 184:10 188:10 194:7 203:4 206:3,10 wanted 20:8 119:25 121:3 144:25 158:7 183:12 wanting 116:7 158:15 196:21 wants 81:17 91:5 98:3 121:10 wasn't 8:12 11:24 13:11 28:10 29:14 38:2 90:17 92:1 109:22 125:22 130:1,3 152:3 153:22 189:6 206:15 water 91:12 wavelength 176:22 way 12:12,17 13:13 14:9,22 17:20 21:16 22:18 27:10 27:11,18 31:5,9 39:1 41:16 50:2 59:8 63:21 68:1,2</p>	<p>82:18 88:4 96:7 96:17 98:1 104:5 107:7,13 109:12 115:20 127:22 129:15 130:9,14 130:19 134:8 135:9 137:11 138:7,20,23 139:20 141:2 142:23,24 143:4 144:4,4 145:8 146:23 147:23,25 149:12 152:12,21 155:1,18 156:10 156:13 160:15 161:5 163:11,12 165:1,5 166:5,7,8 174:2 175:18 177:4 180:19 182:18,18 184:23 187:5,24 189:3 191:17 196:22 208:22 ways 27:3 37:24 38:6 106:21 147:10 164:20 182:6 we're 15:5 49:10 56:22 62:3 64:16 82:1 89:14 116:15 165:20 187:10 we've 61:4,5 110:20 112:15 115:24 184:17,18 web 159:8,8 web-based 195:1 website 1:22 97:12 97:15 99:8 194:11 Wednesday 210:8 week 8:18 weeks 8:11 77:19 185:11 weirdly 88:7 Welby 28:14 welcome 1:3 74:2</p>	<p>welcomed 28:12 82:9 194:12,24 welcoming 185:4 welfare 9:18 10:5,7 10:14 well-being 114:16 went 70:14 128:4 130:8 199:12 weren't 27:17,18 94:11 113:2 158:6 164:15 178:6 Westminster 176:11 wet 201:2 whatsoever 44:13 193:24 whichever 124:1 whilst 44:25 84:4 107:5 125:20 134:17 190:5 191:3 199:18 202:22 whistle 159:11 whistleblowing 132:12 whistlestop 33:6 Whitsey 111:6 who've 192:12 whole-church 186:1 204:12,20 wholly 130:21 161:2 widely 28:10 wider 70:22 84:18 widespread 139:3 wife 171:7 194:4 willing 100:12 145:16 willingness 7:24 Wilson 123:9,10 124:7 182:3 188:4 210:25 win 163:4 Winchester 185:15 204:1</p>	<p>winding 160:21 window 8:11 wisdom 26:13 27:1 wish 40:8 123:13 153:13 178:21 wished 3:18 5:21 wishes 200:25 withdraw 99:16 109:16 withdrawal 4:13 4:25 6:2 7:20 94:21 120:8 withdrawn 8:16 withdrew 122:25 169:9 209:25 witness 1:6,6,13,17 1:20 3:10 12:2,8 13:20 37:13 38:10 43:13 44:3,7,15 44:21 53:5 70:3 97:6 110:25 122:25 123:18 124:5,7,13,18 125:18 131:13 132:3,6 133:13,17 133:20 134:11,15 139:18 141:19 143:12 145:23 146:25 147:11 149:18 152:23 159:12 162:8 163:7 169:9 170:9 170:13 173:2 174:8,19 178:15 202:14 203:11,15 205:16 209:25 witness's 9:1 witnesses 66:4 132:12 134:18 wonder 119:8 wondered 121:3 wondering 118:18 166:7 woolly 185:7 word 8:14 44:5</p>
---	--	--	--	--

159:21 172:17 wording 48:3 words 11:22 17:21 48:9 49:6,25 79:5 106:18 120:10 128:4 147:6 150:16 151:19 183:6 185:7 Wordsworth 103:13 work 15:17 28:24 28:25 29:5 35:12 35:15,25 37:15 46:22 50:5 54:22 60:7 66:10,12 68:10 76:11 77:12 78:23 80:1,7 81:5 82:18 89:20 94:15 103:11 107:2 126:21 128:11,15 132:24 134:11 136:9 144:4,6 146:5 151:17 155:1 156:21 162:9,11 164:22 170:25 172:6 173:12,21 174:3,4 178:14,18,21 179:1 183:24 184:8 205:23 worked 6:23 38:18 73:1 115:20,21 163:19 192:1 worker 2:7 4:10 29:14 workers 142:12 164:5,22 working 7:17 11:1 14:14 24:16 32:16 41:11,11 52:15 79:16 81:12 115:25 135:9 144:22 150:19 174:15 195:9 200:20	workings 132:7 workload 25:19 works 126:17 134:9 139:24 workshops 126:5 world 14:18 15:21 31:22 38:17 115:17 126:15 131:7 161:17 worry 44:13 worship 136:24 worth 36:18 143:1 190:21 wouldn't 52:2 60:4 61:9 75:20 92:5 106:6,14 108:5 112:17 114:11 137:10 139:10 143:23 154:20 158:9 173:3,10 193:8 200:14 208:13,14 wrestled 31:22 write 23:15 82:7 144:20 196:10 writing 50:12 144:18 150:13 182:12 written 14:19 15:7 81:20 95:14 96:17 99:1 120:11 144:14 150:4 153:23 174:19 wrong 95:5 99:1 127:7 133:11 139:25 154:3 157:13,13 159:10 162:21,24 163:12 165:4 180:3,23 182:18 191:15 wrongdoing 65:19 159:10 wrote 38:3 103:8 105:20 108:9 144:16 174:7	176:11 196:8 197:16 <hr/> X <hr/> X 210:11 <hr/> Y <hr/> Yates 193:18 Yeah 94:15 year 31:11 34:15 68:17 74:18 104:21,25 105:10 127:16 129:15,24 165:18 171:15 180:8 191:11 195:25 202:2 years 2:2,8 23:4 47:23,24 52:11 55:5 59:7 61:25 65:19,22,23 69:13 71:6 94:3 102:2 103:12 104:10 109:6 112:13,13 117:11,16 121:25 128:6 129:3,12 130:7 134:17 144:22 145:10 146:21 149:21 154:1 156:5 157:4 167:25 170:20 175:9,19 176:13 178:5,7 185:14,19 197:2 199:12 206:13 yen 132:21 yesterday 4:13 11:6 21:11 23:2 26:12 45:11 46:24 72:20 73:15 101:9 107:16 119:11,17 146:20 York 200:4 201:14 201:14 young 156:1 youth 142:11	<hr/> Z <hr/> zoom 16:7 31:5 <hr/> 0 <hr/> 0.3 75:5,7 0.4 47:1 002 97:23 002/003 106:12 004 108:13 005 199:5 007 56:25 026 205:17 <hr/> 1 <hr/> 1 64:1 198:2 206:6 210:13,15 1.09 123:5 10 18:5 26:5 202:14 10-40 65:19 10.00 1:2 210:2,8 100 125:10 11 18:5 11.05 43:15 11.30 43:18,20 44:10 62:7,14 11.45 62:10 11.48 62:16 117 210:23 12 18:14 26:6 33:7 54:15 176:3 201:9 123 210:25 211:2 13 33:20 53:5 106:10,12 153:15 14 22:24 35:1,3 54:10,12 119:4 125:18 152:12,13 14/1/15 101:2 15 22:24 25:3 29:10 133:17 16 34:14 74:15 97:3 97:5 104:23 118:9 166 211:4 169 211:6,8 18 117:11 1844 125:15	1950s 112:2 1963 140:19 1972 68:4,4 1974 198:22 1979 125:20 1989 125:20 1997 55:16,20 57:1 67:14 <hr/> 2 <hr/> 2 1:1,3 9:1 29:7,20 205:15,23 206:3 206:18 2.00 123:3 2.08 123:7 20 47:23 65:22,23 71:5 112:13 170:20 20,000 165:13 200 75:21 125:9 165:18 2000 57:13 2003 124:20 127:3 127:25 130:24 131:22 136:18 2005 104:25 2006 64:1 153:24 153:25 2007 64:25 152:21 153:23 2007/2008 154:15 2008 203:19 204:8 2009 58:3 60:23 62:19 198:23 206:9,11 2010 127:3 2012 63:1 69:8,20 104:25 2014 5:17 2015 2:16 3:2 33:19 65:5 104:19 2016 29:10 80:4 84:7,9 130:25 131:22 154:10 197:7 200:20
--	---	---	--	--

<p>2017 34:15 118:4 118:18 119:4 129:24 177:13 198:12 2018 53:12 110:1 2019 1:1,15 70:15 170:12 199:10 210:8 22 102:9 23 203:14 25 5:13 26 16:8 27 145:23 28 21:9 77:21 94:18 289 125:9 29 21:9 94:21 149:17 173:6</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 30:6 37:14 85:6 110:7 189:5 193:12 197:19 198:13 210:8 3.09 169:16 3.15 123:21 3.20 169:14 3.26 169:18 30 47:23 71:6 77:20 77:22 94:21 167:25 173:6 30-odd 129:14 300 75:21 33 22:5 149:17 34 125:3 35 101:1,1 37 53:21 101:10 177:14 38 101:10</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 5:14 30:14 36:4 58:5 65:17 70:2,4 70:6 110:8,10 189:12 197:19 198:18 204:11</p>	<p>4.32 210:6 40 47:24 121:25 157:4 160:11 185:14 42 140:2 161:21 177:14 210:17 43 210:19,21 45 2:2 18:6 199:12</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 1:15 5:14 9:2 12:2 12:7 13:19,20 55:25 105:13 204:11 50 36:7 112:13 132:5 52 132:6 53 101:13 143:12 143:13 55 18:15 56 101:20 59 146:25</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 31:4 37:13 74:10 204:11 60 103:4 145:12 64(ii) 95:10 645 189:8 193:15 647 189:8 68 147:10</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 125:18 204:11 72 162:7 74 203:10,16 78 163:7 79 205:16</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 204:11 81 163:7 164:17 85 133:13 86 133:23 87 137:13</p>	<p style="text-align: center;">9</p> <hr/> <p>9 21:6 22:6 94:20 90 65:23 92 139:18 173:2,4 93 141:18 94 173:2,4 95 50:21</p>		
---	---	--	--	--