

INDEPENDENT INQUIRY INTO CHILD SEXUAL ABUSE

**INVESTIGATION INTO INSTITUTIONAL RESPONSES TO CHILD SEXUAL ABUSE
INVOLVING THE LATE LORD JANNER OF BRAUNSTONE QC**

**SUBMISSIONS ADVANCED BY AFFINITY LAW ON BEHALF OF TRACEY TAYLOR,
TIMOTHY BETTERIDGE, [JA-A21] AND [JA-A14]
IN RESPONSE TO 'NOTE FOR THE PRELIMINARY HEARING ON 24 SEPTEMBER
2019' AND SUBMISSIONS OF COUNSEL TO THE INQUIRY DATED 2 SEPTEMBER
2019**

1. Tracey Taylor, Timothy Betteridge, [JA-A21] and [JA-A14] are represented by the same counsel as [JA-A41], whose solicitors are Howe & Co.
2. Affinity Law have seen the submissions drafted by Howe & Co and Counsel on behalf of [JA-A41] and fully support those submissions
3. Affinity Law will request that they are served with Rule 9 statement requests as their clients, some of whom have health concerns, are anxious that their statements are placed before the Inquiry as soon as possible.

4. We have taken Instructions from our Core Participant clients in relation to the proposals for further delays in this investigation and the suggestion raised by Counsel to the Investigation in his submissions at paragraph 39 to the effect that unless the CPS takes a decision by early 2020 not to bring any charges, then there will be considerable uncertainty as to when any future hearings in this Investigation could possibly be held.
5. We further note the references in italics at paragraph 36.4.1: *'If the Chair decides that the Investigation is to continue'*.
6. Our clients are deeply concerned at these developments and have asked us to put forward their comments.
7. Tracey Taylor states that she has been waiting for closure since she was aged 14 years in relation to the abuse that she suffered as a child. She says that it would disgust her if the IICSA Investigation, which in which she has placed her hopes for closure, were to stop now. She says that the Investigation will enable her to free herself of a burden that she has been carrying since childhood.
8. [JA-A21] also told us that he cannot have treatment for Post- Traumatic Stress Disorder until the conclusion of the Investigation because only then will he have the necessary closure, which will enable him to respond to that treatment. [JA-A21] has a number of physical conditions which he believes are linked to the ongoing trauma concerning the abuse that he suffered as a child and the inability of any agency to protect him at the time. He struggles to form and maintain relationships with certain types of person. [JA-A21] has placed his hopes for the resolution of his physical symptoms in the Inquiry process. He says that the lives of victims have been ruined by nobody having believed them and that this is why the Investigation is so important.

9. It is important to note that one of the primary purposes of public inquiries is to provide catharsis and enable victims of institutional failures to heal.
10. [JA-A14] will apply for the removal of his cipher. He holds a firm view that the IICSA is hugely important for victims and survivors as they need somebody to say, in a public forum, that they have been believed. It will be appreciated that this is a common feature in the evidence of complainant Core Participants throughout this Inquiry process.
11. [JA-A14] states that were the Investigation to be discontinued, he would be angry that his abuser and the agencies which he says covered up the abuse will have evaded scrutiny yet again. [JA-A14] states that it would be horrific if a high - profile abuser and institutions responsible for the care of children in Leicestershire were to escape accountability one more time. He maintains he descended into criminality and now is now serving a sentence of life imprisonment as a result of what happened to him when he was 11 years old.
12. [JA-A14] further instructs that even today, should the Chair decide to stop the Investigation, it would feel to him as though he were being abused all over again.
13. Tim Betteridge has told us that he will be distraught if the Investigation is discontinued. He believes that the only good thing that has come out of his traumatic childhood is the ability to be part of something that will prevent sexual abuse from happening to other children. He says that he would consider any decision to discontinue the Inquiry as 'another cover up' and that he would always believe that any decision to do so would have been motivated by improper influences.
14. Mr Betteridge states that he has been 'through hell and back since being involved in the Investigation' and that were the Investigation not to proceed, it would be the

same, for him, as not being believed when first he first reported abuse as a child. Mr Betteridge states that IICSA is more important to him than any civil damages claim.

15. In all the circumstances, the Inquiry is requested to rule at the preliminary hearing that the Investigation will not be discontinued. As they submissions demonstrate, our clients are deeply concerned at the course of action that has been proposed in CTI's Note.

AFFINITY LAW

16 September 2019