

<p>1 Friday, 11 October 2019</p> <p>2 (10.00 am)</p> <p>3 THE CHAIR: Good morning, everyone. Welcome to the final</p> <p>4 day of this part of the public hearing. Ms Bicarregui?</p> <p>5 MS BICARREGUI: Thank you, chair. Chair, I am about to call</p> <p>6 Ms Kate Dixon again. We heard from Ms Dixon on Monday,</p> <p>7 as you know, and I am going to be asking her some</p> <p>8 questions about the children's barred list from</p> <p>9 yesterday in relation to RS-F3, and then Ms Scolding is</p> <p>10 going to take over and ask some general questions that</p> <p>11 were not asked on Monday.</p> <p>12 MS KATE DIXON (affirmed)</p> <p>13 Examination by MS BICARREGUI</p> <p>14 MS BICARREGUI: Thank you, Ms Dixon. I know you have given</p> <p>15 evidence to this inquiry before, on Monday, so I am not</p> <p>16 going to take you through, "You can ask for a break",</p> <p>17 and all the rest of it.</p> <p>18 A. Yes.</p> <p>19 Q. You have your witness statement in the bundle in front</p> <p>20 of you. Can I ask you to turn that up, please. It</p> <p>21 should be at the first tab, A/1.</p> <p>22 Chair and panel, it is in your core bundle at</p> <p>23 tab F/11, core bundle E, tab F/11.</p> <p>24 Ms Dixon, we are going to, I think, come to explain</p> <p>25 to the chair and panel that there are some elements of</p> <p style="text-align: center;">Page 1</p>	<p>1 your witness statement which, not that they are not true</p> <p>2 in the sense of the documents you thought you had at the</p> <p>3 time, but which have changed since you wrote that</p> <p>4 witness statement; is that right?</p> <p>5 A. That's correct.</p> <p>6 Q. We will deal with that in the course of evidence, but in</p> <p>7 respect of the rest of your witness statement, insofar</p> <p>8 as it doesn't refer to specific documents, does it</p> <p>9 remain true, to the best of your knowledge and belief?</p> <p>10 A. Yes, it does.</p> <p>11 Q. That witness statement is your tenth witness statement</p> <p>12 I think to the inquiry. It deals with the two</p> <p>13 children's barred lists for those deemed unsuitable to</p> <p>14 work with children; that's right, isn't it?</p> <p>15 A. That's correct.</p> <p>16 Q. Essentially, it deals with List 99, which was</p> <p>17 effectively a list for teachers and those who worked</p> <p>18 with children and young people, and also you deal with</p> <p>19 the framework for the POCA List, the Protection of</p> <p>20 Children Act list, which was primarily for care workers;</p> <p>21 is that right?</p> <p>22 A. Yes.</p> <p>23 Q. We asked you to look at decisions taken by the</p> <p>24 Department for Education and Skills in relation to three</p> <p>25 members of staff: F2, F3, and F11?</p> <p style="text-align: center;">Page 2</p>
<p>1 A. Yes.</p> <p>2 Q. The policy, the policy oversight, we heard from the</p> <p>3 Home Office yesterday in respect of the children's</p> <p>4 barred list and how it operates today. In Susan Young's</p> <p>5 witness statement, she tells us that the Department for</p> <p>6 Education shares policy oversight with the Home Office</p> <p>7 when it comes to policy interests as they affect</p> <p>8 children. Is that your understanding as well?</p> <p>9 A. Yes, so DBS set the policy, but we are obviously</p> <p>10 interested in how it operates for children and we write</p> <p>11 guidance against that policy.</p> <p>12 Q. So, for example, what constitutes regulated activity</p> <p>13 with children, that is something where you would issue</p> <p>14 guidance in respect of that particular issue?</p> <p>15 A. Yes, so the definitions -- I know you asked a lot of</p> <p>16 questions of DBS to explain what regulated activity,</p> <p>17 et cetera, was, but, yes, we have, obviously, a very</p> <p>18 strong interest, because a lot of regulated activity</p> <p>19 covers a lot of educational settings.</p> <p>20 Q. It happens a lot in schools and with teachers?</p> <p>21 A. Yes.</p> <p>22 Q. In fact, it forms quite a large part of Keeping Children</p> <p>23 Safe in Education, doesn't it, the definition of what</p> <p>24 constitutes regulated activity?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 3</p>	<p>1 Q. I think annex F of Keeping Children Safe in Education is</p> <p>2 a specific piece of guidance about supervised</p> <p>3 volunteers; is that right?</p> <p>4 A. I don't know, but if my witness statement says that, and</p> <p>5 that is what -- it is a piece of guidance, so, yes, I am</p> <p>6 sure it is.</p> <p>7 Q. Thank you. Ralph, could we get up part of your witness</p> <p>8 statement, then, please, Ms Dixon. It is DFE002081_002.</p> <p>9 If you could highlight for me paragraphs 9, 10 and</p> <p>10 11.</p> <p>11 Chair and panel, I am going to have to explain</p> <p>12 a misunderstanding which has happened, which is going to</p> <p>13 have to lead to a slightly different form of evidence</p> <p>14 this morning.</p> <p>15 Ms Dixon, this witness statement, you said the</p> <p>16 documents applied by the DBS in the inquiry, you assumed</p> <p>17 they represent the totality?</p> <p>18 A. Yes.</p> <p>19 Q. Then you go on to say that you would need a certain</p> <p>20 amount of information, which you cover there, before you</p> <p>21 could comment on the decision in respect of F3.</p> <p>22 You also say in section 11 that the procedure that</p> <p>23 the department would, or should, have followed in the</p> <p>24 cases identified by the inquiry, you think the absence</p> <p>25 of records means you cannot say for certain whether this</p> <p style="text-align: center;">Page 4</p>

<p>1 procedure was followed?</p> <p>2 A. That's correct.</p> <p>3 Q. Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. When I came this morning, I was rather surprised,</p> <p>6 I think, that you didn't think that the guidance could</p> <p>7 have been followed, and that -- I mentioned a large</p> <p>8 number of documents, which had been disclosed, which</p> <p>9 would help you to track the guidance through and see how</p> <p>10 the decision was come to.</p> <p>11 A. Yes.</p> <p>12 Q. Chair and panel, I was informed by Ms Dixon's counsel,</p> <p>13 I think it is fair to say, about two minutes ago, that</p> <p>14 there has been an issue their end with documents getting</p> <p>15 through to counsel for Ms Dixon. I think they accept</p> <p>16 there are a large number of documents which would</p> <p>17 provide the audit trail and that would show precisely</p> <p>18 how the decision was made in respect of F3, but Ms Dixon</p> <p>19 has not seen them and her counsel has not had the chance</p> <p>20 to consider them.</p> <p>21 So my lengthy set of questions about precisely why</p> <p>22 the documentation was not considered and the particular</p> <p>23 decision in respect of F3 -- chair and panel, you will</p> <p>24 remember that that decision, on the face of it, is very</p> <p>25 surprising -- there is little point in me taking</p> <p style="text-align: center;">Page 5</p>	<p>1 Ms Dixon through that now, because she simply is not</p> <p>2 able to answer and her counsel has not had a chance to</p> <p>3 examine it. So that's the position, chair and panel.</p> <p>4 I think, on that basis, it simply wouldn't be fair</p> <p>5 for me to continue to ask Ms Dixon detailed questions</p> <p>6 about the documents.</p> <p>7 I do want to emphasise that they have been disclosed</p> <p>8 so it is not a failure of disclosure at our end.</p> <p>9 On that basis, I will ask a very few questions about</p> <p>10 supervised volunteers and then move on to Ms Scolding.</p> <p>11 We will be asking the Department for Education to</p> <p>12 provide with us a statement setting out fully their</p> <p>13 views on the decision which we are considering in</p> <p>14 relation to F3.</p> <p>15 Yes, and Ms Scolding points out why this has</p> <p>16 happened in the first place, why we are not able to</p> <p>17 continue today to look at this.</p> <p>18 MS MCGAHEY: I just want to say I am sorry for the</p> <p>19 misunderstanding that has arisen. I don't know how it</p> <p>20 has, but we do not blame the inquiry at all, it is</p> <p>21 a miscommunication at our end and we will provide</p> <p>22 detailed evidence to deal with it as soon as we can.</p> <p>23 THE CHAIR: Thank you.</p> <p>24 MS BICARREGUI: Thank you, chair, so we will, passing over</p> <p>25 a number of pages, Ms Dixon, we will move to the issue</p> <p style="text-align: center;">Page 6</p>
<p>1 of supervised volunteers.</p> <p>2 This was discussed briefly yesterday with the</p> <p>3 Home Office and the DBS and this is the exemption which</p> <p>4 is sometimes referred to as the "peer exemption", where</p> <p>5 supervised volunteers are not considered to be in</p> <p>6 regulated activity. You are familiar with that,</p> <p>7 I think?</p> <p>8 A. Yes, so I did have a question -- our understanding of</p> <p>9 what we thought a peer exemption was, was when other</p> <p>10 children might have been reading, you know, listening to</p> <p>11 younger children reading, but you are talking about</p> <p>12 adults in terms of --</p> <p>13 Q. To be absolutely clear, yes, I am talking about adult</p> <p>14 volunteers who are deemed not to be in regulated</p> <p>15 activity.</p> <p>16 A. Yes.</p> <p>17 Q. Ralph, if we could get HOM002383_001, this is statutory</p> <p>18 guidance which is issued by your department, I think,</p> <p>19 Ms Dixon, and this is what I was talking about, this is</p> <p>20 annex F --</p> <p>21 A. Lovely, thank you.</p> <p>22 Q. -- to Keeping Children Safe in Education.</p> <p>23 You see a little bit further down in paragraph 3 --</p> <p>24 and I think this comes from the Protection of Freedoms</p> <p>25 Act:</p> <p style="text-align: center;">Page 7</p>	<p>1 "We start with the presumption of trust and</p> <p>2 confidence in those who work with children and the good</p> <p>3 sense and judgment of their managers."</p> <p>4 Pausing there for a moment, Ms Dixon, it is true to</p> <p>5 say that the inquiry over the last two weeks, we have</p> <p>6 a skewed view, I am sure it is true to say, but there</p> <p>7 has been a whole series of individuals for whom, if this</p> <p>8 presumption of trust and confidence were to apply, there</p> <p>9 would be a serious problem.</p> <p>10 So how -- what is the presumption within the</p> <p>11 department? Has this presumption stayed the same since</p> <p>12 the 2012 Act or is this something that is constantly</p> <p>13 reviewed?</p> <p>14 A. So we talk obviously to the Home Office about the DBS</p> <p>15 list and, you know, what that includes. It is obviously</p> <p>16 a proportionate decision and a joint decision, it is</p> <p>17 their policy decision that decides what the rules are.</p> <p>18 But yes, the Protection of Freedoms Act is where</p> <p>19 that decision was taken and it does still stand, yes.</p> <p>20 Q. So that means, given that you provide this guidance,</p> <p>21 that the Department of Education is essentially happy</p> <p>22 with the current position whereby an individual could be</p> <p>23 on the children's barred list but still be a supervised</p> <p>24 volunteer in a school?</p> <p>25 A. I think, as Ms Young said yesterday, the DBS list is one</p> <p style="text-align: center;">Page 8</p>

1 **part of the safeguarding regime. And indeed, if there**
 2 **was an opportunity, or if the decision was taken to**
 3 **relook at the DBS system and the rules, then we would be**
 4 **very interested in working with the Home Office to do**
 5 **that.**
 6 Q. So, again, this, as we have seen over the last
 7 two weeks -- the presumption of trust, if you like -- is
 8 something which the inquiry is, I think, interested in
 9 exploring further, but if we could have a look at
 10 an example, perhaps -- chair and panel, you will know
 11 this from yesterday, and I should preface this to you,
 12 Ms Dixon, that we are -- the DBS is going to be
 13 providing the inquiry with information about where
 14 a person might be on the children's barred list, but
 15 that, if an enhanced DBS check were made, there would be
 16 no convictions and no soft information in respect of
 17 that person. Chair and panel, there may be thousands of
 18 people like that, or there may be three or four, and
 19 obviously that will inform the inquiry going in the
 20 future.
 21 So if we take the example of a volunteer who comes
 22 in to read with pupils in a school?
 23 **A. Yes.**
 24 Q. Again, we are in the realms of the hypothetical, but we
 25 have seen a number of situations over the course of the

Page 9

1 **developing relationships with the children. I think you**
 2 **talked about assemblies and somebody from the church,**
 3 **so, yes, there is potential for that.**
 4 Q. I think that we should go to your guidance -- Ralph, if
 5 you go to the next page -- to be entirely fair, because
 6 if you -- the example at the bottom, please, Ralph.
 7 The example that you give here is, indeed, about
 8 reading in a school.
 9 **A. Yes.**
 10 Q. Usually, what you suggest is that Mr Jones, who is
 11 coming in to read, is normally in sight of the teacher
 12 and sometimes he takes some of the children to
 13 a separate room to listen to them reading and, when he
 14 is there, he is supervised by a paid classroom assistant
 15 who is in that room most of the time.
 16 So in that scenario, the supervision is not,
 17 according to the definition, sort of regular and
 18 day-to-day, it is an expression, really, of almost sort
 19 of constant supervision of Mr Jones, isn't it, and that
 20 is what you are recommending in this guidance -- well,
 21 not recommending but you are giving an example of in the
 22 guidance?
 23 **A. We are. I think we talked about, you know, is it**
 24 **possible to give examples that cover every scenario, and**
 25 **it is not. It is a judgment by the school and, as we**

Page 11

1 last two weeks which make these things certainly of
 2 interest to the inquiry, so the person who comes in and
 3 volunteers to read, say, with children, could have been
 4 a teacher, who had been dismissed, and for gross
 5 misconduct, for behaviour that the school considered
 6 placed the child at risk of harm, but it would be below
 7 the criminal threshold, obviously, and, if that person
 8 were to apply to read, absent any other signs, let's say
 9 they are reasonably elderly, so there is no confusion
 10 about why they are no longer a teacher --
 11 **A. Yes.**
 12 Q. -- the head teacher in a different school may consider
 13 that a former teacher, who has an enhanced DBS check,
 14 because that would be required in any event, would only
 15 require a light form of supervision. That is a possible
 16 scenario, isn't it?
 17 **A. It is a possible scenario, yes. It comes down to the**
 18 **school making a decision about what form of supervision,**
 19 **what level of supervision.**
 20 Q. That possible scenario would put children at risk,
 21 potentially?
 22 **A. I think it then comes down to how they are supervised.**
 23 **So if there is very little supervision or they are on**
 24 **their own with children for long periods of time --**
 25 **I think we heard yesterday about the concerns about**

Page 10

1 **have talked about with Keeping Children Safe in**
 2 **Education, it is a series of questions and prompts for**
 3 **the school to ask themselves and apply.**
 4 **Yes, this is an example of a volunteer who is**
 5 **closely supervised.**
 6 Q. Closely supervised?
 7 **A. Yes.**
 8 Q. So, in a sense, you are looking at a situation where it
 9 is entirely really at the discretion of the decision
 10 maker?
 11 **A. Yes.**
 12 MS BICARREGUI: Chair and panel, rather quicker than
 13 anticipated, I have no further questions for Ms Dixon.
 14 Could you stay there a moment, Ms Dixon? The chair
 15 and panel I think will ask questions after Ms Scolding.
 16 **A. Yes, of course.**
 17 **Examination by MS SCOLDING**
 18 MS SCOLDING: Just to make it clear, Ms Dixon, it may well
 19 be that you will be required to ask questions on the
 20 basis of the information once you have had a chance to
 21 look at those documents you have not seen before, and
 22 that may well take the form of further questioning in
 23 phase 2.
 24 **A. No problem.**
 25 Q. Now, Ms Dixon, we had quite a lengthy discussion on

Page 12

1 Monday so I am now returning to some of the issues that
 2 I was not able to cover?
 3 **A. Sure.**
 4 Q. So the first issue I would like to take you to is about
 5 the registration of independent schools, and this is
 6 largely in the light of what Ms Spielman said yesterday.
 7 She identified that the current role of the
 8 Department for Education in permitting people to set up
 9 schools, independent schools, is quite permissive.
 10 Would you agree with that term?
 11 **A. We register independent schools, and they need to meet**
 12 **the standards in order to do so. So, no, I think it is**
 13 **a rigorous --**
 14 Q. When you say "they need to meet the standards", what
 15 standards would they need to meet?
 16 **A. So they need to be able to show that they will meet the**
 17 **independent school standards.**
 18 Q. Right. But the independent school standards, in and of
 19 themselves, are quite a broad church, if I put it that
 20 way. Is there any intense focus on their suitability to
 21 run a school in any way?
 22 **A. Well, the proprietor of the school is subject to checks,**
 23 **so due diligence checks and DBS checks.**
 24 Q. Right. Are they subject to barred list checks?
 25 **A. The proprietor is not subject to barred list checks.**

Page 13

1 **is -- follows the regulated activity.**
 2 Q. I understand that. But I think there is a slightly
 3 different question there, because, if you are the
 4 proprietor of a school, you therefore have an absolute
 5 right, really, it is your school, to go in and out at
 6 will. You might not be teaching or instructing or
 7 caring for individuals, but one would hope that you
 8 would be visiting fairly regularly, at the very least.
 9 I think probably, even if for no other reason, for
 10 public perception, the idea that someone who has been
 11 dismissed for gross misconduct, for, for example, making
 12 lewd or suggestive remarks to a teenage girl, should
 13 then be able to wander around unhindered into
 14 an institution, for obvious reasons, would seem,
 15 possibly, to members of the general public, to be
 16 slightly absurd, do you agree?
 17 **A. They are not unhindered. I guess that is where -- I am**
 18 **trying to explain the DBS. So we consider the contact**
 19 **with children and they are -- we take a number of things**
 20 **into account when we are registering the school.**
 21 **I guess the other element, which, again, you might**
 22 **ask me questions about later, is our section 128 power.**
 23 Q. In fact, that is the question I am going to ask you
 24 about once we've finished asking these questions?
 25 **A. Fine.**

Page 15

1 Q. Right, okay, so it would be perfectly possible, as was
 2 described by Ms Spielman yesterday for somebody to be on
 3 the barred list but still be permitted to be the
 4 proprietor of a school?
 5 **A. They would be permitted to be the proprietor of**
 6 **a school, but this is where "Are they in regulated**
 7 **activity?", also kicks in.**
 8 Q. I suppose the question is, to the general public, it
 9 would seem rather peculiar that somebody who is on
 10 a barred list could continue to be a proprietor of
 11 a school.
 12 So they would be able to pass your -- you have
 13 a sort of fit-and-proper-person test in effect, if
 14 somebody wants to be a proprietor of a school. So being
 15 on a barred list would not be a disqualificatory factor
 16 for being a fit and proper person to run a school -- to
 17 be the proprietor of a school? I apologise.
 18 **A. I think it is probably worth understanding the**
 19 **"proprietor of a school" bit.**
 20 **So the proprietor of a school is, to all intents and**
 21 **purposes, the owner of the school. The way that we have**
 22 **looked at safeguarding is through the regulated activity**
 23 **and what our considerations have been is about contact**
 24 **with children and trying to make sure that, where people**
 25 **are having contact with children, then the safeguarding**

Page 14

1 Q. So, all right. As far as the registration of schools,
 2 what Ms Spielman has said, she said yesterday, is that
 3 there has been a trend of people setting up schools with
 4 the intention of, in her perception -- I have to admit
 5 it is her perception -- of not intending to comply with
 6 the rules.
 7 Is that something which the Department of Education
 8 recognises, or has recognised, being a trend over the
 9 past decade or so?
 10 **A. No, I don't think we recognised that. So we are**
 11 **obviously very careful, when we set up schools, to look**
 12 **at whether they are going to meet the standards or not.**
 13 **It is our decision to register the school, and we**
 14 **will do -- we will register the school if we believe**
 15 **they will meet the standards.**
 16 Q. Can I ask, I know you do due diligence in terms of
 17 various checks, do you actually go out and visit the
 18 premises before the school is allowed to be registered?
 19 **A. Sometimes we do, sometimes we don't. So we treat every**
 20 **case on its application and sometimes decide to go out**
 21 **and visit the school or ask an inspectorate to do that**
 22 **before we register.**
 23 Q. You obviously have a proprietor who's coming along and
 24 saying, "I want to open a school". Before they do that,
 25 do they have to give you details of who is going to be

Page 16

1 teaching at the school? At the very least -- not
 2 everyone, but who is going to be the head, who is going
 3 to be the senior DSL, who are going to be the trustees
 4 or governors if they have any; are they required to
 5 provide that information to you?
 6 **A. I don't know the detail of all of those questions, but**
 7 **they do need to provide us with some detail in order to**
 8 **show that they meet the standards, and the standards are**
 9 **set out.**
 10 Q. So they have to meet the independent school standards?
 11 **A. Yes.**
 12 Q. My understanding is, if it was a boarding establishment,
 13 the national minimum standards sort of have to be met by
 14 virtue -- they're sort of incorporated into --
 15 **A. You cannot meet the independent school standards**
 16 **without -- sorry, yes, you cannot meet the independent**
 17 **school standards if you fail -- if you are not going to**
 18 **meet the NMS.**
 19 Q. One of the issues that I think we dealt with at some
 20 length last time is, obviously, a lot of people have now
 21 given us evidence that the NMS are not good enough, so
 22 to speak, that they need to be strengthened, so is that
 23 something that you have taken into account, the concern
 24 that has been expressed for a number of years? When you
 25 are looking at registering, particularly residential

Page 17

1 How often -- do you know how often you have used
 2 that power over the past ten years or so?
 3 **A. It is something that we have not used hugely and we are**
 4 **learning how to use.**
 5 **So we have -- I think we first used that power in**
 6 **relation to the Birmingham Trojan Horse schools.**
 7 **We are -- we learnt a huge amount from that process,**
 8 **including about thresholds for evidence and reliance on**
 9 **witnesses and how -- you know, how long the process**
 10 **took, disclosure et cetera --**
 11 Q. Is that because there is a right of appeal, I am
 12 assuming, to the First-Tier Tribunal --
 13 **A. Correct.**
 14 Q. -- against any decision to disqualify on that basis?
 15 **A. Yes, there are quite a few processes in terms of sending**
 16 **a minded to bar letter, getting representations, back**
 17 **again, including through appeals systems.**
 18 **Since we used that in the first instance, we have**
 19 **now learnt more about it and are using it more**
 20 **frequently.**
 21 Q. Roughly, how often are you using it or having to use it?
 22 **A. I think we have probably taken through, or are taking**
 23 **through, somewhere between 10 and 20 cases.**
 24 Q. Is that ever or at the moment?
 25 **A. Ever.**

Page 19

1 special schools, have you sat there and thought, "Okay,
 2 we know the standards might not be quite as tough as we
 3 would like them to be, so we are going to look at
 4 registration through that lens", or do you sit there
 5 and -- you know, all you are able to do is say, "You
 6 meet those standards" or not?
 7 **A. The legislation says, if you meet the national minimum**
 8 **standards, then you have met the national minimum**
 9 **standards.**
 10 **I think what people have said is -- I am not sure if**
 11 **people have said they are not tough enough, I think**
 12 **people have said they are not aspirational enough and**
 13 **the debate I have heard has been about quality and being**
 14 **able to show what is great, rather than what is floor.**
 15 Q. I suppose when I was saying "tough", I really wasn't
 16 meaning in terms of a punitive enforcement regime, I was
 17 meaning a regime which looked at providing good quality
 18 for all children, rather than a minimum quality, but
 19 I think we had quite a lot of discussion about that
 20 earlier.
 21 Now, if you do discover somebody who is the
 22 proprietor or owner of a school who is not behaving as
 23 they should, you have a power as you have identified
 24 under section 128 of -- I think it is the 2008 Act, to
 25 remove them from being the owner or proprietor.

Page 18

1 Q. Ever?
 2 **A. Yes.**
 3 Q. So you have only had 10 and 20, despite the fact that
 4 I think there were around 2,500 schools roughly,
 5 independent schools?
 6 **A. Also, we can use that power across all schools actually.**
 7 Q. Right, okay. So that is about 20 when there is,
 8 I think, around 16,000 state schools, I think, roughly?
 9 **A. Maybe more, actually, but yes, in terms of your point,**
 10 **yes, there is a lot of schools.**
 11 Q. There is a lot of schools?
 12 **A. It is a new power, we are learning how to use it, we are**
 13 **also learning the sort of scope that it can be used for,**
 14 **yes.**
 15 Q. Do you think you should be using it more?
 16 **A. I think we are.**
 17 Q. Right, but do you think you are using it enough?
 18 **A. I think we are learning how to use it and we are using**
 19 **it in more cases than we were before and, the more we**
 20 **learn, the more we will use it, and we will also work**
 21 **out if it does everything we would like it to do and**
 22 **whether, actually, we need to look at the underpinning**
 23 **legislation as we learn more and improve it.**
 24 Q. You say you are learning more?
 25 **A. Yes.**

Page 20

1 Q. What have you learnt?
 2 **A. I think we have learnt about circumstances in which it**
 3 **can be used. So we first used it in the Trojan Horse**
 4 **cases. We are now looking at whether it can be used in**
 5 **poor financial cases as well, we have considered cases**
 6 **where the primary concern has been safeguarding and**
 7 **looking at various bits of evidence and how they stack**
 8 **up.**
 9 We are learning about the length of time it takes,
 10 we are learning about the level of disclosure required.
 11 We are also learning about -- we have often needed to
 12 bring evidence from witnesses, and, again, thinking
 13 about, you know, whether people are prepared to do that
 14 or not.
 15 So we are -- yes, I think we are learning quite
 16 a lot of things.
 17 Q. Okay.
 18 But I think in your witness statement just to be
 19 clear, I think you pretty much accepted that the
 20 enforcement powers of the DfE, certainly before 2002, as
 21 far as you understand it, were used very rarely and were
 22 not terribly effective?
 23 **A. Yes, well, so I guess the section 128 is not the only**
 24 **enforcement power.**
 25 Q. No.

Page 21

1 **I think we have used and considered those and perhaps**
 2 **not found them as easy to operate as we might like.**
 3 Q. I think you used them in the case of Chelfham Mill that
 4 I discussed with Ms Spielman yesterday?
 5 **A. Yes.**
 6 Q. Have you ever used them on any other occasion?
 7 **A. I know we have certainly tried to use them, so we had**
 8 **a relatively recent case where we tried to use it and**
 9 **I think actually came to a good outcome in the**
 10 **magistrate kind of recognising some of the limitations**
 11 **of those powers and making their judgment, which, in**
 12 **effect, gave a good outcome, but I think what we have**
 13 **learnt again about the use of those powers is they**
 14 **don't -- they are very stark, so you can close a school**
 15 **immediately, or very quickly, but what you cannot do is**
 16 **close one temporarily using those powers, which might be**
 17 **a useful thing for us to be able to do.**
 18 Q. Right. So do you think that this entire enforcement
 19 regime might need to be looked at again? Because what
 20 you have really told me is: you have a power to close
 21 a school; whenever you have tried to use it, it has been
 22 difficult, complicated and doesn't necessarily work.
 23 You have also told me you have various powers to
 24 prohibit people from being registered as proprietors,
 25 but, again, that is a long, complex and difficult

Page 23

1 **A. So the enforcement system for independent schools uses**
 2 **inspection, uses evidence to decide whether standards**
 3 **are met, it then uses action plans if those standards**
 4 **are not met, and then it has considerations about**
 5 **restrictions to the school -- for example, restricting**
 6 **student intake and/or deregistration of the school.**
 7 **I think your question about, have we strengthened**
 8 **that regime, are we doing that at the moment?**
 9 **Absolutely, most definitely. So we've published**
 10 **an enforcement policy to be clearer --**
 11 Q. I am going to take you to the enforcement policy in
 12 a minute, if I may.
 13 So can I just ask, not only do you have a power to
 14 disqualify fit and proper persons, but I think you have
 15 an interim power to, in effect, suspend them, is that
 16 right or do you not have that power?
 17 **A. Would that be the IPO?**
 18 Q. The proprietor?
 19 **A. So we have a -- if they are a teacher, we have an IPO,**
 20 **an interim prohibition order.**
 21 Q. But do you have that for a proprietor? Is that the sort
 22 of thing you should have, that there can be some sort of
 23 an emergency or are there emergency powers you can use
 24 in any event?
 25 **A. We have emergency closure powers, section 120, and again**

Page 22

1 process. Doesn't that tell you that maybe you need to
 2 be looking again to create something a bit --
 3 **A. Luckily, we are.**
 4 Q. -- easier for you?
 5 **A. Luckily, we are. So we are looking at the current**
 6 **system we have got in terms of the independent school**
 7 **standards, and looking again at the length of time it**
 8 **takes to go through the action plan to enforcement, and,**
 9 **again, that is quite a lengthy process because of the**
 10 **appeal system.**
 11 We have got a draft consultation that we are nearly
 12 ready to consult on, which asks some of those questions
 13 about how we can tighten that regime. I think
 14 I explained to you, when I gave evidence earlier in the
 15 week, if these things were by legislation: (a) there
 16 a process to go through; and (b) there is not a lot of
 17 legislative time at the moment, but it is a priority for
 18 our department and one that we have been pushing.
 19 Q. Do you recognise, therefore, what Ofsted said yesterday,
 20 which is, you know, they said they have got a group of
 21 about 30 schools which they are worried about because
 22 they have inspected them on a number of occasions and
 23 there has just been notice of complaint after notice of
 24 complaint, but no enforcement action.
 25 Do you accept, therefore, their criticism that you

Page 24

<p>1 have not been expeditious enough, not been quick enough, 2 and not been firm enough, in terms of your enforcement 3 action against schools? 4 A. So I am not sure exactly which 30 schools they are 5 referring to -- 6 Q. Neither do I. 7 A. That is fine. I think, since we heard that, we have 8 sort of tried to work out which ones they might be 9 looking at, and we have 177 schools that are subject to 10 some sort of regulatory actions, independent schools. 11 We discuss those on a monthly basis with the minister 12 responsible, the minister makes decisions about those 13 cases and, obviously, the decisions are taken on 14 a case-by-case basis, but we looked at our dashboard and 15 we have -- we looked with him at the cases that have 16 been under some sort of regulatory action for 18 months 17 or more; we have got 22 of those cases. 18 Q. So you have got 22 cases where there has been more than 19 18 months' worth of -- 20 A. Some sort of regulatory action. 21 Q. Without there being successful resolution? 22 A. Well, schools are all under action plans and, quite 23 often, schools will get -- schools that have a long -- 24 we are concerned about for a long time, will go up and 25 down and they might meet some of the standards, and</p> <p style="text-align: center;">Page 25</p>	<p>1 because of the way the system works, they have progress 2 monitoring inspections, so they are inspected fairly 3 regularly against these action plans, it may be the case 4 that they improved on the ones that they were failing 5 against under the first inspection, and then a -- when 6 they have the progress monitoring inspection, they might 7 have got better at some of them and worse at others. 8 So we are talking about a tail of cases that we are 9 watching closely and concerned about. None of those 22 10 have serious safeguarding failings; we have checked 11 that, we would always check that. If there are serious 12 safeguarding failings, we are able to use other powers, 13 albeit within some of the limitations I have explained, 14 but we would obviously act very quickly on those. 15 Q. Okay, can we talk now about the current regulatory 16 regime and how it works. You are familiar with it and 17 I am familiar with it, but other people might not be 18 familiar with the action plans and notice of complaints? 19 A. Sure. 20 Q. I am going to do that through taking you through the 21 current policy statement you issued in April this year, 22 that is DFE001966, Ralph. 23 Shall I say it again? DFE001996. 24 That's my fault, I apologise, Ralph, I said the 25 wrong word, this is the policy statement that you issued</p> <p style="text-align: center;">Page 26</p>
<p>1 in April. Can we go to _005, please, Ralph, which is 2 the introduction and could we get up paragraph 7, 3 please. 4 The power to take enforcement action, Ms Dixon, 5 under section 116. So that is the power not just to 6 close. So that is the statutory power which gives you 7 a right to undertake some form of enforcement against 8 a school and may, in effect, only be exercised where 9 a school has had an opportunity to improve. 10 Is that in all circumstances? Because I am 11 thinking, for educational reasons, I can completely 12 understand why you wouldn't want to issue action unless 13 you have given somebody a chance, but in terms of 14 safeguarding failures, shouldn't there possibly be 15 a distinction between educational failures and 16 safeguarding failures? 17 A. So the section 120 power is the emergency closure power, 18 which we can use for serious safeguarding failings, 19 I have obviously talked about some of the limitations of 20 that power, but I think, in the circumstances of 21 a serious safeguarding failing, it is a bit of 22 an all-or-nothing power, you can close the school in its 23 entirety, so under the most serious safeguarding 24 failings, a section 120 to have emergency closure would 25 keep everybody safe.</p> <p style="text-align: center;">Page 27</p>	<p>1 Q. Obviously, as we identified with Ofsted yesterday, 2 closing any kind of facility, even if it is failing, is 3 not necessarily the most optimal outcome. What might be 4 a more optimal outcome would be to transfer the 5 ownership of the facility to an organisation which can 6 already do it, to do the sorts of things which happen in 7 the state sector in respect of academies, so you can 8 kind of recategorise failing academies into another 9 chain or you can -- do you have any powers to do any of 10 those sorts of things in the independent sector? 11 A. We don't have strict powers to do that, that is not to 12 say we have not achieved that before by -- but that has 13 been through negotiation and dialogue, more than through 14 firm powers. 15 Q. Right. Or even, do you have any powers to put sort of 16 interim managers in? Because the other thing I am 17 thinking is, you might not want the school to close -- 18 say, for example, it deals with, you know, very 19 complicated children with physical disabilities, and 20 everybody says there is literally nowhere else in the 21 country -- and there are some organisations which are 22 like that, you know, we cannot do anything and social 23 services groups -- do you have any power, for example, 24 to put in interim management, to put in interim 25 leadership in the context of the independent sector?</p> <p style="text-align: center;">Page 28</p>

1 **A. So I don't know, I am now thinking about whether there**
 2 **is anything I can learn from examples I know.**
 3 **So we certainly have managed to put interim people**
 4 **into two schools that we are concerned about. Whether**
 5 **we have the strict powers to do that, I suspect possibly**
 6 **not.**
 7 **I guess the other thing that is probably relevant**
 8 **is, in a serious safeguarding case, often -- and we have**
 9 **heard -- it is often about the culture of the school, so**
 10 **would it solve it if you just replaced one or two**
 11 **people, I suppose?**
 12 Q. I think when I am talking about replacing people, what
 13 I am talking about is getting a new broom in and then
 14 possibly replacing a lot more people, but you've
 15 replaced the people rather than the physical space and
 16 the children, so to speak?
 17 **A. Yes, I can see the physical space and the children**
 18 **point. I guess, if you put a new person in but leave**
 19 **a lot of the culture, it has that -- has that solved the**
 20 **problem quick enough? So, actually, is the safer thing**
 21 **to do to close the school, make sure the children are**
 22 **safe and then go round the loop again and reopen -- you**
 23 **might use the same premises, you might end up having**
 24 **some of the same children. I appreciate the disruption**
 25 **there, but I guess you --**

Page 29

1 the time by the physics teacher", and you would then say
 2 to Ofsted or the ISI, "I am very worried about ... I am
 3 concerned about what is going on, can you do
 4 an inspection?" and, obviously, both of them, under your
 5 direction, can be authorised or can be made, in effect,
 6 to inspect those schools; that's right, isn't it?
 7 **A. So we commission inspections. I guess, obviously, you**
 8 **are flipping over the first bit, which is the**
 9 **safeguarding and the referral, et cetera. I assume that**
 10 **is a given, that our first thing would be to make sure**
 11 **the child was safe and the referral was made to the**
 12 **LADO, et cetera.**
 13 **Yes, we commission the inspectorates to go in and do**
 14 **inspection if they are outside of their regular cycle,**
 15 **so if we, or they, or whoever, got some evidence and it**
 16 **came to us that actually there was a concern in the**
 17 **school, then we would commission an inspection.**
 18 Q. I suppose the question is, in some of the cases we have
 19 dealt with where there are concerns around particular
 20 issues which have arisen in respect of particular
 21 children in school, is inspection necessarily the best
 22 thing to do? Do you have any powers to send people in
 23 to, what I would call, investigate, rather than inspect?
 24 **A. So I think that comes back to the bits I was assuming --**
 25 **I was assuming that the referral to the LADO to make**

Page 31

1 Q. There is going to always be some disruption, if you are
 2 talking about ending an institution or moving
 3 an institution.
 4 **A. Yes.**
 5 Q. It is just how much disruption does there need to be and
 6 whether or not there are other ways in which you could
 7 do it which have less of an impact on the children
 8 involved.
 9 Do you think you should have powers to intervene and
 10 to do what I have suggested, which is to put in place
 11 interim managers to try and reshape the institution more
 12 in an image which you think is acceptable?
 13 **A. I think, as is evident, I don't know quite how much we**
 14 **have got, so I probably cannot say whether we need more,**
 15 **because I don't know what we have got.**
 16 Q. Okay. Maybe it would be useful if somebody could
 17 provide us with that information, that would be very
 18 helpful, about that.
 19 If one then goes to how regulatory action arises,
 20 what really happens is, if you have a concern about
 21 a school, you send an inspector in, don't you?
 22 **A. Yes.**
 23 Q. That tends to be the first stage of any possible
 24 enforcement, so somebody might phone up, say, "I am
 25 really worried about Johnny because he is being hit all

Page 30

1 **sure that child is safe, that is the route to look after**
 2 **the child. We are concerned with the school meeting the**
 3 **standards, the local authority route is concerned**
 4 **primarily with looking after that concern about that**
 5 **particular child, and I think that is right, because**
 6 **I think we have also heard about, you know, being really**
 7 **clear about that escalation route and responsibility for**
 8 **the safeguarding of the child.**
 9 Q. Can we go to _006, please, Ralph of the document you
 10 just got up, 1996. Page 6. Yes.
 11 So there is an inspection, the inspection may result
 12 in a report that the school is not meeting standards,
 13 that is paragraph 9. Then, under paragraph 10, it is
 14 then for the Secretary of State to decide, taking into
 15 account any inspection evidence whether the standards
 16 are met?
 17 **A. Yes.**
 18 Q. So that is right?
 19 **A. Yes.**
 20 Q. It says here:
 21 "Consequently, when this first step in regulatory
 22 action is taken, it may be met on a slightly different
 23 set of unmet standards to those listed in an inspection
 24 report."
 25 I have to say I was not entirely clear what was

Page 32

1 meant by that; could you help me with that?

2 **A. So I think the point that's being made there is the**

3 **evidence we get from an inspection is obviously very**

4 **useful, but it may not be the only evidence that we get.**

5 **We also are able to talk to the school and we are the**

6 **ultimate decision maker about whether the standards are**

7 **met or not.**

8 Q. Right, so have there been circumstances in which you

9 have disagreed with Ofsted and either taken action or --

10 Ofsted or the ISI -- either taken action when they have

11 said you should or not taken action when they have said

12 you should?

13 **A. They don't say whether we should take action or not.**

14 **They say whether the standards are met or not.**

15 Q. Right, but, for example, where the standards were not

16 met, but you determined that you were not going to

17 undertake any form of enforcement action --

18 **A. So because we have got different, we have got discretion**

19 **about which kinds of procedures we might follow, the**

20 **action plan deregistration, or some sort of restriction,**

21 **we take each case on its merits and we use the evidence**

22 **from the inspection to decide. There may be cases where**

23 **minor standards are not met or that we might not take**

24 **a decision to take enforcement action, yes.**

25 Q. Can we go to paragraph 11, please, Ralph, which is, if

Page 33

1 **given that we are deciding what the future action would**

2 **be, to comply with that, and it is obviously to attempt**

3 **to give some more evidence, or different evidence, about**

4 **how they are meeting, or going to meet, the standards.**

5 Q. Okay. Then at paragraph 15 -- so you identify there

6 should be a plan which should come back to you within

7 about a month. At paragraph 15, once it is received,

8 the action plan is then sent to the inspectorate. Why

9 do you send it to the inspectorate? Surely, if it is

10 your decision, you should be the one that should be

11 evaluating? You have had the inspectorate saying,

12 "These standards are not met", you have had the action

13 plan, why do you then need to send it back to the

14 inspectorate?

15 **A. So we are the decision maker about whether the standards**

16 **are met or not, but the inspectors have more expertise**

17 **and practical knowledge in the how, I suppose. So the**

18 **action plan will set out how the failing standards will**

19 **be met and we ask for an inspectorate evaluation of that**

20 **action plan.**

21 Q. Okay. But again, the Secretary of State either approves

22 it or doesn't approve it and then, Ralph, can we move on

23 to paragraph 17, please. If it is approved, there will

24 then be -- what's a PMI?

25 **A. Progress monitoring inspection.**

Page 35

1 you decide you do go to take, the normal response is to

2 issue what is called a statutory notice, which then

3 involves the submission of an action plan. That's

4 right, isn't it?

5 **A. That's correct.**

6 Q. Or they may simply, if you don't think that that's

7 needed, there may well be a request for information. Is

8 that right?

9 **A. Yes.**

10 Q. Is that a request or a direction? Because there is --

11 you know I could write to you and say, "Dear Ms Dixon,

12 can you please tell me about this, this and this in the

13 DfE and let's just ignore the Freedom of Information Act

14 just for one second", you may or may not reply.

15 I am assuming you have to tell us this information,

16 rather than, "Please, could you tell us"?

17 **A. I am not sure that it is.**

18 **So we -- if they then didn't supply the information,**

19 **we still have the enforcement action decisions at our**

20 **discretion, so we are asking for additional information**

21 **from the school, additional to that inspection report,**

22 **in order to make the decision that we want to make on**

23 **the case about what to do next.**

24 Q. Okay.

25 **A. In -- yes, it's obviously in the school's interests,**

Page 34

1 Q. Right.

2 **A. I mentioned that before. That is when the inspectorate**

3 **will be -- will go in again to see how the school is**

4 **doing against the action plan.**

5 Q. You get the inspectorate to evaluate the inspection

6 plan. You would then send the inspectorate in and

7 I think we have seen some examples of that, we saw

8 an example of that yesterday in the case of

9 Stanbridge Earls where people came in quite regularly.

10 There may be two separate PMIs if there have been two

11 action plans required.

12 Then, how long does this whole process take? I am

13 just thinking this is quite a lengthy process to go

14 through if there are significant failings in a school?

15 **A. Yes, it varies, depending on what standards were failed**

16 **and what the action plan says to address it and, indeed,**

17 **we take into account the views of the inspectorate in**

18 **evaluating the action plan, so things like fixing the**

19 **single central register, actually is quite a quick**

20 **thing, you know, people ought to be able to get that**

21 **right, you ought to be able to correct that quickly.**

22 **If you are looking at -- we talked earlier about**

23 **changing the culture of a school, then -- and, you know,**

24 **changing staff -- actually, that is something that might**

25 **take longer, but I think to your question of, "Could**

Page 36

<p>1 this take ages?", I think, yes, and that is why</p> <p>2 I mentioned --</p> <p>3 Q. I think even my little head has been trying to get</p> <p>4 around how long it would usually take, and if there is</p> <p>5 sort of a month to get the action plan back, and then</p> <p>6 there is a three-month period to implement it, and then</p> <p>7 you have to get inspectors in who may well not be able</p> <p>8 to do that immediately, you are looking at probably</p> <p>9 minimum six months, more likely, realistically,</p> <p>10 12 months?</p> <p>11 A. It varies. And it depends on the significance of the</p> <p>12 things that the action plan is trying to address, so</p> <p>13 I just talked about some of the things that you can fix</p> <p>14 quickly and not so quickly.</p> <p>15 So it is very variable and we obviously work with</p> <p>16 the inspectorates to prioritise the ones where they</p> <p>17 might want to -- we, and they, might feel that the</p> <p>18 progress monitoring inspection should be quicker or</p> <p>19 slower.</p> <p>20 Q. At paragraph 18 you say:</p> <p>21 "In a small number of cases where an action plan is</p> <p>22 rejected, they will be required to produce another</p> <p>23 action plan."</p> <p>24 I suppose the question is, are you not giving these</p> <p>25 people too much rope to hang themselves with? If they</p> <p style="text-align: center;">Page 37</p>	<p>1 cannot produce a proper action plan first time around,</p> <p>2 the question in my mind is, are they ever going to be</p> <p>3 able to do it?</p> <p>4 A. Again, that is a judgment call on each case. I think</p> <p>5 the purpose of the regulatory regime is to improve the</p> <p>6 schools, so it is not a great outcome if, actually, it</p> <p>7 ends up closing the school, but sometimes it is</p> <p>8 necessary.</p> <p>9 Q. Yes. Okay, so we then go to what happens if you do</p> <p>10 decide to take enforcement action and this, Ralph, is at</p> <p>11 _010, paragraphs 21 and 22, and you set out some</p> <p>12 principles here:</p> <p>13 "Enforcement action can be taken if a school has</p> <p>14 unmet standards ... [either] removal of the school from</p> <p>15 the register ..."</p> <p>16 Which we have already talked about, which is the</p> <p>17 draconian measure:</p> <p>18 "... or imposing a 'relevant restriction' ..."</p> <p>19 For example, requiring that some sort of operation</p> <p>20 ceases, its buildings cease or it can bar the admission</p> <p>21 of new pupils.</p> <p>22 You have a range of sanctions that you can use.</p> <p>23 Can we go now down to paragraph 26, please, Ralph,</p> <p>24 it is on the next page.</p> <p>25 So these are the deciding to take enforcement</p> <p style="text-align: center;">Page 38</p>
<p>1 action, the department follows four principles:</p> <p>2 proportionality, targeting, consistency and</p> <p>3 transparency.</p> <p>4 Can I just double check, unlike other inspectorates</p> <p>5 who have these sorts of things written into the primary</p> <p>6 statute, or enforcement agencies, rather, none of this</p> <p>7 is written into primary statute, is it, or to</p> <p>8 regulations that these will be the processes? So this</p> <p>9 is all guidance but no more than that?</p> <p>10 A. Yes, and in our enforcement policy, yes, which is part</p> <p>11 of why we wanted to publish an enforcement policy, yes.</p> <p>12 Q. Okay, so you say proportionality. I think I understand</p> <p>13 what that means, but you say "proportionate remedy to</p> <p>14 secure the overall policy aim", and I am assuming that</p> <p>15 is to make sure that children are in schools which are</p> <p>16 safe and happy -- they are safe and happy; is that</p> <p>17 right?</p> <p>18 A. Yes.</p> <p>19 Q. And then, targeting, "a risk-based approach is taken".</p> <p>20 What does that mean?</p> <p>21 A. So I think as I have explained, we take each case on its</p> <p>22 merits, so if, actually, we are using the restriction</p> <p>23 part of the enforcement policy, so the one in the</p> <p>24 middle, if, for example, we were worried about a -- say,</p> <p>25 if the school was a day school and a boarding school,</p> <p style="text-align: center;">Page 39</p>	<p>1 and actually the failures were in the boarding school,</p> <p>2 we could place the restrictions on the boarding element,</p> <p>3 but not the whole school, for example.</p> <p>4 Q. Okay. All right, you say, as well, consistency and</p> <p>5 transparency. There are just a couple of questions</p> <p>6 about consistency I have.</p> <p>7 A. Sure.</p> <p>8 Q. Given that there are not common standards or common</p> <p>9 frameworks across the inspectorates, so they both, you</p> <p>10 know, they both look at things in slightly different</p> <p>11 ways, their reports are written in slightly different</p> <p>12 ways, they are sometimes focusing on slightly different</p> <p>13 issues, although they are always focusing on the</p> <p>14 independent school standards and the national minimum</p> <p>15 standards, can you really achieve consistency?</p> <p>16 A. So we can, in that what we take into account is meeting,</p> <p>17 or not meeting, of the standards. So, yes, some things</p> <p>18 are different between the inspectorates, but our primary</p> <p>19 concern is about whether the standards are met or not</p> <p>20 met.</p> <p>21 Q. Right. Can you commission any reviews from Ofsted or</p> <p>22 from local authorities? I am just thinking about, we</p> <p>23 have had a very helpful example in the case of Chetham's</p> <p>24 and there was also a helpful example in the Royal School</p> <p>25 Manchester where Stockport went in with the NSPCC at the</p> <p style="text-align: center;">Page 40</p>

<p>1 same time to provide an extra level of assurance. 2 Is that the sort of thing you can do, either as part 3 of enforcement action or separate to it? 4 A. Yes, I think we can. And because we can -- we take the 5 inspectorate evidence, but we can also get other 6 evidence because we are the decision maker, then, 7 provided we were making the decision in the way that the 8 enforcement policy sets out, we could bring in other 9 evidence -- 10 Q. Have you used other agencies frequently? 11 A. We sometimes use the Charity Commission, for example. 12 Q. Okay, but you don't -- you wouldn't routinely use, for 13 example, local authorities, social services departments 14 to look at specific issues? I am just thinking about 15 the Chetham's inspection where they focused on 16 a particular thing about advocacy where they have got 17 specific expertise in? 18 A. I think we could ask anyone we wanted for additional 19 evidence. So, yes, I think -- yes, we might talk to 20 local authorities, if we felt that was relevant. 21 Q. And last, but by no means least, at paragraph 27 -- that 22 is _011, Ralph -- this sets out the circumstances in 23 which -- which would point, so to speak, towards 24 enforcement action. Again, there are four of those, 25 which is the seriousness and number of failings, the</p> <p style="text-align: center;">Page 41</p>	<p>1 length of time in which the school hasn't met the ISS -- 2 I mean, how frequently is it that schools haven't met 3 the independent schools standards for a number of years? 4 A. I think, looking back on the numbers I gave you earlier, 5 we obviously look at the ones that have been on there -- 6 well, we would look at the seriousness and we would look 7 at the length of time. It is sometimes the case that 8 the long tail of those schools might be sort of bobbing 9 along, meeting some, failing some, so we will be taking 10 that into account, too, and that sort of is looking at 11 the, you know, leadership and management of the school 12 to hold it all together at once, I suppose, but I guess 13 coming back to D on here, thinking about this in terms 14 of the impact, our system is attempting to get schools 15 to meet the standards, rather than to close them. 16 Q. Yes. Then, obviously, a refusal to accept that the 17 standards must all be met, so that is -- is it the 18 case -- and this is probably an appropriate point to ask 19 this question. There were some issues and concerns 20 raised by various individuals about owner/proprietor 21 schools, so obviously an independent school doesn't have 22 to have a board of governors, it doesn't have to have 23 any trustees, I could set up, badly, a school tomorrow, 24 provided I met your checks. Is that something where you 25 found owner/proprietors, it is either more likely that</p> <p style="text-align: center;">Page 42</p>
<p>1 you have to take enforcement action against them or they 2 demonstrate more problems in terms of being able to 3 manage safeguarding in particular? 4 A. I don't think either of those, but in the -- it can make 5 it harder for us to deal with it, so I don't think we 6 have got evidence that they are worse schools, but it 7 obviously becomes more complicated for us if the 8 proprietor and the -- 9 Q. Because -- 10 A. -- (overspeaking) are the same. 11 Q. -- you don't have a lever, you don't have another body 12 that can sit there and say -- is this the sort of 13 situation -- I think the Association of Independent 14 Governors, in fact, said they would like it to be the 15 case that there had to, at the very least, be 16 an advisory body or some sort of supervisory body for 17 all owner/proprietors, and I think some other 18 individuals have also identified that there should 19 always be some kind of Parents' Association that can 20 feed into the running and mechanisms of the school. Is 21 that something the DfE have ever considered or had 22 discussions about? 23 A. I mean, they are certainly options, but I don't think we 24 feel that the system is unworkable at the moment. 25 I think, in some circumstances, it can be more</p> <p style="text-align: center;">Page 43</p>	<p>1 difficult, but I don't think we have reached a point in 2 which we think it is not possible to navigate. 3 Q. Okay, so you don't think there are significant enough 4 problems within the owner/proprietor sector to think 5 about, for example, making it a requirement of 6 registration or, you know, forcing everybody to have 7 some form of supervisory oversight by way of governing 8 body or trustees? 9 A. Correct. We have not got to a point where we think it 10 is necessary to do that; however, we are very prepared 11 to listen. 12 Q. Okay. The other issue is that we see there are a number 13 of other organisations involved in enforcement action, 14 principally the inspectorates, and so, one of the 15 concerns is that this is all a bit kind of -- somebody 16 has to tell you, then you have to tell someone, and then 17 that somebody then has to go back in. 18 Would it not be more straightforward to transfer the 19 regulatory functions to those who also provide the 20 inspection route? I know that has not ever happened -- 21 A. Yes. 22 Q. -- in this context, but there is no reason why it 23 shouldn't and it might, at the very least, cut out some 24 of the process that we have just talked about. 25 A. I mean, obviously, it would be a possible thing to do.</p> <p style="text-align: center;">Page 44</p>

1 **And I am sure you are looking at other -- you know, the**
 2 **chair asked about comparison with other regulatory**
 3 **functions and inspectorates, regulators, but it is not**
 4 **the system that operates in schools and not only for**
 5 **independent schools but for state schools, the DfE is**
 6 **the regulator.**
 7 **It would obviously require primary legislation, it**
 8 **would be quite a major change.**
 9 Q. Yes.
 10 **A. Yes.**
 11 Q. Do you have any views about whether or not it is a good
 12 idea or a bad idea, either corporately or individually?
 13 **A. I don't think I do. I mean, this system, we have spent**
 14 **a long time describing it, is quite complicated, but**
 15 **I think, on the whole, it works so --**
 16 Q. Or even if you don't think the entire sector, do you
 17 think there might be a role, particularly if there is
 18 a much closer approach between children's homes and
 19 residential special schools for that sector to be the
 20 subject of regulation by the same individuals who
 21 inspect, because they are likely to have a lot more
 22 knowledge and experience, as inspectors, of the
 23 particular problems that the residential special school
 24 sector might come up with?
 25 **A. I don't have a straight answer for that question.**

Page 45

1 **inquiry is where those two systems come up against each**
 2 **other, that doesn't necessarily lead to a conclusion**
 3 **that the whole system for independent schools or,**
 4 **indeed, the whole system for all schools should be**
 5 **changed to a different kind of regulatory function.**
 6 **I think the right question is to look at whether**
 7 **that end of those schools and children's homes, there**
 8 **should be something done differently.**
 9 Q. Okay. Can I also ask -- this is on behalf of Mr Scorer,
 10 because we will come back to this the next time, which
 11 is, at the moment, your monitoring of the Independent
 12 Schools Inspectorate -- as we understand it from what
 13 Ms Spielman told us yesterday, she has basically no role
 14 in monitoring the Independent Schools Inspectorate at
 15 the moment.
 16 Can you explain to us why that is the case and
 17 whether or not that is intended to continue?
 18 **A. Yes, sure. So the legislation says that Ofsted are**
 19 **under a duty to write a report to the Secretary of**
 20 **State.**
 21 Q. Yes.
 22 **A. It doesn't specify the content of that report --**
 23 Q. No.
 24 **A. -- and that is commissioned by the Secretary of State.**
 25 **Under the previous HMCI, that was -- there was**

Page 47

1 **I think, you know, what I have heard is a lot of**
 2 **consideration about whether that end of the special**
 3 **schools is very close to the children's homes and**
 4 **whether there actually should be some learning, it is**
 5 **set up under a very different model at the moment. That**
 6 **is not to say it wouldn't be possible to change it, but**
 7 **obviously, the inquiry is looking at that overlap, and**
 8 **we'd have to look at the overlap with the other bits of**
 9 **the system --**
 10 Q. Yes, I --
 11 **A. -- and see what makes sense.**
 12 Q. -- suppose the reality is that I think what was said
 13 yesterday, or by someone, anyway, is that, when the
 14 system was first set up, there were a lot more schools
 15 which looked like boarding schools, but happened to have
 16 some children in them with specific learning
 17 difficulties, in the residential special school sector.
 18 Now, the vast majority of schools are like
 19 Southlands or the Royal School Manchester, so they are
 20 dealing with the most complex end of the spectrum --
 21 **A. Yes.**
 22 Q. -- where, therefore, those children are unable to
 23 express themselves to adults and also the need for
 24 supervision is also much higher, I would imagine?
 25 **A. Yes, I think my point is, what we are looking at in this**

Page 46

1 **an agreement that that would be less -- there would be**
 2 **less monitoring.**
 3 Q. Why was that?
 4 **A. I don't know, I was not --**
 5 Q. Okay.
 6 **A. I think it was --**
 7 Q. I think it might be something that we would want to
 8 explore more in phase 2.
 9 **A. Fine. Where we are at the moment is that we have got**
 10 **two large, reputable inspectorates for independent**
 11 **schools. And that -- I think they do some things --**
 12 Q. Two large inspectorates? I thought the ISI was the last
 13 man standing?
 14 **A. Sorry, and Ofsted. Ofsted and the ISI.**
 15 Q. Sorry.
 16 **A. They do some things similar and they do some things**
 17 **different, so we have been in discussion with us and**
 18 **both of those inspectorates, and agreed to look at a new**
 19 **way of learning from each other, looking at different**
 20 **ways in which the two inspectorates do things in order**
 21 **to do some learning from each other, essentially.**
 22 Q. Okay. I mean, I understand that, but what Ofsted said
 23 to us yesterday is there a slightly asymmetry of
 24 approach in that the ISI really is involved in the
 25 collaboration, but Ofsted, obviously, there is a whole

Page 48

1 level of wriggle in terms of assurance of them, via
 2 parliament, they have to lay various things before
 3 parliament, you undertake relevant regulation of them,
 4 they are subject to various forms of external scrutiny
 5 which the Independent Schools Inspectorate is not.
 6 Isn't that a somewhat unfair situation, where there
 7 isn't equity of approach in terms of the level of
 8 scrutiny?
 9 **A. I think what Amanda was -- I see the point she was**
 10 **making, but I think she was talking about the scrutiny**
 11 **that the organisation has in its totality, not**
 12 **necessarily only the scrutiny it has on independent**
 13 **schools.**
 14 Q. No.
 15 **A. So we are the decision maker, the DfE are the decision**
 16 **maker, both inspectorates are giving us evidence about**
 17 **schools meeting the standards. It is our belief that,**
 18 **actually, we would get more out of the process of**
 19 **learning from each other at this point in time, and so**
 20 **that is what we have agreed to do.**
 21 Q. Okay. Can I ask you generally, I understand there has
 22 been a significant cut to Ofsted's budget, and obviously
 23 you, as the Department of Education who sponsor Ofsted,
 24 so to speak, you are responsible, I am assuming, for
 25 negotiations with the Treasury about --

Page 49

1 the entire independent schools sector?
 2 **A. No.**
 3 Q. Why not?
 4 **A. We have confidence in both those inspectorates.**
 5 Q. Okay, I am just thinking that, in most other settings,
 6 there is one inspector. I am thinking, particularly,
 7 the CQC, which inspects both private and state
 8 institutions in respect of healthcare, is an obvious
 9 example. So I mean, there is no impediment to there
 10 being one body, it is just you are happy with the system
 11 as it currently operates?
 12 **A. Yes, correct.**
 13 Q. Can I ask, however, about inspectorates going in to do
 14 two different sorts of inspections, I think that happens
 15 a lot less than it used to, but both Ofsted and the
 16 Independent Schools Inspectorates have said to us that
 17 being able to do both, having aligned inspections,
 18 integrated inspections, I think they are given slightly
 19 different names, is a helpful thing, is that something
 20 you agree with?
 21 **A. Certainly, from everything I have heard, it sounds like**
 22 **it is more helpful to do them both together if they can**
 23 **be aligned and I think there is only a very small number**
 24 **that aren't, I think five or less.**
 25 Q. Now, at the moment, as you are the ultimate regulator of

Page 51

1 **A. Not fully, actually. So Ofsted are also able to**
 2 **negotiate directly with the Treasury.**
 3 Q. I suppose what -- the analogy that Ms Spielman used
 4 yesterday was that the trifle, the cream has got much
 5 thinner, so to speak, or whichever layer of the trifle
 6 Ofsted is has got much thinner, and there is a thinner
 7 level of assurance because of the relatively -- well,
 8 the massive cuts that there have been to Ofsted over the
 9 past 15 years.
 10 Is there any view that there is going to be any
 11 increase in resources or why has there been such
 12 a significant diminution in monies going to Ofsted
 13 during that period of time?
 14 **A. So Ofsted, like all public sector organisations, have**
 15 **made efficiencies. I don't -- what Amanda is saying to**
 16 **us is that they have taken the efficiencies and -- but**
 17 **that she is still confident in her operation. I think**
 18 **she is saying it is becoming more and more difficult for**
 19 **her to make any more efficiencies and she feels she has**
 20 **reached the limits of being able to do that. Beyond**
 21 **that, spending decisions are not those that I make. So**
 22 **they are the Treasury's decisions.**
 23 Q. Okay. The last point I wanted to raise is, at the
 24 moment, you have two inspectorates. Are there any plans
 25 to amend that and just have one inspectorate managing

Page 50

1 independent -- of all schools, but I am particularly
 2 focusing upon independent schools here, is there any
 3 sort of complaints line where parents can phone you up
 4 and say, "Well, we are a bit worried about this" or "We
 5 are a bit worried about that"?
 6 **A. Yes, we take complaints on all schools, on independent**
 7 **schools, yes. Yes. Sorry, I don't know --**
 8 Q. There is not, like, a kind of DfE hotline, for example?
 9 **A. No, I mean, we have got our public enquiries line, which**
 10 **will get you through to the right people. Obviously, we**
 11 **have got our Department of State Business, in that**
 12 **people can write to ministers and get replies from**
 13 **ministers from officials, yes, it is --**
 14 Q. And as far as -- but the complaint system, as far as it
 15 operates, is largely the school is meant to deal with it
 16 themselves?
 17 **A. In the first instance, yes, if the school can deal with**
 18 **it themselves. I mean, we obviously get complaints**
 19 **coming up to us from a range of places and we deal with**
 20 **those.**
 21 Q. Do you then investigate those or look at those or
 22 operate any kind of ombudsman-type service?
 23 **A. We don't have an ombudsman-type service but we do our**
 24 **best to understand what the complaint is by talking to**
 25 **a range of people or getting evidence from different**

Page 52

1 **places.**
 2 Q. Okay. Can I just check, how good is your information
 3 sharing with the Independent Schools Inspectorate and
 4 Ofsted? Because, obviously, we have noticed --
 5 obviously, we are only looking, we accept, through
 6 a lens which is particularly skewed?
 7 **A. Yes.**
 8 Q. But there have been issues and circumstances where
 9 people haven't told other people what they should have
 10 done. How are you ensuring that that doesn't happen, as
 11 far as you, the Department of Education, are concerned,
 12 and that other bodies are talking to each other?
 13 **A. So we have published and have -- regularly review**
 14 **various MoUs that we have with different organisations,**
 15 **which include data-sharing aspects of that.**
 16 **You know, we have also heard some of the things that**
 17 **have come out of the inquiry, and I would hope things**
 18 **have improved since that has happened, but it doesn't**
 19 **mean it is never going to happen, so it is about helping**
 20 **it not happen as frequently and picking it up where it**
 21 **does.**
 22 Q. Do you have, kind of, memorandums of understanding and
 23 information-sharing arrangements with, for example, the
 24 DBS, the Charity Commission, the ISI and Ofsted, the
 25 police?

Page 53

1 assuming it is things like age range, but I am thinking
 2 in particular, in respect of special educational needs
 3 schools, in terms of its pupil cohort?
 4 **A. If it changed -- if it was not a special educational**
 5 **needs school and it changed to be one, that would be**
 6 **a material change.**
 7 **I think a question about if it slightly changed from**
 8 **one kind of special needs school to another, it wouldn't**
 9 **necessarily be a material change. In terms of pupil**
 10 **numbers, significant changes from pupil numbers, yes.**
 11 **I mean, the purpose of a material change is for us**
 12 **to be able to see if it is a different kind of school,**
 13 **so in the process we went through in registration, in**
 14 **registering the school in the first place, it's actually**
 15 **some of the same checks and balances in the material**
 16 **change.**
 17 **It is not always the case that the schools tell us**
 18 **that they have had a material change and, if that was**
 19 **found out, we would obviously want to work to ensure**
 20 **that the checks and balances in approving the normal**
 21 **process of material change were gone through.**
 22 **Ultimately, we are looking for the school to be safe**
 23 **and providing good education, rather than to necessarily**
 24 **penalise the school for not having told us, although we**
 25 **would obviously prefer them to have gone through the**

Page 55

1 **A. I know we have them with Ofsted, I know we have them**
 2 **with the Charity Commission. I don't know if we have**
 3 **them with -- I would assume we have one with the ISI,**
 4 **but I don't know. DBS, I don't know if we have an MoU**
 5 **with them, but I know we talk to them, as we do to the**
 6 **Home Office. I think they were all your ones, were**
 7 **they? Oh, the police. Yes, with the Home Office and**
 8 **the police, we do. Yes, we do.**
 9 Q. There was a specific question that was raised yesterday
 10 about material changes, but particularly in respect of
 11 Stanbridge Earls and the fact that they had sort of
 12 changed their pupil population, but hadn't necessarily
 13 registered themselves for a material change.
 14 Can you just describe when individuals have to
 15 change themselves --
 16 **A. Yes.**
 17 Q. -- and how much you know that they are doing what they
 18 say they should be doing, particularly gaining the
 19 respect of the special schools sector?
 20 **A. Schools, we have material change guidance, we expect**
 21 **schools to apply for a material change if they meet**
 22 **those criteria.**
 23 Q. What is a material change?
 24 **A. Lots of different things it can be, but it can be --**
 25 Q. I am thinking in particular -- I mean, obviously, I am

Page 54

1 **proper process.**
 2 Q. How often do they not tell you? That is quite naughty.
 3 I mean, that's a slightly childish way of putting it
 4 but --
 5 **A. It may be naughty or it may be not understanding what**
 6 **the criteria are or, indeed, the process. How often,**
 7 **I don't know.**
 8 Q. They are running a school. One would hope they have
 9 a certain level of competence. One would very much hope
 10 so. So I think, isn't that just a bit of a poor excuse
 11 from them?
 12 **A. I don't know the figures and I don't know the reasons,**
 13 **but, you know, if it is a significant problem and is**
 14 **posing risk, then, yes.**
 15 **In terms of -- we would then, if the circumstances**
 16 **were that the school had done the material change**
 17 **without having told us, if that came to light, either**
 18 **through an inspection or through another route, it might**
 19 **be the case that we wanted to go in, ask an inspectorate**
 20 **to go in and see the changes that had been made, so we**
 21 **could assess whether they were appropriate and would**
 22 **meet the standards and we would approve that material**
 23 **change.**
 24 **I guess, in terms of the circumstances -- you know,**
 25 **it could be a penalty against failing of the standards**

Page 56

1 **if, actually, some significant material change had**
 2 **happened and they hadn't told us about it.**
 3 Q. What I want to deal with briefly is you said if they go
 4 from taking one sort of student to another, that would
 5 not necessarily be a material change, and I am
 6 specifically thinking in terms of, if they go from being
 7 a school which deals with children with specific
 8 learning difficulties and dyspraxia and then they move
 9 into dealing with children with significant emotional
 10 and mental health problems, wouldn't that be
 11 a significant material change?
 12 **A. I don't know, I don't know the specific criteria of the**
 13 **material change. I think the example I was giving was,**
 14 **if it moved from a school that didn't take any special**
 15 **educational needs to one that did, that is clearly**
 16 **a significant material change.**
 17 **I don't know whether we go into the detail of**
 18 **different kinds of special educational needs or learning**
 19 **disabilities within the criteria.**
 20 Q. You are not clear what the material change criteria --
 21 **A. I don't know whether they go into that level of detail.**
 22 **I suspect they probably don't.**
 23 Q. They --
 24 **A. You might know.**
 25 Q. I have had a quick look and I don't think they do. They

Page 57

1 **A. I don't know and I don't know why. We did see if we**
 2 **could find out, but we don't know why that was taken out**
 3 **of the legislation in the first place.**
 4 Q. It may well be it was just an oversight, given the
 5 amount of legislative activity that the Department of
 6 Education has historically undertaken. It wouldn't be
 7 a surprise if it was something that slipped under the
 8 radar. Okay.
 9 Can I now ask about the responsibility of local
 10 authorities in respect of safeguarding, in respect of
 11 schools. We have had Mr Benson of the Hampshire Local
 12 Safeguarding Board and we have also had the Association
 13 of Directors of Children's Services provide us with some
 14 written evidence. They have both identified concern
 15 that the director of Children's Services is
 16 strategically responsible for educational improvement
 17 and safeguarding responsibilities, for all schools,
 18 including independent schools, but doesn't really have
 19 any powers, certainly in the independent sector or, in
 20 fact, to any academies, which make up the majority of
 21 schools in this country now, to go in and to have look
 22 and see what is happening, to make sure that they are
 23 knitted in with the relevant safeguarding arrangements
 24 or the relevant partners.
 25 Is that something that you have identified as

Page 59

1 simply -- I mean, it would be a sort of radical change,
 2 so if you were sort of having a sixth form or things
 3 like that, it wouldn't involve a change of type of
 4 special educational need, unless, for example, you were
 5 adding like a nursing wing or something?
 6 **A. Yes.**
 7 Q. That would be the sort of circumstances, as I understand
 8 it, in the current guidance?
 9 **A. Yes, that is what I was trying to get across.**
 10 Q. Okay, so that then raises the question of what
 11 an independent special school is, which is something
 12 which the Independent Schools Inspectorate have raised
 13 with us, that there used to be an definition of it under
 14 section 347 of the Education Act 1996, and that got
 15 repealed but there has not been anything which has
 16 replaced it. So you still have a definition of
 17 a non-maintained special school which is a sort of
 18 slight peculiarity of history, which basically are
 19 schools run by charities largely, they're not
 20 profit-making schools and they are slightly more bound
 21 into the state system whilst still being quasi -- they
 22 are kind of quasi independent schools.
 23 But for independent special schools, there is no
 24 definition of what is or is not one. Do you think that
 25 is something that needs to be rectified?

Page 58

1 a problem? And, if so, what are you going to do to
 2 rectify it?
 3 **A. Okay, I think there are probably two parts.**
 4 **One is the part we have discussed a lot, which is**
 5 **our role in regulating the system. The second is how**
 6 **they are working together with other partners, and we**
 7 **did have a look at this. So Working Together does say**
 8 **that the LSCBs, the statute applies that -- the**
 9 **legislation applies to local authorities, police and the**
 10 **health service, but they are then able to coopt other**
 11 **organisations at their choice, which includes schools,**
 12 **including independent schools who then are under**
 13 **a statutory obligation through that arrangement.**
 14 **So, you know, I think the reforms in the LSCBs were**
 15 **about --**
 16 Q. This is the Children and Social Work Act 2017?
 17 **A. Correct.**
 18 Q. So you now have relevant partners who can be coopted?
 19 **A. That's right, and obviously that was all done on the**
 20 **basis that the relationships would be the important bit,**
 21 **but coopting a range of schools, including independent**
 22 **schools, into those arrangements would then -- would be**
 23 **a sensible thing to do. Working Together sets that out**
 24 **and they are then under a statutory obligation to work**
 25 **in partnership with those organisations. So I hope that**

Page 60

<p>1 is a bit of extra. 2 MS SCOLDING: That is very helpful. I have about five 3 minutes' worth questions, but I do know it is 11.15. So 4 if we may have our morning break now or would you like 5 me to carry on for five minutes? 6 THE CHAIR: I would like you to carry on. 7 MS SCOLDING: That is fine. 8 A. So would I. 9 MS SCOLDING: Okay Ms Dixon, it is just me who is desperate 10 for the cup of tea. 11 Can I ask, as well, one of the issues that's 12 raised -- and this is a more general issue to do with -- 13 there has been a fragmentation, or a perceived 14 fragmentation, in the schools, in the way that schools 15 operate, because local authorities are no longer largely 16 in control of schools, it is largely academies, so it is 17 you directly, the Department for Education, but then you 18 have got people like the Regional Schools Commissioners, 19 you've got Regional Social Care Commissioners who have 20 both come through you, you've got Ofsted, you've got the 21 ISI, you've got the local authority. It is quite 22 a complicated system. 23 Do you think there is some mechanism, or means, to 24 try and harmonise all those particular agencies or, at 25 the very least, to create some sort of coherent</p> <p style="text-align: center;">Page 61</p>	<p>1 relationship between them, so that everybody knows what 2 everybody else is meant to be doing and particularly in 3 respect of safeguarding? 4 A. The first is probably a political question, so, I won't 5 answer that. 6 In terms of how does the system operate together, 7 I think that is set out very clearly in the 8 Working Together guidance, and I think, you know, 9 when -- when there are a lot of partners in a system, 10 being clear where the clear route of escalation is on 11 safeguarding through the local authority, I think that 12 is very clear and we have heard about that being very 13 clear. I suppose the only thing I would say is the 14 about the thing we've just talked about, the local 15 children safeguarding boards, which is recognising that 16 this thing works through relationships and thinking 17 through, in a local area, where those strong 18 relationships need to be, but considering the range of 19 organisations that you might want to draw from. 20 Q. I am just thinking, one of the issues that has been 21 raised is the inspectorate saying they have no power to 22 compel the LADO to provide them with information. 23 Do you think that is something you should be looking 24 at in order to make sure there is adequate information 25 sharing in those circumstances?</p> <p style="text-align: center;">Page 62</p>
<p>1 A. I don't know what we think about that, but we have -- 2 I have heard some things in these hearings about it. 3 I think, as part of inspections, inspectorates do ask 4 the LADO, but I have also heard that their concern is 5 they don't always get the information they need. The 6 other debate is about whether the LADO should be 7 proactively given that information as and when. I think 8 probably the system of them asking when they are going 9 to do an inspection is the right one. 10 Perhaps the gap is there in terms of how -- well, 11 when they are not getting the information they need and 12 it would be expected that they would be. 13 Q. My last question is on a completely different topic -- 14 A. Okay. 15 Q. -- which is managing sexually harmful behaviour between 16 young people. 17 A. Yes. 18 Q. You have obviously produced some guidance last year. 19 A. Yes. 20 Q. I think everybody welcomes that guidance, but the 21 difficulty is that for those with special educational 22 needs and disabilities, I think there is a vanishingly 23 small amount of specific information. I think 24 I counted -- and I might be wrong -- two lines in 25 a 65-page document.</p> <p style="text-align: center;">Page 63</p>	<p>1 Do you think, given the fact that there is possibly 2 a higher prevalence -- and the reasons for that we 3 explored in some detail with Professor Hackett on 4 Tuesday -- there might be a role for some specific 5 guidance about how schools -- particularly mainstream 6 schools, which might be less familiar with the 7 principles for managing and dealing with those issues? 8 A. I think that we are looking at how we incorporate that 9 peer-on-peer abuse guidance into Keeping Children Safe 10 in Education, that we are doing a more significant 11 review, looking at that and other things for 12 next September, and so we can certainly put that in to 13 that review that we are looking at. I think the other 14 points about, you know, how much do you put in that case 15 itself against something separate, it is all things we 16 have heard. 17 MS SCOLDING: Thank you very much, Ms Dixon. I have no 18 further questions, but the chair and panel may have some 19 for you. 20 THE CHAIR: We do, I will begin. 21 Questions from THE PANEL 22 THE CHAIR: Can you just confirm that you said that the 23 majority of inspections of residential special schools 24 were now integrated with inspections between ISI and 25 Ofsted?</p> <p style="text-align: center;">Page 64</p>

1 **A. Yes, I believe that is the case. I think there are**
 2 **about five that are not.**
 3 THE CHAIR: Do they produce a single report?
 4 **A. I don't know. I would think maybe possibly not, because**
 5 **they are meeting two different sets of standards. It**
 6 **might be that the two reports then sit side by side.**
 7 THE CHAIR: All right. The other point I wished to raise
 8 was around at the beginning of questioning, regarding
 9 a barred person becoming a proprietor. You would
 10 acknowledge, I am sure, that, as a proprietor, they
 11 would always require access to buildings and grounds for
 12 maintenance purposes, at the very least, and may,
 13 indeed, live on the grounds of a special school?
 14 **A. They may. Yes, I think it is about the regulatory**
 15 **activity definition contact with children point, but**
 16 **yes.**
 17 THE CHAIR: Indeed, they would have responsibilities for the
 18 upkeep of the grounds, and development of them, that
 19 would have direct implications for safeguarding in
 20 respect of physical layout, for example in changing,
 21 communal showers, et cetera to other kinds, so they may
 22 continue to have a direct involvement in issues that
 23 impact on safeguarding?
 24 **A. Yes, and I guess the ultimate responsibility for**
 25 **safeguarding rests with them, sort of some of the**

Page 65

1 understanding is that the number of residential special
 2 school which the ISI inspect is quite small in number.
 3 So, in fact, the overlap between the residential
 4 special school sector of having two different
 5 inspectorates is quite small.
 6 It is much more common in the non-special school
 7 shall we say, the non-special school boarding. So just
 8 checking that, I think that is the position. I see nods
 9 from the corner.
 10 THE CHAIR: Thank you.
 11 Mr Frank?
 12 MR FRANK: Yes, just it is a small matter, but since this is
 13 being aired publicly, I don't want the public at large
 14 to be misled by an answer that you may have
 15 inadvertently given in relation to the description of
 16 the material changes that need to be notified. Do you
 17 remember you were asked about that?
 18 **A. Yes.**
 19 MR FRANK: I think you indicated that if the school made
 20 a change from the type of special needs provision, you
 21 thought that might not be the kind of change that needs
 22 to be notified. But just for the sake of
 23 completeness -- this is not a law lecture, this is for
 24 your understanding.
 25 **A. Thank you.**

Page 67

1 **questions we explored earlier in the week about relevant**
 2 **levels of training and where they are getting their**
 3 **expertise from, needing to have somebody expert in**
 4 **safeguarding in their organisation.**
 5 THE CHAIR: Yes, but the concern would be that the very fact
 6 of a barred person being able to be an owner/proprietor
 7 is the question.
 8 **A. I mean, yes, what you say is right. I think what I was**
 9 **referring to was the other bits of the system, so the**
 10 **DBS check, the regulatory activity, about thinking**
 11 **through how often or whether they would have the**
 12 **opportunity to have contact with children and the system**
 13 **being set up to protect the contact frequency, with**
 14 **children.**
 15 **Is that the question you were asking?**
 16 THE CHAIR: No. I am really asking you, do you think
 17 a barred person should have the right to continue to be,
 18 or to be, an owner/proprietor of a residential special
 19 school or of any place with vulnerable children?
 20 **A. And I think my response was that we would -- if there**
 21 **was an opportunity to change some things about the DBS**
 22 **system with the Home Office, then we would welcome**
 23 **having those conversations.**
 24 THE CHAIR: Thank you.
 25 MS SCOLDING: Chair, can I just clarify something? My

Page 66

1 MR FRANK: If I can direct your attention to paragraph 3(g)
 2 of paragraph 98 of the Education Act 2008 -- I think you
 3 will find that is, indeed, the kind of material change
 4 that does need to be notified.
 5 So just -- you might want to have a look at that at
 6 some point?
 7 **A. Thank you.**
 8 MR FRANK: The question I want to ask you is this, though:
 9 in relation to the number of cases that you have under
 10 review, which I think you keep an eye on, the difficult
 11 cases, and I think you indicated about 22 in number.
 12 **A. Correct.**
 13 MR FRANK: You don't know whether those are included within
 14 the list of about 30 schools that Ofsted are worried
 15 about, because we have heard in the evidence. Do you
 16 think that is the sort of information that you ought to
 17 know in sharing information between yourselves and
 18 Ofsted?
 19 **A. Yes. So we would be very interested to know which**
 20 **30 cases Amanda was referring to. We do have regular**
 21 **case conferences with Ofsted. So, yes, we will**
 22 **certainly ask which particular 30 she is worried about.**
 23 **It may be because our -- she may be comparing**
 24 **a different set of dates, 30 and 22, because cases**
 25 **obviously come in and out of those things, but yes, we**

Page 68

1 **are interested, so your point about are we talking to**
 2 **each other enough and would we be interested is taken on**
 3 **board.**
 4 MR FRANK: Thank you.
 5 My final question is this, you indicated in relation
 6 to the powers under section 128 of the 2008 Act that you
 7 were -- you said learning how that applies. But that
 8 Act and that section came into force in June of 2009.
 9 More than ten years ago.
 10 **A. Yes.**
 11 MR FRANK: The question may be asked, why is it taking so
 12 long to learn how to use those powers?
 13 **A. I -- again, I don't know quite what it was drafted for,**
 14 **but I think my understanding is we are using that power,**
 15 **section 128, possibly in a different way than it might**
 16 **have been envisaged being originally written, so we are**
 17 **finding that we can use it for more things than we --**
 18 **than it was originally written for. Hence learning how**
 19 **to sort of use it to reflect the current system better.**
 20 MR FRANK: Thank you very much.
 21 **A. No problem.**
 22 THE CHAIR: Ms Sharpling?
 23 MS SHARPLING: Do you know how many registrations of
 24 independent schools were refused, say, in the last
 25 financial year, or calendar year, depending on how you

Page 69

1 **the unregistered schools setting, on home education, on**
 2 **independent school registration, so I think it is a very**
 3 **good question to ask.**
 4 **What we try and do is look in the round about,**
 5 **actually, where the best place for these children would**
 6 **be and, actually, in a system that is visible and**
 7 **regulated is often where we would like them to be, is**
 8 **the best place they can be kept safe.**
 9 MS SHARPLING: Thank you.
 10 **A. Can I just reiterate what my counsel said which is that,**
 11 **apologies for not having the documents that you would**
 12 **have liked me to answer questions on and we will come**
 13 **back to you on that.**
 14 THE CHAIR: Thank you, Ms Dixon. We have no further
 15 questions and we will now take our break, Ms Scolding,
 16 until 11.45.
 17 MS SCOLDING: Thank you very much, chair and panel.
 18 (11.29 am)
 19 (A short break)
 20 (11.45 pm)
 21 MS ALMUDENA LARA (affirmed)
 22 Examination by MS SCOLDING
 23 MS SCOLDING: Chair and panel, this is Ms Lara, who is in
 24 core bundle G, behind tab 4.
 25 Ms Lara, good morning and thank you very much for

Page 71

1 measure these things?
 2 **A. I don't, but I suspect the team do. So if you would**
 3 **be --**
 4 MS SHARPLING: Are you not able to have an educated guess at
 5 it, for the purposes of --
 6 **A. I don't know, sorry.**
 7 MS SHARPLING: My next question is really leading on from
 8 the questions that have already been asked. Could
 9 I just put a proposition to you and see what you think?
 10 **A. Yes, of course.**
 11 MS SHARPLING: If the registration process of independent
 12 schools was made more rigorous in various ways, would
 13 that assist in reducing the number of schools that, in
 14 fact, cause challenges and difficulties and possibly
 15 attract enforcement action further down the line? So
 16 putting what is called front loading, I think it is
 17 called, in the registration process to inhibit the
 18 difficulties that we have discussed during the course of
 19 this inquiry?
 20 **A. I think it is a very good question. I think**
 21 **an application to register a school is often trying to**
 22 **meet a need, so I think it would be looking at,**
 23 **actually, what are the other -- how else might that need**
 24 **be met, and I know we often find there is quite a lot of**
 25 **overlap in terms of the policy thinking we are doing on**

Page 70

1 coming. I just have a few things before I start to ask
 2 you some questions. Firstly, this is not a test of
 3 memory, please feel free to refer either to your witness
 4 statement or, secondly, to any other notes.
 5 Secondly, we can stop at any time and for any
 6 reason, please do just raise your hand.
 7 Thirdly, there is a paper bundle in front of you,
 8 but I will also be getting documents up on the screen.
 9 Can I ask you, please, Ms Lara, to turn behind tab A/1
 10 of your bundle, which should contain your witness
 11 statement, which is 26 pages in length?
 12 **A. Yes.**
 13 Q. Is that right?
 14 **A. Yes, that's correct.**
 15 Q. Did you sign that witness statement?
 16 **A. I did sign that witness statement.**
 17 Q. Is it true, to the best of your knowledge and belief?
 18 **A. It is true, to the best of my knowledge and belief.**
 19 **There is one small edit that I will refer to, if that is**
 20 **okay.**
 21 Q. That is absolutely fine. Please do, if you would like
 22 to tell us now what the small edit is?
 23 **A. It is in relation to some e-learning training that we**
 24 **are providing that we said would be ready for**
 25 **this November and it has been delayed to January, so**

Page 72

1 **that is the correction I would like to make.**
 2 Q. Can I also -- I also understand that you are the head of
 3 policy and public affairs of the NSPCC, but in drawing
 4 together this information, you have had to speak to
 5 a great number of colleagues?
 6 **A. Indeed.**
 7 Q. So this is a corporate witness statement, so to speak?
 8 **A. Absolutely, and I am here representing the totality of**
 9 **the NSPCC, but in putting the witness together, we drew**
 10 **from a lot of expertise across the organisation, so**
 11 **I will do my best to really answer in detail any of the**
 12 **questions that come my way, but if I need to draw on**
 13 **further expertise, I might need to provide further**
 14 **evidence later.**
 15 Q. Okay. So you, Ms Lara, you are the head of policy and
 16 public affairs team at the NSPCC and you are responsible
 17 for the public policy agenda for the organisation; is
 18 that right?
 19 **A. Correct.**
 20 Q. How long have you held that role?
 21 **A. It is coming to three years in February 2020.**
 22 Q. Right, and prior to that, I understand you worked at the
 23 Department of Education in various roles involving
 24 children in care and social work reform; is that right?
 25 **A. Correct.**

Page 73

1 **89, in fact.**
 2 **But the point remains that there is a difference**
 3 **between our reach in state-maintained schools and**
 4 **private schools, and one can only speculate about what**
 5 **the reasons might be, but I think that we would have**
 6 **a concern that some schools are maybe not prioritising**
 7 **this agenda to the extent that we would like to see.**
 8 Q. This programme, is this something that you write to all
 9 schools and offer it and say, "Would you like somebody
 10 to come along?" --
 11 **A. Yes.**
 12 Q. -- or is it promoted by the Department of Education in
 13 any way?
 14 **A. No, this is an NSPCC programme and we will -- we have**
 15 **a reach-out programme to try to get to schools and**
 16 **particularly targeting schools that might not**
 17 **proactively come to us.**
 18 Q. You have also developed a programme on Speak Out, Stay
 19 Safe that is particularly designed for children with
 20 autism, mild/moderate learning disability and other
 21 additional learning needs. Could you tell us a little
 22 bit about that?
 23 **A. Yes, so this is an adaptation and the reason why we --**
 24 **so, throughout our standard offer of Speak Out, Stay**
 25 **Safe, we would reach children with special educational**

Page 75

1 Q. I would like to you ask first about the learning and
 2 education programmes that the NSPCC run?
 3 **A. Yes.**
 4 Q. You mention in your witness statement something called
 5 Speak Out, Stay Safe, which is designed to establish, as
 6 I understand it, a safeguarding culture within schools.
 7 Roughly, what is it that Speak Out, Stay Safe does and
 8 who is it aimed at?
 9 **A. So the service Speak Out, Stay Safe was established in**
 10 **2016 and aims to -- it is aimed to children in primary**
 11 **education.**
 12 Q. Right.
 13 **A. The idea is to go to schools at least twice in the cycle**
 14 **of a child being in primary education to run assemblies**
 15 **that talk about relationships, healthy relationships and**
 16 **unhealthy relationships, and abuse more widely and helps**
 17 **the children, but also the wider school, to start**
 18 **a conversation about relationships and safeguarding.**
 19 Q. Right. And as I understand it, you identify in your
 20 witness statement that you have reached 85 per cent of
 21 maintained primary schools, including academies, but
 22 only 59 per cent of independent schools. Do you know
 23 why that is?
 24 **A. So just to say the figure of which has gone up, so it is**
 25 **closer to 90 per cent, but the point remains that it is**

Page 74

1 **needs that are in mainstream education and we will try**
 2 **to adapt that programme with the teaching assistants to**
 3 **make sure it is adapted to the needs of the children**
 4 **with the special educational needs in mainstream schools**
 5 **but we also identified that there was a gap in the**
 6 **system and that there was a need for a more tailored**
 7 **programme that would actually be better adapted to the**
 8 **needs of special schools.**
 9 **So the programme is, instead of just being one**
 10 **assembly that the NSPCC delivers, the programme is**
 11 **designed over six different sessions to take into**
 12 **account the learning requirements of children with**
 13 **special educational needs, and another difference is**
 14 **it's more visual and more interactive, it is built**
 15 **around four key characters and it helps the child**
 16 **identify what we call the "safe circle", so the trusted**
 17 **adults that would be around the child to protect them.**
 18 **The other key difference, as well, is that this is**
 19 **more led by the school than the standard Speak Out, Stay**
 20 **Safe offer, which would be led by our NSPCC staff and**
 21 **our volunteers, delivered to children. The adaptation**
 22 **actually recognises that it is important that those**
 23 **delivering the programme to children with special**
 24 **educational needs have a specific connection with the**
 25 **child, and trust built, so that what we do is train the**

Page 76

<p>1 teachers to actually deliver this programme.</p> <p>2 Q. And how many -- do you know how many schools it is being</p> <p>3 delivered to and is it something you are looking to</p> <p>4 adapt to a wider range of children with special</p> <p>5 educational needs and disabilities?</p> <p>6 A. Yes, we would love to continue to adapt the programme</p> <p>7 and we would love to reach as many schools as possible.</p> <p>8 I don't actually have the number of schools, but the</p> <p>9 figure that I have is that we have reached 35 per cent</p> <p>10 of special schools, and that would be around 15 schools</p> <p>11 a month that we have reached so far, but that obviously</p> <p>12 leaves still many, many schools that we haven't yet</p> <p>13 reached.</p> <p>14 Q. Okay.</p> <p>15 A. Can I make another point which I think is important,</p> <p>16 which is we don't necessarily reach all children within</p> <p>17 those schools, so I think more work would be required</p> <p>18 and desirable to actually make sure that, within the</p> <p>19 schools, we manage to reach as many children as possible</p> <p>20 that could benefit from this programme.</p> <p>21 Q. You run also a national programme of training, as</p> <p>22 I understand it, for designated safeguarding leads,</p> <p>23 Safer Recruitment training, bespoke audits, as well as</p> <p>24 something called an education self-assessment school</p> <p>25 which you give out to schools for them to audit</p> <p style="text-align: center;">Page 77</p>	<p>1 themselves whether or not they need any more help.</p> <p>2 Do you, or does the NSPCC, have any views about</p> <p>3 whether or not there should be some kind of minimum</p> <p>4 standards of training for designated safeguarding leads</p> <p>5 or for teachers?</p> <p>6 A. I think the answer is, yes, I think the designated</p> <p>7 safeguarding leads need to be properly trained and they</p> <p>8 need to be properly empowered in the school. They need</p> <p>9 to be a visible member of staff that is recognised and</p> <p>10 is knowledgeable, but what I would say is that it cannot</p> <p>11 just be one individual within the school that holds that</p> <p>12 responsibility, the responsibility to safeguard children</p> <p>13 is a shared responsibility across the school, so I would</p> <p>14 argue that all members of staff need to be trained in</p> <p>15 understanding safeguarding.</p> <p>16 Q. But the DSL needs a higher level -- now, at the moment,</p> <p>17 the Department of Education in its Keeping Children Safe</p> <p>18 in Education requires that training is undertaken but</p> <p>19 doesn't specify what it should be or how long it should</p> <p>20 last. Do you think that is acceptable?</p> <p>21 A. I think that in the absence of guidance as to what the</p> <p>22 training needs to cover and the quality of the training,</p> <p>23 I think we are at risk of having designated safeguarding</p> <p>24 leads that do not fully understand the requirements of</p> <p>25 the role.</p> <p style="text-align: center;">Page 78</p>
<p>1 Q. You also offer a number of e-learning courses in child</p> <p>2 protection, school governors, keeping children safe</p> <p>3 online and harmful sexual behaviours?</p> <p>4 A. Hmm.</p> <p>5 Q. Could I ask, in respect of school governors, do you have</p> <p>6 any views about whether or not they should have some</p> <p>7 form of training in order to approach their role as</p> <p>8 governors of schools appropriately?</p> <p>9 A. I think the answer is yes. I think I would argue that</p> <p>10 all governors should take their responsibilities to</p> <p>11 safeguarding seriously and I am sure they do, many, but</p> <p>12 I think having the training would also mean that</p> <p>13 safeguarding is embedded in the school from the top and</p> <p>14 the leadership in safeguarding is taken seriously.</p> <p>15 I think it is also important, since governors have</p> <p>16 the role as well to hold others to account and challenge</p> <p>17 others, that they have that understanding to be able to</p> <p>18 hold others to account in the schools, so that the</p> <p>19 culture of safeguarding is reinforced throughout.</p> <p>20 Q. Can I ask, the training and e-learning courses you</p> <p>21 provide, do they both address the teaching/training for</p> <p>22 those who might work with disabled children or are they</p> <p>23 aimed at a mainstream school setting?</p> <p>24 A. I think, at present, they are aimed at mainstream school</p> <p>25 settings, but we have recognised that there is a gap in</p> <p style="text-align: center;">Page 79</p>	<p>1 the system. So one of the things that we have been</p> <p>2 doing is developing a specific online training course</p> <p>3 for safeguarding children with SEND and that is the</p> <p>4 course that I referred at the beginning that has been</p> <p>5 delayed in its launch but it will be launched</p> <p>6 in January 2020.</p> <p>7 Q. Can you tell us a little bit about your PANTS programme</p> <p>8 as well and whether or not you have adapted it for</p> <p>9 children with disabilities?</p> <p>10 A. The PANTS programme is a simple way, it is based on the</p> <p>11 underwear rule and it is a simple way to start</p> <p>12 a conversation --</p> <p>13 Q. What is the underwear rule? I think probably everyone</p> <p>14 in this room does know it, but other people watching</p> <p>15 might not.</p> <p>16 A. Basically, it is a very simple message, that tells</p> <p>17 children that their private parts belong to them and</p> <p>18 that is everything that is covered by your underwear,</p> <p>19 you should not be asked to be shown to others or touched</p> <p>20 by others and that, if you have any concerns about</p> <p>21 someone approaching you with such a request, you should</p> <p>22 speak to a trusted adult.</p> <p>23 So it is a simple way and it is -- it has a nice</p> <p>24 song attached to it that is appealing to children and</p> <p>25 adults and can also help to -- as a start-up of</p> <p style="text-align: center;">Page 80</p>

<p>1 a conversation. It is not an end in itself, it is the</p> <p>2 start-up of a conversation about how to keep children</p> <p>3 safe.</p> <p>4 Q. Okay, and that has been adapted for children who are</p> <p>5 deaf, children with learning disabilities, autistic</p> <p>6 children, and also parents who may have a learning</p> <p>7 disability, to tell their children?</p> <p>8 A. Indeed.</p> <p>9 Q. Is that the main groups you identify or are you</p> <p>10 proposing to run the PANTS programme with a wider group</p> <p>11 of children with disabilities?</p> <p>12 A. So that is at present. I am in no position now to say</p> <p>13 what the future plans are, but I am happy to go back to</p> <p>14 the NSPCC and get back to you on that.</p> <p>15 Q. You also run, as I understand it, something called the</p> <p>16 Letting the Future In service, which is a specific</p> <p>17 service for children with learning disabilities who have</p> <p>18 been the subject of sexual abuse. Could you tell us</p> <p>19 a little bit about that?</p> <p>20 A. The original Letting the Future In programme was not</p> <p>21 specifically for children with learning disabilities,</p> <p>22 and there has been recently an adaptation for children</p> <p>23 with learning disabilities. So the basics of the</p> <p>24 programme is aimed at children with -- who have suffered</p> <p>25 sexual abuse and it is very adaptive and the therapist</p> <p style="text-align: center;">Page 81</p>	<p>1 will work with the children and the carers to identify</p> <p>2 what type of therapy they might require to recover.</p> <p>3 When we are talking about the adaptation for</p> <p>4 children with learning disabilities, that is done at</p> <p>5 a pace that suits best the child, there is a specific</p> <p>6 focus on consent issues, on communication, and on being</p> <p>7 more adaptive to the needs of the child and I think the</p> <p>8 frequency of the programme is also more -- it is more</p> <p>9 frequent, but shorter sessions as well, so that,</p> <p>10 actually, the child is better served.</p> <p>11 Q. You also, as I understand it, do provide Personal,</p> <p>12 Social and Health Education -- sometimes known as</p> <p>13 PSHE -- lesson plans to schools. Have you developed</p> <p>14 those with disabled children in mind or, again, might</p> <p>15 they be aimed at a neuro-typical young person?</p> <p>16 A. It is my understanding they are mainly aimed at</p> <p>17 neuro-typical children, but it is obviously a gap and</p> <p>18 something that needs to be adapted, and we know from</p> <p>19 a recent survey that we carried out with the National</p> <p>20 Education Union that one of the concerns of teachers in</p> <p>21 implementing the new relationship and sex education</p> <p>22 curriculum is that specifically 50 per cent feel unsure</p> <p>23 or would like more guidance about how to adapt the</p> <p>24 curriculum to children with special educational needs.</p> <p>25 Q. Okay, so we have obviously heard about the survey you</p> <p style="text-align: center;">Page 82</p>
<p>1 have done with the National Education Union, which is</p> <p>2 a large teaching -- I think it is the largest teaching</p> <p>3 union, in fact.</p> <p>4 Now, obviously, the government has plans to</p> <p>5 implement statutory relationship education in all</p> <p>6 primary schools and sex and relationship education in</p> <p>7 all secondary schools from next September. Does the</p> <p>8 NSPCC have any view about what sort of training,</p> <p>9 resources, guidance, is going to be needed in order to</p> <p>10 make sure that it is, firstly, effective and, secondly,</p> <p>11 consistent?</p> <p>12 A. Yes, I think almost the answer is in the question.</p> <p>13 I think we need to make sure that, in order to make it</p> <p>14 effective and consistent, we have clear guidance</p> <p>15 developed by the DfE and that schools are supported in</p> <p>16 whatever way is required to actually make sure that they</p> <p>17 understand what the requirements are and that they are</p> <p>18 prepared to deliver that content.</p> <p>19 I think we have fantastic teachers across the land</p> <p>20 but I think it is a big ask on them, an additional ask,</p> <p>21 to teach this material that, for many, will basically</p> <p>22 get them out of their comfort zone, so we need to make</p> <p>23 sure that we prepare them well so that this doesn't</p> <p>24 become just a tick-box exercise and pays lip service to</p> <p>25 these really important agendas, so we will -- we are</p> <p style="text-align: center;">Page 83</p>	<p>1 advocating for strong support for teachers in delivering</p> <p>2 this agenda.</p> <p>3 Q. Are you doing any work around that? Are you providing</p> <p>4 any resources? Are you undertaking any training for</p> <p>5 teachers as far as that is concerned?</p> <p>6 A. So we are influencing -- doing influential work and</p> <p>7 influencing work with the DfE. We have a lot of</p> <p>8 material in our website about safeguarding. I think our</p> <p>9 Speak Out, Stay Safe assembly can be seen as providing</p> <p>10 one of the modules of relationship and sex education;</p> <p>11 obviously relationship and sex education is a much</p> <p>12 broader agenda, but keeping safe and safeguarding would</p> <p>13 be a key plank to any relationship and sex education</p> <p>14 agenda.</p> <p>15 So that is the angle where the NSPCC has particular</p> <p>16 expertise and where we want to make sure that that</p> <p>17 becomes more mainstream. Also, that is not a one-off</p> <p>18 assembly that is delivered by someone externally, but</p> <p>19 that becomes more embedded in the day-to-day of the</p> <p>20 school life and the conversation of the school.</p> <p>21 Q. Now I would like to turn to focus and ask you in</p> <p>22 particular on the protection of children with</p> <p>23 disabilities from sexual abuse.</p> <p>24 The NSPCC produced a report in 2015 called "We have</p> <p>25 the right to be safe: Protecting disabled children from</p> <p style="text-align: center;">Page 84</p>

<p>1 abuse" and that is at NSP000103, please, Ralph. 2 Can I take you to page 15 of that report. A lot of 3 the first 12 or 13 pages tells us a lot of the things we 4 heard from various individuals earlier in the week. 5 Page 15, second column, second paragraph, please. 6 So from "Marchant" all the way down to the bottom of 7 that, please, thank you. 8 That identified a number of myths that were referred 9 to way back in 1991 about the sexual abuse of disabled 10 children, but what you say in the second paragraph is: 11 "Anecdotal evidence and the lack of investment in 12 teaching personal safety skills to disabled children 13 suggests these myths may still to some degree remain 14 today. The delays in identifying child protection 15 thresholds for disabled children are further evidence of 16 the reluctance to believe that disabled children are 17 abused and the minimisation of the harm done." 18 So can we identify -- do we think those myths -- 19 this was in 2014. Do we think those myths still apply 20 today in 2019? 21 A. Unfortunately, yes. I think that those remain. 22 Q. Okay, and the report also identifies significant gaps in 23 knowledge about the abuse of disabled children. That is 24 page 28, the second column, please, Ralph. 25 So we identify a number of gaps in knowledge,</p> <p style="text-align: center;">Page 85</p>	<p>1 including: the nature and circumstances of abuse; the 2 effectiveness of different preventative measures; what 3 helps and hinders; disabled children's views; models for 4 effective therapeutic intervention; children's 5 experience of the criminal justice system; the potential 6 of new technology. 7 That is quite a lot. So you would say, within the 8 UK, we don't really know which children who are disabled 9 are subject to abuse, how often that takes place, what 10 the differences might be, what the effectiveness is of 11 any preventative measures or any models for effective 12 therapeutic intervention? 13 A. I think we know some of that, but I think in its 14 totality, I think the gaps in knowledge are big and 15 I think we need to -- we just need to invest 16 collectively to get a better understanding across all 17 those bullet points. 18 Q. Have any of those gaps in knowledge been filled between 19 2014 to now? 20 A. Fully filled? 21 Q. Yes. 22 A. No. 23 Q. But, at the very least, partially filled? I am thinking 24 in particular about knowing the nature and circumstances 25 of abuse, the effectiveness of preventative measures and</p> <p style="text-align: center;">Page 86</p>
<p>1 models of effective therapeutic intervention? 2 A. I think we know more about those but I don't think we 3 know as much as we should to fully serve this group of 4 children properly. So more can be done. 5 Q. Okay, and what more do you think should be done on 6 a very practical level? Is this more professional 7 research, is this more research by bodies like yourself, 8 is this by the DfE collecting more information? 9 A. I think it is a number of things that include all those 10 that you mentioned. I think there is something quite 11 basic as well about collecting data from local 12 authorities, from the bottom up, and from schools. It 13 is a big gap currently in knowledge. I know that -- 14 Q. What sort of data would you like to see collected? 15 A. So it is simply about how many children with the special 16 educational needs are in different educational settings, 17 what type of support they are receiving, what type of 18 issues are being raised in relation to those children. 19 I think the information that we have is anecdotal and 20 there is no way to collectively make sense of the 21 information that we have, so that we can make a judgment 22 of the totality of the problem and I think the inquiry 23 is doing a fantastic job in moving us in that direction 24 but I think there is much more work that needs to be 25 done.</p> <p style="text-align: center;">Page 87</p>	<p>1 I know that the working group on protecting -- 2 sorry, what is the -- let me get the name right, of the 3 working group. 4 Q. Please do? 5 A. It is the National Working Group on Safeguarding 6 Disabled Children, which is a group of organisations 7 across the sector that the NSPCC co-chairs with the 8 (inaudible) Trust. That group has developed a document 9 called Key Lines of Enquiry and we are starting to work 10 with some local authorities to refine that document, to 11 see how we can start getting better information on the 12 ground of what the totality of the problem is. 13 Q. Yes, okay. So we are still really at what I might 14 describe as quite an embryonic stage of understanding 15 even what the problem is, let alone how we might solve 16 it? 17 A. I think so, yes. 18 Q. You talk about, in some places, the Safeguarding Board 19 of Northern Ireland which has identified, as one of its 20 priorities, the safeguarding of disabled children in its 21 first strategic plan. 22 Obviously, we don't have safeguarding boards in 23 England and Wales in the same way. Do you think, from 24 the work that the NSPCC has undertaken in Northern 25 Ireland, that prioritising the safeguarding of disabled</p> <p style="text-align: center;">Page 88</p>

<p>1 children has made a difference in terms of the 2 education, training or outcomes for those children since 3 that plan was put in place? 4 A. I am afraid I do not have answer to that question, but 5 I am very happy to go back to my colleagues in Northern 6 Ireland and get back to you. 7 Q. Do you think that England and Wales should do the same 8 thing in terms of having some kind of priority for 9 safeguarding disabled children? 10 A. I think having a clear statement of priority would help, 11 but I think that, if I am going to go back and see how 12 it has worked in Northern Ireland, I might be able to 13 also get back to you with ideas on how it might work 14 here. 15 Q. Okay. Just turning now to the particular issue of 16 safeguarding in a residential school setting, you 17 identified the particular complexities there might be 18 there and the difficulties with children living away 19 from home; in this case, in a boarding school setting. 20 You use a term saying that, "The schools' 21 safeguarding policies need to adopt a contextual 22 safeguarding lens". This is something that is also set 23 out in Keeping Children Safe in Education. 24 What does that mean? 25 A. So what that basically means is that to fully safeguard</p> <p style="text-align: center;">Page 89</p>	<p>1 children, you need to understand the context, the wider 2 context, in which the child operates. That applies to 3 residential schools, but applies also more widely to any 4 other setting. So you need to understand, what is the 5 context of the child, what is the history of the 6 child -- the children that you have, their experiences 7 of abuse. You need to understand the context of the 8 school and the situations that might be risky or 9 generate more risk for children and, as a school, you 10 need to think about how those situations are minimised 11 and you need to take -- to invest in creating a culture 12 where all children feel safe and are able to identify 13 adults that are safe and that they can turn to. 14 Q. Now, can I ask you -- which sort of follows on from 15 that, is listening and advocacy services. You identify 16 in your witness statement that you are concerned about 17 the entitlement, particularly, of disabled children to 18 listening and advocacy services and confusion in terms 19 of the national minimum standards and where children 20 are. 21 What would the NSPCC like to see in terms of, 22 particularly, the provision of advocacy services for 23 disabled children living away from home in residential 24 schools? 25 A. So I think the system needs to be strengthened and the</p> <p style="text-align: center;">Page 90</p>
<p>1 system needs to be clarified and applied more 2 consistently. 3 I think that what the system needs also to ensure is 4 that the listening system, or oral advocacy system, is 5 fully embedded in the school, so you cannot have 6 a system that sits outside -- so bearing in mind, it is 7 obviously a tension that others have identified between 8 independence, which suggests it needs to be independent, 9 but also needs to be fully embedded as part of what 10 children understand that is their entitlement and they 11 can go back to someone that will listen and take action 12 if issues are raised, and specifically in relation to 13 children with special educational needs, it needs to be 14 adapted to their communication needs. 15 So I know that some people have talked about, like, 16 calling someone. That might actually not be appropriate 17 for many young people with learning disabilities and we 18 know that from our Childline service as well, where 19 actually we have -- 20 Q. Can you tell us a little bit about the fact you have 21 adapted your Childline service for those with 22 disabilities, as I understand it? 23 A. Yes, so it builds more on the wider adaptation of 24 catching up with the way children communicate at 25 present, which generally involves less of a phone call</p> <p style="text-align: center;">Page 91</p>	<p>1 and more of a chat. But what we know -- online chat -- 2 is that that is particularly the preferred option for 3 children that have learning disabilities. It is the 4 preferred option for children more widely, but it also 5 helps to start the conversation, start testing the 6 grounds, seeing how much trust you can build on the 7 service that you are reaching out to, and then that 8 might be followed up with a phone conversation, or not, 9 but, actually, for many children, the ability to just 10 chat online is a much more appropriate way of expressing 11 their feelings, feelings that are often just very 12 difficult to get across, especially with people that you 13 don't know. 14 So I would say that -- and in relation to Childline, 15 as well, I would say there is that service that is 16 available to all children, so I would like that service 17 to be made clearer to children that it is available, 18 that they can reach out to Childline, it is 24/7 and 19 children in residential schools, children with special 20 educational needs, could call the service and receive 21 support. That does not preclude wider investment in 22 an advocacy service, which I think needs to also take 23 place to ensure that the needs of children with 24 disabilities in residential schools, and in particular 25 those with special educational needs, are met.</p> <p style="text-align: center;">Page 92</p>

<p>1 Q. Following on from that, you identify in your statement 2 some concerns you have about the current system of 3 educational guardianship? 4 A. Yes. 5 Q. Can you identify what the NSPCC thinks should happen? 6 A. This is not an area that we have covered in any detail, 7 so I will refer back to some of the experts that have 8 been seen by the inquiry during this process, but it 9 does seem -- what we have identified is that this is 10 an area of concern and that we would like this to be 11 looked at in detail, to ensure that the system is 12 properly safe for children, especially children that 13 come from other countries and generally benefit from 14 that service. 15 Q. You also identify some concerns you have about the 16 current system of monitoring and inspection of schools. 17 And you identify, at paragraph 63 of your witness 18 statement, that there should be a common safeguarding 19 inspection framework supported by standardised 20 monitoring and oversight processes. 21 What do you think the problem is with the current 22 system and why are you suggesting its replacement? 23 A. So I think that the problem with the current system is 24 its complexity and I think that was something that was 25 explored at length by the previous witness, where</p> <p style="text-align: center;">Page 93</p>	<p>1 actually the problem is that it is very difficult to 2 know what framework applies, what inspectorate is 3 responsible, what are the pathways if you have concern. 4 So that added complexity is something that, for the 5 purposes of safeguarding, is a concern. 6 I do not have the answers and the solutions to how 7 the system should look in the future, but it is clear 8 that having two systems which often lack transparency is 9 just adding to the risk. 10 Q. You are also concerned there is a data gap in respect of 11 independent schools, in particular, in terms of knowing 12 where there has been concerns about welfare and what has 13 been done about them. Is that right? Could you tell us 14 a little bit about that, please? 15 A. Yes, so it is covered in my witness statement. 16 Q. Yes, it is at paragraph 63. 17 A. Yes. 18 Q. Would you like me to put that up on screen, if that 19 would be helpful for you, Ms Lara? 20 It is, Ralph, NSP000143_013. That is where it 21 starts. 22 A. Yes, I think paragraph 66 is probably the relevant one. 23 Q. Top of the next page, Ralph? 24 A. Yes. 25 So I mean, like, others might correct me if I am</p> <p style="text-align: center;">Page 94</p>
<p>1 wrong here; this is based on the information that we 2 have been able to get. 3 Q. Okay. 4 A. But it is my understanding that it is very difficult to 5 get data on schools that are part of the independent 6 school counsel, which will be inspected by the 7 Independent Schools Inspectorate. 8 So what we could tell is only -- we could only get 9 data on those independent schools that are actually 10 monitored and inspected by Ofsted, so it is very clear 11 there that there is a gap in our understanding of how 12 independent schools that are not monitored by Ofsted are 13 meeting their safeguarding requirements. 14 I am happy to be corrected if this information is 15 readily available and we have not been able to find it, 16 but the fact that we have not been able to find it is in 17 itself an issue. 18 Q. If I could just clarify something, however, in that 19 non-association independent schools which are inspected 20 by Ofsted, they have told us are quite small in number, 21 so when you identify a difficulty, say, and 14 per cent 22 did not meet the standard of welfare of pupils, that is 23 probably quite a small data set that we are looking at 24 there and, therefore, it might not be reflective of the 25 independent school picture as a whole in terms of</p> <p style="text-align: center;">Page 95</p>	<p>1 failures in that respect. I thought I should just 2 clarify that issue. 3 A. Yes. 4 Q. You also identify in your witness statement some 5 concerns about the current exemptions from the barred 6 list for those who are -- well, they are not in the 7 supervision exemptions, so to speak, that you don't have 8 get a barred list check if you are being supervised in 9 the context of regulated activity. 10 Now, we heard a lot of evidence about that, why do 11 you, as the NSPCC, have concerns? And it is both 12 yourself and Mr Noyes, who has also provided us with 13 some written evidence. 14 A. Yes, so I think the problem is that there will be a lot 15 of adults around the child that are technically 16 supervised, but that will get a lot of access to 17 children that, in practice, is not supervised, and also, 18 that they will be able to build relationships with 19 children, even during that supervised part of their 20 role, that actually they can then take on whether it is 21 online or whether it is off the premises, and exploit 22 the opportunities to abuse that relationship. 23 So there are clear issues with the supervision 24 exemption and how that is implemented, and we would like 25 the DfE and the Home Office to really look at that.</p> <p style="text-align: center;">Page 96</p>

<p>1 Can I add something though, as well, which 2 complements my comment about the DBS -- 3 Q. Yes. 4 A. -- which is, as well, that I would not like us to move 5 to a situation where we over-rely on the DBS check as 6 the solution to the problem. I think it is an important 7 part of the solution, but we also know that a lot of the 8 sexual offences never come to the attention to the 9 authorities, so if we rely on a system that actually 10 only tells us what we know, I think we will be putting 11 children at risk. 12 The DBS system works, and works well, when it is 13 implemented in a wider system of wider understanding of 14 the importance of safeguarding by the school and safe 15 recruitment practices and actually loads of checks and 16 balances in the system. So I am aware of all the 17 conversation about the DBS and we will be absolutely in 18 favour of strengthening it, but it needs to be part of 19 a wider safeguarding culture. 20 Q. Thank you. 21 You also identify at paragraph 76 that you, as the 22 NSPCC, undertook some recent Freedom of Information Act 23 requests to police forces which revealed a 73 per cent 24 increase in sexual assaults in schools reported to 25 police between 2015 and 2017.</p> <p style="text-align: center;">Page 97</p>	<p>1 Do you have any observations or insights as to why 2 that increase might have taken place? 3 A. That is a very difficult question. I think we need to 4 really get a bit more under the skin of the data. 5 I think part of it, I think there might be an element of 6 less tolerance in school, of some sexual behaviours and 7 sexual assaults; and more reporting, therefore, of those 8 instances. 9 But it could also be that the underlying cause of 10 this rise is that there are more sexual assaults in the 11 school premises and it is very difficult from the data 12 to tell which one of those is (inaudible) the rise. But 13 it is a very big increase, so in any case, it is 14 concerning. 15 Q. Following on from that, the NSPCC, along with 16 an organisation called Research in Practice, has 17 coordinated the development of what is called the 18 Harmful Sexual Behaviour Framework, which -- whose 19 second edition has just been launched. It identifies 20 a number of areas of focus which are needed to have 21 a successful harmful sexual behaviour strategy. So that 22 is: prevention; identification; assessment; intervention 23 and workforce development. 24 How far, do you think, are we along the road in all 25 those areas in terms of addressing and managing harmful</p> <p style="text-align: center;">Page 98</p>
<p>1 sexual behaviour between young people and children in 2 school settings? 3 A. So I think we are definitely moving in the right 4 direction. I think maybe ten years ago we would not 5 have been having this conversation at all, not even five 6 years ago. 7 I think that the fact that there is a framework and 8 it is being used successfully in many local authorities 9 and is driving the conversation across the different 10 local agencies that have responsibility for safeguarding 11 children is a very positive step in the right direction. 12 I think that more should be done, and not only in terms 13 of the reach of the framework, the framework is simply 14 an auditing tool of what the current status of your 15 provision of services for children with harmful sexual 16 behaviour is. 17 So it is only a part of the equation, you also need 18 to be able to then deliver in the schools and the 19 communities' safe practices for managing those 20 behaviours. 21 I think that in some of those behaviours you have 22 also heard how it might be about the individual child or 23 children that are displaying those behaviours, but going 24 back to the conversation about contextual safeguarding, 25 it is also about the culture and the context that is</p> <p style="text-align: center;">Page 99</p>	<p>1 created where young people interact and might be more 2 prone to particular behaviour or less so. So we need to 3 make sure that more is done, but I think having these 4 conversations is definitely a step in the right 5 direction. 6 Q. Thank you and the last question but by no means the 7 least question is about mandatory reporting? 8 A. Yes. 9 Q. I know you and your organisation have contributed to 10 inquiry seminars on that matter, so I wanted to double 11 check that it is still the NSPCC's policy to support 12 making it a criminal offence for school staff to cover 13 up, conceal or ignore known child sexual abuse; is that 14 right? 15 A. That's correct, yes. 16 Q. Yes, and it is still your policy that senior staff 17 should be under a duty to report suspicions of child 18 abuse to local authorities; is that right? 19 A. Yes. 20 MS SCOLDING: Thank you very much. Ms Lara, I have no 21 further questions for you. Thank you very much for your 22 time this morning. But the chair and panel may have 23 questions for you. 24 THE CHAIR: We have no questions. Thank you very much, 25 Ms Lara.</p> <p style="text-align: center;">Page 100</p>

<p>1 A. Thank you. Thank you everybody.</p> <p>2 MS SCOLDING: Chair, can we now -- I would now like to move</p> <p>3 on to Ms Robertson, who is going to adduce some witness</p> <p>4 statements from where oral evidence has not been given</p> <p>5 during the past two weeks. I would then suggest, chair,</p> <p>6 with your respectful permission, that once Ms Robertson</p> <p>7 has finished, which might be slightly before 1.00, we</p> <p>8 could then take a slightly earlier lunch break and then</p> <p>9 start with all the closing submissions after lunch.</p> <p>10 THE CHAIR: Thank you, we will do that.</p> <p>11 MS SCOLDING: Thank you.</p> <p>12 MS ROBERTSON: Thank you, chair. It is quite a lengthy list</p> <p>13 as we haven't adduced as we have gone along, so I hope</p> <p>14 the chair and panel will bear with me as I go through</p> <p>15 it. If you just give me one moment. (Pause).</p> <p>16 Witness statements adduced by MS ROBERTSON</p> <p>17 MS ROBERTSON: The following documents are documents which</p> <p>18 are to be adduced. DfE002072, which is a witness</p> <p>19 statement from Heather McNaughton from the Teaching</p> <p>20 Regulation Agency, dated 7 August 2019, describing the</p> <p>21 Department for Education's database for qualified</p> <p>22 teachers and setting out the checks which are done as</p> <p>23 part of initial teacher training or under the</p> <p>24 requirements of Keeping Children Safe in Education.</p> <p>25 The statement also considers whether there are gaps in</p> <p style="text-align: center;">Page 101</p>	<p>1 the current regulatory system in relation to teacher</p> <p>2 misconduct or in relation to the vetting of teachers</p> <p>3 both from the UK and abroad.</p> <p>4 Document TRA000003, which is a witness statement</p> <p>5 from Alan Meyrick, also of the Teaching Regulation</p> <p>6 Agency, dated 1 August 2019, and which describes the</p> <p>7 history, role and function of the Teaching Regulation</p> <p>8 Agency and deals with the regulatory system for teacher</p> <p>9 misconduct. The statement also gives statistics for</p> <p>10 cases referring for a hearing and cases prohibited for</p> <p>11 the last five years. The work of the Professional</p> <p>12 Conduct Panel and its legal framework and relationship</p> <p>13 with the Secretary of State is also explained.</p> <p>14 Document CYC000395, which is a witness statement</p> <p>15 from Harvey Grenville, who is the Head of Safeguarding</p> <p>16 and Development at the Charity Commission, and which is</p> <p>17 dated 13 August 2019, and which sets out, on</p> <p>18 a school-by-school basis, the references received by the</p> <p>19 Charity Commission in relation to each of the phase 1</p> <p>20 schools.</p> <p>21 Document CYC000410, which is another statement from</p> <p>22 Harvey Grenville, this time dated 3 September 2019,</p> <p>23 which sets out the role and responsibilities of the</p> <p>24 Commission in relation to charities, and summarises its</p> <p>25 role in relation to schools and safeguarding generally.</p> <p style="text-align: center;">Page 102</p>
<p>1 The statement also explains the process and purpose of</p> <p>2 setting up a statutory inquiry into misconduct or</p> <p>3 mismanagement and provides examples of enforcement</p> <p>4 action taken by the Commission.</p> <p>5 Document TRI000011, which is a witness statement</p> <p>6 from Charlie Orrell from the organisation Triangle,</p> <p>7 which is dated 22 April 2019, and which describes ways</p> <p>8 of assisting children with disabilities to be able to</p> <p>9 make disclosures when they have been abused. The</p> <p>10 statement also explains the prevalence of sexually</p> <p>11 concerning behaviour amongst children with disabilities</p> <p>12 and describes the services which it provides to assist</p> <p>13 such children and to help prevent it becoming sexually</p> <p>14 harmful behaviour. Training and Achieving Best Evidence</p> <p>15 Interviews are also touched on.</p> <p>16 Document INQ004255, which is a witness statement</p> <p>17 from the Children's Commissioner for England, dated</p> <p>18 11 April 2019, which sets out the duties and powers of</p> <p>19 the Children's Commissioner for England and describes</p> <p>20 the Help at Hand advice line for children living away</p> <p>21 from home, such as children in residential schools. The</p> <p>22 statement also describes The Lighthouse, a residential</p> <p>23 facility for children who have been sexually abused, and</p> <p>24 for their families, to receive multi-agency help and</p> <p>25 support under one roof. It also includes a summary of</p> <p style="text-align: center;">Page 103</p>	<p>1 the NSPCC's study identifying good practice in</p> <p>2 identifying and responding to safeguarding concerns in</p> <p>3 primary schools.</p> <p>4 Document ADS000016, which is witness statement from</p> <p>5 Sarah Caton from the Association of Directors of</p> <p>6 Children's Services and dated 29 May 2019. This witness</p> <p>7 statement explains the role of the Association of the</p> <p>8 Directors of Children's Services and its aims and</p> <p>9 objectives and provides a summary of the association's</p> <p>10 research and surveys on child protection and</p> <p>11 safeguarding in schools. The statement also provides an</p> <p>12 overview as to the adequacy of the current system for</p> <p>13 referrals to the local authority of child abuse in</p> <p>14 schools.</p> <p>15 Document INQ004416 which is a witness statement from</p> <p>16 Kelley Fray from Ambito Care, which explains the work of</p> <p>17 Ambito Care in caring for and educating children with</p> <p>18 disabilities. The statement also draws attention to the</p> <p>19 particular vulnerability of children whose disabilities</p> <p>20 require them to communicate through an interpreter and</p> <p>21 considers whether current safeguarding guidance is</p> <p>22 adequate to protect disabled children. It also sets out</p> <p>23 Ambito's current practice in terms of providing sex and</p> <p>24 relationship education to children with disabilities and</p> <p>25 communication difficulties.</p> <p style="text-align: center;">Page 104</p>

<p>1 NAH000007, which is a witness statement from 2 Paul Whiteman, the General Secretary of the National 3 Association of Head Teachers, which is dated 4 25 July 2019, and which explains the role of the 5 National Association of Head Teachers and outlines the 6 support services provided by it. The statement calls 7 for additional guidance from the government for schools 8 managing a pupil who has displayed sexually harmful 9 behaviour or who has been convicted of a sexual offence 10 and expresses concern that the local authority's 11 thresholds for responding to a school's concerns are too 12 high. 13 Document NGA000001, which is a witness statement 14 from Emma Knights from the National Governance 15 Association, dated 5 August 2019, and which sets out -- 16 sorry, it is a witness statement from that association 17 which is an association whose members are governors and 18 trustees of state-funded schools in England and points 19 out that there is no statutory requirement for governors 20 to receive training in safeguarding. The statement 21 further notes that only one governor on a school's board 22 is required to be trained in Safer Recruitment and 23 governing trusts are not required to have any member so 24 trained. A further point is made that there is no 25 safeguarding scheme for training governors in</p> <p style="text-align: center;">Page 105</p>	<p>1 safeguarding. 2 Document INQ004428, which is a statement from 3 Chris Keates of the NASUWT, dated 6 August 2019, which 4 expresses concern about guidance provided by the 5 government since Safeguarding Children and Safer 6 Recruitment in Education was replaced by Keeping 7 Children Safe in Education in 2014, and saying that much 8 of the previous guidance has been stripped away. The 9 statement also deals with inspections, vetting and 10 barring of teachers and the processes which are followed 11 when allegations are made. 12 Document ASC000005, which is a witness statement by 13 Julie McCulloch of the Association of School and College 14 Leaders, which is dated 31 July 2019, and which explains 15 why her association, the ASCL, is not in favour of the 16 introduction of mandatory reporting, but provides some 17 ways of limiting the duties imposed on organisations and 18 individuals in the event that mandatory reporting is 19 introduced. 20 Document ASC000006, which is a witness statement 21 from Richard Tanton, the Director of Member Support at 22 the Association of School and College Leaders, dated 23 2 August 2019, and which explains his organisation's 24 role in supporting and representing individuals accused 25 of breaching safeguarding provisions and proposing that</p> <p style="text-align: center;">Page 106</p>
<p>1 it be made mandatory for employers to refer individuals 2 to the Teaching Regulation Agency in cases where they 3 are dismissed for gross misconduct. 4 Document NEU000001, which is a witness statement 5 from Amanda Brown, the Deputy General Secretary of the 6 National Education Union, dated 28 July 2019, and which 7 expresses concern at the level of mandatory safeguarding 8 training required of teachers and raises issues to do 9 with the training of teachers who are required to 10 deliver sex and relationships education. The statement 11 also states that the NEU opposes mandatory reporting and 12 explains why. 13 Document INQ004258, which is a witness statement 14 from Claire Dorer, from the National Association of 15 Independent Schools and Non-maintained Special Schools, 16 dated 12 April 2019, which considers whether there is 17 a need for separate stand-alone safeguarding training in 18 relation to children with special educational needs and 19 calls for better input for special schools from the 20 local children's safeguarding boards and for local 21 authorities to ensure that they have a member of staff 22 trained in taking disclosures from non-verbal children. 23 Document INQ004426, which is a witness statement 24 from Richard Harman, Chief Executive of the Association 25 of Governing Bodies of Independent Schools, dated</p> <p style="text-align: center;">Page 107</p>	<p>1 1 August 2019, which deals with the training of school 2 governors and suggests a national standardised minimum 3 content and expectation on governor training across both 4 the state and independent sectors. The statement also 5 recognises the importance of governors promoting 6 a positive safeguarding culture in their school by 7 setting the example from the top. 8 Document ISM000011, which is a witness statement 9 from Deborah Annetts of the Incorporated Society of 10 Musicians, dated 14 August 2019, which summarises her 11 organisation's safeguarding and child protection policy, 12 its code of practice, its document on "How to Report 13 Your Concerns" and its document giving guidance for 14 the very strict and limited use of touch in private 15 one-to-one lessons. The statement also draws attention 16 to the creation of an ISM Designated Safeguarding Person 17 and a Child Protection Committee. 18 Document EWM000471, which is an expert report by 19 Marcus Erooga, who is an independent safeguarding 20 consultant, dated August 2019. This report was 21 commissioned by the inquiry and gives an overview of the 22 characteristics of sexual abuse, including descriptions 23 of types of abuser, grooming and the importance of 24 institutional structures. The report also describes and 25 explains neutral notification.</p> <p style="text-align: center;">Page 108</p>

<p>1 Document OHY007907, which is the witness statement 2 of Jamie Daniels of Greater Manchester Police, dated 3 19 June 2019, which describes Operation Kiso and the 4 steps taken by the police in relation to each 5 perpetrator. 6 Document CPS004806, which is a witness statement of 7 Gregor McGill of the CPS, dated 17 June 2019, and which 8 summarises the CPS's role and involvement in the case of 9 Christopher Ling in 1990 and in 2013, setting out 10 allegations made against him and dealing with the advice 11 that extradition proceedings could not be launched. 12 Document CSM000573, which is a witness statement by 13 Alun Jones, the current principal of Chetham's School, 14 dated 2 July 2019, and which gives a general overview of 15 Chetham's Music School, including a description of the 16 school and its student body, its safeguarding culture 17 and structures, neutral notification and guardianship. 18 Document IMC000001, which is a witness statement by 19 Amanda Corcoran, Director of Education at Manchester 20 City Council, dated 8 August 2019, which describes the 21 relationship between Manchester City Council and 22 Chetham's School of Music, and details in particular the 23 2013 multi-agency review of Chetham's and gives details 24 of certain allegations against Chetham's staff between 25 2011 and 2015.</p> <p style="text-align: center;">Page 109</p>	<p>1 Moving on to Wells Cathedral School now, document 2 SOM000014, which is a witness statement by Anthony Goble 3 of Somerset County Council, who is the LADO there, dated 4 13 June 2019, and describes the relationship between the 5 LADO and the designated safeguarding leader at Wells 6 Cathedral School and comments on the Wells Cathedral 7 School's approach to safeguarding since 2015. 8 Document ACE026446, which is a witness statement by 9 Glenys Armstrong, the Diocesan Safeguarding Officer from 10 Bath and Wells, dated 5 March 2019, and which sets out 11 her role, the connections between the diocese, the 12 Cathedral School and the school, and setting out the 13 diocesan safeguarding policies and commenting on 14 specific incidents which occurred in the school. 15 Document OHY008527, which is a witness statement 16 setting out the information held by Avon and Somerset 17 Police in relation to Julien Bertrand, [redacted] -- may 18 I cut the feed? 19 I think I may not have -- I think we're all right. 20 Are we all right? 21 My apologies. We can now carry on, but I remind 22 everyone present that the information that I have just 23 stated is subject to the restriction order dated 24 27 September 2019. 25 Taking that document again, it is a witness</p> <p style="text-align: center;">Page 110</p>
<p>1 statement setting out the information held by Avon and 2 Somerset Police in relation to various alleged 3 perpetrators in relation to Wells Cathedral School. 4 Document OHY007903, which is a witness statement 5 setting out information about abuse perpetrated by 6 Michael Brewer and Hillary Brewer in relation to 7 Frances Andrade and RS-A187 at Chetham's Music School 8 and describing the evidence of witnesses who had some 9 information about those allegations at the time. That 10 is a statement by Martin Bottomley of Greater Manchester 11 Police, dated 10 May 2019. 12 Document CHO000007, which is a statement by 13 Neil Chippington of the Choir Schools' Association, 14 dated 15 November 2018, and which describes the Choir 15 Schools' Association's role in sharing best practice and 16 exhibiting good practice documents. 17 Document ACE026445, which is a witness statement by 18 Jackie Croft, the Cathedral Administrator and Chapel 19 Clerk of Wells Cathedral, dated 1 March 2019, which 20 explains the link between Wells Cathedral, the school 21 and the choir and describes the safeguarding 22 arrangements at the Cathedral and how these apply in 23 particular to the choir, the Music Foundation and 24 visiting choirs, and setting out the procedure for 25 responding to allegations of sexual abuse.</p> <p style="text-align: center;">Page 111</p>	<p>1 We now move on to the Yehudi Menuhin School. 2 Document INQ004395, which is a statement from 3 Peter Renshaw, a former headmaster of the school, 4 describing the ethos of the school under his headship 5 and explaining the safeguarding culture of the time, 6 giving information about incidents involving RS-F25 and 7 two others and considering safeguarding challenges which 8 are particular to music schools. 9 Document INQ004486 which is a witness statement by 10 Malcolm Singer, former Director of Music at the Yehudi 11 Menuhin School, setting out the safeguarding 12 arrangements at school during his tenure as Director of 13 Music and giving information in relation to specific 14 incidents. 15 Document OHY007905, which is a further witness 16 statement by Jamie Daniels of the Greater Manchester 17 Police, dated 23 June 2019, setting out initial contact 18 between Operation Kiso and RS-A170. 19 Document OHY008531, which is a witness statement by 20 Jamie Daniels again, this time dated 7 August 2019, and 21 giving more information on the investigation of 22 RS-A170's allegations, having retained the relevant 23 materials from deep storage. 24 Document SRC000014, a witness statement by 25 Gillian Halden, the LADO in Surrey, dated</p> <p style="text-align: center;">Page 112</p>

<p>1 16 August 2019, and which gives an overview of the 2 historic and current safeguarding arrangements at the 3 Yehudi Menuhin School and gives information on certain 4 specific incidents and sets out best practice, 5 procedures and examples from Surrey. 6 Document INQ004419, which is a witness statement by 7 Nicholas Chisholm, former headmaster of the Yehudi 8 Menuhin School, describing safeguarding practice at the 9 Yehudi Menuhin School during his tenure as headmaster, 10 discussing safeguarding challenges at residential music 11 schools and reviewing certain documents relevant to the 12 cases of RS-A218 and RS-A150. 13 Document YMS000142, which is the second statement 14 from Geoffrey Richards, the vice-chair of governors of 15 the Yehudi Menuhin School, and gives the background to 16 the school and an overview of the school, and considers 17 issues raised by one-to-one teaching, describes the 18 current safeguarding arrangements and policies of the 19 school, avenues for children to report abuse and 20 provides information about certain specific cases. 21 We now turn to statements relevant to the 22 Purcell School. 23 Document HDC000046, which is the witness statement 24 of Frazer Smith of Hertfordshire County Council. He is 25 the LADO there. The statement is dated 21 August 2019</p> <p style="text-align: center;">Page 113</p>	<p>1 and describes the processes followed at the 2 Purcell School dealing with allegations against RS-F20 3 and one other and the processes followed when dealing 4 with criticisms of the head teacher, Peter Crook. 5 Document PUR001247, the witness statement of 6 Paul Elliot, the former designated safeguarding lead at 7 the Purcell School, dated 5 August 2019. It sets out 8 the school's current approach to safeguarding training 9 and his view of the role of the head teacher and the 10 governors. The statement also sets out information 11 about the action taken in relation to allegations 12 against RS-F20 and one other and criticisms of the head 13 teacher, Peter Crook. 14 Document INQ004425, which is the witness statement 15 of David Thomas, the former headmaster of the 16 Purcell School, and which gives details of the 17 investigations into allegations about RS-F20 and one 18 other, and highlights the safeguarding challenges at 19 specialist music schools. 20 Document OHY007966 which is the witness statement of 21 William Jepson from Hertfordshire Police, dated 22 30 July 2019, and which summarises the police 23 investigations into allegations that arose at the 24 Purcell School and gives details of an incident 25 involving RS-A193.</p> <p style="text-align: center;">Page 114</p>
<p>1 Document INQ004580, which is a witness statement 2 from Andrew Leverton of the Purcell School, who is the 3 current head of English at Purcell and sets out his 4 response and involvement and the school's response in 5 relation to incidents involving Peter Crook, RS-F20 and 6 two others. The statement also gives details of recent 7 instances of concern and the responses of Paul Bambrough 8 and expresses general concerns of the current 9 safeguarding arrangements. 10 We have only one document to adduce in relation to 11 Appletree and it is CPS004851, which is the witness 12 statement of Gregor McGill and sets out the policy 13 framework in 2016 for decision making in respect of 14 assessing the competency of vulnerable witnesses. The 15 statement also makes some observations about the case of 16 C1. 17 I thank you for your patience, that was a long list 18 but those are all the documents we wish to adduce. 19 THE CHAIR: Thank you, Ms Robertson. 20 MS SCOLDING: Just before we break for lunch, chair and 21 panel, I wanted to clarify something. Mr Frank raised 22 earlier a question with Ms Dixon about material change 23 under the Education and Skills Act 2008. Just to 24 clarify, under section 98, when somebody registers to 25 become an independent educational institution, they have</p> <p style="text-align: center;">Page 115</p>	<p>1 to provide information about what type, or types, of 2 special educational provision they are organised to 3 take. There is then section 101 of the Act which 4 identifies that if there are going to be material 5 changes to such, that would include to the type, or 6 types, of special educational needs. However, 7 section 101 is only partially in force and, in fact, it 8 is not in force in respect of identifying the material 9 change in terms of the type or types of special 10 educational provision. 11 It is simply in force in order to implement a series 12 of regulations which are the Independent Educational 13 Provision In England (Provision of Information) and 14 Non-Maintained Special Schools (England) and Independent 15 School Standards (Amendment) Regulations 2018 -- 16 a snappy title if ever there was one, which are 17 conspicuous by their silence about the issue of material 18 change. 19 I just wanted to clarify that. Thank you. 20 Chair, on that exciting note, may we have a slightly 21 earlier lunch break? 22 THE CHAIR: Yes, we will return at 1.55 pm. 23 MS SCOLDING: Thank you. 24 (12.54 pm) 25 (The Luncheon Adjournment)</p> <p style="text-align: center;">Page 116</p>

<p>1 (1.55 pm) 2 MS SCOLDING: Chair, I now pass over to the core 3 participants to undertake submissions. The first core 4 participant to make submissions is Ms Harrison acting on 5 behalf of the victims and survivors represented by 6 Slater & Gordon. 7 Closing submissions by MS HARRISON 8 MS HARRISON: Chair and panel, in the course of this hearing 9 you will have heard a considerable volume of evidence. 10 In this closing, we can only touch upon some of the most 11 significant points raised on behalf of our clients. 12 Firstly, Chetham's School of Music: you heard the 13 moving evidence of A1 and A2. For the many former 14 Chet's pupils around the world who were listening to 15 this evidence, their words struck a real chord. You 16 heard the manipulation and coercion they experienced at 17 the hands of Christopher Ling. You heard how the 18 environment and culture of the school, and especially 19 the attitude of their housemistress, facilitated that 20 abuse. You heard A1 and A2 describe the total isolation 21 and lack of support they experienced at Chetham's when 22 their abuse came to light. Of course, A1 and A2 are 23 just two victims, amongst many, from Chetham's. You 24 have also been provided with the powerful statements of 25 our clients A3, A4 and A5 and the testimony of other</p> <p style="text-align: center;">Page 117</p>	<p>1 victims. Some of those victims, like Frances Andrade, 2 are, tragically, no longer here to give voice to their 3 experiences. 4 Given what we now know of the culture of this 5 school, the suggestion that any of Christopher Ling's 6 victims were consenting to their abuse is not only 7 ludicrous but utterly insulting. 8 The harm that our clients have suffered as a result 9 of the abuse is obvious. It is also very clear that 10 this harm has been greatly compounded by the failure of 11 the school to respond with even a modicum of human 12 sympathy. 13 The evidence of the three former head teachers at 14 Chetham's was also listened to by many, but it was 15 listened to with utter incredulity. John Vallens was 16 the headmaster of Chetham's when much of the most 17 serious abuse was occurring. He was ignorant, he 18 claimed, of the sexual abuse which was occurring on his 19 watch and which former pupils, such as Ian Pace, say 20 were widely known and talked about throughout the school 21 over many years. 22 When confronted with the reality that he must have 23 known, or suspected, that abuse was occurring, he hid 24 behind the following bizarre formulation and I quote: 25 "It would be idle of me to deny that it is evident,</p> <p style="text-align: center;">Page 118</p>
<p>1 from the subject of this inquiry, that there were bad 2 things happening which I did not know about and I should 3 have done." 4 Our clients are of the view that John Vallens 5 adopted an approach of see no evil, hear no evil, speak 6 no evil. 7 You then heard from Peter Hullah. He was even more 8 brazen. He came before you, under oath, and tried to 9 tell you with a straight face that it was justified to 10 have claimed that Michael Brewer left Chetham's because 11 of ill health. We will address this further in written 12 submissions, but we will be inviting you to conclude 13 that he lied to this inquiry. 14 We then heard from Claire Moreland, she was happy to 15 describe Peter Hullah's actions as a cover up, but was 16 unable to acknowledge her own shortcomings. Despite 17 claiming to be committed to "blistering transparency", 18 her response to the inspectors demonstrated the exact 19 opposite. You will remember, in 2013, she failed to 20 disclose a number of suspensions and disciplinary 21 proceedings in response to a direct question about this. 22 This omission led Elizabeth Coley to describe 23 Ms Moreland's omission as "dodgy". By the standards of 24 inspectors, this is about as harsh as judgment as it 25 gets. Ms Moreland's primary interest was not in</p> <p style="text-align: center;">Page 119</p>	<p>1 protecting children, it was in protecting the reputation 2 of the school and giving the appearance of progress on 3 child protection without being honest and transparent 4 with the inspectors. 5 This hearing has exposed Chetham's School of Music 6 in a deeply disturbing light. At the start of this 7 hearing, those representing the school delivered a very 8 carefully-worded apology. That apology will be utterly 9 meaningless unless the school in the future commits to 10 real transparency about its failings and to supporting 11 the victims and survivors whom it has so grievously 12 injured and failed over past decades. The next few 13 months will show whether it has any serious intention of 14 doing that or whether its apology was simply designed to 15 placate this inquiry. 16 We then move on to the Purcell School. It is clear 17 from the evidence we have heard that, for a number of 18 years, the school was presided over by a headmaster who 19 was totally unfit for that role, indeed for any role in 20 teaching. It should be a cause for real concern that 21 within this sector, a man like Peter Crook could rise to 22 the headship of a major music school. 23 Even more worryingly, in our submission, was the 24 response of the chair of governors. Mr Smallbone's 25 evidence was hopelessly contradictory. He sought to</p> <p style="text-align: center;">Page 120</p>

<p>1 persuade you, on the one hand, that Peter Crook's talk 2 was "very good, with only minor exceptions", yet, when 3 pressed by inquiry counsel on the detail of the talk, he 4 acknowledged that most of what was said was wholly 5 unsuitable and unacceptable. He was trying to have it 6 both ways. He was trying to persuade you that he 7 recognised the seriousness of what had occurred, whilst 8 trying to minimise his own role in silencing staff like 9 Margaret Moore and Andrew Leverton, who tried to 10 challenge it.</p> <p>11 He showed no remorse that the school had hounded and 12 ultimately destroyed the career of a conscientious and 13 committed teacher who clearly cared for her pupils. 14 Again, the fact he could become chair of governors at 15 a major institution in this sector, despite his 16 unsuitability for the role, demonstrates the need for 17 drastic overhaul of governance.</p> <p>18 Since Peter Crook, Purcell School has had seven 19 headteachers; you rightly queried why and nobody was 20 able to tell you. The current head, Mr Bambrough, 21 acknowledged that the accountability structures at 22 Purcell remain inadequate. He recognised the force of 23 points raised by our client Mr Leverton at the need for 24 more parental input, for example.</p> <p>25 I hope that following these hearings we will hear</p> <p style="text-align: center;">Page 121</p>	<p>1 from Purcell an unqualified commitment to real change on 2 those fronts, as well as their long overdue apology for 3 these events.</p> <p>4 Moving on to special schools, you heard from our 5 clients A6 and A7 who very courageously told you about 6 the appalling sexual abuse they experienced. The 7 principal of Appletree, Clair Davies, offered you 8 a one-line apology for the abuse of A6. However, it was 9 entirely unclear from the rest of her evidence what she 10 was apologising for or what she had learned. She 11 attempted to downplay the restraints and injuries A6 had 12 suffered at the hands of staff; she did not appear to 13 accept that staff at Appletree had failed to protect A6 14 and that her own systems had been at fault in allowing 15 C1 access to abuse children in bedrooms and when 16 children absconded from school, despite clear knowledge 17 of the risks C1 posed. She failed to acknowledge the 18 reality that the abuse of A6 was preventable.</p> <p>19 It also became apparent had her evidence that the 20 governance and accountability structures at Appletree to 21 this day remain woefully vague and inadequate. She 22 rather implausibly tried to persuade you that staff 23 would be willing to challenge her on safeguarding issues 24 if necessary, yet Appletree operates on the basis that 25 she runs it, her husband is the headteacher and both are</p> <p style="text-align: center;">Page 122</p>
<p>1 the safeguarding officers. The registered proprietors 2 she described as an elderly couple in their 80s. She 3 said they had very little involvement, if any, in the 4 running of the school, yet also claimed they were able 5 to advise her on safeguarding issues at the school.</p> <p>6 We say that the idea that you can have proper 7 accountability, governance and independent oversight, 8 when all this is quite literally kept within the family, 9 is clearly absurd and it insults the intelligence of 10 this inquiry. It cannot be right that in 2019 a school 11 is allowed to operate in this way and, frankly, it seems 12 to us that it could only happen without outcry because 13 the children who were placed there are children to whom 14 society has decided to attach very little worth.</p> <p>15 It is absolutely imperative that you as an inquiry 16 call out this scandal and ensure through your 17 recommendations that organisations that are entrusted 18 with the care of vulnerable children simply cannot be 19 allowed it operate in this way without proper structures 20 of accountability and oversight.</p> <p>21 With Stony Dean, Richard Nash from Buckinghamshire 22 County Council was frank with the inquiry about the 23 numerous failings of the local authority. On behalf of 24 A7, we welcome his offer of an apology. Yet again, 25 however, this apology only comes under the spotlight of</p> <p style="text-align: center;">Page 123</p>	<p>1 this inquiry and it comes a full ten years after the 2 Serious Case Review highlighted so many failings of 3 Buckinghamshire County Council in this case.</p> <p>4 We also welcome the therapeutic support again 5 belatedly now offered to A7 and other victims of Bulley. 6 However, it was notable that, when pressed by inquiry 7 counsel about the general availability of support 8 packages for victims and survivors of child abuse, 9 Mr Nash was unable to point to a package of support in 10 place, despite the specific recommendations of the 11 Serious Case Review from 2009. Despite the 12 acknowledgment of the many failings of the County 13 Council regarding the investigation of Bulley's abuse of 14 children at Stony Dean School, Mr Nash's view that these 15 events could not be repeated now was, in our view, 16 unconvincing. The local authority's procedures are 17 still not up to scratch.</p> <p>18 The broader point here is that systems that 19 ultimately rely on individual discretion, rather than 20 a clear mandatory duty, backed up by sanctions for 21 non-reporting, cannot be relied upon.</p> <p>22 We end with some comments on the lessons of these 23 hearings. Across a number of the institutions examined, 24 the governance failures are obvious. Amanda Spielman 25 described the independent sector as a "permissive space"</p> <p style="text-align: center;">Page 124</p>

<p>1 where there are inadequate controls on the selection and 2 suitability of governors. Too many institutions 3 operated on outdated governance models and with 4 governors focused on protecting the school's reputation, 5 rather than the protection of children. 6 There is then the treatment of staff who tried to 7 raise concerns. You saw with Purcell how longstanding 8 staff members were terrified to complain openly. We say 9 the only thing that would have transformed that 10 situation is an unambiguous, clear legal requirement for 11 safeguarding issues to be reported externally. 12 There has been some talk in these hearings of 13 introducing a duty of candour similar to the NHS. We 14 say that this is nothing like enough and there is no 15 real evidence of the duty of candour making a meaningful 16 difference in the health sector. On the contrary, 17 research published in the Health Service Journal 18 identified an ongoing failure by NHS trusts to adhere to 19 the so-called duty of candour and a failure by the CQC 20 to enforce it. The only thing that realistically would 21 have protected Mrs Moore would have been a mandatory 22 reporting duty backed up by criminal sanctions for 23 failure to report. 24 We remind you that such a duty exists in other areas 25 of the criminal law. Lawyers are required to report</p> <p style="text-align: center;">Page 125</p>	<p>1 knowledge or reasonable suspicion of money laundering. 2 This has the effect across the legal profession of 3 overriding any pressure from the client. It has 4 embedded a culture in which reporting of these matters 5 becomes automatic. We need to do this with child abuse. 6 It is also important to add, however, that reporting 7 to the LADO can only work if LADOs have the training, 8 capability and resources to do the job properly. It 9 remains a real concern that there is, as we understand 10 it, currently no national training or accreditation 11 scheme for LADOs. Whilst they are supposed to be social 12 workers by background, there is no requirement for this. 13 We would suggest that an important recommendation of 14 your inquiry is that this needs to change. 15 Finally, the evidence of Helen Humphreys and 16 Amanda Spielman highlighted several problems in the 17 regulation of institutions tasked with the education and 18 care of children. Inspection, said Amanda Spielman, is, 19 and I quote, "predicated on the integrity of the 20 leadership of the school". As she put it, "We are 21 working in legal frameworks that assume that everybody 22 intends to act honestly and well". 23 Given the evidence of the last two weeks, that is 24 clearly a fundamental problem. When you look at the 25 inspection system in phase 2, there is clearly</p> <p style="text-align: center;">Page 126</p>
<p>1 significant further work to be done to ensure that one 2 of the legacies of this inquiry is an inspection system 3 which is truly fit for purpose. 4 Chair, those are just some of the points which we 5 wish to highlight. We will develop them in our written 6 submissions. We end by putting on record our thanks to 7 the inquiry staff, who have supported our clients 8 professionally and compassionately during the process of 9 giving their evidence. Most of all we want to finish by 10 paying tribute to our clients, who had the courage to 11 give their accounts by way of written statements and by 12 oral evidence in some cases. In their interests, and in 13 the interests of future generations, we hope that these 14 hearings can lead to real change. 15 Thank you. 16 THE CHAIR: Thank you, Ms Harrison. 17 Mr O'Donnell. 18 Closing submissions by MR O'DONNELL 19 MR O'DONNELL: Chair, thank you. 20 I represent the various Verisona Law survivors 21 RS-A207 and RS-A189 in this case study. Both of them 22 attended Stanbridge Earls School as boarders. Neither 23 have given live evidence in this case study, so 24 I propose to use this short closing to remind the panel 25 of their experiences at Stanbridge Earls and then</p> <p style="text-align: center;">Page 127</p>	<p>1 address you on what should be done to prevent those 2 sorts of events again in the future. 3 RS-A207 was sent to board at Stanbridge Earls 4 in September 2009, when she was 11 years of age. She 5 was physically and sexually assaulted by other pupils 6 from the moment she started there. She called her 7 mother repeatedly to inform her that she was unhappy. 8 Her mother contacted the school but was told that what 9 was described as "the bullying" would settle down. In 10 fact it continued in until 2012. When her mother 11 emailed the school to complain about the fact that 12 nothing was being done to stop her daughter being abused 13 by other pupils, she was told that such conduct was 14 "part of children's normal behaviour at the age". 15 A207 has described in her statement that she was 16 physically and sexually assaulted as a matter routine at 17 Stanbridge Earls: boys would grab her breasts during 18 lessons, she would be rugby tackled and then punched 19 when she was on the ground. During her second year at 20 Stanbridge Earls, she was forced by a group of older 21 boys to expose her genitals and breasts when she was at 22 the school and remain exposed for two minutes. That 23 incident was raised by the then headteacher in a school 24 assembly the following year. In front of the whole 25 school, the head humiliated A207 by naming her as the</p> <p style="text-align: center;">Page 128</p>

<p>1 girl who had exposed herself. The school then dismissed 2 that incident as a game of truth-or-dare. 3 Quite understandably, A207's mother made a formal 4 complaint about Stanbridge Earls to Ofsted, ISI and to 5 the Hampshire County Council in February 2012, and A207 6 left the school a month later. The following year she 7 was diagnosed with post-traumatic stress disorder caused 8 by the abuse inflicted on her when she was there. 9 RS-A189 started as a boarder at Stanbridge Earls in 10 September 2004, when he was 12 years old. He was 11 bullied by his first roommate very soon after his 12 arrival and within weeks he was being subjected to child 13 on child sexual abuse. It began when A189 attended the 14 school chapel: another pupil, Gareth Stepenson, told 15 A189 to close his eyes and to expect a sweet to be put 16 into his mouth; instead the other pupil put his penis 17 into his mouth and left it there until he ejaculated. 18 A189 was left terrified that that would happen again but 19 he was brave enough to tell a staff member at 20 Stanbridge Earls about it pretty soon afterwards. His 21 account was brushed off and he was told that the other 22 pupil would never have behaved as he alleged. 23 The sexual assaults continued after that disclosure. 24 If A189 tried to escape when he was being assaulted, his 25 abuser would punch him repeatedly. He tried again to</p> <p style="text-align: center;">Page 129</p>	<p>1 disclose to the school what was being done to him. He 2 pleaded with the teacher to walk him from music lessons, 3 after which his abuser tended to assault him more 4 frequently. In fairness to the school, that did 5 eventually occur but not until two years after A189 6 first asked for it to happen, and his abuser still found 7 ways to sexually assault him. He dragged A189 into 8 woodlands on the school grounds to rape him. On one 9 occasion he forced A-189 to eat what he said was a sweet 10 but was in fact Viagra and then forced A189 to bugger 11 him. 12 By year 10, when A189 was 14, he was being sexually 13 assaulted at Stanbridge Earls about three times a day. 14 Incredibly, on one such occasion, a member of staff 15 walked in and observed him being forced into performing 16 oral sex on another pupil in the drama building. She 17 simply turned round and walked out again, ignoring what 18 she had seen. A189 used the teacher's arrival as 19 an opportunity to escape, chased after her, pleading 20 with her to help. Even more shockingly, she refused 21 point blank to take any action. 22 By the beginning of year 11, which was in autumn 23 2006, at least three staff members knew for a fact what 24 was being done to A189. They all failed to act. The 25 Stanbridge Earls then headteacher told A189 that if he</p> <p style="text-align: center;">Page 130</p>
<p>1 went to the police he would be expelled. The police did 2 become involved and attended Stanbridge Earls to 3 interview A189 but he was so scared of expelled, after 4 what he had been told, he refused to make any 5 allegations. 6 A189 has described in his inquiry statement that he 7 feels the police failed him, but the bigger failure of 8 course was Stanbridge Earls'. He was the victim of 9 a cover by the school, pure and simple. Once the police 10 investigation had concluded, he felt that everyone at 11 Stanbridge Earls was against him. He was a pupil there 12 when Ofsted conducted pupil welfare investigations. 13 Staff members took A189 to the sick bay during those 14 investigations and told him in terms that he would lose 15 privileges if he said anything to any Ofsted inspectors. 16 After Stanbridge Earls closed, as you know, chair, 17 in 2013, A189 brought a civil claim for compensation. 18 The defence responded initially by stating that his 19 claim would be defended because it was out of time. As 20 is so often the case in these matters, no sympathy was 21 offered, nor any suggestion of an apology. He was then 22 told subsequently by the school's insurers that the 23 claim would also be defended on the additional ground 24 that he had consented to the sexual abuse. This was 25 despite the fact that they knew A189 had serious</p> <p style="text-align: center;">Page 131</p>	<p>1 Asperger's syndrome and was partially sighted at the 2 time -- he was subsequently registered as blind in 2011, 3 before he brought his claim. They only accepted 4 responsibility after A189 had given evidence to a jury 5 in the criminal trial and his abuser was convicted of 6 11 counts of indecency. Even then, he received no 7 apology from the school. 8 Now, chair, there are two particularly striking 9 factors to the accounts given by A207 and A189 in their 10 statements. Firstly, both of their accounts of sexual 11 abuse at Stanbridge Earls are very recent. A189 12 described events that lasted until mid 2008 and A207 13 described being abused at Stanbridge Earls until 2013, 14 just six years ago. 15 Second, both A207 and A189 were brave enough to 16 disclose that they were being abused very soon after the 17 abuse began. A189 told a member of staff at 18 Stanbridge Earls soon after he was first assaulted in 19 the school chapel, as I have described; A207's mother 20 contacted Stanbridge Earls to inform staff that her 21 daughter was being abused shortly after she started 22 there as a boarder. But the serious sexual abuse that 23 they both suffered at Stanbridge Earls then went on for 24 years after staff at the school had first been told 25 about it in both occasions.</p> <p style="text-align: center;">Page 132</p>

1 If there had been a law enforced that compelled
 2 staff in schools to report complaints of sexual abuse
 3 from pupils, it is far more likely that A207 and A189
 4 would have escaped those subsequent years of abuse that
 5 followed their early disclosures. In A189's case in
 6 particular, he would have avoided the sexual assaults
 7 inflicted on him progressing from that first instance of
 8 forced oral sex to ultimately him being repeatedly raped
 9 by his abuser for years thereafter.

10 Chair, I have addressed you on mandatory reporting
 11 many times before, and I appreciate that the inquiry has
 12 of course recently published the result of your second
 13 conference on mandatory reporting that was held over
 14 those two days in April 2019, in which the pros and cons
 15 I see were considered with the benefit of some
 16 international perspectives, which can only be useful,
 17 and indeed we note the support that was provided earlier
 18 on today for mandatory reporting by the NSPCC's Ms Lara.

19 Well, we submit that the two relatively current
 20 accounts of the Verisona Law survivors that I have just
 21 described to you demonstrate the closed environment
 22 institutions like boarding schools such as
 23 Stanbridge Earls, where contact between vulnerable
 24 children and adults outside the institution are
 25 inevitably that bit more limited, are in particularly

Page 133

1 all possible lessons from what we heard today. I am
 2 deeply and truly sorry that teachers at our school
 3 abused their position of trust to hurt young people.
 4 Current parents and students would not recognise what
 5 was said at the inquiry today as the school they know,
 6 but this is of no consolation to victims and survivors.

7 "As the head of a school you have responsibility for
 8 what happens under your leadership. No amount of
 9 musical ability comes before the well being of my
 10 students. I regularly speak to students about the
 11 importance of speaking up and out, and if they believe
 12 something is wrong. Parents staff and students know
 13 Chetham's as a telling school where everyone looks out
 14 for each other. This was clearly not the case at the
 15 school in the past, as we heard today. Students should
 16 have been supported and listened to and their concerns
 17 acted upon.

18 "I am deeply sorry that the school did not do more
 19 to provide emotional support to the victims and
 20 survivors of abuse and their families. I would welcome
 21 any victim and survivor of abuse at Chetham's getting in
 22 touch with me if they feel it could help to rectify some
 23 of the appalling mistakes of the past."

24 Chair, as that statement demonstrates, it is no part
 25 of the response of the current leadership regime at the

Page 135

1 urgent need of some form of legal obligation to report
 2 child sexual abuse, and we invite the panel to consider
 3 how different the lives of these two survivors might
 4 have been if those staff members to whom their initial
 5 disclosures were made had been compelled by law to
 6 report them to the appropriate agencies at the time.

7 Thank you very much.

8 THE CHAIR: Thank you, Mr Ode.
 9 Mr Ford.

10 Closing submissions by MR FORD

11 MR FORD: Chair, thank you.

12 I make these submissions on behalf of
 13 Chetham's School of Music, written submissions will be
 14 lodged which provide some more detail in respect of some
 15 of the points that I am going to make now.

16 Chair, at the close of the second day of this
 17 hearing on 1 October, having heard the evidence of RS-A1
 18 and RS-A2, as well as that of Mr Vallens, Mr Pace and
 19 Mr Hullah, the current principle of Chetham's,
 20 Alun Jones, posted the following message on to the
 21 school's website, and I quote:

22 "What I have heard today has been shocking and
 23 distressing and it is clear that serious errors of
 24 judgment were made at our school. My task as the
 25 current principal of Chetham's is to make sure we learn

Page 134

1 school to seek to justify the mistakes of the past or to
 2 deflect criticism from the school where criticism is
 3 due.

4 In terms of what went wrong in the past, in
 5 particular in the 80s and 90s, the panel have heard
 6 distressing allegations of sexual abuse against
 7 a shocking number of adults associated with the school.
 8 More victims and survivors may yet come forward. The
 9 evidence of Detective Chief Inspector Daniels was that
 10 Operation Kiso received allegations against
 11 35 individuals associated with the school, including two
 12 people who have subsequently been convicted, one
 13 a visiting conductor and the other a visiting
 14 instrumental teacher; others who have been acquitted,
 15 for example Malcolm Layfield, who was acquitted of
 16 charges of rape, but only on the basis that the students
 17 were over the age of 16 and consented -- he admitted
 18 that he had had sexual relationships with more than one
 19 student. Allegations have been made against six
 20 individuals who were deceased by the time of the police
 21 operation.

22 More specifically, the inquiry has heard ample
 23 evidence that Christopher Ling sexually abused students.
 24 The inquiry has seen evidence of a number of allegations
 25 of abuse taking place during private lessons and on

Page 136

<p>1 courses organised by Ling, as well as, in the cases of 2 A1 and A2, abuse on school premises. 3 The inquiry has also heard evidence about the 4 circumstances of the termination of the employment of 5 Michael Brewer. That evidence shows that this was dealt 6 with in a wholly unacceptable manner. The announcement 7 that he had resigned, or perhaps was retiring because he 8 was suffering ill-health, was simply not true. The 9 decision to reward him financially on his departure was 10 unforgivable, as was the failure to alert the 11 authorities to the true reason for it. 12 The school today, chair, deprecates the attempt by 13 Mr Hullah to seek to justify what was done in 1994. In 14 opening, counsel to the inquiry asked "whether the 15 institutional response to these concerns demonstrated 16 that the school put its reputation and that of a great 17 man above the need to find out if an abuse of power had 18 taken place." The school accepts and sincerely regrets 19 the fact that on this occasion that was indeed the case. 20 Since the 1990s, the school has taken many positive 21 steps to improve safeguarding, both specifically in 22 response to concerns that have come to light and more 23 generally with the criminal trial of Mr Brewer in 2013 24 being a clear watershed in the school's approach to the 25 welfare of pupils. Early on in her tenure,</p> <p style="text-align: center;">Page 137</p>	<p>1 Claire Moreland changed the basis on which peripatetic 2 instrumental tuition was provided. Previously, the 3 musicians had been engaged on a freelance basis, but 4 then they became employed on the books. Since 2006, 5 almost all music staff have been employees and subject 6 to safeguarding and safer recruitment checks. There are 7 a small number of visiting teachers who, owing to the 8 infrequency of their visits, are not employees but, 9 where they are engaged in regulated activity, they too 10 are subject to the same checks. Changes have been made 11 to the guardianship system, as you have heard, by 12 firstly revising the school's policy so that tutors and 13 teachers could not act as guardians and secondly by 14 providing written information and guidelines to parents 15 of overseas students on how the system works. 16 The physical environment at the school has changed 17 considerably during Claire Moreland's tenure and 18 subsequently. You have heard about a new building which 19 was opened in 2012, which houses the music and academic 20 teaching rooms and supervised practice rooms, which was 21 intended to prompt fuller integration of the academic 22 and music programmes. 23 The school was subject to considerable criticisms, 24 as you have heard, in the March 2013 joint inspection. 25 Notwithstanding the positive changes that had been made</p> <p style="text-align: center;">Page 138</p>
<p>1 before that date that I have just referred to, the 2 inspection was a wake-up call the school, which resulted 3 in significant changes in their policies and procedures 4 after that date. 5 The inquiry has heard evidence that the school was 6 required to prepare and submit to the Department for 7 Education an action plan and to improve standards in 8 respect of, among other things, the welfare, health and 9 safety of pupils. The plan was prepared and submitted 10 and approved by the Department for Education and at the 11 follow up inspection on 10 September 2013, the following 12 was said: 13 "The school has implemented its action plan 14 effectively and has taken many steps over and above 15 those required to ensure compliance with regulations and 16 standards identified in the action points of the 17 previous inspection. Evidence indicates that the school 18 takes seriously the findings of the previous inspection 19 and the shortcomings identified." 20 Meanwhile, chair, also as you have heard, 21 in June 2013 the school set up a safeguarding 22 subcommittee, later the safeguarding committee of the 23 board of governors, and an independent safeguarding 24 commission. This commission operates completely 25 independently of the school. It was, until his death</p> <p style="text-align: center;">Page 139</p>	<p>1 earlier this year, chaired by the retired High Court 2 judge Sir David Maddison. Its current members include 3 the former Chief Executive Officer of the Manchester 4 Probation Trust, a retired Deputy Chief Superintendent 5 with 30 years' experience in the police and a retired 6 circuit judge. The commission first met in August 2013 7 and has met at least twice a year since then. Its role 8 is to advise, scrutinise, question, monitor, challenge 9 and oversee and provide quality and assurance to the 10 school in matters relating to child protection. It does 11 this by scrutinising the minutes of the management 12 committee, ensuring that the school has in place and 13 properly implements appropriate and effective policies 14 for the care of students ensuring that the up to date in 15 complying with regulatory standards and exercising its 16 power to call before it members of the school staff in 17 order to answer any questions about safeguarding the 18 commission may have. Its terms of reference require it 19 to publish an annual report, which it does and which is 20 posted on the school's website. 21 Chair, the written submissions will contain a little 22 more detail about what has been found at subsequent 23 inspections at the school and I will not set that out 24 now. It also contains information about the 25 restructured safeguarding team within the school, its</p> <p style="text-align: center;">Page 140</p>

<p>1 relationships with external agencies such as the police, 2 the Children's Services and the LADO. In fact the 3 current deputy director of Children's Services for 4 Manchester is co-opted on to the governing body. There 5 is also within the written submissions information about 6 the Independent Listener, of which you have heard 7 something and, as you know, we have put in a little more 8 evidence about that recently.</p> <p>9 Chair, turning to the future, the school continues 10 to believe that music students should receive the 11 highest available quality of one-to-one instrumental and 12 vocal tuition, as long as there are appropriate 13 safeguards in place. Given its history, the school is 14 not and never will be complacent about safeguarding but 15 the school is presently not aware of any instant of 16 abuse by a member of staff involving a pupil which has 17 taken place since 1997. So there is reason to be 18 hopeful that, by continuing to develop its policies and 19 procedures, and with the benefit of any recommendation 20 that this inquiry may make, that such tuition can be 21 safely provided.</p> <p>22 As regards those recommendations, the school would 23 like to associate itself in particular with the 24 improvements that have been suggested in respect of the 25 guardianship system, and also supports the introduction</p> <p style="text-align: center;">Page 141</p>	<p>1 of a regime of mandatory reporting.</p> <p>2 Finally, chair, a specific criticism has been made 3 of the school's failure in the recent past to offer 4 support to victims and survivors. The school accepts, 5 and is profoundly sorry, that little or no support was 6 offered. The school accepts that it could, and should, 7 have done more. Over the course of the last two weeks, 8 a number of former pupils, including victims and 9 survivors of abuse at the school, have felt able to 10 come -- to get in touch with the school in response to 11 Mr Jones' statement that I read at the beginning of this 12 submission. As a result, the school is now actively 13 considering what further resources and support for 14 former pupils can be put in place and would welcome the 15 inquiry's recommendations to make sure that any support 16 provided meets best practice standards.</p> <p>17 Thank you very much.</p> <p>18 THE CHAIR: Thank you, Mr Ford.</p> <p>19 Ms Gallafent?</p> <p>20 Closing submissions by MS GALLAFENT</p> <p>21 MS GALLAFENT: Thank you.</p> <p>22 Chair, members of the panel, the trust is very 23 grateful for the opportunity to participate in this case 24 study.</p> <p>25 Throughout this inquiry, children with SEND have</p> <p style="text-align: center;">Page 142</p>
<p>1 been referred to as some of the vulnerable in society. 2 And those in residential care, even more so. But even 3 within that group, the children cared for and educated 4 at the Royal School Manchester are exceptional. You 5 heard yesterday from the current chief executive of the 6 trust and principal of the school, Jolanta McCall, who 7 explained the profound complexity and severity of the 8 needs of this small group of children. This makes the 9 responsibility of keeping those children safe and well 10 all the greater.</p> <p>11 The trust fully recognises that in the past, it did 12 not always live up to that responsibility. Ms McCall 13 has apologised unreservedly for those failings, but 14 those mistakes, now over 20 years ago, prompted decisive 15 action to improve the trust's safeguarding processes and 16 policies. Yesterday, the panel was taken to some of the 17 documents that the trust has submitted but we do invite 18 the panel to read the full safeguarding policy and the 19 suite of associated documents when considering 20 Ms McCall's evidence in full.</p> <p>21 In her opening statement, counsel to the 22 investigation set out the five principles which the 23 Children's Commissioner had identified for good practice 24 in schools. We suggest that these provided a useful 25 prism through which to consider the trust's evidence.</p> <p style="text-align: center;">Page 143</p>	<p>1 The first principle is the giving of priority to 2 child protection. Ms McCall could not have been clearer 3 as to the paramount importance of safeguarding at the 4 school. It is demonstrated not only by the governance 5 structure, which has a dedicated safeguarding governor 6 and a designated director responsible for chairing the 7 safeguarding board, the members of which include 8 independent people such as representatives from the 9 police, the CCG and the local authority.</p> <p>10 Below that, is the designated safeguarding lead 11 group which reviews and actions all safeguarding cases 12 and concerns across the trust, on a fortnightly basis at 13 meetings.</p> <p>14 As Ms McCall put it, it is a massive commitment of 15 time and resource, but it is worth it to ensure that the 16 trust prioritises safeguarding, takes a holistic 17 multidisciplinary approach to all cases and creates 18 a culture of continuous improvement.</p> <p>19 This structure and the regular meetings of its 20 constituent safeguarding bodies also supports the 21 second principle identified by the Children's 22 Commissioner, which is that safeguarding is a shared 23 responsibility for all who work within the school and 24 that all staff understand how their role contributes to 25 the overall ethos. You were shown, yesterday,</p> <p style="text-align: center;">Page 144</p>

<p>1 a practical example of the way in which the school 2 ensures responsibility for safeguarding is shared. 3 That, is the inclusion of the four Rs on the back of 4 every staff card: recognise; respond; record; refer. 5 The positive impact of the culture of shared 6 responsibility is also demonstrated by the fact that 7 reporting of any concern not just a concern that might 8 meet a threshold for potential abuse, is very high. The 9 school's consistent stance is that it is better to 10 overreport than underreport. 11 The third principle is that there should be strong 12 communication networks between schools and local 13 authorities. Again, Ms McCall's evidence is that the 14 trust has close, positive and valued working 15 relationships with its local partners, which has been 16 reflected by praise for the trust's approach and 17 confidence in its processes. 18 So far as the fourth principle, which relates to 19 training and support for staff is concerned, Ms McCall 20 explained that the school's biggest asset is its staff, 21 that it follows safe recruitment practices and it 22 provides a two-week induction before staff start working 23 at the school. Thereafter, there is a detailed 24 programme of training under the school's policies, on 25 a range of safeguarding issues, calibrated to match the</p> <p style="text-align: center;">Page 145</p>	<p>1 staff members' roles and responsibilities, which also 2 covers the board of directors and the governors. 3 The fifth principle was a little different. Unlike 4 the first four principles, which were unlikely, in 5 practice, to be applied by the vast majority of schools 6 in a broadly similar way, the fifth principle poses very 7 particular challenges to a school such as the Royal 8 School Manchester. It concerns the extent to which 9 staff know their students and look after their welfare 10 and that students have the language and education to 11 understand risks and to be able to identify them. 12 For children at RSM, language is very far from 13 straightforward. Only a very few of the children are 14 able to communicate in any way orally. For the others, 15 the trust has had to find ways to communicate. That may 16 involve signing, hand signing, talking mats, picture 17 exchange communication systems, or PECS, or objects of 18 reference. So all around the school, and in all of the 19 houses, the posters which tell children to find a member 20 of staff, if they feel concerned or sad or cross, are in 21 a range of formats, including, as the panel saw, signing 22 and symbols. 23 But communication between staff and students goes 24 much further. Staff are also trained to observe the 25 full range of a child's behaviours, in order to</p> <p style="text-align: center;">Page 146</p>
<p>1 understand what they may be communicating, by indicators 2 which may be as subtle as the flick of an eye or a jump, 3 as Ms McCall explained. 4 The recent introduction of what is called the "mood 5 barometer" harnesses the child's voice through the 6 observations of his or her mood and readiness to learn 7 which can be analysed at an extremely granular level. 8 This barometer should allow any indicators of potential 9 abuse to be picked up at a very early stage. 10 As for education to understand risks, you were taken 11 yesterday to one example of a lesson plan in relation to 12 educating young men in relation to their own developing 13 sexuality and the importance of the distinction between 14 behaviour that is acceptable in public and in private. 15 As counsel to the investigation pointed out in 16 opening, there is no national guidance, on relationships 17 and sex education for children with SEND, still less for 18 children with such profound and complex needs as those 19 at RSM. 20 The RSM has developed for itself specialist lesson 21 plans based on contextual learning, but the panel will 22 readily appreciate the amount of work and resources 23 involved just from the few pages of the lesson plan that 24 it saw yesterday. 25 RSM has always sought to share its thinking and</p> <p style="text-align: center;">Page 147</p>	<p>1 learning with other special schools and organisations 2 and it will continue to do so. It would also be equally 3 happy to provide further information and examples for 4 the inquiry, should it find that to be of assistance. 5 Having set out what the trust considers that it does 6 well, I must, of course, emphasise that the trust is by 7 no means complacent. It is for that reason it regularly 8 seeks independent scrutiny of its safeguarding practices 9 and procedures, including by peer review from other 10 schools and organisations, as well as, of course, 11 undergoing inspection by three sets of regulators. The 12 trust has also viewed this investigation as a unique 13 opportunity for constructive scrutiny by the inquiry and 14 it looks forward to receiving and acting upon any 15 recommendations of this inquiry for further improvement. 16 Thank you. 17 THE CHAIR: Thank you, Ms Gallafent. 18 Mr Morley? 19 MS SCOLDING: Mr Morley indicated just before lunch that he 20 was not going to be making any submissions. 21 THE CHAIR: Thank you. 22 Ms Hannett? 23 Closing submissions by MS HANNETT 24 MS HANNETT: Thank you, chair and panel. Ofsted are very 25 grateful for the opportunity to make brief closing</p> <p style="text-align: center;">Page 148</p>

<p>1 observations.</p> <p>2 As an inspectorate which makes judgments about</p> <p>3 safeguarding provision in schools and inspects the</p> <p>4 quality of child protection, working in local</p> <p>5 authorities, Ofsted is acutely aware of the consequences</p> <p>6 of child sexual abuse and its long-term effects and it</p> <p>7 need hardly be said that these are matters to which</p> <p>8 Ofsted gives the highest priority which is reflected in</p> <p>9 how it carries out its inspection and regulatory</p> <p>10 functions.</p> <p>11 Ofsted regularly reviews its regulatory frameworks</p> <p>12 and practices in dialogue with the key stakeholders, and</p> <p>13 this includes feedback from children and young people.</p> <p>14 It endeavours continually to learn from past practice,</p> <p>15 and to reflect on how current practice can be</p> <p>16 strengthened. Ofsted welcomes the opportunity the</p> <p>17 inquiry has provided to continue that thinking.</p> <p>18 To that end, Ofsted would like to record its</p> <p>19 gratitude to the victims and survivors who gave evidence</p> <p>20 to the inquiry. Ofsted recognises the courage that</p> <p>21 required and are certain that this has assisted the</p> <p>22 inquiry in its work.</p> <p>23 In their opening submissions, counsel to the inquiry</p> <p>24 asked five questions about the process of inspection.</p> <p>25 These submissions summarise Ofsted's position in</p> <p style="text-align: center;">Page 149</p>	<p>1 relation to each of those questions. Starting, then,</p> <p>2 with questions one and two: how far inspections can</p> <p>3 provide an accurate exploration of child protection</p> <p>4 issues, which may be present, and discover safeguarding</p> <p>5 failures rather than simply interrogate known failures,</p> <p>6 inspection is only one part of the system for keeping</p> <p>7 children safe in schools. As Ms Spielman put it</p> <p>8 yesterday, one layer in the trifle. It provides a level</p> <p>9 of assurance about the quality of safeguarding</p> <p>10 provision. Ofsted accepts, however, that an inspection</p> <p>11 model has inherent limitations, specifically, first, by</p> <p>12 its nature, inspection involves the making of</p> <p>13 qualitative judgments by reference to what is seen on</p> <p>14 that day and, in that sense, they can only reflect</p> <p>15 a snapshot of what goes on in any institution.</p> <p>16 Second, inspections are not forensic investigations,</p> <p>17 Ofsted doesn't have powers of investigation and such</p> <p>18 a power would risk undermining the investigative role of</p> <p>19 other agencies.</p> <p>20 Third, inspections rely to a large extent on the</p> <p>21 good faith of those running the schools and other</p> <p>22 providers being inspected and, sadly, as the inquiry has</p> <p>23 heard in the last two weeks, inspectorates can sometimes</p> <p>24 encounter concealment.</p> <p>25 Whilst Ofsted inspectors try to identify deception</p> <p style="text-align: center;">Page 150</p>
<p>1 on the part of the provider -- for example, accompanying</p> <p>2 members of staff to collect files -- we acknowledge this</p> <p>3 is not, and cannot be, conclusive. Inspections depend</p> <p>4 on effective information sharing, which can help to</p> <p>5 mitigate any active concealment on the part of the</p> <p>6 school, but doesn't prevent it from taking place.</p> <p>7 Nevertheless, in Ofsted's experience, an inspection</p> <p>8 will be at its most effective where all inspectors have</p> <p>9 the necessary and relevant expertise and are well</p> <p>10 trained in understanding safeguarding issues; where</p> <p>11 inspectors exercise professional curiosity and endeavour</p> <p>12 to understand the safeguarding culture of</p> <p>13 an institution, including ensuring that all staff are</p> <p>14 well trained and supported; where Ofsted are -- where</p> <p>15 inspectors are asked a range of questions, including of</p> <p>16 the children, to establish that the institution does</p> <p>17 more than just comply with the legal requirements, and</p> <p>18 the very short notice period that is given to schools</p> <p>19 prior to an Ofsted inspection is an important part of</p> <p>20 this exercise.</p> <p>21 Inspectors will cross-check evidence from different</p> <p>22 sources to ensure that the conclusions reached are as</p> <p>23 accurate as possible. Thus, inspectors triangulate what</p> <p>24 they are told by children with what is found in</p> <p>25 paperwork and what staff and others tell them.</p> <p style="text-align: center;">Page 151</p>	<p>1 Finally in this respect, where inspectors act</p> <p>2 independently, and, as you heard yesterday from</p> <p>3 Ms Humphreys, Ofsted has systems in place to ensure</p> <p>4 a regular turnover of the inspectors on each school</p> <p>5 inspected, to ensure they remain at one remove from the</p> <p>6 schools they inspect.</p> <p>7 Ofsted accepts it is obviously easier to inspect</p> <p>8 a school in respect of which specific concerns have been</p> <p>9 raised; however, that does not render inspections</p> <p>10 ineffective in the absence of such complaints.</p> <p>11 Where there are no pre-existing concerns, inspectors</p> <p>12 can, and do, come across evidence or allegations of</p> <p>13 child abuse and, if this happens, they must satisfy</p> <p>14 themselves that appropriate referrals have been made and</p> <p>15 not assume someone else will take action.</p> <p>16 In summary, therefore, Ofsted considers inspections</p> <p>17 can provide a robust assessment of safeguarding concerns</p> <p>18 within the inherent limitations of an inspection model.</p> <p>19 Nevertheless, effective inspections must also be</p> <p>20 adequately resourced. There has been a 52 per cent cut</p> <p>21 in real terms to Ofsted's school funding since 2000 and,</p> <p>22 whilst Ofsted remains confident it provides a sufficient</p> <p>23 layer of assurance in relation to the schools and other</p> <p>24 providers inspected, Her Majesty's Chief Inspector has</p> <p>25 made clear repeatedly that it is operating the leanest</p> <p style="text-align: center;">Page 152</p>

<p>1 possible model and any further reductions are likely to 2 mean Ofsted can no longer provide sufficient assurance. 3 Turning, then, to 3: is the current framework for 4 inspection sufficiently robust in examining child 5 protection? 6 Ofsted accepts there were failures in how it 7 conducted its inspections of Stanbridge Earls School, 8 but the inquiry should be cautious about using those now 9 historic shortcomings to reach any conclusions about the 10 robustness of the current inspection regime, given the 11 significant changes to inspections that have taken place 12 since. 13 Ofsted has fundamentally revised its approach to 14 safeguarding across the organisation, including 15 commissioning Dame Christine Lenehan to review its 16 approach to inspection of residential special schools -- 17 full details are set out in Ms Humphreys' witness 18 statement -- but have included revisions to the 19 inspection frameworks, changes to the judgment, 20 specifically so that if safeguarding is inadequate, the 21 overall provision is also automatically rendered 22 inadequate and inspectors no longer require proof of 23 actual harm to make an "inadequate" finding. 24 A risk of harm suffices. 25 Increase of the frequency of aligned and integrated</p> <p style="text-align: center;">Page 153</p>	<p>1 inspections; improved safeguarding training and 2 guidance; changes to the way the complaints have been 3 handled; and improvements in the system of information 4 sharing, as well as establishment of the cross-Ofsted 5 safeguarding group. 6 Ofsted repeatedly raised concerns about the 7 exemption of "outstanding" schools from the ordinary 8 inspection cycle, and so therefore welcomed DfE's 9 announcement that it plans to remove this exemption and 10 make additional funding available for further 11 inspections. 12 Ofsted are satisfied that the current inspection 13 framework is now robust. That said, Ofsted is not 14 complacent and recognises there may always be further 15 improvements that can be made. Ofsted's position on the 16 recommendation posed by other core participants is 17 therefore dealt with when we deal with question 5 in due 18 course. 19 Turning to question 4: does the current system of 20 regulation by the DfE in the relationship between the 21 DfE, Ofsted and the ISI and other statutory bodies work 22 in practice? 23 Ofsted has a good working relationship with DfE. 24 There is day-to-day contact and a monthly working group 25 to discuss issues of independent boarding and</p> <p style="text-align: center;">Page 154</p>
<p>1 residential schools, including any schools causing 2 concern. There is, however, an inherent weakness in the 3 current regulatory framework for schools, namely, that 4 the role of inspectorate and regulator is split. 5 Whilst Ofsted inspects independent schools, it has 6 no power to take any action in respect of those that are 7 failing. Regulatory action is in the remit of the DfE 8 only. Ofsted has long held concerns that the DfE does 9 not take enforcement action against failing schools 10 quickly enough. Timescales are currently too long and 11 allow for repeated cycles of inspection and submission 12 of action plans before enforcement action is taken, even 13 when it is clear that appropriate progress is not, and 14 will not, be made. 15 Ofsted is aware of examples of schools which have 16 been failing to meet minimum standards for many years 17 which remain open. Even when schools do improve, many 18 subsequently fall back, leading to a recurrent cycle of 19 underperformance, and this means that pupils may be 20 spending parts of their education in schools where they 21 are not learning well or unsafe. 22 Further, as Ms Spielman indicated yesterday, Ofsted 23 has concerns that the process for approving independent 24 schools' proprietors is not fit for purpose, in that 25 individuals who ought not to be approved are presently</p> <p style="text-align: center;">Page 155</p>	<p>1 being approved. 2 The relationship between Ofsted and ISI has improved 3 considerably under the current chief inspectors and 4 their relationship is now positive and collaborative. 5 Ofsted and ISI have met regularly to discuss areas of 6 mutual interest and to share best practice around the 7 independent schools. Ofsted does not, however, consider 8 that the current statutory monitoring arrangements of 9 ISI, or those presently posed by DfE, are sufficient, 10 for the reasons given by Ms Spielman yesterday. 11 Finally question 5: do there need to be changes in 12 inspection practices or procedures to improve the 13 safeguarding of children? A number of recommendations 14 have been proposed by core participants. Ofsted has 15 expressed its view on those recommendations in its 16 written and oral evidence. The key points are 17 summarised now. 18 By way of preliminary observations, first, Ofsted 19 notes the need to strike a balance between regulation 20 and guidance, on the one hand, and, on the other, the 21 need to ensure that that regulation and guidance, in 22 fact, improves safeguarding and is capable of being 23 implemented. 24 Further, and regrettably, a minority of those 25 seeking -- of those working in schools and other</p> <p style="text-align: center;">Page 156</p>

<p>1 institutions do not comply with inspectors or seek to 2 conceal matters adverse to the school. Ofsted's 3 regulatory tools need to be strengthened to recognise 4 this. A focus on competency and effectiveness no longer 5 suffices by itself.</p> <p>6 Turning to the recommendations, first, Ofsted 7 broadly supports a mandatory duty on professionals to 8 refer allegations of child sexual abuse, subject to the 9 implementation of this duty incorporating certain 10 safeguards. The duty must first be clear and 11 unambiguous in its scope and identify clearly the 12 professional or criminal consequences of breach. It 13 must be introduced in tandem with high-quality guidance 14 and not conflict with any pre-existing guidance such as 15 Keeping Children Safe in Education. It should be 16 limited to those in leadership positions or designated 17 persons such as child protection leads, designated 18 safeguarding officers and so on.</p> <p>19 It must contain legislative safeguards for those who 20 report akin to those who whistle blow and it must not be 21 regarded as a single solution to a complex issue.</p> <p>22 Second recommendation. Ofsted continues to have 23 concerns about the lack of a requirement on schools to 24 notify Ofsted or ISI of allegations of abuse, even if 25 they have already been referred to the LADO. Ofsted</p> <p style="text-align: center;">Page 157</p>	<p>1 asked the inquiry to recommend that a formal 2 notification duty is reinstated on residential schools 3 in a form similar to that previously in place under the 4 national minimum standards with professional and/or 5 regulatory consequences clearly set out.</p> <p>6 ISI's suggestion of supplementing the current 7 requirement for schools to provide any information 8 reasonably requested with a duty of candour merits 9 further consideration by the DfE, but Ofsted consider 10 this recommendation ought to be considered alongside 11 improvements to governance standards and to the approval 12 of proprietors more generally.</p> <p>13 Third, Ofsted has carefully considered the evidence 14 adduced by Marcus Erooga and Wells School and others in 15 respect of neutral notification. Under Keeping Children 16 Safe in Education, Ofsted would already expect all staff 17 to report many of the incidents identified and be alert 18 to concerning emerging patterns of behaviour. Ofsted 19 would consider this to form part of the vigilant and 20 transparent safeguarding culture. Ofsted has yet to see 21 sufficient evidence from a range of settings that a more 22 formalised system of neutral reporting would enhance the 23 safeguarding protection of children. Indeed, Ofsted has 24 a concern that it may create a further layer of 25 bureaucracy or confusion which takes staff time away</p> <p style="text-align: center;">Page 158</p>
<p>1 from acting on safeguarding concerns. At present, 2 therefore, Ofsted does not support this emotion.</p> <p>3 Fourth, Ofsted considers that the NMS ought to be 4 replaced by Quality Standards equivalent to the more 5 aspirational and outcome-focused standards imposed on 6 children's homes. Ofsted notes this proposal was 7 recommended by the NSPCC and described as a "fundamental 8 urgency" by Dame Christine Lenehan in her witness 9 statement. Ofsted considers that all children living 10 away from home should be given equivalent levels of 11 protection and care and that government expectations 12 should be broadly similar across similar settings.</p> <p>13 Ofsted welcomes the upcoming consultation by the 14 Department of Education on revising the NMS and 15 considers this to be a good first step but, until the 16 detail is provided, cannot comment on whether this will 17 be sufficient.</p> <p>18 Fifth, Ofsted considers that the standard around 19 leadership and management contained in the independent 20 schools standards needs development. It currently sets 21 out no specific requirements about governance. Ofsted 22 considers that such a standard should require evidence 23 that a school's governance structure can effectively 24 hold head teachers to account and independently 25 scrutinise the school policies and practice.</p> <p style="text-align: center;">Page 159</p>	<p>1 Similarly, and in principle, Ofsted is in favour of 2 standards which introduce mandatory safeguarding 3 training for proprietors or governors of independent 4 schools.</p> <p>5 Sixth and penultimately, Ofsted is grateful for the 6 focus that the inquiry has brought to bear on the issues 7 of guardians. These include not only children studying 8 in the UK on a Tier 4 Visa but also EU citizens and 9 British children with parents overseas. It is clear it 10 is an under-regulated area.</p> <p>11 Ofsted notes the proposal by the DfE to amend the 12 NMS to include a new standard on guardians, namely, that 13 where guardianship arrangements are not made by the 14 school, the NMS will require schools to take appropriate 15 steps to ensure the children are safe and that the 16 guardianship arrangement is promoting the physical and 17 emotional wellbeing of the child.</p> <p>18 Presently, Ofsted doesn't have a firm position on 19 how or by whom guardians should be regulated. A range 20 of options should be carefully considered to accommodate 21 the variety of relationships such regulation may cover. 22 Nevertheless, Ofsted obviously also inspects local 23 authorities and, accordingly, supports greater clarity 24 for them when considering the suitability of 25 guardianship arrangements that may fall under their</p> <p style="text-align: center;">Page 160</p>

<p>1 remit.</p> <p>2 Finally, Ofsted has considered the role of the</p> <p>3 Independent Listener and the suggestion by counsel to</p> <p>4 the inquiry that this be enhanced to be more analogous</p> <p>5 to the role played by a Regulation 44 Visitor to</p> <p>6 a children's home.</p> <p>7 Ofsted welcomes the focus on schools who have</p> <p>8 a closed culture and which may be geographically or</p> <p>9 socially isolated. Ofsted agrees that further thinking</p> <p>10 on how to both provide a mechanism by which children may</p> <p>11 report concerns to an independent person, and by which</p> <p>12 independent person may challenge the school between</p> <p>13 inspections, should be done. Presently, however, Ofsted</p> <p>14 does not consider there is sufficient evidence to assess</p> <p>15 whether the answer to this mischief identified is to</p> <p>16 enhance the role of the Independent Listener or some</p> <p>17 other solution.</p> <p>18 Ofsted has not seen any analysis of evaluating the</p> <p>19 role played by an Independent Listener. Further, the</p> <p>20 role of a Regulation 44 Visitor, particularly the extent</p> <p>21 of the overview and scrutiny required, monthly checks,</p> <p>22 power to make recommendations and the provision of</p> <p>23 a report for Ofsted, are very different to that of</p> <p>24 an Independent Listener and may not be proportionate to</p> <p>25 the risks and vulnerabilities of all children who attend</p> <p style="text-align: center;">Page 161</p>	<p>1 residential schools.</p> <p>2 Nevertheless, having an independent and external</p> <p>3 person coming into a school on a more regular basis</p> <p>4 specifically for the purpose of assessing pupils' safety</p> <p>5 and wellbeing and who can make recommendations to</p> <p>6 approve this, where needed, is worth exploring in more</p> <p>7 detail. As part of this, Ofsted welcomes the DfE's</p> <p>8 statement but they are likely to consult on clarifying</p> <p>9 standard 20 of the residential special schools' NMS</p> <p>10 which deal with periodic monitoring by independent</p> <p>11 visitors.</p> <p>12 Ofsted looks forward to the recommendations arising</p> <p>13 from this phase of the inquiry and looks forward to</p> <p>14 participating in phase 2 in due course.</p> <p>15 THE CHAIR: Thank you, Ms Hannett.</p> <p>16 That concludes all the closing oral submissions from</p> <p>17 core participants.</p> <p>18 MS SCOLDING: I am afraid, Professor Jay, you have been</p> <p>19 given an old list, because Mr Wolfe from the Independent</p> <p>20 Schools Inspectorate should have been on your list.</p> <p>21 THE CHAIR: Mr Wolfe, apologies.</p> <p>22 Closing submissions by MR WOLFE</p> <p>23 MR WOLFE: Chair, panel, the safety and welfare of children</p> <p>24 is at the heart of everything ISI does. And so all of</p> <p>25 us at ISI have listened with great sadness to the</p> <p style="text-align: center;">Page 162</p>
<p>1 evidence from victims and survivors and recognise their</p> <p>2 courage in speaking out. We can assure them that</p> <p>3 everyone at ISI is listening to them.</p> <p>4 I can also reassure the inquiry that ISI is already</p> <p>5 reflecting on the issues emerging in this part of the</p> <p>6 inquiry in relation to the specific characteristics of</p> <p>7 music and special schools and how those characteristics</p> <p>8 my impact on inspection and, therefore, for the training</p> <p>9 and guidance for inspectors.</p> <p>10 In addition, ISI has welcomed the scrutiny of the</p> <p>11 inquiry over the last two weeks and has been pleased, as</p> <p>12 before, to be able to assist in that work.</p> <p>13 We hope the inquiry has been assisted by further,</p> <p>14 detailed information from us about our role and how ISI</p> <p>15 and its inspectors go about their task. We hope the</p> <p>16 inquiry now well appreciates the diligence and</p> <p>17 thoroughness of ISI's inspectors, including the way in</p> <p>18 which their assessment of safeguarding takes into</p> <p>19 account everything they see and hear in a school,</p> <p>20 policies, procedures, practices and, crucially, its</p> <p>21 culture.</p> <p>22 As an example of the thoroughness of ISI</p> <p>23 inspections, you have seen and heard now ISI, and its</p> <p>24 inspectors, check school policies before, and again</p> <p>25 during, each inspection to ensure they are fully</p> <p style="text-align: center;">Page 163</p>	<p>1 implemented in practice and supported by a culture of</p> <p>2 listening to children.</p> <p>3 You have heard how ISI reports on whether standards</p> <p>4 are met or not met in relation to each standard in the</p> <p>5 independent school standards and, where relevant, the</p> <p>6 boarding NMS. We don't operate a system of "key"</p> <p>7 requirements or overall grading or subsume safeguarding</p> <p>8 judgments under other headings. We believe this makes</p> <p>9 things crystal clear, both for the purpose of school</p> <p>10 improvement and, where necessary, for DfE enforcement.</p> <p>11 You have also heard from both the Chief Inspector of</p> <p>12 ISI and Elizabeth Coley, an experienced inspector, of</p> <p>13 the importance of integrated inspections which enable</p> <p>14 inspectors to consider in the round how every part of</p> <p>15 a school's provision contributes to the safety of the</p> <p>16 children.</p> <p>17 You have also heard Elizabeth Coley explain how</p> <p>18 inspectors meticulously check the content of the Single</p> <p>19 Central Register of Appointments, and you have seen in</p> <p>20 detail how that meant that ISI picked up the failure at</p> <p>21 Chetham's to complete DBS checks in a timely way,</p> <p>22 something seemingly unreported on in the previous</p> <p>23 inspection.</p> <p>24 On the other hand, you have also seen how, when it</p> <p>25 comes to finding out, for example, about staff</p> <p style="text-align: center;">Page 164</p>

<p>1 disciplinary action, ISI's inspectors are reliant on 2 high-quality information from other agencies to 3 triangulate the information they receive from school 4 records, senior leaders, staff and governors. 5 When it comes to how schools behave in that regard, 6 the experience of Chetham's in 2013 provides good 7 support, in ISI's view, for the creation of some form of 8 a duty of candour towards inspectors. 9 It was only on the third time of asking -- once in 10 writing before the inspection, and twice face to face 11 during the inspection -- that the head revealed relevant 12 disciplinary action had been taken against staff, and 13 her explanation to you -- namely, she had taken the 14 question as referring only to events since the previous 15 inspection -- bore no scrutiny because one of the 16 unrevealed incidents had been just three weeks before. 17 The standard 24(1)(g) obligation to provide 18 information, perhaps in place to enable inspectors to 19 gain access to what they needed, is clearly no longer 20 sufficient. 21 ISI can also see the potential benefits of a form of 22 neutral reporting which might sit alongside a duty of 23 candour, and possibly also mandatory reporting, but ISI 24 recognises that such systems are not without legal and 25 practical difficulties and it is keen to engage in</p> <p style="text-align: center;">Page 165</p>	<p>1 further discussions in that light. 2 As for information from other agencies, you have 3 heard of the inconsistency of the approach by LADOs 4 across the country, with only 35 per cent of LADOs 5 responding in the last two years. The ISI has worked 6 with LADOs to evolve its processes so that it now asks 7 very specific questions in relation to each school 8 before inspection. This is clearly, though, an ongoing 9 area for development and ISI would support the 10 introduction of arrangements which enable and ensure 11 a more consistent response from LADOs. 12 As for Independent Listeners in mainstream boarding 13 schools under NMS 2.3, you have heard of ISI's concerns 14 about the tension between the need for them to be 15 genuinely independent -- and certainly not a governor, 16 as at Chetham's in 2013 -- but also sufficiently well 17 known to be realistically approachable by young people. 18 That said, as Ms Richards explained, the role of 19 the Independent Listener must now be seen in the context 20 of mobile phones and internet access in modern boarding 21 school, although we share the experience of colleagues, 22 in that regard, that restriction of access to phones can 23 particularly impact on pupils from overseas with family 24 in other time zones. This is a separate issue covered 25 in NMS 4.1, which requires schools to ensure that pupils</p> <p style="text-align: center;">Page 166</p>
<p>1 can contact their parents or carers, and we have 2 provided information to the inquiry about how that can 3 lead to schools not meeting NMS 4.1. 4 On guardians, ISI believes that, even if not 5 specifically prohibited and despite risk assessments, 6 issues can still arise where staff act as guardians and 7 therefore supports the suggestion of some means of 8 regulation of guardianship. 9 As for whether Keeping Children Safe in Education 10 provides sufficient guidance on children with SEN and 11 disabilities, you have heard that there is an appetite 12 among some providers for further advice -- if only to 13 build confidence, as Dame Christine Lenehan advocated. 14 However, ISI does not suggest a freestanding 15 document dealing specifically with that or significantly 16 expanding the text of Keeping Children Safe in 17 Education. 18 Integration and streamlining of systems is important 19 to support effective practice. A further annex to 20 Keeping Children Safe in Education, providing additional 21 information and examples of what is different and what 22 is the same, for use in relation to disabled children in 23 mainstream and special schools, might strike the right 24 balance. 25 As you have seen, NMS 11 is the safeguarding</p> <p style="text-align: center;">Page 167</p>	<p>1 standard for boarding schools and it mirrors links to 2 paragraphs 7 and 8 of the independent school standards 3 which give it regulatory force and enable the Secretary 4 of State to take action for failure to meet the 5 standard. You have heard that the NMS are not 6 enforceable in maintained schools -- something on which 7 he don't comment -- but that is not the case in the 8 independent sector. 9 Some have suggested that NMS 11 is too vague or 10 broadly worded, but Kate Richards of ISI and Kate Dixon 11 for DfE explained how it incorporates, and therefore 12 must be considered alongside, Keeping Children Safe in 13 Education and Working Together. ISI interprets, "have 14 regard to" as meaning "follow unless there a good reason 15 not to", with it being difficult to envisage any good 16 and genuine reason for departure. 17 In any event, as you have seen, ISI's annual 18 publication, "The Commentary on the Regulatory 19 Requirements", unpacks the requirements and expectations 20 of the guidance with a clarity necessary to inform 21 inspection judgments and ensure consistent 22 interpretation. To support compliance, that commentary 23 is available to all schools ISI suspects. 24 ISI does not consider it necessary to have more 25 detail in NMS 11, or the NMS generally, since greater</p> <p style="text-align: center;">Page 168</p>

<p>1 detail also risks creating loopholes. The breadth of 2 the current drafting allows ISI inspectors to assess and 3 report on the welfare of children and the culture of 4 a school. 5 As for "quality" rather than "minimum" standards, 6 ISI would simply point out that "minimum standards" do 7 not need to be "minimal standards". The point is to 8 define the requirements at a level which we can be sure 9 keeps every child safe. Where the bar is not high 10 enough, it should be raised, but it is important to keep 11 the simplicity and clarity of the registration 12 standards. 13 As for the point raised this morning by Mr Frank 14 about material changes -- can I just pick up on that 15 very briefly -- Ms Scolding dealt with that partly 16 before lunch in relation to the regulations not being -- 17 or the relevant provisions not being in force. It is 18 also important to bear in mind that the elements in 19 question only apply to special schools or schools which 20 are providing particularly for children with special 21 needs. So that regime wouldn't have dealt with the 22 issues at Stanbridge Earls. 23 Can I then pick up additional points that have been 24 raised which were not dealt with in the evidence of 25 Ms Richards last week, one relating to interaction with</p> <p style="text-align: center;">Page 169</p>	<p>1 Ofsted and DfE and one in relation to the provision of 2 information raised by NSPCC. 3 In terms of interaction with Ofsted and ISI, ISI 4 enjoys open and good relationships with both of them, as 5 explained by Ms Hannett. We look forward to explaining, 6 in phase 2, how the collaborative arrangements are 7 working, and working well. For now, we would simply 8 observe that we are under considerable scrutiny and 9 happy to be under considerable scrutiny from the DfE. 10 In terms of the transparency of the information, the 11 NSPCC raised questions about information being provided 12 to them. Can I just clarify one thing in that regard? 13 They asked us in May of this year to provide them with 14 information. That was available to them, but 15 unfortunately, they took the view that that was too late 16 for their evidence for this inquiry, so this inquiry has 17 not had the benefit of that information. However, that, 18 information is readily available to them and to anybody 19 else. 20 Chair, panel, unless we can assist you further, 21 those are our submissions and we look forward to 22 assisting you in part 2 next year. 23 THE CHAIR: Thank you, Mr Wolfe. 24 Ms Scolding? 25</p> <p style="text-align: center;">Page 170</p>
<p>1 Closing remarks by MS SCOLDING 2 MS SCOLDING: Thank you. First, chair, I would just like to 3 read out a letter that the inquiry received on 4 10 October from MIND, which formally ran 5 Feversham School. The letter reads as follows: 6 "To whom it may concern, 7 "Re IICSA, we want to thank the inquiry for its work 8 in investigating abuse in schools and for including 9 Feversham School in its scope. Survivors deserve to be 10 heard and for justice to be served. 11 "The terrible events that took place at 12 Feversham School should never have happened. 13 "We are deeply sorry for the years of trauma and 14 anguish that have been caused to those involved and for 15 the failings of the investigation in 1988. 16 "There is no one left at MIND who had any 17 involvement in the organisation at the time of the 18 abuses or the investigation, and nothing can ever make 19 up for the suffering caused, but we recognise the role 20 we have in trying to make amends for what happened. We 21 apologise unreservedly to survivors and everyone else 22 affected. 23 "We have, in the past, met with a number of 24 survivors and apologised fully for what they have been 25 through, offered the support service of our local MINDs</p> <p style="text-align: center;">Page 171</p>	<p>1 in the north-east and have made appropriate payments of 2 compensation. We know that no amount of support or 3 money can ever compensate for the damage caused, but we 4 will continue to do whatever we can. 5 "Yours sincerely. 6 "Paul Ward (chief operating officer)." 7 Chair and panel, I would like to thank all legal 8 teams for their courtesy and cooperation in what has 9 been a very busy couple of weeks. We have heard, in 10 fact, from some 35 oral witnesses and have had 11 41 witnesses adduced into evidence furthermore. 12 I would, in particular, like to thank the investigation 13 team, especially the paralegals who have had to work 14 tirelessly behind the scenes to make sure that 15 everything operates smoothly. I would also like to 16 thank the hearing centre staff and transcribers and 17 evidence handlers and the audio/visual staff who make 18 sure the videos run smoothly. 19 Most of all, we are extremely grateful to all 20 victims and survivors who have given evidence orally or 21 whose accounts we have read. 22 Thank you for agreeing to share the distressing, 23 highly sensitive and private events in your life to help 24 us try and make children safe in the future. Thank you. 25</p> <p style="text-align: center;">Page 172</p>

<p>1 Closing remarks by THE CHAIR 2 THE CHAIR: Thank you, Ms Scolding, and thank you all for 3 the closing submissions made today, and in advance for 4 those that will be submitted in written form. 5 We are grateful to all of the witnesses who have 6 given evidence in person to the inquiry during the 7 hearings and, of course, also those who told us about 8 the child sexual abuse they experienced, and about those 9 who told us about how their schools had responded to 10 safeguarding concerns in the past and what their current 11 processes are. 12 From other witnesses, we have heard many different 13 kinds of responses to child sexual abuse and gaps in 14 safeguarding and child protection procedures. We are 15 also grateful to all of those who have gathered and sent 16 evidence in to the inquiry for the purposes of this 17 investigation, even in these last few weeks. Your 18 efforts in bringing this information to our attention 19 are very much appreciated and all of it will be 20 considered. 21 Finally, we also would like to extend our thanks to 22 all of the representatives for their assistance and to 23 all of the inquiry staff for ensuring the smooth 24 progress of the hearings. 25 As you may know, the phase 2 hearing in the</p> <p style="text-align: center;">Page 173</p>	<p>1 Residential Schools Investigation will take place 2 in May 2020. We will carefully review all of the 3 evidence obtained in phase 1 and phase 2 of this 4 investigation and prepare a single report which will 5 enable us to take all the relevant matters into account. 6 It is our current intention to publish this report in 7 early 2021. 8 With that, I will draw this hearing to a close. 9 Thank you very much to everyone. 10 (3.06 pm) 11 (The inquiry adjourned)</p> <p style="text-align: center;">I N D E X</p> <p>MS KATE DIXON (affirmed)1 16 Examination by MS BICARREGUI1 17 Examination by MS SCOLDING12 18 Questions from THE PANEL64 19 MS ALMUDENA LARA (affirmed)71 20 Examination by MS SCOLDING71 21 Witness statements adduced by MS101 22 ROBERTSON 23 Closing submissions by MS HARRISON117 24 Closing submissions by MR O'DONNELL127 25 Closing submissions by MR FORD134</p> <p style="text-align: center;">Page 174</p>
<p>1 Closing submissions by MS GALLAFENT142 2 Closing submissions by MS HANNETT148 3 Closing submissions by MR WOLFE162 4 Closing remarks by MS SCOLDING171 5 Closing remarks by THE CHAIR173 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 175</p>	

A	absolute 15:4	access 65:11 96:16	167:6	adding 58:5 94:9
A-189 130:9	absolutely 7:13	122:15 165:19	acted 135:17	addition 163:10
A/1 1:21 72:9	22:9 72:21 73:8	166:20,22	acting 117:4 148:14	additional 34:20,21
A1 117:13,20,22	97:17 123:15	accommodate	159:1	41:18 75:21 83:20
137:2	absurd 15:16 123:9	160:20	action 22:3 24:8,24	105:7 131:23
A189 129:13,15,18	abuse 64:9 74:16	accompanying	25:3,16,20,22	154:10 167:20
129:24 130:5,7,10	81:18,25 84:23	151:1	26:3,18 27:4,12	169:23
130:12,18,24,25	85:1,9,23 86:1,9	account 15:20	30:19 32:22 33:9	address 36:16
131:3,6,13,17,25	86:25 90:7 96:22	17:23 32:15 36:17	33:10,11,13,17,20	37:12 79:21
132:4,9,11,15,17	100:13,18 104:13	40:16 42:10 76:12	33:24 34:3,19	119:11 128:1
133:3	108:22 111:5,25	79:16,18 129:21	35:1,8,12,18,20	addressed 133:10
A189's 133:5	113:19 117:20,22	159:24 163:19	36:4,11,16,18	addressing 98:25
A2 117:13,20,22	118:6,9,17,18,23	174:5	37:5,12,21,23	adduce 101:3
137:2	122:6,8,15,18	accountability	38:1,10,13 39:1	115:10,18
A207 128:15,25	124:8,13 126:5	121:21 122:20	41:3,24 43:1	adduced 101:13,16
129:5 132:9,12,15	129:8,13 131:24	123:7,20	44:13 70:15 91:11	101:18 158:14
133:3	132:11,17,22	accounts 127:11	103:4 114:11	172:11 174:21
A207's 129:3	133:2,4 134:2	132:9,10 133:20	130:21 139:7,13	adequacy 104:12
132:19	135:20,21 136:6	172:21	139:16 143:15	adequate 62:24
A3 117:25	136:25 137:2,17	accreditation	152:15 155:6,7,9	104:22
A4 117:25	141:16 142:9	126:10	155:12,12 165:1	adequately 152:20
A5 117:25	145:8 147:9 149:6	accurate 150:3	165:12 168:4	adhere 125:18
A6 122:5,8,11,13	152:13 157:8,24	151:23	actions 25:10	adjourned 174:11
122:18	171:8 173:8,13	accused 106:24	119:15 144:11	Adjournment
A7 122:5 123:24	abused 85:17 103:9	ACE026445 111:17	active 151:5	116:25
124:5	103:23 128:12	ACE026446 110:8	actively 142:12	Administrator
ability 92:9 135:9	132:13,16,21	achieve 40:15	activity 3:12,16,18	111:18
able 6:2,16 13:2,16	135:3 136:23	achieved 28:12	3:24 7:6,15 14:7	admission 38:20
14:12 15:13 18:5	abuser 108:23	Achieving 103:14	14:22 15:1 59:5	admit 16:4
18:14 23:17 26:12	129:25 130:3,6	acknowledge 65:10	65:15 66:10 96:9	admitted 136:17
33:5 36:20,21	132:5 133:9	119:16 122:17	138:9	adopt 89:21
37:7 38:3 43:2	abuses 171:18	151:2	actual 153:23	adopted 119:5
50:1,20 51:17	academic 138:19	acknowledged	acutely 149:5	ADS000016 104:4
55:12 60:10 66:6	138:21	121:4,21	adapt 76:2 77:4,6	adult 7:13 80:22
70:4 79:17 89:12	academies 28:7,8	acknowledgment	82:23	adults 7:12 46:23
90:12 95:2,15,16	59:20 61:16 74:21	124:12	adaptation 75:23	76:17 80:25 90:13
96:18 99:18 103:8	accept 5:15 24:25	acquitted 136:14	76:21 81:22 82:3	96:15 133:24
121:20 123:4	42:16 53:5 122:13	136:15	91:23	136:7
142:9 146:11,14	acceptable 30:12	act 2:20 7:25 8:12	adapted 76:3,7	advance 173:3
163:12	78:20 147:14	8:18 18:24 26:14	80:8 81:4 82:18	adverse 157:2
abroad 102:3	accepted 21:19	34:13 58:14 60:16	91:14,21	advice 103:20
absconded 122:16	132:3	68:2 69:6,8 97:22	adaptive 81:25	109:10 167:12
absence 4:24 78:21	accepts 137:18	115:23 116:3	82:7	advise 123:5 140:8
152:10	142:4,6 150:10	126:22 130:24	add 97:1 126:6	advisory 43:16
absent 10:8	152:7 153:6	138:13 152:1	added 94:4	advocacy 41:16

90:15,18,22 91:4 92:22 advocated 167:13 advocating 84:1 affairs 73:3,16 affect 3:7 affirmed 1:12 71:21 174:15,19 afraid 89:4 162:18 age 55:1 128:4,14 136:17 agencies 39:6 41:10 61:24 99:10 134:6 141:1 150:19 165:2 166:2 Agency 101:20 102:6,8 107:2 agenda 73:17 75:7 84:2,12,14 agendas 83:25 ages 37:1 ago 5:13 69:9 99:4 99:6 132:14 143:14 agree 13:10 15:16 51:20 agreed 48:18 49:20 agreeing 172:22 agreement 48:1 agrees 161:9 aim 39:14 aimed 74:8,10 79:23,24 81:24 82:15,16 aims 74:10 104:8 aired 67:13 akin 157:20 Alan 102:5 albeit 26:13 alert 137:10 158:17 aligned 51:17,23 153:25 all-or-nothing 27:22 allegations 106:11	109:10,24 111:9 111:25 112:22 114:2,11,17,23 131:5 136:6,10,19 136:24 152:12 157:8,24 alleged 111:2 129:22 allow 147:8 155:11 allowed 16:18 123:11,19 allowing 122:14 allows 169:2 ALMUDENA 71:21 174:19 alongside 158:10 165:22 168:12 Alun 109:13 134:20 Amanda 49:9 50:15 68:20 107:5 109:19 124:24 126:16,18 Ambito 104:16,17 Ambito's 104:23 amend 50:25 160:11 Amendment 116:15 amends 171:20 amount 4:20 19:7 59:5 63:23 135:8 147:22 172:2 ample 136:22 analogous 161:4 analogy 50:3 analysed 147:7 analysis 161:18 and/or 22:6 158:4 Andrade 111:7 118:1 Andrew 115:2 121:9 anecdotal 85:11 87:19 angle 84:15	anguish 171:14 Annetts 108:9 annex 4:1 7:20 167:19 announcement 137:6 154:9 annual 140:19 168:17 answer 6:2 45:25 62:5 67:14 71:12 73:11 78:6 79:9 83:12 89:4 140:17 161:15 answers 94:6 Anthony 110:2 anticipated 12:13 anybody 170:18 anyway 46:13 apologies 71:11 110:21 162:21 apologise 14:17 26:24 171:21 apologised 143:13 171:24 apologising 122:10 apology 120:8,8,14 122:2,8 123:24,25 131:21 132:7 appalling 122:6 135:23 apparent 122:19 appeal 19:11 24:10 appealing 80:24 appeals 19:17 appear 122:12 appearance 120:2 appetite 167:11 Appletree 115:11 122:7,13,20,24 application 16:20 70:21 applied 4:16 91:1 146:5 applies 60:8,9 69:7 90:2,3 94:2	apply 8:8 10:8 12:3 54:21 85:19 111:22 169:19 Appointments 164:19 appreciate 29:24 133:11 147:22 appreciated 173:19 appreciates 163:16 approach 39:19 45:18 48:24 49:7 79:7 110:7 114:8 119:5 137:24 144:17 145:16 153:13,16 166:3 approachable 166:17 approaching 80:21 appropriate 42:18 56:21 91:16 92:10 134:6 140:13 141:12 152:14 155:13 160:14 172:1 appropriately 79:8 approval 158:11 approve 35:22 56:22 162:6 approved 35:23 139:10 155:25 156:1 approves 35:21 approving 55:20 155:23 April 26:21 27:1 103:7,18 107:16 133:14 area 62:17 93:6,10 160:10 166:9 areas 98:20,25 125:24 156:5 argue 78:14 79:9 arisen 6:19 31:20 arises 30:19 arising 162:12	Armstrong 110:9 arose 114:23 arrangement 60:13 160:16 arrangements 53:23 59:23 60:22 111:22 112:12 113:2,18 115:9 156:8 160:13,25 166:10 170:6 arrival 129:12 130:18 ASC000005 106:12 ASC000006 106:20 ASCL 106:15 asked 1:11 2:23 3:15 45:2 67:17 69:11 70:8 80:19 130:6 137:14 149:24 151:15 158:1 170:13 asking 1:7 6:11 15:24 34:20 63:8 66:15,16 165:9 asks 24:12 166:6 aspects 53:15 Asperger's 132:1 aspirational 18:12 159:5 assault 130:3,7 assaulted 128:5,16 129:24 130:13 132:18 assaults 97:24 98:7 98:10 129:23 133:6 assemblies 11:2 74:14 assembly 76:10 84:9,18 128:24 assess 56:21 161:14 169:2 assessing 115:14 162:4 assessment 98:22
---	---	--	--	---

152:17 163:18	attention 68:1 97:8	149:5 155:15	Bath 110:10	72:17,18 73:11
assessments 167:5	104:18 108:15		bay 131:13	82:5 103:14
asset 145:20	173:18	B	bear 101:14 160:6	111:15 113:4
assist 70:13 103:12	attitude 117:19	b 24:16	169:18	142:16 156:6
163:12 170:20	attract 70:15	back 19:16 31:24	bearing 91:6	better 26:7 69:19
assistance 148:4	audio/visual	35:6,13 37:5 42:4	becoming 50:18	76:7 82:10 86:16
173:22	172:17	42:13 44:17 47:10	65:9 103:13	88:11 107:19
assistant 11:14	audit 5:17 77:25	71:13 81:13,14	bedrooms 122:15	145:9
assistants 76:2	auditing 99:14	85:9 89:5,6,11,13	began 129:13	Beyond 50:20
assisted 149:21	audits 77:23	91:11 93:7 99:24	132:17	Bicarregui 1:4,5,13
163:13	August 101:20	145:3 155:18	beginning 65:8	1:14 6:24 12:12
assisting 103:8	102:6,17 105:15	backed 124:20	80:4 130:22	174:16
170:22	106:3,23 108:1,10	125:22	142:11	big 83:20 86:14
associate 141:23	108:20 109:20	background	behalf 47:9 117:5	87:13 98:13
associated 136:7,11	112:20 113:1,25	113:15 126:12	117:11 123:23	bigger 131:7
143:19	114:7 140:6	bad 45:12 119:1	134:12	biggest 145:20
association 43:13	authorised 31:5	badly 42:23	behave 165:5	Birmingham 19:6
43:19 59:12 104:5	authorities 40:22	balance 156:19	behaved 129:22	bit 7:23 14:19 24:2
104:7 105:3,5,15	41:13,20 59:10	167:24	behaving 18:22	27:21 31:8 44:15
105:16,17 106:13	60:9 61:15 87:12	balances 55:15,20	behaviour 10:5	52:4,5 56:10
106:15,22 107:14	88:10 97:9 99:8	97:16	63:15 98:18,21	60:20 61:1 75:22
107:24 111:13	100:18 107:21	Bambrough 115:7	99:1,16 100:2	80:7 81:19 91:20
association's 104:9	137:11 145:13	121:20	103:11,14 105:9	94:14 98:4 133:25
111:15	149:5 160:23	bar 19:16 38:20	128:14 147:14	bits 21:7 31:24 46:8
assume 31:9 54:3	authority 32:3	169:9	158:18	66:9
126:21 152:15	61:21 62:11	barometer 147:5,8	behaviours 79:3	bizarre 118:24
assumed 4:16	104:13 123:23	barred 1:8 2:13 3:4	98:6 99:20,21,23	blame 6:20
assuming 19:12	144:9	8:23 9:14 13:24	146:25	blank 130:21
31:24,25 34:15	authority's 105:10	13:25 14:3,10,15	belatedly 124:5	blind 132:2
39:14 49:24 55:1	124:16	65:9 66:6,17 96:5	belief 2:9 49:17	blistering 119:17
assurance 41:1	autism 75:20	96:8	72:17,18	blow 157:20
49:1 50:7 140:9	autistic 81:5	barring 106:10	believe 16:14 65:1	board 42:22 59:12
150:9 152:23	automatic 126:5	based 80:10 95:1	85:16 135:11	69:3 88:18 105:21
153:2	automatically	147:21	141:10 164:8	128:3 139:23
assure 163:2	153:21	basic 87:11	believes 167:4	144:7 146:2
asymmetry 48:23	autumn 130:22	basically 47:13	belong 80:17	boarder 129:9
attach 123:14	availability 124:7	58:18 80:16 83:21	benefit 77:20 93:13	132:22
attached 80:24	available 92:16,17	89:25	133:15 141:19	boarders 127:22
attempt 35:2	95:15 141:11	basics 81:23	170:17	boarding 17:12
137:12	154:10 168:23	basis 6:4,9 12:20	benefits 165:21	39:25 40:1,2
attempted 122:11	170:14,18	19:14 25:11,14	Benson 59:11	46:15 67:7 89:19
attempting 42:14	avenues 113:19	60:20 102:18	Bertrand 110:17	133:22 154:25
attend 161:25	avoided 133:6	122:24 136:16	bespoke 77:23	164:6 166:12,20
attended 127:22	Avon 110:16 111:1	138:1,3 144:12	best 2:9 31:21	168:1
129:13 131:2	aware 97:16 141:15	162:3	52:24 71:5,8	boards 62:15 88:22

107:20 bobbing 42:8 bodies 53:12 87:7 107:25 144:20 154:21 body 43:11,16,16 44:8 51:10 109:16 141:4 books 138:4 bore 165:15 bottom 11:6 85:6 87:12 Bottomley 111:10 bound 58:20 boys 128:17,21 brave 129:19 132:15 brazen 119:8 breach 157:12 breaching 106:25 breadth 169:1 break 1:16 61:4 71:15,19 101:8 115:20 116:21 breasts 128:17,21 Brewer 111:6,6 119:10 137:5,23 brief 148:25 briefly 7:2 57:3 169:15 bring 21:12 41:8 bringing 173:18 British 160:9 broad 13:19 broader 84:12 124:18 broadly 146:6 157:7 159:12 168:10 broom 29:13 brought 131:17 132:3 160:6 Brown 107:5 brushed 129:21 Buckinghamshire	123:21 124:3 budget 49:22 bugger 130:10 build 92:6 96:18 167:13 building 130:16 138:18 buildings 38:20 65:11 builds 91:23 built 76:14,25 bullet 86:17 Bulley 124:5 Bulley's 124:13 bullied 129:11 bullying 128:9 bundle 1:19,22,23 71:24 72:7,10 bureaucracy 158:25 Business 52:11 busy 172:9 <hr/> C <hr/> C1 115:16 122:15 122:17 calendar 69:25 calibrated 145:25 call 1:5 31:23 38:4 76:16 91:25 92:20 123:16 139:2 140:16 called 34:2 70:16 70:17 74:4 77:24 81:15 84:24 88:9 98:16,17 128:6 147:4 calling 91:16 calls 105:6 107:19 candour 125:13,15 125:19 158:8 165:8,23 capability 126:8 capable 156:22 card 145:4	care 2:20 61:19 73:24 104:16,17 123:18 126:18 140:14 143:2 159:11 cared 121:13 143:3 career 121:12 careful 16:11 carefully 158:13 160:20 174:2 carefully-worded 120:8 carers 82:1 167:1 caring 15:7 104:17 carried 82:19 carries 149:9 carry 61:5,6 110:21 case 16:20 23:3,8 26:3 29:8 33:21 34:23 36:8 38:4 39:21 40:23 42:7 42:18 43:15 47:16 55:17 56:19 64:14 65:1 68:21 89:19 98:13 109:8 115:15 124:2,3,11 127:21,23 131:20 133:5 135:14 137:19 142:23 168:7 case-by-case 25:14 cases 4:24 19:23 20:19 21:4,5,5 25:13,15,17,18 26:8 31:18 33:22 37:21 68:9,11,20 68:24 102:10,10 107:2 113:12,20 127:12 137:1 144:11,17 catching 91:24 Cathedral 110:1,6 110:6,12 111:3,18 111:19,20,22 Caton 104:5	cause 70:14 98:9 120:20 caused 129:7 171:14,19 172:3 causing 155:1 cautious 153:8 CCG 144:9 cease 38:20 ceases 38:20 cent 74:20,22,25 77:9 82:22 95:21 97:23 152:20 166:4 central 36:19 164:19 centre 172:16 certain 4:19,25 56:9 109:24 113:3 113:11,20 149:21 157:9 certainly 10:1 21:20 23:7 29:3 43:23 51:21 59:19 64:12 68:22 166:15 cetera 3:17 19:10 31:9,12 65:21 chain 28:9 chair 1:3,5,5,22,25 4:11 5:12,23 6:3 6:23,24 9:10,17 12:12,14 45:2 61:6 64:18,20,22 65:3,7,17 66:5,16 66:24,25 67:10 69:22 71:14,17,23 100:22,24 101:2,5 101:10,12,14 115:19,20 116:20 116:22 117:2,8 120:24 121:14 127:4,16,19 131:16 132:8 133:10 134:8,11 134:16 135:24	137:12 139:20 140:21 141:9 142:2,18,22 148:17,21,24 162:15,21,23 170:20,23 171:2 172:7 173:1,2 175:5 chaired 140:1 chairing 144:6 challenge 79:16 121:10 122:23 140:8 161:12 challenges 70:14 112:7 113:10 114:18 146:7 chance 5:19 6:2 12:20 27:13 change 45:8 46:6 54:13,15,20,21,23 55:6,9,11,16,18 55:21 56:16,23 57:1,5,11,13,16 57:20 58:1,3 66:21 67:20,21 68:3 115:22 116:9 116:18 122:1 126:14 127:14 changed 2:3 47:5 54:12 55:4,5,7 138:1,16 changes 54:10 55:10 56:20 67:16 116:5 138:10,25 139:3 153:11,19 154:2 156:11 169:14 changing 36:23,24 65:20 chapel 111:18 129:14 132:19 characteristics 108:22 163:6,7 characters 76:15 charges 136:16
---	---	--	--	---

<p>charities 58:19 102:24</p> <p>Charity 41:11 53:24 54:2 102:16 102:19</p> <p>Charlie 103:6</p> <p>chased 130:19</p> <p>chat 92:1,1,10</p> <p>check 9:15 10:13 26:11 39:4 53:2 66:10 96:8 97:5 100:11 163:24 164:18</p> <p>checked 26:10</p> <p>checking 67:8</p> <p>checks 13:22,23,23 13:24,25 16:17 42:24 55:15,20 97:15 101:22 138:6,10 161:21 164:21</p> <p>Chelfham 23:3</p> <p>Chet's 117:14</p> <p>Chetham's 40:23 41:15 109:13,15 109:22,23,24 111:7 117:12,21 117:23 118:14,16 119:10 120:5 134:13,19,25 135:13,21 164:21 165:6 166:16</p> <p>chief 107:24 136:9 140:3,4 143:5 152:24 156:3 164:11 172:6</p> <p>child 10:6 31:11 32:1,2,5,8 74:14 76:15,17,25 79:1 82:5,7,10 85:14 90:2,5,6 96:15 99:22 100:13,17 104:10,13 108:11 108:17 120:3 124:8 126:5</p>	<p>129:12,13 134:2 140:10 144:2 149:4,6 150:3 152:13 153:4 157:8,17 160:17 169:9 173:8,13,14</p> <p>child's 146:25 147:5</p> <p>childish 56:3</p> <p>Childline 91:18,21 92:14,18</p> <p>children 2:14,18,20 3:8,10,13,22 4:1 7:10,11,22 8:2 10:3,20,24 11:1 11:12 12:1 14:24 14:25 15:19 18:18 28:19 29:16,17,21 29:24 30:7 31:21 39:15 46:16,22 57:7,9 60:16 62:15 64:9 65:15 66:12,14,19 71:5 73:24 74:10,17 75:19,25 76:3,12 76:21,23 77:4,16 77:19 78:12,17 79:2,22 80:3,9,17 80:24 81:2,4,5,6,7 81:11,17,21,22,24 82:1,4,14,17,24 84:22,25 85:10,12 85:15,16,23 86:8 87:4,15,18 88:6 88:20 89:1,2,9,18 89:23 90:1,6,9,12 90:17,19,23 91:10 91:13,24 92:3,4,9 92:16,17,19,19,23 93:12,12 96:17,19 97:11 99:1,11,15 99:23 101:24 103:8,11,13,20,21 103:23 104:17,19 104:22,24 106:5,7</p>	<p>107:18,22 113:19 120:1 122:15,16 123:13,13,18 124:14 125:5 126:18 133:24 142:25 143:3,8,9 146:12,13,19 147:17,18 149:13 150:7 151:16,24 156:13 157:15 158:15,23 159:9 160:7,9,15 161:10 161:25 162:23 164:2,16 167:9,10 167:16,20,22 168:12 169:3,20 172:24</p> <p>children's 1:8 2:13 3:3 8:23 9:14 45:18 46:3 47:7 59:13,15 86:3,4 103:17,19 104:6,8 107:20 128:14 141:2,3 143:23 144:21 159:6 161:6</p> <p>Chippington 111:13</p> <p>Chisholm 113:7</p> <p>CHO000007 111:12</p> <p>choice 60:11</p> <p>choir 111:13,14,21 111:23</p> <p>choirs 111:24</p> <p>chord 117:15</p> <p>Chris 106:3</p> <p>Christine 153:15 159:8 167:13</p> <p>Christopher 109:9 117:17 118:5 136:23</p> <p>church 11:2 13:19</p> <p>circle 76:16</p> <p>circuit 140:6</p>	<p>circumstances 21:2 27:10,20 33:8 41:22 43:25 53:8 56:15,24 58:7 62:25 86:1,24 137:4</p> <p>citizens 160:8</p> <p>City 109:20,21</p> <p>civil 131:17</p> <p>claim 131:17,19,23 132:3</p> <p>claimed 118:18 119:10 123:4</p> <p>claiming 119:17</p> <p>Clair 122:7</p> <p>Claire 107:14 119:14 138:1,17</p> <p>clarified 91:1</p> <p>clarify 66:25 95:18 96:2 115:21,24 116:19 170:12</p> <p>clarifying 162:8</p> <p>clarity 160:23 168:20 169:11</p> <p>classroom 11:14</p> <p>clear 7:13 12:18 21:19 32:7,25 57:20 62:10,10,12 62:13 83:14 89:10 94:7 95:10 96:23 118:9 120:16 122:16 124:20 125:10 134:23 137:24 152:25 155:13 157:10 160:9 164:9</p> <p>clearer 22:10 92:17 144:2</p> <p>clearly 57:15 62:7 121:13 123:9 126:24,25 135:14 157:11 158:5 165:19 166:8</p> <p>Clerk 111:19</p> <p>client 121:23 126:3</p>	<p>clients 117:11,25 118:8 119:4 122:5 127:7,10</p> <p>close 23:14,16,20 27:6,22 28:17 29:21 42:15 46:3 129:15 134:16 145:14 174:8</p> <p>closed 131:16 133:21 161:8</p> <p>closely 12:5,6 26:9</p> <p>closer 45:18 74:25</p> <p>closing 28:2 38:7 101:9 117:7,10 127:18,24 134:10 142:20 148:23,25 162:16,22 171:1 173:1,3 174:23,24 174:25 175:1,2,3 175:4,5</p> <p>closure 22:25 27:17 27:24</p> <p>co-chairs 88:7</p> <p>co-opted 141:4</p> <p>code 108:12</p> <p>coercion 117:16</p> <p>coherent 61:25</p> <p>cohort 55:3</p> <p>Coley 119:22 164:12,17</p> <p>collaboration 48:25</p> <p>collaborative 156:4 170:6</p> <p>colleagues 73:5 89:5 166:21</p> <p>collect 151:2</p> <p>collected 87:14</p> <p>collecting 87:8,11</p> <p>collectively 86:16 87:20</p> <p>College 106:13,22</p> <p>column 85:5,24</p> <p>come 1:24 5:10 35:6 45:24 47:1</p>
--	--	--	--	--

47:10 53:17 61:20 68:25 71:12 73:12 75:10,17 93:13 97:8 136:8 137:22 142:10 152:12 comes 3:7 7:24 9:21 10:2,17,22 31:24 123:25 124:1 135:9 164:25 165:5 comfort 83:22 coming 11:11 16:23 42:13 52:19 72:1 73:21 162:3 comment 4:21 97:2 159:16 168:7 commentary 168:18,22 commenting 110:13 comments 110:6 124:22 commission 31:7 31:13,17 40:21 41:11 53:24 54:2 102:16,19,24 103:4 139:24,24 140:6,18 commissioned 47:24 108:21 Commissioner 103:17,19 143:23 144:22 Commissioners 61:18,19 commissioning 153:15 commitment 122:1 144:14 commits 120:9 committed 119:17 121:13 committee 108:17 139:22 140:12 common 40:8,8	67:6 93:18 communal 65:21 communicate 91:24 104:20 146:14,15 communicating 147:1 communication 82:6 91:14 104:25 145:12 146:17,23 communities' 99:19 comparing 68:23 comparison 45:2 compassionately 127:8 compel 62:22 compelled 133:1 134:5 compensate 172:3 compensation 131:17 172:2 competence 56:9 competency 115:14 157:4 complacent 141:14 148:7 154:14 complain 125:8 128:11 complaint 24:23,24 52:14,24 129:4 complaints 26:18 52:3,6,18 133:2 152:10 154:2 complements 97:2 complete 164:21 completely 27:11 63:13 139:24 completeness 67:23 complex 23:25 46:20 147:18 157:21 complexities 89:17 complexity 93:24 94:4 143:7	compliance 139:15 168:22 complicated 23:22 28:19 43:7 45:14 61:22 comply 16:5 35:2 151:17 157:1 complying 140:15 compounded 118:10 conceal 100:13 157:2 concealment 150:24 151:5 concern 17:23 21:6 30:20 31:16 32:4 40:19 59:14 63:4 66:5 75:6 93:10 94:3,5 105:10 106:4 107:7 115:7 120:20 126:9 145:7,7 155:2 158:24 171:6 concerned 25:24 26:9 29:4 31:3 32:2,3 53:11 84:5 90:16 94:10 145:19 146:20 concerning 98:14 103:11 158:18 concerns 10:25 31:19 42:19 44:15 80:20 82:20 93:2 93:15 94:12 96:5 96:11 104:2 105:11 108:13 115:8 125:7 135:16 137:15,22 144:12 146:8 152:8,11,17 154:6 155:8,23 157:23 159:1 161:11 166:13 173:10 conclude 119:12 concluded 131:10	concludes 162:16 conclusion 47:2 conclusions 151:22 153:9 conclusive 151:3 conduct 102:12 128:13 conducted 131:12 153:7 conductor 136:13 conference 133:13 conferences 68:21 confidence 8:2,8 51:4 145:17 167:13 confident 50:17 152:22 confirm 64:22 conflict 157:14 confronted 118:22 confusion 10:9 90:18 158:25 connection 76:24 connections 110:11 cons 133:14 conscientious 121:12 consent 82:6 consented 131:24 136:17 consenting 118:6 consequences 149:5 157:12 158:5 Consequently 32:21 consider 5:20 10:12 15:18 134:2 143:25 156:7 158:9,19 161:14 164:14 168:24 considerable 117:9 138:23 170:8,9 considerably 138:17 156:3	consideration 46:2 158:9 considerations 14:23 22:4 considered 5:22 7:5 10:5 21:5 23:1 43:21 133:15 158:10,13 160:20 161:2 168:12 173:20 considering 6:13 62:18 112:7 142:13 143:19 160:24 considers 101:25 104:21 107:16 113:16 148:5 152:16 159:3,9,15 159:18,22 consistency 39:2 40:4,6,15 consistent 83:11,14 145:9 166:11 168:21 consistently 91:2 consolation 135:6 conspicuous 116:17 constant 11:19 constantly 8:12 constituent 144:20 constitutes 3:12,24 constructive 148:13 consult 24:12 162:8 consultant 108:20 consultation 24:11 159:13 contact 14:23,25 15:18 65:15 66:12 66:13 112:17 133:23 154:24 167:1 contacted 128:8 132:20
--	---	---	---	--

contain 72:10 140:21 157:19	Corcoran 109:19	courses 79:1,20 137:1	CSM000573 109:12	cycles 155:11
contained 159:19	core 1:22,23 71:24 117:2,3 154:16	Court 140:1	culture 29:9,19 36:23 74:6 79:19 90:11 97:19 99:25	<hr/> D <hr/>
contains 140:24	156:14 162:17	courtesy 172:8	108:6 109:16	D 42:13 174:14
content 47:22 83:18 108:3 164:18	corner 67:9	cover 4:20 11:24 13:2 78:22 100:12 119:15 131:9 160:21	112:5 117:18 118:4 126:4 144:18 145:5 151:12 158:20 161:8 163:21 164:1 169:3	damage 172:3
context 28:25 44:22 90:1,2,5,7 96:9 99:25 166:19	corporate 73:7	covered 80:18 93:6 94:15 166:24	cup 61:10	Dame 153:15 159:8 167:13
contextual 89:21 99:24 147:21	corporately 45:12	covers 3:19 146:2	curiosity 151:11	Daniels 109:2 112:16,20 136:9
continually 149:14	correct 2:5,15 5:2 19:13 34:5 36:21 44:9 51:12 60:17 68:12 72:14 73:19 73:25 94:25 100:15	CPS 109:7	current 8:22 13:7 24:5 26:15,21 58:8 69:19 93:2 93:16,21,23 96:5 99:14 102:1 104:12,21,23 109:13 113:2,18 114:8 115:3,8 121:20 133:19 134:19,25 135:4 135:25 140:2 141:3 143:5 149:15 153:3,10 154:12,19 155:3 156:3,8 158:6 169:2 173:10 174:6	data 87:11,14 94:10 95:5,9,23 98:4,11
continue 6:5,17 14:10 47:17 65:22 66:17 77:6 148:2 149:17 172:4	corrected 95:14	CPS's 109:8	currently 51:11 87:13 126:10 155:10 159:20	data-sharing 53:15
continues 141:9 157:22	correction 73:1	CPS004806 109:6	curriculum 82:22 82:24	database 101:21
continuing 141:18	Council 109:20,21 110:3 113:24 123:22 124:3,13 129:5	CPS004851 115:11	cut 44:23 49:22 110:18 152:20	date 139:1,4 140:14
continuous 144:18	counted 63:24	CQC 51:7 125:19	cuts 50:8	dated 101:20 102:6 102:17,22 103:7 103:17 104:6 105:3,15 106:3,14 106:22 107:6,16 107:25 108:10,20 109:2,7,14,20 110:3,10,23 111:11,14,19 112:17,20,25 113:25 114:7,21
contradictory 120:25	counsel 5:12,15,19 6:2 71:10 95:6 121:3 124:7 137:14 143:21 147:15 149:23 161:3	cream 50:4	CYC000395 102:14	dates 68:24
contrary 125:16	countries 93:13	create 24:2 61:25 158:24	CYC000410 102:21	daughter 128:12 132:21
contributed 100:9	country 28:21 59:21 166:4	created 100:1	cycle 31:14 74:13 154:8 155:18	David 114:15 140:2
contributes 144:24 164:15	counts 132:6	creates 144:17		Davies 122:7
control 61:16	County 110:3 113:24 123:22 124:3,12 129:5	creating 90:11 169:1		day 1:4 39:25 122:21 130:13 134:16 150:14
controls 125:1	country 28:21 59:21 166:4	creation 108:16 165:7		day-to-day 11:18 84:19 154:24
conversation 74:18 80:12 81:1,2 84:20 92:5,8 97:17 99:5,9,24	counted 63:24	criminal 10:7 86:5 100:12 125:22,25 132:5 137:23 157:12		days 133:14
conversations 66:23 100:4	countries 93:13	criteria 54:22 56:6 57:12,19,20		DBS 3:9,16 4:16 7:3 8:14,25 9:3,12 9:15 10:13 13:23 15:18 53:24 54:4 66:10,21 97:2,5 97:12,17 164:21
convicted 105:9 132:5 136:12	country 28:21 59:21 166:4	criticism 24:25 136:2,2 142:2		deaf 81:5
convictions 9:16	counts 132:6	criticisms 114:4,12 138:23		
cooperation 172:8	County 110:3 113:24 123:22 124:3,12 129:5	Croft 111:18		
coopt 60:10	couple 40:5 123:2 172:9	Crook 114:4,13 115:5 120:21 121:18		
coopted 60:18	courage 127:10 149:20 163:2	Crook's 121:1		
coopting 60:21	courageously 122:5	cross 146:20		
coordinated 98:17	course 2:6 9:25 12:16 70:10,18 80:2,4 117:8,22 131:8 133:12 142:7 148:6,10 154:18 162:14 173:7	cross-check 151:21		
		cross-Ofsted 154:4		
		crucially 163:20		
		crystal 164:9		

<p>deal 2:6,18 6:22 43:5 52:15,17,19 57:3 154:17 162:10 dealing 46:20 57:9 64:7 109:10 114:2 114:3 167:15 deals 2:12,16 28:18 57:7 102:8 106:9 108:1 dealt 17:19 31:19 137:5 154:17 169:15,21,24 Dean 123:21 124:14 Dear 34:11 death 139:25 debate 18:13 63:6 Deborah 108:9 decade 16:9 decades 120:12 deceased 136:20 deception 150:25 decide 16:20 22:2 32:14 33:22 34:1 38:10 decided 123:14 decides 8:17 deciding 35:1 38:25 decision 4:21 5:10 5:18,23,24 6:13 8:16,16,17,19 9:2 10:18 12:9 16:13 19:14 33:6,24 34:22 35:10,15 41:6,7 49:15,15 115:13 137:9 decisions 2:23 25:12,13 34:19 50:21,22 decisive 143:14 dedicated 144:5 deemed 2:13 7:14 deep 112:23 deeply 120:6 135:2</p>	<p>135:18 171:13 defence 131:18 defended 131:19,23 define 169:8 definitely 22:9 99:3 100:4 definition 3:23 11:17 58:13,16,24 65:15 definitions 3:15 deflect 136:2 degree 85:13 delayed 72:25 80:5 delays 85:14 deliver 77:1 83:18 99:18 107:10 delivered 76:21 77:3 84:18 120:7 delivering 76:23 84:1 delivers 76:10 demonstrate 43:2 133:21 demonstrated 119:18 137:15 144:4 145:6 demonstrates 121:16 135:24 deny 118:25 department 2:24 3:5 4:23 6:11 7:18 8:11,21 13:8 16:7 24:18 39:1 49:23 52:11 53:11 59:5 61:17 73:23 75:12 78:17 101:21 139:6,10 159:14 departments 41:13 departure 137:9 168:16 depend 151:3 depending 36:15 69:25 depends 37:11</p>	<p>deprecates 137:12 deputy 107:5 140:4 141:3 deregistration 22:6 33:20 describe 54:14 88:14 117:20 119:15,22 described 14:2 123:2 124:25 128:9,15 131:6 132:12,13,19 133:21 159:7 describes 102:6 103:7,12,19,22 108:24 109:3,20 110:4 111:14,21 113:17 114:1 describing 45:14 101:20 111:8 112:4 113:8 description 67:15 109:15 descriptions 108:22 deserve 171:9 designated 77:22 78:4,6,23 108:16 110:5 114:6 144:6 144:10 157:16,17 designed 74:5 75:19 76:11 120:14 desirable 77:18 desperate 61:9 despite 20:3 119:16 121:15 122:16 124:10,11 131:25 167:5 destroyed 121:12 detail 17:6,7 57:17 57:21 64:3 73:11 93:6,11 121:3 134:14 140:22 159:16 162:7</p>	<p>164:20 168:25 169:1 detailed 6:5,22 145:23 163:14 details 16:25 109:22,23 114:16 114:24 115:6 153:17 Detective 136:9 determined 33:16 develop 127:5 141:18 developed 75:18 82:13 83:15 88:8 147:20 developing 11:1 80:2 147:12 development 65:18 98:17,23 102:16 159:20 166:9 DfE 21:20 34:13 43:21 45:5 49:15 52:8 83:15 84:7 87:8 96:25 154:20 154:21,23 155:7,8 156:9 158:9 160:11 164:10 168:11 170:1,9 DfE's 154:8 162:7 DFE001966 26:22 DFE001996 26:23 DfE002072 101:18 DFE002081_002 4:8 diagnosed 129:7 dialogue 28:13 149:12 difference 75:2 76:13,18 89:1 125:16 differences 86:10 different 4:13 10:12 15:3 32:22 33:18 35:3 40:10 40:11,12,18 46:5</p>	<p>47:5 48:17,19 51:14,19 52:25 53:14 54:24 55:12 57:18 63:13 65:5 67:4 68:24 69:15 76:11 86:2 87:16 99:9 134:3 146:3 151:21 161:23 167:21 173:12 differently 47:8 difficult 23:22,25 44:1 50:18 68:10 92:12 94:1 95:4 98:3,11 168:15 difficulties 46:17 57:8 70:14,18 89:18 104:25 165:25 difficulty 63:21 95:21 diligence 13:23 16:16 163:16 diminution 50:12 diocesan 110:9,13 diocese 110:11 direct 65:19,22 68:1 119:21 direction 31:5 34:10 87:23 99:4 99:11 100:5 directly 50:2 61:17 director 59:15 106:21 109:19 112:10,12 141:3 144:6 directors 59:13 104:5,8 146:2 disabilities 28:19 57:19 63:22 77:5 80:9 81:5,11,17 81:21,23 82:4 84:23 91:17,22 92:3,24 103:8,11 104:18,19,24 167:11</p>
---	--	---	---	---

disability 75:20 81:7	distinction 27:15 147:13	downplay 122:11	Earls' 131:8	23:12 27:8 31:5 126:2
disabled 79:22 82:14 84:25 85:9 85:12,15,16,23 86:3,8 88:6,20,25 89:9 90:17,23 104:22 167:22	distressing 134:23 136:6 172:22	draconian 38:17	early 133:5 137:25 147:9 174:7	effective 21:22 83:10,14 86:4,11 87:1 140:13 151:4 151:8 152:19 167:19
disagreed 33:9	disturbing 120:6	drafted 69:13	easier 24:4 152:7	effectively 2:17 139:14 159:23
disciplinary 119:20 165:1,12	Dixon 1:6,6,12,14 1:24 4:8,15 5:15 5:18 6:1,5,25 7:19 8:4 9:12 12:13,14 12:18,25 27:4 34:11 61:9 64:17 71:14 115:22 168:10 174:15	drafting 169:2	easy 23:2	effectiveness 86:2 86:10,25 157:4
disclose 119:20 130:1 132:16	Dixon's 5:12	dragged 130:7	eat 130:9	effects 149:6
disclosed 5:8 6:7	document 32:9 63:25 88:8,10 102:4,14,21 103:5 103:16 104:4,15 105:13 106:2,12 106:20 107:4,13 107:23 108:8,12 108:13,18 109:1,6 109:12,18 110:1,8 110:15,25 111:4 111:12,17 112:2,9 112:15,19,24 113:6,13,23 114:5 114:14,20 115:1 115:10 167:15	drama 130:16	edit 72:19,22	efficiencies 50:15 50:16,19
disclosure 6:8 19:10 21:10 129:23	documentation 5:22	draw 62:19 73:12 174:8	edition 98:19	efforts 173:18
disclosures 103:9 107:22 133:5 134:5	documents 2:2,8 4:16 5:8,14,16 6:6 12:21 71:11 72:8 101:17,17 111:16 113:11 115:18 143:17,19	draws 104:18 108:15	educated 70:4 143:3	either 33:9,10 35:21 38:14 41:2 42:25 43:4 45:12 56:17 72:3
discover 18:21 150:4	dodgy 119:23	drawing 73:3	educating 104:17 147:12	ejaculated 129:17
discretion 12:9 33:18 34:20 124:19	doing 22:8 36:4 54:17,18 62:2 64:10 70:25 80:2 84:3,6 87:23 120:14	DSL 17:3 78:16	education 2:24 3:6 3:23 4:1 6:11 7:22 8:21 12:2 13:8 16:7 49:23 53:11 55:23 58:14 59:6 61:17 64:10 68:2 71:1 73:23 74:2,11,14 75:12 76:1 77:24 78:17 78:18 82:12,20,21 83:1,5,6 84:10,11 84:13 89:2,23 101:24 104:24 106:6,7 107:6,10 109:19 115:23 126:17 139:7,10 146:10 147:10,17 155:20 157:15 158:16 159:14 167:9,17,20 168:13	elderly 10:9 123:2
discuss 25:11 154:25 156:5	Dorer 107:14	due 13:23 16:16 136:3 154:17 162:14	element 15:21 40:2 98:5	element 15:21 40:2 98:5
discussed 7:2 23:4 60:4 70:18	double 39:4 100:10	duties 103:18 106:17	elements 1:25 169:18	Elizabeth 119:22 164:12,17
discussing 113:10		duty 47:19 100:17 124:20 125:13,15 125:19,22,24 157:7,9,10 158:2 158:8 165:8,22	Elizab 119:22 164:12,17	Elliot 114:6
discussion 12:25 18:19 48:17		dyspraxia 57:8	emailed 128:11	embedded 79:13 84:19 91:5,9 126:4
discussions 43:22 166:1		<hr/> E <hr/>	Education's 101:21	embryonic 88:14
dismissed 10:4 15:11 107:3 129:1		E 1:23 174:14	educational 3:19 27:11,15 55:2,4 57:15,18 58:4 59:16 63:21 75:25 76:4,13,24 77:5 82:24 87:16,16 91:13 92:20,25 93:3 107:18 115:25 116:2,6,10 116:12	emergency 22:23 22:23,25 27:17,24
disorder 129:7		e-learning 72:23 79:1,20	effect 14:13 22:15	emerging 158:18 163:5
displayed 105:8		earlier 18:20 24:14 36:22 42:4 66:1 85:4 101:8 115:22 116:21 133:17 140:1		Emma 105:14
displaying 99:23		Earls 36:9 54:11 127:22,25 128:3 128:17,20 129:4,9 129:20 130:13,25 131:2,11,16 132:11,13,18,20 132:23 133:23 153:7 169:22		emotion 159:2
disqualificatory 14:15				emotional 57:9 135:19 160:17
disqualify 19:14 22:14				emphasise 6:7 148:6
disruption 29:24 30:1,5				employed 138:4 employees 138:5,8

<p>employers 107:1 employment 137:4 empowered 78:8 enable 164:13 165:18 166:10 168:3 174:5 encounter 150:24 endeavour 151:11 endeavours 149:14 ends 38:7 enforce 125:20 enforceable 168:6 enforced 133:1 enforcement 18:16 21:20,24 22:1,10 22:11 23:18 24:8 24:24 25:2 27:4,7 30:24 33:17,24 34:19 38:10,13,25 39:6,10,11,23 41:3,8,24 43:1 44:13 70:15 103:3 155:9,12 164:10 engage 165:25 engaged 138:3,9 England 88:23 89:7 103:17,19 105:18 116:13,14 English 115:3 enhance 158:22 161:16 enhanced 9:15 10:13 161:4 enjoys 170:4 enquiries 52:9 Enquiry 88:9 ensure 55:19 91:3 92:23 93:11 107:21 123:16 127:1 139:15 144:15 151:22 152:3,5 156:21 160:15 163:25 166:10,25 168:21 ensures 145:2</p>	<p>ensuring 53:10 140:12,14 151:13 173:23 entire 23:18 45:16 51:1 entirely 11:5 12:9 32:25 122:9 entirety 27:23 entitlement 90:17 91:10 entrusted 123:17 environment 117:18 133:21 138:16 envisage 168:15 envisaged 69:16 equally 148:2 equation 99:17 equity 49:7 equivalent 159:4 159:10 Erooga 108:19 158:14 errors 134:23 escalation 32:7 62:10 escape 129:24 130:19 escaped 133:4 especially 92:12 93:12 117:18 172:13 essentially 2:16 8:21 48:21 establish 74:5 151:16 established 74:9 establishment 17:12 154:4 et 3:17 19:10 31:9 31:12 65:21 ethos 112:4 144:25 EU 160:8 evaluate 36:5 evaluating 35:11</p>	<p>36:18 161:18 evaluation 35:19 event 10:14 22:24 106:18 168:17 events 122:3 124:15 128:2 132:12 165:14 171:11 172:23 eventually 130:5 everybody 27:25 28:20 44:6 62:1,2 63:20 101:1 126:21 evidence 1:15 2:6 4:13 6:22 17:21 19:8 21:7,12 22:2 24:14 31:15 32:15 33:3,4,21 35:3,3 41:5,6,9,19 43:6 49:16 52:25 59:14 68:15 73:14 85:11 85:15 96:10,13 101:4 103:14 111:8 117:9,13,15 118:13 120:17,25 122:9,19 125:15 126:15,23 127:9 127:12,23 132:4 134:17 136:9,23 136:24 137:3,5 139:5,17 141:8 143:20,25 145:13 149:19 151:21 152:12 156:16 158:13,21 159:22 161:14 163:1 169:24 170:16 172:11,17,20 173:6,16 174:3 evident 30:13 118:25 evil 119:5,5,6 evolve 166:6 EWM000471 108:18</p>	<p>exact 119:18 exactly 25:4 Examination 1:13 12:17 71:22 174:16,17,20 examine 6:3 examined 124:23 examining 153:4 example 3:12 9:10 9:21 11:6,7,21 12:4 15:11 22:5 28:18,23 33:15 36:8 38:19 39:24 40:3,23,24 41:11 41:13 44:5 51:9 52:8 53:23 57:13 58:4 65:20 108:7 121:24 136:15 145:1 147:11 151:1 163:22 164:25 examples 11:24 29:2 36:7 103:3 113:5 148:3 155:15 167:21 exceptional 143:4 exceptions 121:2 exchange 146:17 exciting 116:20 excuse 56:10 executive 107:24 140:3 143:5 exemption 7:3,4,9 96:24 154:7,9 exemptions 96:5,7 exercise 83:24 151:11,20 exercised 27:8 exercising 140:15 exhibiting 111:16 exists 125:24 expanding 167:16 expect 54:20 129:15 158:16 expectation 108:3</p>	<p>expectations 159:11 168:19 expected 63:12 expeditious 25:1 expelled 131:1,3 experience 45:22 86:5 140:5 151:7 165:6 166:21 experienced 117:16 117:21 122:6 164:12 173:8 experiences 90:6 118:3 127:25 expert 66:3 108:18 expertise 35:16 41:17 66:3 73:10 73:13 84:16 151:9 experts 93:7 explain 1:24 3:16 4:11 15:18 47:16 164:17 explained 24:14 26:13 39:21 102:13 143:7 145:20 147:3 166:18 168:11 170:5 explaining 112:5 170:5 explains 103:1,10 104:7,16 105:4 106:14,23 107:12 108:25 111:20 explanation 165:13 exploit 96:21 exploration 150:3 explore 48:8 explored 64:3 66:1 93:25 exploring 9:9 162:6 expose 128:21 exposed 120:5 128:22 129:1 express 46:23 expressed 17:24</p>
---	--	--	---	--

156:15 expresses 105:10 106:4 107:7 115:8 expressing 92:10 expression 11:18 extend 173:21 extent 75:7 146:8 150:20 161:20 external 49:4 141:1 162:2 externally 84:18 125:11 extra 41:1 61:1 extradition 109:11 extremely 147:7 172:19 eye 68:10 147:2 eyes 129:15	failed 36:15 119:19 120:12 122:13,17 130:24 131:7 failing 26:4 27:21 28:2,8 35:18 42:9 56:25 155:7,9,16 failings 26:10,12 27:18,24 36:14 41:25 120:10 123:23 124:2,12 143:13 171:15 failure 6:8 118:10 125:18,19,23 131:7 137:10 142:3 164:20 168:4 failures 27:14,15 27:16 40:1 96:1 124:24 150:5,5 153:6 fair 5:13 6:4 11:5 fairly 15:8 26:2 fairness 130:4 faith 150:21 fall 155:18 160:25 familiar 7:6 26:16 26:17,18 64:6 families 103:24 135:20 family 123:8 166:23 fantastic 83:19 87:23 far 16:1 21:21 52:14,14 53:11 77:11 84:5 98:24 133:3 145:18 146:12 150:2 fault 26:24 122:14 favour 97:18 106:15 160:1 February 73:21 129:5 feed 43:20 110:18 feedback 149:13	feel 37:17 43:24 72:3 82:22 90:12 135:22 146:20 feelings 92:11,11 feels 50:19 131:7 felt 41:20 131:10 142:9 Feversham 171:5,9 171:12 fifth 146:3,6 159:18 figure 74:24 77:9 figures 56:12 files 151:2 filled 86:18,20,23 final 1:3 69:5 Finally 126:15 142:2 152:1 156:11 161:2 173:21 financial 21:5 69:25 financially 137:9 find 59:2 68:3 70:24 95:15,16 137:17 146:15,19 148:4 finding 69:17 153:23 164:25 findings 139:18 fine 15:25 25:7 48:9 61:7 72:21 finish 127:9 finished 15:24 101:7 firm 25:2 28:14 160:18 first 1:21 6:16 13:4 19:5,18 21:3 26:5 30:23 31:8,10 32:21 38:1 46:14 52:17 55:14 59:3 62:4 74:1 85:3 88:21 117:3 129:11 130:6 132:18,24 133:7	140:6 144:1 146:4 150:11 156:18 157:6,10 159:15 171:2 First-Tier 19:12 firstly 72:2 83:10 117:12 132:10 138:12 fit 14:16 22:14 127:3 155:24 fit-and-proper-p... 14:13 five 51:24 61:2,5 65:2 99:5 102:11 143:22 149:24 fix 37:13 fixing 36:18 flick 147:2 flipping 31:8 floor 18:14 focus 13:20 82:6 84:21 98:20 157:4 160:6 161:7 focused 41:15 125:4 focusing 40:12,13 52:2 follow 33:19 139:11 168:14 followed 4:23 5:1,7 92:8 106:10 114:1 114:3 133:5 following 93:1 98:15 101:17 118:24 121:25 128:24 129:6 134:20 139:11 follows 15:1 39:1 90:14 145:21 171:5 force 69:8 116:7,8 116:11 121:22 168:3 169:17 forced 128:20 130:9,10,15 133:8	forces 97:23 forcing 44:6 Ford 134:9,10,11 142:18 174:25 forensic 150:16 form 4:13 10:15,18 12:22 27:7 33:17 44:7 58:2 79:7 134:1 158:3,19 165:7,21 173:4 formal 129:3 158:1 formalised 158:22 formally 171:4 formats 146:21 former 10:13 112:3 112:10 113:7 114:6,15 117:13 118:13,19 140:3 142:8,14 forms 3:22 49:4 formulation 118:24 fortnightly 144:12 forward 136:8 148:14 162:12,13 170:5,21 found 23:2 42:25 55:19 130:6 140:22 151:24 Foundation 111:23 four 9:18 39:1 41:24 76:15 145:3 146:4 fourth 145:18 159:3 fragmentation 61:13,14 framework 2:19 93:19 94:2 98:18 99:7,13,13 102:12 115:13 153:3 154:13 155:3 frameworks 40:9 126:21 149:11 153:19 Frances 111:7
F				
F 4:1 7:20 F/11 1:23,23 F11 2:25 F2 2:25 F3 2:25 4:21 5:18 5:23 6:14 face 5:24 119:9 165:10,10 facilitated 117:19 facility 28:2,5 103:23 fact 3:22 15:23 20:3 43:14 54:11 59:20 64:1 66:5 67:3 70:14 75:1 83:3 91:20 95:16 99:7 116:7 121:14 128:10,11 130:10 130:23 131:25 137:19 141:2 145:6 156:22 172:10 factor 14:15 factors 132:9 fail 17:17				

118:1 frank 67:11,12,19 68:1,8,13 69:4,11 69:20 115:21 123:22 169:13 frankly 123:11 Fray 104:16 Frazer 113:24 free 72:3 Freedom 34:13 97:22 Freedom's 7:24 8:18 freelance 138:3 freestanding 167:14 frequency 66:13 82:8 153:25 frequent 82:9 frequently 19:20 41:10 42:2 53:20 130:4 Friday 1:1 front 1:19 70:16 72:7 128:24 fronts 122:2 full 124:1 143:18 143:20 146:25 153:17 fuller 138:21 fully 6:12 50:1 78:24 86:20 87:3 89:25 91:5,9 143:11 163:25 171:24 function 47:5 102:7 functions 44:19 45:3 149:10 fundamental 126:24 159:7 fundamentally 153:13 funding 152:21 154:10 further 7:23 9:9	12:13,22 64:18 70:15 71:14 73:13 73:13 85:15 100:21 105:21,24 112:15 119:11 127:1 142:13 146:24 148:3,15 153:1 154:10,14 155:22 156:24 158:9,24 161:9,19 163:13 166:1 167:12,19 170:20 furthermore 172:11 future 9:20 35:1 81:13,16,20 94:7 120:9 127:13 128:2 141:9 172:24 <hr/> G <hr/> G 71:24 gain 165:19 gaining 54:18 Gallafent 142:19 142:20,21 148:17 175:1 game 129:2 gap 63:10 76:5 79:25 82:17 87:13 94:10 95:11 gaps 85:22,25 86:14,18 101:25 173:13 Gareth 129:14 gathered 173:15 general 1:10 14:8 15:15 61:12 105:2 107:5 109:14 115:8 124:7 generally 49:21 91:25 93:13 102:25 137:23 158:12 168:25 generate 90:9	generations 127:13 genitals 128:21 genuine 168:16 genuinely 166:15 Geoffrey 113:14 geographically 161:8 getting 5:14 19:16 29:13 52:25 63:11 66:2 72:8 88:11 135:21 Gillian 112:25 girl 15:12 129:1 give 11:7,24 16:25 35:3 77:25 101:15 118:2 127:11 168:3 given 1:14 8:20 17:21 27:13 31:10 35:1 40:8 51:18 59:4 63:7 64:1 67:15 101:4 118:4 126:23 127:23 132:4,9 141:13 151:18 153:10 156:10 159:10 162:19 172:20 173:6 gives 27:6 102:9 108:21 109:14,23 113:1,3,15 114:16 114:24 115:6 149:8 giving 11:21 37:24 49:16 57:13 108:13 112:6,13 112:21 120:2 127:9 144:1 Glenys 110:9 go 4:19 11:4,5 15:5 16:17,20 24:8,16 25:24 27:1 29:22 31:13 32:9 33:25 34:1 36:3,13 38:9 38:23 44:17 56:19	56:20 57:3,6,17 57:21 59:21 74:13 81:13 89:5,11 91:11 101:14 163:15 Goble 110:2 goes 30:19 146:23 150:15 going 1:7,10,16,24 4:11,12 9:12,19 15:23 16:12,25 17:2,2,3,17 18:3 22:11 26:20 30:1 31:3 33:16 35:4 38:2 50:10,12 51:13 53:19 60:1 63:8 83:9 89:11 99:23 101:3 116:4 134:15 148:20 good 1:3 8:2 17:21 18:17 23:9,12 45:11 53:2 55:23 70:20 71:3,25 104:1 111:16 121:2 143:23 150:21 154:23 159:15 165:6 168:14,15 170:4 Gordon 117:6 governance 105:14 121:17 122:20 123:7 124:24 125:3 144:4 158:11 159:21,23 governing 44:7 105:23 107:25 141:4 government 83:4 105:7 106:5 159:11 governor 105:21 108:3 144:5 166:15 governors 17:4 42:22 43:14 79:2	79:5,8,10,15 105:17,19,25 108:2,5 113:14 114:10 120:24 121:14 125:2,4 139:23 146:2 160:3 165:4 grab 128:17 grading 164:7 granular 147:7 grateful 142:23 148:25 160:5 172:19 173:5,15 gratitude 149:19 great 18:14 38:6 73:5 137:16 162:25 greater 109:2 111:10 112:16 143:10 160:23 168:25 greatly 118:10 Gregor 109:7 115:12 Grenville 102:15 102:22 grievously 120:11 grooming 108:23 gross 10:4 15:11 107:3 ground 88:12 128:19 131:23 grounds 65:11,13 65:18 92:6 130:8 group 24:20 81:10 87:3 88:1,3,5,6,8 128:20 143:3,8 144:11 154:5,24 groups 28:23 81:9 guardians 138:13 160:7,12,19 167:4 167:6 guardianship 93:3 109:17 138:11 141:25 160:13,16
---	--	---	--	---

160:25 167:8 guess 15:17,21 21:23 29:7,18,25 31:7 42:12 56:24 65:24 70:4 guidance 3:11,14 4:2,5 5:6,9 7:18 8:20 11:4,20,22 39:9 54:20 58:8 62:8 63:18,20 64:5,9 78:21 82:23 83:9,14 104:21 105:7 106:4,8 108:13 147:16 154:2 156:20,21 157:13 157:14 163:9 167:10 168:20 guidelines 138:14	119:2 happens 3:20 30:20 38:9 51:14 135:8 152:13 happy 8:21 39:16 39:16 51:10 81:13 89:5 95:14 119:14 148:3 170:9 harder 43:5 harm 10:6 85:17 118:8,10 153:23 153:24 Harman 107:24 harmful 63:15 79:3 98:18,21,25 99:15 103:14 105:8 harmonise 61:24 harnesses 147:5 Harrison 117:4,7,8 127:16 174:23 harsh 119:24 Harvey 102:15,22 HDC000046 113:23 head 10:12 17:2 37:3 73:2,15 102:15 105:3,5 114:4,9,12 115:3 118:13 121:20 128:25 135:7 159:24 165:11 headings 164:8 headmaster 112:3 113:7,9 114:15 118:16 120:18 headship 112:4 120:22 headteacher 122:25 128:23 130:25 headteachers 121:19 health 57:10 60:10 82:12 119:11 125:16,17 139:8	healthcare 51:8 healthy 74:15 hear 119:5 121:25 163:19 heard 1:6 3:2 10:25 18:13 25:7 29:9 32:6 46:1 51:21 53:16 62:12 63:2 63:4 64:16 68:15 82:25 85:4 96:10 99:22 117:9,12,16 117:17,20 119:7 119:14 120:17 122:4 134:17,22 135:1,15 136:5,22 137:3 138:11,18 138:24 139:5,20 141:6 143:5 150:23 152:2 163:23 164:3,11 164:17 166:3,13 167:11 168:5 171:10 172:9 173:12 hearing 1:4 102:10 117:8 120:5,7 134:17 172:16 173:25 174:8 hearings 63:2 121:25 124:23 125:12 127:14 173:7,24 heart 162:24 Heather 101:19 held 73:20 110:16 111:1 133:13 155:8 Helen 126:15 help 5:9 33:1 78:1 80:25 89:10 103:13,20,24 130:20 135:22 151:4 172:23 helpful 30:18 40:23 40:24 51:19,22	61:2 94:19 helping 53:19 helps 74:16 76:15 86:3 92:5 Hertfordshire 113:24 114:21 hid 118:23 high 105:12 140:1 145:8 169:9 high-quality 157:13 165:2 higher 46:24 64:2 78:16 highest 141:11 149:8 highlight 4:9 127:5 highlighted 124:2 126:16 highlights 114:18 highly 172:23 Hillary 111:6 hinders 86:3 historic 113:2 153:9 historically 59:6 history 58:18 90:5 102:7 141:13 hit 30:25 HMCI 47:25 Hmm 79:4 hold 42:12 79:16 79:18 159:24 holds 78:11 holistic 144:16 HOM002383_001 7:17 home 3:3,6 7:3 8:14 9:4 54:6,7 66:22 71:1 89:19 90:23 96:25 103:21 159:10 161:6 homes 45:18 46:3 47:7 159:6 honest 120:3 honestly 126:22	hope 15:7 53:17 56:8,9 60:25 101:13 121:25 127:13 163:13,15 hopeful 141:18 hopelessly 120:25 Horse 19:6 21:3 hotline 52:8 hounded 121:11 housemistress 117:19 houses 138:19 146:19 huge 19:7 hugely 19:3 Hullah 119:7 134:19 137:13 Hullah's 119:15 human 118:11 humiliated 128:25 Humphreys 126:15 152:3 Humphreys' 153:17 hurt 135:3 husband 122:25 hypothetical 9:24
<hr/> H <hr/> Hackett 64:3 Halden 112:25 Hampshire 59:11 129:5 hand 72:6 103:20 121:1 146:16 156:20 164:24 handled 154:3 handlers 172:17 hands 117:17 122:12 hang 37:25 Hannett 148:22,23 148:24 162:15 170:5 175:2 happen 28:6 53:10 53:19,20 93:5 123:12 129:18 130:6 happened 4:12 6:16 44:20 46:15 53:18 57:2 171:12 171:20 happening 59:22				<hr/> I <hr/> Ian 118:19 idea 15:10 45:12,12 74:13 123:6 ideas 89:13 identification 98:22 identified 4:24 13:7 18:23 28:1 43:18 59:14,25 76:5 85:8 88:19 89:17 91:7 93:9 125:18 139:16,19 143:23 144:21 158:17 161:15 identifies 85:22 98:19 116:4

<p>identify 35:5 74:19 76:16 81:9 82:1 85:18,25 90:12,15 93:1,5,15,17 95:21 96:4 97:21 146:11 150:25 157:11</p> <p>identifying 85:14 104:1,2 116:8</p> <p>idle 118:25</p> <p>ignorant 118:17</p> <p>ignore 34:13 100:13</p> <p>ignoring 130:17</p> <p>IICSA 171:7</p> <p>ill 119:11</p> <p>ill-health 137:8</p> <p>image 30:12</p> <p>imagine 46:24</p> <p>IMC000001 109:18</p> <p>immediately 23:15 37:8</p> <p>impact 30:7 42:14 65:23 145:5 163:8 166:23</p> <p>impediment 51:9</p> <p>imperative 123:15</p> <p>implausibly 122:22</p> <p>implement 37:6 83:5 116:11</p> <p>implementation 157:9</p> <p>implemented 96:24 97:13 139:13 156:23 164:1</p> <p>implementing 82:21</p> <p>implements 140:13</p> <p>implications 65:19</p> <p>importance 97:14 108:5,23 135:11 144:3 147:13 164:13</p> <p>important 60:20 76:22 77:15 79:15</p>	<p>83:25 97:6 126:6 126:13 151:19 167:18 169:10,18</p> <p>imposed 106:17 159:5</p> <p>imposing 38:18</p> <p>improve 20:23 27:9 38:5 137:21 139:7 143:15 155:17 156:12</p> <p>improved 26:4 53:18 154:1 156:2</p> <p>improvement 59:16 144:18 148:15 164:10</p> <p>improvements 141:24 154:3,15 158:11</p> <p>improves 156:22</p> <p>inadequate 121:22 122:21 125:1 153:20,22,23</p> <p>inadvertently 67:15</p> <p>inaudible 88:8 98:12</p> <p>incident 114:24 128:23 129:2</p> <p>incidents 110:14 112:6,14 113:4 115:5 158:17 165:16</p> <p>include 53:15 87:9 116:5 140:2 144:7 160:7,12</p> <p>included 68:13 153:18</p> <p>includes 8:15 60:11 103:25 149:13</p> <p>including 19:8,17 59:18 60:12,21 74:21 86:1 108:22 109:15 136:11 142:8 146:21 148:9 151:13,15</p>	<p>153:14 155:1 163:17 171:8</p> <p>inclusion 145:3</p> <p>inconsistency 166:3</p> <p>incorporate 64:8</p> <p>incorporated 17:14 108:9</p> <p>incorporates 168:11</p> <p>incorporating 157:9</p> <p>increase 50:11 97:24 98:2,13 153:25</p> <p>Incredibly 130:14</p> <p>incredulity 118:15</p> <p>indecency 132:6</p> <p>independence 91:8</p> <p>independent 13:5,9 13:11,17,18 17:10 17:15,16 20:5 22:1 24:6 25:10 28:10,25 40:14 42:3,21 43:13 45:5 47:3,11,14 48:10 49:5,12 51:1,16 52:1,2,6 53:3 58:11,12,22 58:23 59:18,19 60:12,21 69:24 70:11 71:2 74:22 91:8 94:11 95:5,7 95:9,12,19,25 107:15,25 108:4 108:19 115:25 116:12,14 123:7 124:25 139:23 141:6 144:8 148:8 154:25 155:5,23 156:7 159:19 160:3 161:3,11,12 161:16,19,24 162:2,10,19 164:5 166:12,15,19</p>	<p>168:2,8</p> <p>independently 139:25 152:2 159:24</p> <p>indicated 67:19 68:11 69:5 148:19 155:22</p> <p>indicates 139:17</p> <p>indicators 147:1,8</p> <p>individual 8:22 78:11 99:22 124:19</p> <p>individually 45:12</p> <p>individuals 8:7 15:7 42:20 43:18 45:20 54:14 85:4 106:18,24 107:1 136:11,20 155:25</p> <p>induction 145:22</p> <p>ineffective 152:10</p> <p>inevitably 133:25</p> <p>inflicted 129:8 133:7</p> <p>influencing 84:6,7</p> <p>influential 84:6</p> <p>inform 9:19 128:7 132:20 168:20</p> <p>information 4:20 9:13,16 12:20 17:5 30:17 34:7 34:13,15,18,20 53:2 62:22,24 63:5,7,11,23 68:16,17 73:4 87:8,19,21 88:11 95:1,14 97:22 110:16,22 111:1,5 111:9 112:6,13,21 113:3,20 114:10 116:1,13 138:14 140:24 141:5 148:3 151:4 154:3 158:7 163:14 165:2,3,18 166:2 167:2,21 170:2,10</p>	<p>170:11,14,17,18 173:18</p> <p>information-shar... 53:23</p> <p>informed 5:12</p> <p>infrequency 138:8</p> <p>inherent 150:11 152:18 155:2</p> <p>inhibit 70:17</p> <p>initial 101:23 112:17 134:4</p> <p>initially 131:18</p> <p>injured 120:12</p> <p>injuries 122:11</p> <p>input 107:19 121:24</p> <p>INQ004255 103:16</p> <p>INQ004258 107:13</p> <p>INQ004395 112:2</p> <p>INQ004416 104:15</p> <p>INQ004419 113:6</p> <p>INQ004425 114:14</p> <p>INQ004426 107:23</p> <p>INQ004428 106:2</p> <p>INQ004486 112:9</p> <p>INQ004580 115:1</p> <p>inquiry 1:15 2:12 4:16,24 6:20 8:5 9:8,13,19 10:2 46:7 47:1 53:17 70:19 87:22 93:8 100:10 103:2 108:21 119:1,13 120:15 121:3 123:10,15,22 124:1,6 126:14 127:2,7 131:6 133:11 135:5 136:22,24 137:3 137:14 139:5 141:20 142:25 148:4,13,15 149:17,20,22,23 150:22 153:8 158:1 160:6 161:4</p>
---	---	---	---	---

162:13 163:4,6,11 163:13,16 167:2 170:16,16 171:3,7 173:6,16,23 174:11 inquiry's 142:15 insights 98:1 insofar 2:7 inspect 31:6,23 45:21 67:2 152:6 152:7 inspected 24:22 26:2 95:6,10,19 150:22 152:5,24 inspection 22:2 26:5,6 31:4,14,17 31:21 32:11,11,15 32:23 33:3,22 34:21 35:25 36:5 37:18 41:15 44:20 56:18 63:9 93:16 93:19 126:18,25 127:2 138:24 139:2,11,17,18 148:11 149:9,24 150:6,10,12 151:7 151:19 152:18 153:4,10,16,19 154:8,12 155:11 156:12 163:8,25 164:23 165:10,11 165:15 166:8 168:21 inspections 26:2 31:7 51:14,17,18 63:3 64:23,24 106:9 140:23 150:2,16,20 151:3 152:9,16,19 153:7 153:11 154:1,11 161:13 163:23 164:13 inspector 30:21 51:6 136:9 152:24 164:11,12	inspectorate 16:21 35:8,9,11,14,19 36:2,5,6,17 41:5 47:12,14 49:5 50:25 53:3 56:19 58:12 62:21 94:2 95:7 149:2 155:4 162:20 inspectorates 31:13 37:16 39:4 40:9 40:18 44:14 45:3 48:10,12,18,20 49:16 50:24 51:4 51:13,16 63:3 67:5 150:23 inspectors 35:16 37:7 45:22 119:18 119:24 120:4 131:15 150:25 151:8,11,15,21,23 152:1,4,11 153:22 156:3 157:1 163:9 163:15,17,24 164:14,18 165:1,8 165:18 169:2 inspects 51:7 149:3 155:5 160:22 instance 19:18 52:17 133:7 instances 98:8 115:7 instant 141:15 institution 15:14 30:2,3,11 115:25 121:15 133:24 150:15 151:13,16 institutional 108:24 137:15 institutions 51:8 124:23 125:2 126:17 133:22 157:1 instructing 15:6 instrumental 136:14 138:2	141:11 insulting 118:7 insults 123:9 insurers 131:22 intake 22:6 integrated 51:18 64:24 153:25 164:13 integration 138:21 167:18 integrity 126:19 intelligence 123:9 intended 47:17 138:21 intending 16:5 intends 126:22 intense 13:20 intention 16:4 120:13 174:6 intents 14:20 interact 100:1 interaction 169:25 170:3 interactive 76:14 interest 3:18 10:2 119:25 156:6 interested 3:10 9:4 9:8 68:19 69:1,2 interests 3:7 34:25 127:12,13 interim 22:15,20 28:16,24,24 29:3 30:11 international 133:16 internet 166:20 interpretation 168:22 interpreter 104:20 interprets 168:13 interrogate 150:5 intervene 30:9 intervention 86:4 86:12 87:1 98:22 interview 131:3	Interviews 103:15 introduce 160:2 introduced 106:19 157:13 introducing 125:13 introduction 27:2 106:16 141:25 147:4 166:10 invest 86:15 90:11 investigate 31:23 52:21 investigating 171:8 investigation 112:21 124:13 131:10 143:22 147:15 148:12 150:17 171:15,18 172:12 173:17 174:1,4 investigations 114:17,23 131:12 131:14 150:16 investigative 150:18 investment 85:11 92:21 invite 134:2 143:17 inviting 119:12 involve 58:3 146:16 involved 30:8 44:13 48:24 131:2 147:23 171:14 involvement 65:22 109:8 115:4 123:3 171:17 involves 34:3 91:25 150:12 involving 73:23 112:6 114:25 115:5 141:16 IPO 22:17,19 Ireland 88:19,25 89:6,12 ISI 31:2 33:10 48:12,14,24 53:24	54:3 61:21 64:24 67:2 129:4 154:21 156:2,5,9 157:24 162:24,25 163:3,4 163:10,14,22,23 164:3,12,20 165:21,23 166:5,9 167:4,14 168:10 168:13,23,24 169:2,6 170:3,3 ISI's 158:6 163:17 165:1,7 166:13 168:17 ISM 108:16 ISM000011 108:8 isolated 161:9 isolation 117:20 ISS 42:1 issue 3:13,14 5:14 6:25 13:4 27:12 34:2 44:12 61:12 89:15 95:17 96:2 116:17 157:21 166:24 issued 7:18 26:21 26:25 issues 13:1 17:19 31:20 40:13 41:14 42:19 53:8 61:11 62:20 64:7 65:22 82:6 87:18 91:12 96:23 107:8 113:17 122:23 123:5 125:11 145:25 150:4 151:10 154:25 160:6 163:5 167:6 169:22
J				
Jackie 111:18 Jamie 109:2 112:16 112:20 January 72:25 80:6 Jay 162:18				

Jepson 114:21	157:15 158:15	88:1 91:15,18	launch 80:5	leaves 77:12
job 87:23 126:8	167:9,16,20	92:1,13 94:2 97:7	launched 80:5	lecture 67:23
John 118:15 119:4	168:12	97:10 100:9 118:4	98:19 109:11	led 76:19,20 119:22
Johnny 30:25	keeps 169:9	119:2 131:16	laundering 126:1	left 119:10 129:6
joint 8:16 138:24	Kelley 104:16	135:5,12 141:7	law 67:23 125:25	129:17,18 171:16
Jolanta 143:6	kept 71:8 123:8	146:9 172:2	127:20 133:1,20	legacies 127:2
Jones 11:10,19	key 76:15,18 84:13	173:25	134:5	legal 102:12 125:10
109:13 134:20	88:9 149:12	knowing 86:24	Lawyers 125:25	126:2,21 134:1
Jones' 142:11	156:16 164:6	94:11	lay 49:2	151:17 165:24
Journal 125:17	kicks 14:7	knowledge 2:9	layer 50:5 150:8	172:7
judge 140:2,6	kind 23:10 28:2,8	35:17 45:22 72:17	152:23 158:24	legislation 18:7
judgment 8:3 11:25	43:19 44:15 47:5	72:18 85:23,25	Layfield 136:15	20:23 24:15 45:7
23:11 38:4 87:21	52:8,22 53:22	86:14,18 87:13	layout 65:20	47:18 59:3 60:9
119:24 134:24	55:8,12 58:22	122:16 126:1	lead 4:13 47:2	legislative 24:17
153:19	67:21 68:3 78:3	knowledgeable	114:6 127:14	59:5 157:19
judgments 149:2	89:8	78:10	144:10 167:3	Lenahan 153:15
150:13 164:8	kinds 33:19 57:18	known 82:12	leader 110:5	159:8 167:13
168:21	65:21 173:13	100:13 118:20,23	leaders 106:14,22	length 17:20 21:9
Julie 106:13	Kiso 109:3 112:18	150:5 166:17	165:4	24:7 42:1,7 72:11
Julien 110:17	136:10	knows 62:1	leadership 28:25	93:25
July 105:4 106:14	knew 130:23		42:11 79:14	lengthy 5:21 12:25
107:6 109:14	131:25	L	126:20 135:8,25	24:9 36:13 101:12
114:22	Knights 105:14	lack 85:11 94:8	157:16 159:19	lens 18:4 53:6
jump 147:2	knitted 59:23	117:21 157:23	leading 70:7 155:18	89:22
June 69:8 109:3,7	know 1:7,14 3:15	LADO 31:12,25	leads 77:22 78:4,7	lesson 82:13 147:11
110:4 112:17	4:4 6:19 7:10	62:22 63:4,6	78:24 157:17	147:20,23
139:21	8:15 9:10 11:23	110:3,5 112:25	leanest 152:25	lessons 108:15
jury 132:4	16:16 17:6 18:2,5	113:25 126:7	learn 20:20,23 29:2	124:22 128:18
justice 86:5 171:10	19:1,9 21:13 23:7	141:2 157:25	69:12 134:25	130:2 135:1
justified 119:9	24:20 28:18,22	LADOs 126:7,11	147:6 149:14	136:25
justify 136:1	29:1,2 30:13,15	166:3,4,6,11	learned 122:10	let's 10:8 34:13
137:13	32:6 34:11 36:20	land 83:19	learning 19:4 20:12	letter 19:16 171:3,5
K	36:23 40:10 42:11	language 146:10,12	20:13,18,24 21:9	Letting 81:16,20
Kate 1:6,12 168:10	44:6,20 45:1 46:1	Lara 71:21,23,25	21:10,11,15 46:4	level 10:19 21:10
168:10 174:15	48:4 52:7 53:16	72:9 73:15 94:19	46:16 48:19,21	41:1 49:1,7 50:7
Keates 106:3	54:1,1,2,4,4,5,17	100:20,25 133:18	49:19 57:8,18	56:9 57:21 78:16
keen 165:25	56:7,12,12,13,24	174:19	69:7,18 74:1	87:6 107:7 147:7
keep 27:25 68:10	57:12,12,17,21,24	large 3:22 5:7,16	75:20,21 76:12	150:8 169:8
81:2 169:10	59:1,1,2 60:14	48:10,12 67:13	81:5,6,17,21,23	levels 66:2 159:10
keeping 3:22 4:1	61:3 62:8 63:1	83:2 150:20	82:4 91:17 92:3	lever 43:11
7:22 12:1 64:9	64:14 65:4 68:13	largely 13:6 52:15	147:21 148:1	Leverton 115:2
78:17 79:2 84:12	68:17,19 69:13,23	58:19 61:15,16	155:21	121:9,23
89:23 101:24	70:6,24 74:22	largest 83:2	learnt 19:7,19 21:1	lewd 15:12
106:6 143:9 150:6	77:2 80:14 82:18	lasted 132:12	21:2 23:13	lied 119:13
	86:8,13 87:2,3,13	late 170:15	leave 29:18	life 84:20 172:23

light 10:15 13:6 56:17 117:22 120:6 137:22 166:1 Lighthouse 103:22 liked 71:12 limitations 23:10 26:13 27:19 150:11 152:18 limited 108:14 133:25 157:16 limiting 106:17 limits 50:20 line 52:3,9 70:15 103:20 lines 63:24 88:9 Ling 109:9 117:17 136:23 137:1 Ling's 118:5 link 111:20 links 168:1 lip 83:24 list 1:8 2:16,17,19 2:20 3:4 8:15,23 8:25 9:14 13:24 13:25 14:3,10,15 68:14 96:6,8 101:12 115:17 162:19,20 listed 32:23 listen 11:13 44:11 91:11 listened 118:14,15 135:16 162:25 Listener 141:6 161:3,16,19,24 166:19 Listeners 166:12 listening 7:10 90:15 90:18 91:4 117:14 163:3 164:2 lists 2:13 literally 28:20 123:8 little 5:25 7:23	10:23 37:3 75:21 80:7 81:19 91:20 94:14 123:3,14 140:21 141:7 142:5 146:3 live 65:13 127:23 143:12 lives 134:3 living 89:18 90:23 103:20 159:9 loading 70:16 loads 97:15 local 32:3 40:22 41:13,20 59:9,11 60:9 61:15,21 62:11,14,17 87:11 88:10 99:8,10 100:18 104:13 105:10 107:20,20 123:23 124:16 144:9 145:12,15 149:4 160:22 171:25 lodged 134:14 long 10:24 19:9 23:25 25:23,24 36:12 37:4 42:8 45:14 69:12 73:20 78:19 115:17 122:2 141:12 155:8,10 long-term 149:6 longer 10:10 36:25 61:15 118:2 153:2 153:22 157:4 165:19 longstanding 125:7 look 2:23 6:17 9:9 12:21 16:11 18:3 20:22 32:1 40:10 41:14 42:5,6,6 46:8 47:6 48:18 52:21 57:25 59:21 60:7 68:5 71:4 94:7 96:25 126:24	146:9 170:5,21 looked 14:22 18:17 23:19 25:14,15 46:15 93:11 looking 12:8 17:25 21:4,7 24:2,5,7 25:9 32:4 36:22 37:8 42:4,10 45:1 46:7,25 48:19 53:5 55:22 62:23 64:8,11,13 70:22 77:3 95:23 looks 135:13 148:14 162:12,13 loop 29:22 loopholes 169:1 lose 131:14 lot 3:15,18,19,20 17:20 18:19 20:10 20:11 21:16 24:16 29:14,19 45:21 46:1,14 51:15 60:4 62:9 70:24 73:10 84:7 85:2,3 86:7 96:10,14,16 97:7 Lots 54:24 love 77:6,7 Lovely 7:21 LSCBs 60:8,14 Luckily 24:3,5 ludicrous 118:7 lunch 101:8,9 115:20 116:21 148:19 169:16 Luncheon 116:25	maintained 74:21 168:6 maintenance 65:12 Majesty's 152:24 major 45:8 120:22 121:15 majority 46:18 59:20 64:23 146:5 maker 12:10 33:6 35:15 41:6 49:15 49:16 making 10:18 15:11 23:11 41:7 44:5 49:10 100:12 115:13 125:15 148:20 150:12 Malcolm 112:10 136:15 man 48:13 120:21 137:17 manage 43:3 77:19 managed 29:3 management 28:24 42:11 140:11 159:19 managers 8:3 28:16 30:11 managing 50:25 63:15 64:7 98:25 99:19 105:8 Manchester 40:25 46:19 109:2,19,21 111:10 112:16 140:3 141:4 143:4 146:8 mandatory 100:7 106:16,18 107:1,7 107:11 124:20 125:21 133:10,13 133:18 142:1 157:7 160:2 165:23 manipulation 117:16 manner 137:6	March 110:10 111:19 138:24 Marchant 85:6 Marcus 108:19 158:14 Margaret 121:9 Martin 111:10 massive 50:8 144:14 match 145:25 material 54:10,13 54:20,21,23 55:6 55:9,11,15,18,21 56:16,22 57:1,5 57:11,13,16,20 67:16 68:3 83:21 84:8 115:22 116:4 116:8,17 169:14 materials 112:23 mats 146:16 matter 67:12 100:10 128:16 matters 126:4 131:20 140:10 149:7 157:2 174:5 McCall 143:6,12 144:2,14 145:19 147:3 McCall's 143:20 145:13 McCulloch 106:13 McGAHEY 6:18 McGill 109:7 115:12 McNaughton 101:19 mean 39:20 42:2 43:23 44:25 45:13 48:22 51:9 52:9 52:18 53:19 54:25 55:11 56:3 58:1 66:8 79:12 89:24 94:25 153:2 meaning 18:16,17 168:14
M				
Maddison 140:2 magistrate 23:10 main 81:9 mainstream 64:5 76:1,4 79:23,24 84:17 166:12 167:23				

meaningful 125:15	mention 74:4	minute 22:12	month 35:7 37:5	mutual 156:6
meaningless 120:9	mentioned 5:7 36:2	minutes 5:13 61:5	77:11 129:6	myths 85:8,13,18
means 4:25 8:20	37:2 87:10	128:22 140:11	monthly 25:11	85:19
39:13 41:21 61:23	Menuhin 112:1,11	minutes' 61:3	154:24 161:21	<hr/> N <hr/>
89:25 100:6 148:7	113:3,8,9,15	mirrors 168:1	months 25:16 37:9	N 174:14
155:19 167:7	merits 33:21 39:22	mischief 161:15	37:10 120:13	NAH000007 105:1
meant 33:1 52:15	158:8	miscommunication	months' 25:19	name 88:2
62:2 164:20	message 80:16	6:21	mood 147:4,6	names 51:19
measure 38:17 70:1	134:20	misconduct 10:5	Moore 121:9	naming 128:25
measures 86:2,11	met 17:13 18:8 22:3	15:11 102:2,9	125:21	Nash 123:21 124:9
86:25	22:4 32:16,22	103:2 107:3	Moreland 119:14	Nash's 124:14
mechanism 61:23	33:7,14,16,23	misled 67:14	138:1	NASUWT 106:3
161:10	35:12,16,19 40:19	mismanagement	Moreland's 119:23	national 17:13 18:7
mechanisms 43:20	40:20 42:1,2,17	103:3	119:25 138:17	18:8 40:14 77:21
meet 13:11,14,15	42:24 70:24 92:25	mistakes 135:23	Morley 148:18,19	82:19 83:1 88:5
13:16 16:12,15	140:6,7 156:5	136:1 143:14	morning 1:3 4:14	90:19 105:2,5,14
17:8,10,15,16,18	164:4,4 171:23	misunderstanding	5:5 61:4 71:25	107:6,14 108:2
18:6,7 25:25 35:4	meticulously	4:12 6:19	100:22 169:13	126:10 147:16
42:15 54:21 56:22	164:18	mitigate 151:5	mother 128:7,8,10	158:4
70:22 95:22 145:8	Meyrick 102:5	mobile 166:20	129:3 132:19	nature 86:1,24
155:16 168:4	Michael 111:6	model 46:5 150:11	MoU 54:4	150:12
meeting 32:2,12	119:10 137:5	152:18 153:1	MoUs 53:14	naughty 56:2,5
35:4 40:16,17	mid 132:12	models 86:3,11	mouth 129:16,17	navigate 44:2
42:9 49:17 65:5	middle 39:24	87:1 125:3	move 6:10,25 35:22	nearly 24:11
95:13 167:3	mild/moderate	modern 166:20	57:8 97:4 101:2	necessarily 23:22
meetings 144:13,19	75:20	modicum 118:11	112:1 120:16	28:3 31:21 47:2
meets 142:16	Mill 23:3	modules 84:10	moved 57:14	49:12 54:12 55:9
member 78:9	mind 38:2 82:14	modules 84:10	moving 30:2 87:23	55:23 57:5 77:16
105:23 106:21	91:6 169:18 171:4	moment 8:4 12:14	99:3 110:1 117:13	necessary 38:8
107:21 129:19	171:16	19:24 22:8 24:17	122:4	44:10 122:24
130:14 132:17	mindful 19:16	43:24 46:5 47:11	multi-agency	151:9 164:10
141:16 146:19	MINDs 171:25	47:15 48:9 50:24	103:24 109:23	168:20,24
members 2:25	minimal 169:7	51:25 78:16	multidisciplinary	need 4:19 13:11,14
15:15 78:14	minimisation 85:17	101:15 128:6	144:17	13:15,16 17:7,22
105:17 125:8	minimise 121:8	Monday 1:6,11,15	music 109:15,22	20:22 23:19 24:1
130:23 131:13	minimised 90:10	13:1	111:7,23 112:8,10	30:5,14 35:13
134:4 140:2,16	minimum 17:13	money 126:1 172:3	112:13 113:10	46:23 58:4 62:18
142:22 144:7	18:7,8,18 37:9	monies 50:12	114:19 117:12	63:5,11 67:16
151:2	40:14 78:3 90:19	monitor 140:8	120:5,22 130:2	68:4 70:22,23
members' 146:1	108:2 155:16	monitored 95:10	134:13 138:5,19	73:12,13 76:6
memorandums	158:4 169:5,6	95:12	138:22 141:10	78:1,7,8,8,14
53:22	minister 25:11,12	monitoring 26:2,6	163:7	83:13,22 86:15,15
memory 72:3	ministers 52:12,13	35:25 37:18 47:11	musical 135:9	89:21 90:1,4,7,10
men 147:12	minor 33:23 121:2	47:14 48:2 93:16	musicians 108:10	90:11 98:3 99:17
mental 57:10	minority 156:24	93:20 156:8	138:3	
		162:10		

100:2 107:17 121:16,23 126:5 134:1 137:17 149:7 156:11,19 156:21 157:3 166:14 169:7 needed 21:11 34:7 83:9 98:20 162:6 165:19 needing 66:3 needs 55:2,5,8 57:15,18 58:25 63:22 67:20,21 75:21 76:1,3,4,8 76:13,24 77:5 78:16,22 82:7,18 82:24 87:16,24 90:25 91:1,3,8,9 91:13,13,14 92:20 92:22,23,25 97:18 107:18 116:6 126:14 143:8 147:18 159:20 169:21 negotiate 50:2 negotiation 28:13 negotiations 49:25 Neil 111:13 Neither 25:6 127:22 networks 145:12 NEU 107:11 NEU000001 107:4 neuro-typical 82:15,17 neutral 108:25 109:17 158:15,22 165:22 never 53:19 97:8 129:22 141:14 171:12 Nevertheless 151:7 152:19 160:22 162:2 new 20:12 29:13,18	38:21 48:18 82:21 86:6 138:18 160:12 NGA000001 105:13 NHS 125:13,18 nice 80:23 Nicholas 113:7 NMS 17:18,21 159:3,14 160:12 160:14 162:9 164:6 166:13,25 167:3,25 168:5,9 168:25,25 nods 67:8 non-association 95:19 non-maintained 58:17 107:15 116:14 non-reporting 124:21 non-special 67:6,7 non-verbal 107:22 normal 34:1 55:20 128:14 normally 11:11 north-east 172:1 Northern 88:19,24 89:5,12 notable 124:6 note 116:20 133:17 notes 72:4 105:21 156:19 159:6 160:11 notice 24:23,23 26:18 34:2 151:18 noticed 53:4 notification 108:25 109:17 158:2,15 notified 67:16,22 68:4 notify 157:24 Notwithstanding 138:25	November 72:25 111:14 Noyes 96:12 NSP000103 85:1 NSP000143_013 94:20 NSPCC 40:25 73:3 73:9,16 74:2 75:14 76:10,20 78:2 81:14 83:8 84:15,24 88:7,24 90:21 93:5 96:11 97:22 98:15 159:7 170:2,11 NSPCC's 100:11 104:1 133:18 number 5:8,16 6:25 9:25 15:19 17:24 24:22 37:21 41:25 42:3 44:12 51:23 67:1,2 68:9 68:11 70:13 73:5 77:8 79:1 85:8,25 87:9 95:20 98:20 119:20 120:17 124:23 136:7,24 138:7 142:8 156:13 171:23 numbers 42:4 55:10,10 numerous 123:23 nursing 58:5 <hr/> O <hr/> O'Donnell 127:17 127:18,19 174:24 oath 119:8 objectives 104:9 objects 146:17 obligation 60:13,24 134:1 165:17 observations 98:1 115:15 147:6 149:1 156:18 observe 146:24	170:8 observed 130:15 obtained 174:3 obvious 15:14 51:8 118:9 124:24 obviously 3:9,17 8:14,15 9:19 10:7 16:11,23 17:20 25:13 26:14 27:19 28:1 31:4,7 33:3 34:25 35:2 37:15 42:5,16,21 43:7 44:25 45:7 46:7 48:25 49:22 52:10 52:18 53:4,5 54:25 55:19,25 60:19 63:18 68:25 77:11 82:17,25 83:4 84:11 88:22 91:7 152:7 160:22 occasion 23:6 130:9 130:14 137:19 occasions 24:22 132:25 occur 130:5 occurred 110:14 121:7 occurring 118:17 118:18,23 October 1:1 134:17 171:4 Ode 134:8 offence 100:12 105:9 offences 97:8 offer 75:9,24 76:20 79:1 123:24 142:3 offered 122:7 124:5 131:21 142:6 171:25 Office 3:3,6 7:3 8:14 9:4 54:6,7 66:22 96:25 officer 110:9 140:3 172:6	officers 123:1 157:18 officials 52:13 Ofsted 24:19 28:1 31:2 33:9,10 40:21 47:18 48:14 48:14,22,25 49:23 50:1,6,8,12,14 51:15 53:4,24 54:1 61:20 64:25 68:14,18,21 95:10 95:12,20 129:4 131:12,15 148:24 149:5,8,11,16,18 149:20 150:10,17 150:25 151:14,19 152:3,7,16,22 153:2,6,13 154:6 154:12,13,21,23 155:5,8,15,22 156:2,5,7,14,18 157:6,22,24,25 158:9,13,16,18,20 158:23 159:2,3,6 159:9,13,18,21 160:1,5,11,18,22 161:2,7,9,13,18 161:23 162:7,12 170:1,3 Ofsted's 49:22 149:25 151:7 152:21 154:15 157:2 Oh 54:7 OHY007903 111:4 OHY007905 112:15 OHY007907 109:1 OHY007966 114:20 OHY008527 110:15 OHY008531 112:19 okay 14:1 18:1 20:7
---	--	---	--	--

21:17 26:15 30:16 34:24 35:5,21 38:9 39:12 40:4 41:12 44:3,12 47:9 48:5,22 49:21 50:23 51:5 53:2 58:10 59:8 60:3 61:9 63:14 72:20 73:15 77:14 81:4 82:25 85:22 87:5 88:13 89:15 95:3 old 129:10 162:19 older 128:20 ombudsman-type 52:22,23 omission 119:22,23 once 12:20 15:24 35:7 42:12 101:6 131:9 165:9 one-line 122:8 one-off 84:17 one-to-one 108:15 113:17 141:11 ones 25:8 26:4 37:16 42:5 54:6 ongoing 125:18 166:8 online 79:3 80:2 92:1,10 96:21 open 16:24 155:17 170:4 opened 138:19 opening 137:14 143:21 147:16 149:23 openly 125:8 operate 23:2 52:22 61:15 62:6 123:11 123:19 164:6 operated 125:3 operates 3:4,10 45:4 51:11 52:15 90:2 122:24 139:24 172:15	operating 152:25 172:6 operation 38:19 50:17 109:3 112:18 136:10,21 opportunities 96:22 opportunity 9:2 27:9 66:12,21 130:19 142:23 148:13,25 149:16 opposes 107:11 opposite 119:19 optimal 28:3,4 option 92:2,4 options 43:23 160:20 oral 91:4 101:4 127:12 130:16 133:8 156:16 162:16 172:10 orally 146:14 172:20 order 13:12 17:7 22:20 34:22 48:20 62:24 79:7 83:9 83:13 110:23 116:11 140:17 146:25 ordinary 154:7 organisation 28:5 49:11 66:4 73:10 73:17 98:16 100:9 103:6 153:14 171:17 organisation's 106:23 108:11 organisations 28:21 44:13 50:14 53:14 60:11,25 62:19 88:6 106:17 123:17 148:1,10 organised 116:2 137:1 original 81:20	originally 69:16,18 Orrell 103:6 ought 36:20,21 68:16 155:25 158:10 159:3 outcome 23:9,12 28:3,4 38:6 outcome-focused 159:5 outcomes 89:2 outcry 123:12 outdated 125:3 outlines 105:5 outside 31:14 91:6 133:24 outstanding 154:7 over-rely 97:5 overall 39:14 144:25 153:21 164:7 overdue 122:2 overhaul 121:17 overlap 46:7,8 67:3 70:25 overreport 145:10 overriding 126:3 overseas 138:15 160:9 166:23 oversee 140:9 oversight 3:2,6 44:7 59:4 93:20 123:7,20 overspeaking 43:10 overview 104:12 108:21 109:14 113:1,16 161:21 owing 138:7 owner 14:21 18:22 18:25 owner/proprietor 42:20 44:4 66:6 66:18 owner/proprietors 42:25 43:17	ownership 28:5 <hr/> P <hr/> pace 82:5 118:19 134:18 package 124:9 packages 124:8 page 11:5 32:10 38:24 85:2,5,24 94:23 pages 6:25 72:11 85:3 147:23 paid 11:14 panel 1:22,25 4:11 5:12,23 6:3 9:10 9:17 12:12,15 64:18,21 71:17,23 100:22 101:14 102:12 115:21 117:8 127:24 134:2 136:5 142:22 143:16,18 146:21 147:21 148:24 162:23 170:20 172:7 174:18 PANTS 80:7,10 81:10 paper 72:7 paperwork 151:25 paragraph 7:23 27:2 32:13,13 33:25 35:5,7,23 37:20 38:23 41:21 68:1,2 85:5,10 93:17 94:16,22 97:21 paragraphs 4:9 38:11 168:2 paralegals 172:13 paramount 144:3 parental 121:24 parents 52:3 81:6 135:4,12 138:14 160:9 167:1	Parents' 43:19 parliament 49:2,3 part 1:4 3:22 4:7 9:1 39:10,23 41:2 60:4 63:3 91:9 95:5 96:19 97:7 97:18 98:5 99:17 101:23 128:14 135:24 150:6 151:1,5,19 158:19 162:7 163:5 164:14 170:22 partially 86:23 116:7 132:1 participant 117:4 participants 117:3 154:16 156:14 162:17 participate 142:23 participating 162:14 particular 3:14 5:22 31:19,20 32:5 41:16 43:3 45:23 54:25 55:2 61:24 68:22 84:15 84:22 86:24 89:15 89:17 92:24 94:11 100:2 104:19 109:22 111:23 112:8 133:6 136:5 141:23 146:7 172:12 particularly 17:25 45:17 51:6 52:1 53:6 54:10,18 62:2 64:5 75:16 75:19 90:17,22 92:2 132:8 133:25 161:20 166:23 169:20 partly 169:15 partners 59:24 60:6,18 62:9 145:15
---	---	--	---	---

<p>partnership 60:25 parts 60:3 80:17 155:20 pass 14:12 117:2 passing 6:24 pathways 94:3 patience 115:17 patterns 158:18 Paul 105:2 114:6 115:7 172:6 Pause 101:15 Pausing 8:4 paying 127:10 payments 172:1 pays 83:24 PECS 146:17 peculiar 14:9 peculiarity 58:18 peer 7:4,9 148:9 peer-on-peer 64:9 penalise 55:24 penalty 56:25 penis 129:16 penultimately 160:5 people 2:18 9:18 13:8 14:24 16:3 17:20 18:10,11,12 21:13 23:24 26:17 29:3,11,12,14,15 31:22 36:9,20 37:25 52:10,12,25 53:9,9 61:18 63:16 80:14 91:15 91:17 92:12 99:1 100:1 135:3 136:12 144:8 149:13 166:17 perceived 61:13 perception 15:10 16:4,5 perfectly 14:1 performing 130:15 period 37:6 50:13 151:18</p>	<p>periodic 162:10 periods 10:24 peripatetic 138:1 permission 101:6 permissive 13:9 124:25 permitted 14:3,5 permitting 13:8 perpetrated 111:5 perpetrator 109:5 perpetrators 111:3 person 9:14,17 10:2,7 14:16 29:18 65:9 66:6 66:17 82:15 108:16 161:11,12 162:3 173:6 personal 82:11 85:12 persons 22:14 157:17 perspectives 133:16 persuade 121:1,6 122:22 Peter 112:3 114:4 114:13 115:5 119:7,15 120:21 121:1,18 phase 12:23 48:8 102:19 126:25 162:13,14 170:6 173:25 174:3,3 phone 30:24 52:3 91:25 92:8 phones 166:20,22 physical 28:19 29:15,17 65:20 138:16 160:16 physically 128:5,16 physics 31:1 pick 169:14,23 picked 147:9 164:20 picking 53:20</p>	<p>picture 95:25 146:16 piece 4:2,5 placate 120:15 place 6:16 30:10 40:2 55:14 59:3 66:19 71:5,8 86:9 89:3 92:23 98:2 124:10 136:25 137:18 140:12 141:13,17 142:14 151:6 152:3 153:11 158:3 165:18 171:11 174:1 placed 10:6 123:13 places 52:19 53:1 88:18 plan 24:8 33:20 34:3 35:6,8,13,18 35:20 36:4,6,16 36:18 37:5,12,21 37:23 38:1 88:21 89:3 139:7,9,13 147:11,23 plank 84:13 plans 22:3 25:22 26:3,18 36:11 50:24 81:13 82:13 83:4 147:21 154:9 155:12 played 161:5,19 pleaded 130:2 pleading 130:19 please 1:20 4:8 11:6 27:1,3 32:9 33:25 34:12,16 35:23 38:23 72:3 72:6,9,21 85:1,5,7 85:24 88:4 94:14 pleased 163:11 pm 71:20 116:22 116:24 117:1 174:10 PMI 35:24</p>	<p>PMIs 36:10 POCA 2:19 point 5:25 20:9 29:18 33:2 41:23 42:18 44:1,9 46:25 49:9,19 50:23 65:7,15 68:6 69:1 74:25 75:2 77:15 105:24 124:9,18 130:21 169:6,7,13 pointed 147:15 points 6:15 64:14 86:17 105:18 117:11 121:23 127:4 134:15 139:16 156:16 169:23 police 53:25 54:7,8 60:9 97:23,25 109:2,4 110:17 111:2,11 112:17 114:21,22 131:1,1 131:7,9 136:20 140:5 141:1 144:9 policies 89:21 110:13 113:18 139:3 140:13 141:18 143:16 145:24 159:25 163:20,24 policy 3:2,2,6,7,9 3:11 8:17 22:10 22:11 26:21,25 39:10,11,14,23 41:8 70:25 73:3 73:15,17 100:11 100:16 108:11 115:12 138:12 143:18 political 62:4 poor 21:5 56:10 population 54:12 posed 122:17 154:16 156:9</p>	<p>poses 146:6 posing 56:14 position 6:3 8:22 67:8 81:12 135:3 149:25 154:15 160:18 positions 157:16 positive 99:11 108:6 137:20 138:25 145:5,14 156:4 possible 10:15,17 10:20 11:24 14:1 30:23 44:2,25 46:6 77:7,19 135:1 151:23 153:1 possibly 15:15 27:14 29:5,14 64:1 65:4 69:15 70:14 165:23 post-traumatic 129:7 posted 134:20 140:20 posters 146:19 potential 11:3 86:5 145:8 147:8 165:21 potentially 10:21 power 15:22 18:23 19:2,5 20:6,12 21:24 22:13,15,16 23:20 27:4,5,6,17 27:17,20,22 28:23 62:21 69:14 137:17 140:16 150:18 155:6 161:22 powerful 117:24 powers 21:20 22:23 22:25 23:11,13,16 23:23 26:12 28:9 28:11,14,15 29:5 30:9 31:22 59:19</p>
--	---	--	--	---

69:6,12 103:18 150:17 practical 35:17 87:6 145:1 165:25 practice 96:17 98:16 104:1,23 108:12 111:15,16 113:4,8 138:20 142:16 143:23 146:5 149:14,15 154:22 156:6 159:25 164:1 167:19 practices 97:15 99:19 145:21 148:8 149:12 156:12 163:20 praise 145:16 pre-existing 152:11 157:14 precisely 5:17,21 preclude 92:21 predicated 126:19 preface 9:11 prefer 55:25 preferred 92:2,4 preliminary 156:18 premises 16:18 29:23 96:21 98:11 137:2 prepare 83:23 139:6 174:4 prepared 21:13 44:10 83:18 139:9 present 79:24 81:12 91:25 110:22 150:4 159:1 presently 141:15 155:25 156:9 160:18 161:13 presided 120:18 pressed 121:3 124:6 pressure 126:3	presumption 8:1,8 8:10,11 9:7 pretty 21:19 129:20 prevalence 64:2 103:10 prevent 103:13 128:1 151:6 preventable 122:18 preventative 86:2 86:11,25 prevention 98:22 previous 47:25 93:25 106:8 139:17,18 164:22 165:14 previously 138:2 158:3 primarily 2:20 32:4 primary 21:6 39:5 39:7 40:18 45:7 74:10,14,21 83:6 104:3 119:25 principal 109:13 122:7 134:25 143:6 principally 44:14 principle 134:19 144:1,21 145:11 145:18 146:3,6 160:1 principles 38:12 39:1 64:7 143:22 146:4 prior 73:22 151:19 priorities 88:20 prioritise 37:16 prioritises 144:16 prioritising 75:6 88:25 priority 24:17 89:8 89:10 144:1 149:8 prism 143:25 private 51:7 75:4 80:17 108:14 136:25 147:14	172:23 privileges 131:15 proactively 63:7 75:17 probably 14:18 15:9 19:22 29:7 30:14 37:8 42:18 57:22 60:3 62:4 63:8 80:13 94:22 95:23 Probation 140:4 problem 8:9 12:24 29:20 56:13 60:1 69:21 87:22 88:12 88:15 93:21,23 94:1 96:14 97:6 126:24 problems 43:2 44:4 45:23 57:10 126:16 procedure 4:22 5:1 111:24 procedures 33:19 113:5 124:16 139:3 141:19 148:9 156:12 163:20 173:14 proceedings 109:11 119:21 process 19:7,9 24:1 24:9,16 36:12,13 44:24 49:18 55:13 55:21 56:1,6 70:11,17 93:8 103:1 127:8 149:24 155:23 processes 19:15 39:8 93:20 106:10 114:1,3 143:15 145:17 166:6 173:11 produce 37:22 38:1 65:3 produced 63:18 84:24	profession 126:2 professional 87:6 102:11 151:11 157:12 158:4 professionally 127:8 professionals 157:7 Professor 64:3 162:18 profit-making 58:20 profound 143:7 147:18 profoundly 142:5 programme 75:8 75:14,15,18 76:2 76:7,9,10,23 77:1 77:6,20,21 80:7 80:10 81:10,20,24 82:8 145:24 programmes 74:2 138:22 progress 26:1,6 35:25 37:18 120:2 155:13 173:24 progressing 133:7 prohibit 23:24 prohibited 102:10 167:5 prohibition 22:20 promoted 75:12 promoting 108:5 160:16 prompt 138:21 prompted 143:14 prompts 12:2 prone 100:2 proof 153:22 proper 14:16 22:14 38:1 56:1 123:6 123:19 properly 78:7,8 87:4 93:12 126:8 140:13 proportionality	39:2,12 proportionate 8:16 39:13 161:24 proposal 159:6 160:11 propose 127:24 proposed 156:14 proposing 81:10 106:25 proposition 70:9 proprietor 13:22 13:25 14:4,5,10 14:14,17,19,20 15:4 16:23 18:22 18:25 22:18,21 43:8 65:9,10 proprietors 23:24 123:1 155:24 158:12 160:3 pros 133:14 protect 66:13 76:17 104:22 122:13 protected 125:21 protecting 84:25 88:1 120:1,1 125:4 protection 2:19 7:24 8:18 79:2 84:22 85:14 104:10 108:11,17 120:3 125:5 140:10 144:2 149:4 150:3 153:5 157:17 158:23 159:11 173:14 provide 5:17 6:12 6:21 8:20 17:5,7 30:17 41:1 44:19 59:13 62:22 73:13 79:21 82:11 116:1 134:14 135:19 140:9 148:3 150:3 152:17 153:2 158:7 161:10 165:17 170:13
--	---	--	--	---

provided 41:7 42:24 96:12 105:6 106:4 117:24 133:17 138:2 141:21 142:16 143:24 149:17 159:16 167:2 170:11	55:10 105:8 129:14,16,22 130:16 131:11,12 141:16 pupils 9:22 38:21 95:22 117:14 118:19 121:13 128:5,13 133:3 137:25 139:9 142:8,14 155:19 166:23,25	quasi 58:21,22 queried 121:19 question 7:8 14:8 15:3,23 22:7 31:18 36:25 37:24 38:2 42:19 45:25 47:6 54:9 55:7 58:10 62:4 63:13 66:7,15 68:8 69:5 69:11 70:7,20 71:3 83:12 89:4 98:3 100:6,7 115:22 119:21 140:8 154:17,19 156:11 165:14 169:19	95:23 101:12 123:8 129:3 quote 118:24 126:19 134:21	172:21 readily 95:15 147:22 170:18 readiness 147:6 reading 7:10,11 11:8,13 reads 171:5 ready 24:12 72:24 real 117:15 120:10 120:20 122:1 125:15 126:9 127:14 152:21 realistically 37:9 125:20 166:17 reality 46:12 118:22 122:18 really 11:18 12:9 15:5 18:15 23:20 30:20,25 32:6 40:15 48:24 59:18 66:16 70:7 73:11 83:25 86:8 88:13 96:25 98:4
provider 151:1 providers 150:22 152:24 167:12 provides 103:3,12 104:9,11 106:16 113:20 145:22 150:8 152:22 165:6 167:10 providing 9:13 18:17 55:23 72:24 84:3,9 104:23 138:14 167:20 169:20 provision 67:20 90:22 99:15 116:2 116:10,13,13 149:3 150:10 153:21 161:22 164:15 170:1 provisions 106:25 169:17 PSHE 82:13 public 1:4 14:8 15:10,15 50:14 52:9 67:13 73:3 73:16,17 147:14 publication 168:18 publicly 67:13 publish 39:11 140:19 174:6 published 22:9 53:13 125:17 133:12 punch 129:25 punched 128:18 punitive 18:16 pupil 54:12 55:3,9	pupils' 162:4 PUR001247 114:5 Purcell 113:22 114:2,7,16,24 115:2,3 120:16 121:18,22 122:1 125:7 pure 131:9 purpose 38:5 55:11 103:1 127:3 155:24 162:4 164:9 purposes 14:21 65:12 70:5 94:5 173:16 pushing 24:18 put 10:20 13:19 28:15,24,24 29:3 29:18 30:10 64:12 64:14 70:9 89:3 94:18 126:20 129:15,16 137:16 141:7 142:14 144:14 150:7 putting 56:3 70:16 73:9 97:10 127:6	questioning 12:22 65:8 questions 1:8,10 3:16 5:21 6:5,9 12:2,13,15,19 15:22,24 17:6 24:12 40:5 61:3 64:18,21 66:1 70:8 71:12,15 72:2 73:12 100:21 100:23,24 140:17 149:24 150:1,2 151:15 166:7 170:11 174:18 quick 25:1 29:20 36:19 57:25 quicker 12:12 37:18 quickly 23:15 26:14 36:21 37:14 37:14 155:10 quite 3:22 12:25 13:9,19 18:2,19 19:15 21:15 24:9 25:22 30:13 36:9 36:13,19 45:8,14 56:2 61:21 67:2,5 69:13 70:24 86:7 87:10 88:14 95:20	radar 59:8 radical 58:1 raise 50:23 65:7 72:6 125:7 raised 42:20 54:9 58:12 61:12 62:21 87:18 91:12 113:17 115:21 117:11 121:23 128:23 152:9 154:6 169:10,13 169:24 170:2,11 raises 58:10 107:8 Ralph 4:7 7:17 11:4,6 26:22,24 27:1 32:9 33:25 35:22 38:10,23 41:22 85:1,24 94:20,23 ran 171:4 range 38:22 52:19 52:25 55:1 60:21 62:18 77:4 145:25 146:21,25 151:15 158:21 160:19 rape 130:8 136:16 raped 133:8 rarely 21:21 reach 75:3,25 77:7 77:16,19 92:18 99:13 153:9 reach-out 75:15 reached 44:1 50:20 74:20 77:9,11,13 151:22 reaching 92:7 read 9:22 10:3,8 11:11 142:11 143:18 171:3	readily 95:15 147:22 170:18 readiness 147:6 reading 7:10,11 11:8,13 reads 171:5 ready 24:12 72:24 real 117:15 120:10 120:20 122:1 125:15 126:9 127:14 152:21 realistically 37:9 125:20 166:17 reality 46:12 118:22 122:18 really 11:18 12:9 15:5 18:15 23:20 30:20,25 32:6 40:15 48:24 59:18 66:16 70:7 73:11 83:25 86:8 88:13 96:25 98:4 realms 9:24 rears 166:5 reason 15:9 44:22 72:6 75:23 137:11 141:17 148:7 168:14,16 reasonable 126:1 reasonably 10:9 158:8 reasons 15:14 27:11 56:12 64:2 75:5 156:10 reassure 163:4 recategorise 28:8 receive 92:20 103:24 105:20 141:10 165:3 received 35:7 102:18 132:6 136:10 171:3 receiving 87:17 148:14
	Q			
	qualified 101:21 qualitative 150:13 quality 18:13,17,18 78:22 140:9 141:11 149:4 150:9 159:4 169:5			

<p>recognise 24:19 135:4 145:4 157:3 163:1 171:19</p> <p>recognised 16:8,10 78:9 79:25 121:7 121:22</p> <p>recognises 16:8 76:22 108:5 143:11 149:20 154:14 165:24</p> <p>recognising 23:10 62:15</p> <p>recommend 158:1</p> <p>recommendation 126:13 141:19 154:16 157:22 158:10</p> <p>recommendations 123:17 124:10 141:22 142:15 148:15 156:13,15 157:6 161:22 162:5,12</p> <p>recommended 159:7</p> <p>recommending 11:20,21</p> <p>record 127:6 145:4 149:18</p> <p>records 4:25 165:4</p> <p>recover 82:2</p> <p>recruitment 77:23 97:15 105:22 106:6 138:6 145:21</p> <p>rectified 58:25</p> <p>rectify 60:2 135:22</p> <p>recurrent 155:18</p> <p>redacted 110:17</p> <p>reducing 70:13</p> <p>reductions 153:1</p> <p>refer 2:8 72:3,19 93:7 107:1 145:4 157:8</p> <p>reference 140:18</p>	<p>146:18 150:13</p> <p>references 102:18</p> <p>referral 31:9,11,25</p> <p>referrals 104:13 152:14</p> <p>referred 7:4 80:4 85:8 139:1 143:1 157:25</p> <p>referring 25:5 66:9 68:20 102:10 165:14</p> <p>refine 88:10</p> <p>reflect 69:19 149:15 150:14</p> <p>reflected 145:16 149:8</p> <p>reflecting 163:5</p> <p>reflective 95:24</p> <p>reform 73:24</p> <p>reforms 60:14</p> <p>refusal 42:16</p> <p>refused 69:24 130:20 131:4</p> <p>regard 165:5 166:22 168:14 170:12</p> <p>regarded 157:21</p> <p>regarding 65:8 124:13</p> <p>regards 141:22</p> <p>regime 9:1 18:16 18:17 22:8 23:19 24:13 26:16 38:5 135:25 142:1 153:10 169:21</p> <p>Regional 61:18,19</p> <p>register 13:11 16:13,14,22 36:19 38:15 70:21 164:19</p> <p>registered 16:18 23:24 54:13 123:1 132:2</p> <p>registering 15:20 17:25 55:14</p>	<p>registers 115:24</p> <p>registration 13:5 16:1 18:4 44:6 55:13 70:11,17 71:2 169:11</p> <p>registrations 69:23</p> <p>regrets 137:18</p> <p>regrettably 156:24</p> <p>regular 11:17 31:14 68:20 144:19 152:4 162:3</p> <p>regularly 15:8 26:3 36:9 53:13 135:10 148:7 149:11 156:5</p> <p>regulated 3:12,16 3:18,24 7:6,14 14:6,22 15:1 71:7 96:9 138:9 160:19</p> <p>regulating 60:5</p> <p>regulation 45:20 49:3 101:20 102:5 102:7 107:2 126:17 154:20 156:19,21 160:21 161:5,20 167:8</p> <p>regulations 39:8 116:12,15 139:15 169:16</p> <p>regulator 45:6 51:25 155:4</p> <p>regulators 45:3 148:11</p> <p>regulatory 25:10 25:16,20 26:15 30:19 32:21 38:5 44:19 45:2 47:5 65:14 66:10 102:1 102:8 140:15 149:9,11 155:3,7 157:3 158:5 168:3 168:18</p> <p>reinforced 79:19</p> <p>reinstated 158:2</p>	<p>reiterate 71:10</p> <p>rejected 37:22</p> <p>relates 145:18</p> <p>relating 140:10 169:25</p> <p>relation 1:9 2:24 6:14 19:6 67:15 68:9 69:5 72:23 87:18 91:12 92:14 102:1,2,19,24,25 107:18 109:4 110:17 111:2,3,6 112:13 114:11 115:5,10 147:11 147:12 150:1 152:23 163:6 164:4 166:7 167:22 169:16 170:1</p> <p>relationship 62:1 82:21 83:5,6 84:10,11,13 96:22 102:12 104:24 109:21 110:4 154:20,23 156:2,4</p> <p>relationships 11:1 60:20 62:16,18 74:15,15,16,18 96:18 107:10 136:18 141:1 145:15 147:16 160:21 170:4</p> <p>relatively 23:8 50:7 133:19</p> <p>relevant 29:7 38:18 41:20 49:3 59:23 59:24 60:18 66:1 94:22 112:22 113:11,21 151:9 164:5 165:11 169:17 174:5</p> <p>reliance 19:8</p> <p>reliant 165:1</p> <p>relied 124:21</p> <p>relook 9:3</p>	<p>reluctance 85:16</p> <p>rely 97:9 124:19 150:20</p> <p>remain 2:9 85:13 85:21 121:22 122:21 128:22 152:5 155:17</p> <p>remains 74:25 75:2 126:9 152:22</p> <p>remarks 15:12 171:1 173:1 175:4 175:5</p> <p>remedy 39:13</p> <p>remember 5:24 67:17 119:19</p> <p>remind 110:21 125:24 127:24</p> <p>remit 155:7 161:1</p> <p>remorse 121:11</p> <p>removal 38:14</p> <p>remove 18:25 152:5 154:9</p> <p>render 152:9</p> <p>rendered 153:21</p> <p>Renshaw 112:3</p> <p>reopen 29:22</p> <p>repealed 58:15</p> <p>repeated 124:15 155:11</p> <p>repeatedly 128:7 129:25 133:8 152:25 154:6</p> <p>replaced 29:10,15 58:16 106:6 159:4</p> <p>replacement 93:22</p> <p>replacing 29:12,14</p> <p>replies 52:12</p> <p>reply 34:14</p> <p>report 32:12,24 34:21 47:19,22 65:3 84:24 85:2 85:22 100:17 108:12,18,20,24 113:19 125:23,25 133:2 134:1,6</p>
---	--	---	---	--

140:19 157:20 158:17 161:11,23 169:3 174:4,6 reported 97:24 125:11 reporting 98:7 100:7 106:16,18 107:11 125:22 126:4,6 133:10,13 133:18 142:1 145:7 158:22 165:22,23 reports 40:11 65:6 164:3 represent 4:17 127:20 representations 19:16 representatives 144:8 173:22 represented 117:5 representing 73:8 106:24 120:7 reputable 48:10 reputation 120:1 125:4 137:16 request 34:7,10 80:21 requested 158:8 requests 97:23 require 10:15 45:7 65:11 82:2 104:20 140:18 153:22 159:22 160:14 required 10:14 12:19 17:4 21:10 36:11 37:22 77:17 83:16 105:22,23 107:8,9 125:25 139:6,15 149:21 161:21 requirement 44:5 105:19 125:10 126:12 157:23 158:7	requirements 76:12 78:24 83:17 95:13 101:24 151:17 159:21 164:7 168:19,19 169:8 requires 78:18 166:25 requiring 38:19 research 87:7,7 98:16 104:10 125:17 reshape 30:11 residential 17:25 45:19,23 46:17 64:23 66:18 67:1 67:3 89:16 90:3 90:23 92:19,24 103:21,22 113:10 143:2 153:16 155:1 158:2 162:1 162:9 174:1 resigned 137:7 resolution 25:21 resource 144:15 resourced 152:20 resources 50:11 83:9 84:4 126:8 142:13 147:22 respect 2:7 3:3,14 4:21 5:18,23 9:16 28:7 31:20 51:8 54:10,19 55:2 59:10,10 62:3 65:20 79:5 94:10 96:1 115:13 116:8 134:14 139:8 141:24 152:1,8 155:6 158:15 respectful 101:6 respond 118:11 145:4 responded 131:18 173:9 responding 104:2	105:11 111:25 166:5 response 34:1 66:20 115:4,4 119:18,21 120:24 135:25 137:15,22 142:10 166:11 responses 115:7 173:13 responsibilities 59:17 65:17 79:10 102:23 146:1 responsibility 32:7 59:9 65:24 78:12 78:12,13 99:10 132:4 135:7 143:9 143:12 144:23 145:2,6 responsible 25:12 49:24 59:16 73:16 94:3 144:6 rest 1:17 2:7 122:9 restraints 122:11 restricting 22:5 restriction 33:20 39:22 110:23 166:22 restriction' 38:18 restrictions 22:5 40:2 restructured 140:25 rests 65:25 result 32:11 118:8 133:12 142:12 resulted 139:2 retained 112:22 retired 140:1,4,5 retiring 137:7 return 116:22 returning 13:1 revealed 97:23 165:11 review 53:13 64:11 64:13 68:10	109:23 124:2,11 148:9 153:15 174:2 reviewed 8:13 reviewing 113:11 reviews 40:21 144:11 149:11 revised 153:13 revising 138:12 159:14 revisions 153:18 reward 137:9 Richard 106:21 107:24 123:21 Richards 113:14 166:18 168:10 169:25 right 2:4,14,21 4:3 13:18,24 14:1 15:5 16:1 19:11 20:7,17 22:16 23:18 27:7 28:15 31:6 32:5,18 33:8 33:15 34:4,8 36:1 36:21 39:17 40:4 40:21 47:6 52:10 60:19 63:9 65:7 66:8,17 72:13 73:18,22,24 74:12 74:19 84:25 88:2 94:13 99:3,11 100:4,14,18 110:19,20 123:10 167:23 rightly 121:19 rigorous 13:13 70:12 rise 98:10,12 120:21 risk 10:6,20 56:14 78:23 90:9 94:9 97:11 150:18 153:24 167:5 risk-based 39:19 risks 122:17 146:11	147:10 161:25 169:1 risky 90:8 road 98:24 Robertson 101:3,6 101:12,16,17 115:19 174:22 robust 152:17 153:4 154:13 robustness 153:10 role 13:7 45:17 47:13 60:5 64:4 73:20 78:25 79:7 79:16 96:20 102:7 102:23,25 104:7 105:4 106:24 109:8 110:11 111:15 114:9 120:19,19 121:8 121:16 140:7 144:24 150:18 155:4 161:2,5,16 161:19,20 163:14 166:18 171:19 roles 73:23 146:1 roof 103:25 room 11:13,15 80:14 roommate 129:11 rooms 138:20,20 rope 37:25 roughly 19:21 20:4 20:8 74:7 round 29:22 71:4 130:17 164:14 route 32:1,3,7 44:20 56:18 62:10 routine 128:16 routinely 41:12 Royal 40:24 46:19 143:4 146:7 Rs 145:3 RS-A1 134:17 RS-A150 113:12 RS-A170 112:18
---	--	---	--	---

RS-A170's 112:22	168:12 169:9	173:10,14	38:7,13,14 39:25	141:15,22 142:4,6
RS-A187 111:7	172:24	safeguards 141:13	39:25,25 40:1,3	142:9,10,12 143:4
RS-A189 127:21	safeguard 78:12	157:10,19	40:14,24 42:1,11	143:6 144:4,23
129:9	89:25	safely 141:21	42:21,23 43:20	145:1,23 146:7,8
RS-A193 114:25	safeguarding 9:1	safer 29:20 77:23	45:23 46:17,19	146:18 151:6
RS-A2 134:18	14:22,25 21:6	105:22 106:5	52:15,17 55:5,8	152:4,8,21 153:7
RS-A207 127:21	26:10,12 27:14,16	138:6	55:12,14,22,24	157:2 158:14
128:3	27:18,21,23 29:8	safety 85:12 139:9	56:8,16 57:7,14	159:25 160:14
RS-A218 113:12	31:9 32:8 43:3	162:4,23 164:15	58:11,17 65:13	161:12 162:3
RS-F20 114:2,12	59:10,12,17,23	sake 67:22	66:19 67:2,4,6,7	163:19,24 164:5,9
114:17 115:5	62:3,11,15 65:19	sanctions 38:22	67:19 70:21 71:2	165:3 166:7,21
RS-F25 112:6	65:23,25 66:4	124:20 125:22	74:17 76:19 77:24	168:2 169:4 171:5
RS-F3 1:9	74:6,18 77:22	Sarah 104:5	78:8,11,13 79:2,5	171:9,12
RSM 146:12	78:4,7,15,23	sat 18:1	79:13,23,24 84:20	school's 34:25
147:19,20,25	79:11,13,14,19	satisfied 154:12	84:20 89:16,19	105:11,21 110:7
rugby 128:18	80:3 84:8,12 88:5	satisfy 152:13	90:8,9 91:5 95:6	114:8 115:4 125:4
rule 80:11,13	88:18,20,22,25	saw 36:7 125:7	95:25 97:14 98:6	131:22 134:21
rules 8:17 9:3 16:6	89:9,16,21,22	146:21 147:24	98:11 99:2 100:12	137:24 138:12
run 13:21 14:16	93:18 94:5 95:13	saying 16:24 18:15	106:13,22 108:1,6	140:20 142:3
58:19 74:2,14	97:14,19 99:10,24	35:11 50:15,18	109:13,15,16,22	145:9,20,24
77:21 81:10,15	102:15,25 104:2	62:21 89:20 106:7	110:1,6,12,12,14	159:23 164:15
172:18	104:11,21 105:20	says 4:4 18:7 28:20	111:3,7,20 112:1	school-by-school
running 43:20 56:8	105:25 106:1,5,25	32:20 36:16 47:18	112:3,4,11,12	102:18
123:4 150:21	107:7,17,20 108:6	scandal 123:16	113:3,8,9,15,16	schools 3:20 13:5,9
runs 122:25	108:11,16,19	scared 131:3	113:16,19,22	13:9,11 16:1,3,11
	109:16 110:5,7,9	scenario 10:16,17	114:2,7,16,24	18:1 19:6 20:4,5,6
S	110:13 111:21	10:20 11:16,24	115:2 116:15	20:8,10,11 22:1
sad 146:20	112:5,7,11 113:2	scenes 172:14	117:12,18 118:5	24:21 25:3,4,9,10
sadly 150:22	113:8,10,18 114:6	scheme 105:25	118:11,20 120:2,5	25:22,23,23 29:4
sadness 162:25	114:8,18 115:9	126:11	120:7,9,16,18,22	31:6 38:6 39:15
safe 3:23 4:1 7:22	122:23 123:1,5	school 8:24 9:22	121:11,18 122:16	42:2,3,8,14,21
12:1 27:25 29:22	125:11 137:21	10:5,12,18 11:8	123:4,5,10 124:14	43:6 45:4,5,5,19
31:11 32:1 39:16	138:6 139:21,22	11:25 12:3 13:17	126:20 127:22	46:3,14,15,18
39:16 55:22 64:9	139:23 140:17,25	13:18,21,22 14:4	128:8,11,22,23,25	47:3,4,7,12,14
71:8 74:5,7,9	141:14 143:15,18	14:6,11,14,16,17	129:1,6,14 130:1	48:11 49:5,13,17
75:19,25 76:16,20	144:3,5,7,10,11	14:19,20,21 15:4	130:4,8 131:9	51:1,16 52:1,2,6,7
78:17 79:2 81:3	144:16,20,22	15:5,20 16:13,14	132:7,19,24	53:3 54:19,20,21
84:9,12,25 89:23	145:2,25 148:8	16:18,21,24 17:1	134:13,24 135:2,5	55:3,17 58:12,19
90:12,13 93:12	149:3 150:4,9	17:10,15,17 18:22	135:7,13,15,18	58:20,22,23 59:11
97:14 99:19	151:10,12 152:17	22:5,6 23:14,21	136:1,2,7,11	59:17,18,21 60:11
101:24 106:7	153:14,20 154:1,5	24:6 27:8,9,22	137:2,12,16,18,20	60:12,21,22 61:14
143:9 145:21	156:13,22 157:18	28:17 29:9,21	138:16,23 139:2,5	61:14,16,18 64:5
150:7 157:15	158:20,23 159:1	30:21 31:17,21	139:13,17,21,25	64:6,23 68:14
158:16 160:15	160:2 163:18	32:2,12 33:5	140:10,12,16,23	69:24 70:12,13
167:9,16,20	164:7 167:25	34:21 36:3,14,23	140:25 141:9,13	71:1 74:6,13,21

74:22 75:3,4,6,9 75:15,16 76:4,8 77:2,7,8,10,10,12 77:17,19,25 79:8 79:18 82:13 83:6 83:7,15 87:12 90:3,24 92:19,24 93:16 94:11 95:5 95:7,9,12,19 97:24 99:18 102:20,25 103:21 104:3,11,14 105:7 105:18 107:15,15 107:19,25 112:8 113:11 114:19 116:14 122:4 133:2,22 143:24 145:12 146:5 148:1,10 149:3 150:7,21 151:18 152:6,23 153:16 154:7 155:1,1,3,5 155:9,15,17,20 156:7,25 157:23 158:2,7 159:20 160:4,14 161:7 162:1,20 163:7 165:5 166:13,25 167:3,23 168:1,6 168:23 169:19,19 171:8 173:9 174:1 schools' 89:20 111:13,15 155:24 162:9 Scolding 1:9 6:10 6:15 12:15,17,18 61:2,7,9 64:17 66:25 71:15,17,22 71:23 100:20 101:2,11 115:20 116:23 117:2 148:19 162:18 169:15 170:24 171:1,2 173:2 174:17,20 175:4	scope 20:13 157:11 171:9 Scorer 47:9 scratch 124:17 screen 72:8 94:18 scrutinise 140:8 159:25 scrutinising 140:11 scrutiny 49:4,8,10 49:12 148:8,13 161:21 163:10 165:15 170:8,9 second 34:14 60:5 85:5,5,10,24 98:19 113:13 128:19 132:15 133:12 134:16 144:21 150:16 157:22 secondary 83:7 secondly 72:4,5 83:10 138:13 Secretary 32:14 35:21 47:19,24 102:13 105:2 107:5 168:3 section 4:22 15:22 18:24 21:23 22:25 27:5,17,24 58:14 69:6,8,15 115:24 116:3,7 sector 28:7,10,25 44:4 45:16,19,24 46:17 50:14 51:1 54:19 59:19 67:4 88:7 120:21 121:15 124:25 125:16 168:8 sectors 108:4 secure 39:14 see 5:3,9 7:23 29:17 36:3 44:12 46:11 49:9 55:12 56:20 59:1,22 67:8 70:9 75:7 87:14 88:11	89:11 90:21 119:5 133:15 158:20 163:19 165:21 seeing 92:6 seek 136:1 137:13 157:1 seeking 156:25 seeks 148:8 seemingly 164:22 seen 5:19 9:6,25 12:21 36:7 84:9 93:8 130:18 136:24 150:13 161:18 163:23 164:19,24 166:19 167:25 168:17 selection 125:1 self-assessment 77:24 seminars 100:10 SEN 167:10 send 30:21 31:22 35:9,13 36:6 80:3 142:25 147:17 sending 19:15 senior 17:3 100:16 165:4 sense 2:2 8:3 12:8 46:11 87:20 150:14 sensible 60:23 sensitive 172:23 sent 35:8 128:3 173:15 separate 11:13 36:10 41:3 64:15 107:17 166:24 September 64:12 83:7 102:22 110:24 128:4 129:10 139:11 series 8:7 12:2 116:11 serious 8:9 26:10 26:11 27:18,21,23	29:8 118:17 120:13 124:2,11 131:25 132:22 134:23 seriously 79:11,14 139:18 seriousness 41:25 42:6 121:7 serve 87:3 served 82:10 171:10 service 52:22,23 60:10 74:9 81:16 81:17 83:24 91:18 91:21 92:7,15,16 92:20,22 93:14 125:17 171:25 services 28:23 41:13 59:13,15 90:15,18,22 99:15 103:12 104:6,8 105:6 141:2,3 sessions 76:11 82:9 set 3:9 5:21 13:8 16:11 17:9 32:23 35:18 38:11 42:23 46:5,14 62:7 66:13 68:24 89:22 95:23 139:21 140:23 143:22 148:5 153:17 158:5 sets 41:8,22 60:23 65:5 102:17,23 103:18 104:22 105:15 110:10 113:4 114:7,10 115:3,12 148:11 159:20 setting 6:12 16:3 71:1 79:23 89:16 89:19 90:4 101:22 103:2 108:7 109:9 110:12,16 111:1,5 111:24 112:11,17	settings 3:19 51:5 79:25 87:16 99:2 158:21 159:12 settle 128:9 seven 121:18 severity 143:7 sex 82:21 83:6 84:10,11,13 104:23 107:10 130:16 133:8 147:17 sexual 79:3 81:18 81:25 84:23 85:9 97:8,24 98:6,7,10 98:18,21 99:1,15 100:13 105:9 108:22 111:25 118:18 122:6 129:13,23 131:24 132:10,22 133:2,6 134:2 136:6,18 149:6 157:8 173:8 173:13 sexuality 147:13 sexually 63:15 103:10,13,23 105:8 128:5,16 130:7,12 136:23 share 147:25 156:6 166:21 172:22 shared 78:13 144:22 145:2,5 shares 3:6 sharing 53:3 62:25 68:17 111:15 151:4 154:4 Sharpling 69:22,23 70:4,7,11 71:9 shocking 134:22 136:7 shockingly 130:20 short 71:19 127:24 151:18 shortcomings 119:16 139:19
--	---	--	---	--

<p>153:9 shorter 82:9 shortly 132:21 show 5:17 13:16 17:8 18:14 120:13 showed 121:11 showers 65:21 shown 80:19 144:25 shows 137:5 sick 131:13 side 65:6,6 sight 11:11 sighted 132:1 sign 72:15,16 significance 37:11 significant 36:14 44:3 49:22 50:12 55:10 56:13 57:1 57:9,11,16 64:10 85:22 117:11 127:1 139:3 153:11 significantly 167:15 signing 146:16,16 146:21 signs 10:8 silence 116:17 silencing 121:8 similar 48:16 125:13 146:6 158:3 159:12,12 Similarly 160:1 simple 80:10,11,16 80:23 131:9 simplicity 169:11 simply 6:1,4 34:6 58:1 87:15 99:13 116:11 120:14 123:18 130:17 137:8 150:5 169:6 170:7 sincerely 137:18 172:5</p>	<p>Singer 112:10 single 36:19 65:3 157:21 164:18 174:4 Sir 140:2 sit 18:4 43:12 65:6 165:22 sits 91:6 situation 12:8 43:13 49:6 97:5 125:10 situations 9:25 90:8 90:10 six 37:9 76:11 132:14 136:19 sixth 58:2 160:5 skewed 8:6 53:6 skills 2:24 85:12 115:23 skin 98:4 Slater 117:6 slight 58:18 slightly 4:13 15:2 15:16 32:22 40:10 40:11,12 48:23 51:18 55:7 56:3 58:20 101:7,8 116:20 slipped 59:7 slower 37:19 small 37:21 51:23 63:23 67:2,5,12 72:19,22 95:20,23 138:7 143:8 Smallbone's 120:24 Smith 113:24 smooth 173:23 smoothly 172:15,18 snappy 116:16 snapshot 150:15 so-called 125:19 social 28:22 41:13 60:16 61:19 73:24 82:12 126:11</p>	<p>socially 161:9 society 108:9 123:14 143:1 soft 9:16 solution 97:6,7 157:21 161:17 solutions 94:6 solve 29:10 88:15 solved 29:19 SOM000014 110:2 somebody 11:2 14:2,9,14 18:21 27:13 30:16,24 44:15,17 66:3 75:9 115:24 Somerset 110:3,16 111:2 somewhat 49:6 song 80:24 soon 6:22 129:11 129:20 132:16,18 sorry 6:18 17:16 48:14,15 52:7 70:6 88:2 105:16 135:2,18 142:5 171:13 sort 11:17,18 14:13 17:13,14 20:13 22:21,22 25:8,10 25:16,20 28:15 33:20 37:5 38:19 41:2 42:8,10 43:12,16 52:3 54:11 57:4 58:1,2 58:7,17 61:25 65:25 68:16 69:19 83:8 87:14 90:14 sorts 28:6,10 39:5 51:14 128:2 sought 120:25 147:25 sounds 51:21 sources 151:22 Southlands 46:19 space 29:15,17</p>	<p>124:25 speak 17:22 29:16 41:23 49:24 50:5 73:4,7 74:5,7,9 75:18,24 76:19 80:22 84:9 96:7 119:5 135:10 speaking 135:11 163:2 special 18:1 45:19 45:23 46:2,17 54:19 55:2,4,8 57:14,18 58:4,11 58:17,23 63:21 64:23 65:13 66:18 67:1,4,20 75:25 76:4,8,13,23 77:4 77:10 82:24 87:15 91:13 92:19,25 107:15,18,19 116:2,6,9,14 122:4 148:1 153:16 162:9 163:7 167:23 169:19,20 specialist 114:19 147:20 specific 2:8 4:2 41:14,17 46:16 54:9 57:7,12 63:23 64:4 76:24 80:2 81:16 82:5 110:14 112:13 113:4,20 124:10 142:2 152:8 159:21 163:6 166:7 specifically 57:6 81:21 82:22 91:12 136:22 137:21 150:11 153:20 162:4 167:5,15 specify 47:22 78:19 spectrum 46:20 speculate 75:4</p>	<p>spending 50:21 155:20 spent 45:13 Spielman 13:6 14:2 16:2 23:4 47:13 50:3 124:24 126:16,18 150:7 155:22 156:10 split 155:4 sponsor 49:23 spotlight 123:25 SRC000014 112:24 stack 21:7 staff 2:25 36:24 76:20 78:9,14 100:12,16 107:21 109:24 121:8 122:12,13,22 125:6,8 127:7 129:19 130:14,23 131:13 132:17,20 132:24 133:2 134:4 135:12 138:5 140:16 141:16 144:24 145:4,19,20,22 146:1,9,20,23,24 151:2,13,25 158:16,25 164:25 165:4,12 167:6 172:16,17 173:23 stage 30:23 88:14 147:9 stakeholders 149:12 Stanbridge 36:9 54:11 127:22,25 128:3,17,20 129:4 129:9,20 130:13 130:25 131:2,8,11 131:16 132:11,13 132:18,20,23 133:23 153:7 169:22 stance 145:9</p>
--	--	---	---	--

<p>stand 8:19</p> <p>stand-alone 107:17</p> <p>standard 75:24 76:19 95:22 159:18,22 160:12 162:9 164:4 165:17 168:1,5</p> <p>standardised 93:19 108:2</p> <p>standards 13:12,14 13:15,17,18 16:12 16:15 17:8,8,10 17:13,15,17 18:2 18:6,8,9 22:2,3 24:7 25:25 32:3 32:12,15,23 33:6 33:14,15,23 35:4 35:12,15,18 36:15 38:14 40:8,14,15 40:17,19 42:3,15 42:17 49:17 56:22 56:25 65:5 78:4 90:19 116:15 119:23 139:7,16 140:15 142:16 155:16 158:4,11 159:4,5,20 160:2 164:3,5 168:2 169:5,6,7,12</p> <p>standing 48:13</p> <p>stark 23:14</p> <p>start 8:1 72:1 74:17 80:11 88:11 92:5 92:5 101:9 120:6 145:22</p> <p>start-up 80:25 81:2</p> <p>started 128:6 129:9 132:21</p> <p>starting 88:9 150:1</p> <p>starts 94:21</p> <p>state 20:8 28:7 32:14 35:21 45:5 47:20,24 51:7 52:11 58:21 102:13 108:4</p>	<p>168:4</p> <p>state-funded 105:18</p> <p>state-maintained 75:3</p> <p>stated 110:23</p> <p>statement 1:19 2:1 2:4,7,11,11 3:5 4:4,8,15 6:12 21:18 26:21,25 72:4,11,15,16 73:7 74:4,20 89:10 90:16 93:1 93:18 94:15 96:4 101:19,25 102:4,9 102:14,21 103:1,5 103:10,16,22 104:4,7,11,15,18 105:1,6,13,16,20 106:2,9,12,20 107:4,10,13,23 108:4,8,15 109:1 109:6,12,18 110:2 110:8,15 111:1,4 111:10,12,17 112:2,9,16,19,24 113:6,13,23,25 114:5,10,14,20 115:1,6,12,15 128:15 131:6 135:24 142:11 143:21 153:18 159:9 162:8</p> <p>statements 101:4 101:16 113:21 117:24 127:11 132:10 174:21</p> <p>states 107:11</p> <p>stating 131:18</p> <p>statistics 102:9</p> <p>status 99:14</p> <p>statute 39:6,7 60:8</p> <p>statutory 7:17 27:6 34:2 60:13,24 83:5 103:2 105:19</p>	<p>154:21 156:8</p> <p>stay 12:14 74:5,7,9 75:18,24 76:19 84:9</p> <p>stayed 8:11</p> <p>step 32:21 99:11 100:4 159:15</p> <p>Stepenson 129:14</p> <p>steps 109:4 137:21 139:14 160:15</p> <p>Stockport 40:25</p> <p>Stony 123:21 124:14</p> <p>stop 72:5 128:12</p> <p>storage 112:23</p> <p>straight 45:25 119:9</p> <p>straightforward 44:18 146:13</p> <p>strategic 88:21</p> <p>strategically 59:16</p> <p>strategy 98:21</p> <p>streamlining 167:18</p> <p>strengthened 17:22 22:7 90:25 149:16 157:3</p> <p>strengthening 97:18</p> <p>stress 129:7</p> <p>strict 28:11 29:5 108:14</p> <p>strike 156:19 167:23</p> <p>striking 132:8</p> <p>stripped 106:8</p> <p>strong 3:18 62:17 84:1 145:11</p> <p>struck 117:15</p> <p>structure 144:5,19 159:23</p> <p>structures 108:24 109:17 121:21 122:20 123:19</p> <p>student 22:6 57:4</p>	<p>109:16 136:19</p> <p>students 135:4,10 135:10,12,15 136:16,23 138:15 140:14 141:10 146:9,10,23</p> <p>study 104:1 127:21 127:23 142:24</p> <p>studying 160:7</p> <p>subcommittee 139:22</p> <p>subject 13:22,24,25 25:9 45:20 49:4 81:18 86:9 110:23 119:1 138:5,10,23 157:8</p> <p>subjected 129:12</p> <p>submission 34:3 120:23 142:12 155:11</p> <p>submissions 101:9 117:3,4,7 119:12 127:6,18 134:10 134:12,13 140:21 141:5 142:20 148:20,23 149:23 149:25 162:16,22 170:21 173:3 174:23,24,25 175:1,2,3</p> <p>submit 133:19 139:6</p> <p>submitted 139:9 143:17 173:4</p> <p>subsequent 133:4 140:22</p> <p>subsequently 131:22 132:2 136:12 138:18 155:18</p> <p>subsume 164:7</p> <p>subtle 147:2</p> <p>successful 25:21 98:21</p> <p>successfully 99:8</p>	<p>suffered 81:24 118:8 122:12 132:23</p> <p>suffering 137:8 171:19</p> <p>suffices 153:24 157:5</p> <p>sufficient 152:22 153:2 156:9 158:21 159:17 161:14 165:20 167:10</p> <p>sufficiently 153:4 166:16</p> <p>suggest 11:10 101:5 126:13 143:24 167:14</p> <p>suggested 30:10 141:24 168:9</p> <p>suggesting 93:22</p> <p>suggestion 118:5 131:21 158:6 161:3 167:7</p> <p>suggestive 15:12</p> <p>suggests 85:13 91:8 108:2</p> <p>suitability 13:20 125:2 160:24</p> <p>suite 143:19</p> <p>suits 82:5</p> <p>summarise 149:25</p> <p>summarised 156:17</p> <p>summarises 102:24 108:10 109:8 114:22</p> <p>summary 103:25 104:9 152:16</p> <p>Superintendent 140:4</p> <p>supervised 4:2 6:10 7:1,5 8:23 10:22 11:14 12:5,6 96:8 96:16,17,19 138:20</p>
---	--	--	---	---

supervision 10:15 10:18,19,23 11:16 11:19 46:24 96:7 96:23 supervisory 43:16 44:7 supplementing 158:6 supply 34:18 support 84:1 87:17 92:21 100:11 103:25 105:6 106:21 117:21 124:4,7,9 133:17 135:19 142:4,5,13 142:15 145:19 159:2 165:7 166:9 167:19 168:22 171:25 172:2 supported 83:15 93:19 127:7 135:16 151:14 164:1 supporting 106:24 120:10 supports 141:25 144:20 157:7 160:23 167:7 suppose 14:8 18:15 29:11 31:18 35:17 37:24 42:12 46:12 50:3 62:13 supposed 126:11 sure 4:6 8:6 13:3 14:24 18:10 25:4 26:19 29:21 31:10 32:1 34:17 39:15 40:7 45:1 47:18 59:22 62:24 65:10 76:3 77:18 79:11 83:10,13,16,23 84:16 100:3 134:25 142:15 169:8 172:14,18 Surely 35:9	surprise 59:7 surprised 5:5 surprising 5:25 Surrey 112:25 113:5 survey 82:19,25 surveys 104:10 survivors 117:5 120:11 survivor 135:21 survivors 124:8 127:20 133:20 134:3 135:6,20 136:8 142:4,9 149:19 163:1 171:9,21,24 172:20 Susan 3:4 suspect 29:5 57:22 70:2 suspected 118:23 suspects 168:23 suspend 22:15 suspensions 119:20 suspicion 126:1 suspicious 100:17 sweet 129:15 130:9 symbols 146:22 sympathy 118:12 131:20 syndrome 132:1 system 9:3 22:1 24:6,10 26:1 42:14 43:24 45:4 45:13 46:9,14 47:3,4 51:10 52:14 58:21 60:5 61:22 62:6,9 63:8 66:9,12,22 69:19 71:6 76:6 80:1 86:5 90:25 91:1,3 91:4,4,6 93:2,11 93:16,22,23 94:7 97:9,12,13,16 102:1,8 104:12	126:25 127:2 138:11,15 141:25 150:6 154:3,19 158:22 164:6 systems 19:17 47:1 94:8 122:14 124:18 146:17 152:3 165:24 167:18 <hr/> T <hr/> tab 1:21,23,23 71:24 72:9 tackled 128:18 tail 26:8 42:8 tailored 76:6 take 1:10,16 9:21 12:22 13:4 15:19 22:11 27:4 33:13 33:21,23,24 34:1 36:12,17,25 37:1 37:4 38:10,25 39:21 40:16 41:4 43:1 52:6 57:14 71:15 76:11 79:10 85:2 90:11 91:11 92:22 96:20 101:8 116:3 130:21 152:15 155:6,9 160:14 168:4 174:1,5 taken 2:23 8:19 9:2 17:23 19:22 25:13 32:22 33:9,10,11 38:13 39:19 50:16 59:2 69:2 79:14 98:2 103:4 109:4 114:11 137:18,20 139:14 141:17 143:16 147:10 153:11 155:12 165:12,13 takes 11:12 21:9 24:8 86:9 139:18 144:16 158:25	163:18 talk 8:14 26:15 33:5 41:19 54:5 74:15 88:18 121:1 121:3 125:12 talked 11:2,23 12:1 27:19 36:22 37:13 38:16 44:24 62:14 91:15 118:20 talking 7:11,13,19 26:8 29:12,13 30:2 49:10 52:24 53:12 69:1 82:3 146:16 tandem 157:13 Tanton 106:21 targeting 39:2,19 75:16 task 134:24 163:15 tasked 126:17 tea 61:10 teach 83:21 teacher 10:4,10,12 10:13 11:11 22:19 31:1 101:23 102:1 102:8 114:4,9,13 121:13 130:2 136:14 teacher's 130:18 teachers 2:17 3:20 77:1 78:5 82:20 83:19 84:1,5 101:22 102:2 105:3,5 106:10 107:8,9 118:13 135:2 138:7,13 159:24 teaching 15:6 17:1 76:2 83:2,2 85:12 101:19 102:5,7 107:2 113:17 120:20 138:20 teaching/training 79:21 team 70:2 73:16	140:25 172:13 teams 172:8 technically 96:15 technology 86:6 teenage 15:12 tell 24:1 34:12,15 34:16 44:16,16 55:17 56:2 72:22 75:21 80:7 81:7 81:18 91:20 94:13 95:8 98:12 119:9 121:20 129:19 146:19 151:25 telling 135:13 tells 3:5 80:16 85:3 97:10 temporarily 23:16 ten 19:2 69:9 99:4 124:1 tended 130:3 tends 30:23 tension 91:7 166:14 tenth 2:11 tenure 112:12 113:9 137:25 138:17 term 13:10 89:20 termination 137:4 terms 7:12 16:16 18:16 19:15 20:9 24:6 25:2 27:13 42:13 43:2 49:1,7 55:3,9 56:15,24 57:6 62:6 63:10 70:25 89:1,8 90:18,21 94:11 95:25 98:25 99:12 104:23 116:9 131:14 136:4 140:18 152:21 170:3,10 terrible 171:11 terribly 21:22 terrified 125:8 129:18
--	---	---	---	--

<p>test 14:13 72:2 testimony 117:25 testing 92:5 text 167:16 thank 1:5,14 4:7 6:23,24 7:21 64:17 66:24 67:10 67:25 68:7 69:4 69:20 71:9,14,17 71:25 85:7 97:20 100:6,20,21,24 101:1,1,10,11,12 115:17,19 116:19 116:23 127:15,16 127:19 134:7,8,11 142:17,18,21 148:16,17,21,24 162:15 170:23 171:2,7 172:7,12 172:16,22,24 173:2,2 174:9 thanks 127:6 173:21 therapeutic 86:4,12 87:1 124:4 therapist 81:25 therapy 82:2 thing 22:22 23:17 28:16 29:7,20 31:10,22 36:20 41:2,16 44:25 51:19 60:23 62:13 62:14,16 89:8 125:9,20 170:12 things 10:1 15:19 21:16 24:15 28:6 28:10 36:18 37:12 37:13 39:5 40:10 40:17 48:11,16,16 48:20 49:2 53:16 53:17 54:24 55:1 58:2 63:2 64:11 64:15 66:21 68:25 69:17 70:1 72:1 80:1 85:3 87:9</p>	<p>119:2 139:8 164:9 think 1:24 2:12 4:1 4:24 5:6,6,13,15 6:4 7:7,18,24 8:25 9:8 10:22,25 11:1 11:4,23 12:15 13:12 14:18 15:2 15:9 16:10 17:19 18:10,11,19,24 19:5,22 20:4,8,8 20:15,16,17,18 21:2,15,18,19 22:7,14 23:1,3,9 23:12,18 24:13 25:7 27:20 29:12 30:9,12,13 31:24 32:5,6 33:2 34:6 36:7,25 37:1,3 38:4 39:12,21 41:4,18,19 42:4 43:4,5,13,17,23 43:25 44:1,2,3,4,9 45:13,15,16,17 46:1,12,25 47:6 48:6,7,11 49:9,10 50:17 51:14,18,23 51:24 54:6 55:7 56:10 57:13,25 58:24 60:3,14 61:23 62:7,8,11 62:23 63:1,3,7,20 63:22,23 64:1,8 64:13 65:1,4,14 66:8,16,20 67:8 67:19 68:2,10,11 68:16 69:14 70:9 70:16,20,20,22 71:2 75:5 77:15 77:17 78:6,6,20 78:21,23 79:9,9 79:12,15,24 80:13 82:7 83:2,12,13 83:19,20 84:8 85:18,19,21 86:13 86:13,14,15 87:2</p>	<p>87:2,5,9,10,19,22 87:24 88:17,23 89:7,10,11 90:10 90:25 91:3 92:22 93:21,23,24 94:22 96:14 97:6,10 98:3,5,5,24 99:3,4 99:7,12,21 100:3 110:19,19 thinking 21:12 27:11 28:17 29:1 36:13 40:22 41:14 42:13 51:5,6 54:25 55:1 57:6 62:16,20 66:10 70:25 86:23 147:25 149:17 161:9 thinks 93:5 thinner 50:5,6,6 third 145:11 150:20 158:13 165:9 Thirdly 72:7 Thomas 114:15 thoroughness 163:17,22 thought 2:2 7:9 18:1 48:12 67:21 96:1 thousands 9:17 three 2:24 9:18 73:21 118:13 130:13,23 148:11 165:16 three-month 37:6 threshold 10:7 145:8 thresholds 19:8 85:15 105:11 tick-box 83:24 Tier 160:8 tighten 24:13 time 2:3 10:24 11:15 17:20 21:9</p>	<p>24:7,17 25:24 31:1 38:1 41:1 42:1,7 45:14 47:10 49:19 50:13 72:5 100:22 102:22 111:9 112:5,20 131:19 132:2 134:6 136:20 144:15 158:25 165:9 166:24 171:17 timely 164:21 times 130:13 133:11 Timescales 155:10 tirelessly 172:14 title 116:16 today 3:4 6:17 85:14,20 133:18 134:22 135:1,5,15 137:12 173:3 told 23:20,23 47:13 53:9 55:24 56:17 57:2 95:20 122:5 128:8,13 129:14 129:21 130:25 131:4,14,22 132:17,24 151:24 173:7,9 tolerance 98:6 tomorrow 42:23 tool 99:14 tools 157:3 top 79:13 94:23 108:7 topic 63:13 total 117:20 totality 4:17 49:11 73:8 86:14 87:22 88:12 totally 120:19 touch 108:14 117:10 135:22 142:10 touched 80:19</p>	<p>103:15 tough 18:2,11,15 TRA000003 102:4 track 5:9 tragically 118:2 trail 5:17 train 76:25 trained 78:7,14 105:22,24 107:22 146:24 151:10,14 training 66:2 72:23 77:21,23 78:4,18 78:22,22 79:7,12 79:20 80:2 83:8 84:4 89:2 101:23 103:14 105:20,25 107:8,9,17 108:1 108:3 114:8 126:7 126:10 145:19,24 154:1 160:3 163:8 transcribers 172:16 transfer 28:4 44:18 transformed 125:9 transparency 39:3 40:5 94:8 119:17 120:10 170:10 transparent 120:3 158:20 trauma 171:13 Treasury 49:25 50:2 Treasury's 50:22 treat 16:19 treatment 125:6 trend 16:3,8 TRI000011 103:5 trial 132:5 137:23 Triangle 103:6 triangulate 151:23 165:3 Tribunal 19:12 tribute 127:10 tried 23:7,8,21 25:8 119:8 121:9</p>
--	---	---	--	--

122:22 125:6 129:24,25 trifle 50:4,5 150:8 Trojan 19:6 21:3 true 2:1,9 8:4,6 72:17,18 137:8,11 truly 127:3 135:2 trust 8:1,8 9:7 76:25 88:8 92:6 135:3 140:4 142:22 143:6,11 143:17 144:12,16 145:14 146:15 148:5,6,12 trust's 143:15,25 145:16 trusted 76:16 80:22 trustees 17:3 42:23 44:8 105:18 trusts 105:23 125:18 truth-or-dare 129:2 try 30:11 61:24 71:4 75:15 76:1 150:25 172:24 trying 14:24 15:18 37:3,12 58:9 70:21 121:5,6,8 171:20 Tuesday 64:4 tuition 138:2 141:12,20 turn 1:20 72:9 84:21 90:13 113:21 turned 130:17 turning 89:15 141:9 153:3 154:19 157:6 turnover 152:4 tutors 138:12 twice 74:13 140:7 165:10 two 2:12 5:13 8:5	9:7 10:1 29:4,10 36:10,10 47:1 48:10,12,20 50:24 51:14 60:3 63:24 65:5,6 67:4 94:8 101:5 112:7 115:6 117:23 126:23 128:22 130:5 132:8 133:14,19 134:3 136:11 142:7 150:2,23 163:11 166:5 two-week 145:22 type 58:3 67:20 82:2 87:17,17 116:1,5,9 types 108:23 116:1 116:6,9 <hr/> U UK 86:8 102:3 160:8 ultimate 33:6 51:25 65:24 ultimately 55:22 121:12 124:19 133:8 unable 46:22 119:16 124:9 unacceptable 121:5 137:6 unambiguous 125:10 157:11 unclear 122:9 unconvincing 124:16 under-regulated 160:10 undergoing 148:11 underlying 98:9 undermining 150:18 underperformance 155:19 underpinning	20:22 underreport 145:10 understand 15:2 21:21 27:12 39:12 47:12 48:22 49:21 52:24 58:7 73:2 73:22 74:6,19 77:22 78:24 81:15 82:11 83:17 90:1 90:4,7 91:10,22 126:9 144:24 146:11 147:1,10 151:12 understandably 129:3 understanding 3:8 7:8 14:18 17:12 53:22 56:5 67:1 67:24 69:14 78:15 79:17 82:16 86:16 88:14 95:4,11 97:13 151:10 undertake 27:7 33:17 49:3 117:3 undertaken 59:6 78:18 88:24 undertaking 84:4 undertook 97:22 underwear 80:11 80:13,18 unfair 49:6 unfit 120:19 unforgivable 137:10 unfortunately 85:21 170:15 unhappy 128:7 unhealthy 74:16 unhindered 15:13 15:17 union 82:20 83:1,3 107:6 unique 148:12 unmet 32:23 38:14	unpacks 168:19 unqualified 122:1 unregistered 71:1 unreported 164:22 unreservedly 143:13 171:21 unrevealed 165:16 unsafe 155:21 unsuitability 121:16 unsuitable 2:13 121:5 unsure 82:22 unworkable 43:24 upcoming 159:13 upkeep 65:18 urgency 159:8 urgent 134:1 use 19:4,21 20:6,12 20:18,20 22:23 23:7,8,13,21 26:12 27:18 29:23 33:21 38:22 41:11 41:12 69:12,17,19 89:20 108:14 127:24 167:22 useful 23:17 30:16 33:4 133:16 143:24 uses 22:1,2,3 usually 11:10 37:4 utter 118:15 utterly 118:7 120:8 <hr/> V vague 122:21 168:9 Vallens 118:15 119:4 134:18 valued 145:14 vanishingly 63:22 variable 37:15 varies 36:15 37:11 variety 160:21 various 16:17 21:7 23:23 42:20 49:2	49:4 53:14 70:12 73:23 85:4 111:2 127:20 vast 46:18 146:5 Verisona 127:20 133:20 vetting 102:2 106:9 Viagra 130:10 vice-chair 113:14 victim 131:8 135:21 victims 117:5,23 118:1,1,6 120:11 124:5,8 135:6,19 136:8 142:4,8 149:19 163:1 172:20 videos 172:18 view 8:6 50:10 83:8 114:9 119:4 124:14,15 156:15 165:7 170:15 viewed 148:12 views 6:13 36:17 45:11 78:2 79:6 86:3 vigilant 158:19 virtue 17:14 Visa 160:8 visible 71:6 78:9 visit 16:17,21 visiting 15:8 111:24 136:13,13 138:7 Visitor 161:5,20 visitors 162:11 visits 138:8 visual 76:14 vocal 141:12 voice 118:2 147:5 volume 117:9 volunteer 8:24 9:21 12:4 volunteers 4:3 6:10 7:1,5,14 10:3 76:21
--	---	--	--	---

vulnerabilities 161:25	130:7 146:15	wider 74:17 77:4 81:10 90:1 91:23 92:21 97:13,13,19	79:22 82:1 84:3,6 84:7 87:24 88:9 88:24 89:13 102:11 104:16 126:7 127:1 144:23 147:22 149:22 154:21 163:12 171:7 172:13	140:21 141:5 156:16 173:4 wrong 26:25 63:24 95:1 135:12 136:4 wrote 2:3
vulnerability 104:19	we're 110:19	William 114:21	163:12 171:7 172:13	X
vulnerable 66:19 115:14 123:18 133:23 143:1	we've 15:24 22:9 62:14	willing 122:23	172:13	X 174:14
<hr/> W <hr/>	weakness 155:2	wing 58:5	worked 2:17 73:22 89:12 166:5	<hr/> Y <hr/>
wake-up 139:2	website 84:8 134:21 140:20	wish 115:18 127:5	workers 2:20 126:12	year 26:21 63:18 69:25,25 128:19 128:24 129:6 130:12,22 140:1,7 170:13,22
Wales 88:23 89:7	week 24:15 66:1 85:4 169:25	wished 65:7	workforce 98:23	years 17:24 19:2 42:3 50:9 69:9 73:21 99:4,6 102:11 118:21 120:18 124:1 128:4 129:10 130:5 132:14,24 133:4,9 143:14 155:16 171:13
walk 130:2	weeks 8:5 9:7 10:1 101:5 126:23 129:12 142:7 150:23 163:11 165:16 172:9 173:17	witness 1:19 2:1,4,7 2:11,11 3:5 4:4,7 4:15 21:18 72:3 72:10,15,16 73:7 73:9 74:4,20 90:16 93:17,25 94:15 96:4 101:3 101:16,18 102:4 102:14 103:5,16 104:4,6,15 105:1 105:13,16 106:12 106:20 107:4,13 107:23 108:8 109:1,6,12,18 110:2,8,15,25 111:4,17 112:9,15 112:19,24 113:6 113:23 114:5,14 114:20 115:1,11 153:17 159:8 174:21	working 9:4 60:6,7 60:23 62:8 88:1,3 88:5 126:21 145:14,22 149:4 154:23,24 156:25 168:13 170:7,7	years' 140:5
walked 130:15,17	welcome 1:3 66:22 123:24 124:4 135:20 142:14	witnesses 19:9 21:12 111:8 115:14 172:10,11 173:5,12	works 26:1,16 45:15 62:16 97:12 97:12 138:15	Yehudi 112:1,10 113:3,7,9,15
wander 15:13	welcomed 154:8 163:10	woefully 122:21	worries 120:23	yesterday 1:9 3:3 7:2 8:25 9:11 10:25 13:6 14:2 16:2 23:4 24:19 28:1 36:8 46:13 47:13 48:23 50:4 54:9 143:5,16 144:25 147:11,24 150:8 152:2 155:22 156:10
want 6:7,18 16:24 27:12 28:17 34:22 37:17 48:7 55:19 57:3 62:19 67:13 68:5,8 84:16 127:9 171:7	welcomes 63:20 149:16 159:13 161:7 162:7	Wolfe 162:19,21,22 162:23 170:23 175:3	worse 26:7 43:6	YMS000142 113:13
wanted 39:11 41:18 50:23 56:19 100:10 115:21 116:19	welfare 94:12 95:22 131:12 137:25 139:8 146:9 162:23 169:3	work 2:14 8:2 20:20 23:22 25:8 37:15 55:19 60:16 60:24 73:24 77:17	worth 14:18 25:19 61:3 123:14 144:15 162:6	young 2:18 8:25 63:16 82:15 91:17 99:1 100:1 135:3 147:12 149:13 166:17
wants 14:14	wellbeing 160:17 162:5	woodlands 130:8	wouldn't 6:4 27:12 41:12 46:6 55:8 57:10 58:3 59:6 169:21	Young's 3:4
Ward 172:6	Wells 110:1,5,6,10 111:3,19,20 158:14	word 26:25	wriggle 49:1	
wasn't 18:15	went 40:25 55:13 131:1 132:23 136:4	worded 168:10	write 3:10 34:11 47:19 52:12 75:8	
watch 118:19	whichever 50:5	words 117:15	writing 165:10	
watching 26:9 80:14	whilst 58:21 121:7 126:11 150:25 152:22 155:5	work 2:14 8:2 20:20 23:22 25:8 37:15 55:19 60:16 60:24 73:24 77:17	written 39:5,7 40:11 59:14 69:16 69:18 96:13 119:11 127:5,11 134:13 138:14	
watershed 137:24	whistle 157:20			
way 13:20,21 14:21 26:1 41:7 44:7 48:19 56:3 61:14 69:15 73:12 75:13 80:10,11,23 83:16 85:6,9 87:20 88:23 91:24 92:10 123:11,19 127:11 145:1 146:6,14 154:2 156:18 163:17 164:21	Whitman 105:2			
ways 30:6 40:11,12 48:20 70:12 103:7 106:17 121:6	wholly 121:4 137:6			
	widely 74:16 90:3 92:4 118:20			

younger 7:11	14 95:21 108:10 130:12	2013 109:9,23 119:19 131:17	30 24:21 25:4 68:14 68:20,22,24 114:22 140:5	90s 136:5 98 68:2 115:24 99 2:16
<hr/> Z <hr/>	142 175:1	132:13 137:23	31 106:14	
zone 83:22	148 175:2	138:24 139:11,21	347 58:14	
zones 166:24	15 35:5,7 50:9 77:10 85:2,5 111:14	140:6 165:6 166:16	35 77:9 136:11 166:4 172:10	
<hr/> 0 <hr/>	16 113:1 136:17	2014 85:19 86:19 106:7	<hr/> 4 <hr/>	
005 27:1	16,000 20:8	2015 84:24 97:25 109:25 110:7	4 71:24 154:19 160:8	
006 32:9	162 175:3	2016 74:10 115:13	4.1 166:25 167:3	
010 38:11	17 35:23 109:7	2017 60:16 97:25	41 172:11	
011 41:22	171 175:4	2018 111:14 116:15	44 161:5,20	
<hr/> 1 <hr/>	173 175:5	2019 1:1 85:20 101:20 102:6,17 102:22 103:7,18 104:6 105:4,15 106:3,14,23 107:6 107:16 108:1,10 108:20 109:3,7,14 109:20 110:4,10 110:24 111:11,19 112:17,20 113:1 113:25 114:7,22 123:10 133:14	<hr/> 5 <hr/>	
1 102:6,19 108:1 111:19 134:17 174:3,15,16	177 25:9	2020 73:21 80:6 174:2	5 105:15 110:10 114:7 154:17 156:11	
1.00 101:7	18 25:16,19 37:20	2021 174:7	50 82:22	
1.55 116:22 117:1	19 109:3	21 38:11 113:25	52 152:20	
10 4:9 19:23 20:3 32:13 111:11 130:12 139:11 171:4	1988 171:15	22 25:17,18 26:9 38:11 68:11,24 103:7	59 74:22	
104 9 19:23 20:3 32:13 111:11 130:12 139:11 171:4	1990 109:9	23 112:17	<hr/> 6 <hr/>	
10.00 1:2	1990s 137:20	24(1)(g) 165:17	6 32:10 106:3	
101 116:3,7 174:21	1991 85:9	24/7 92:18	63 93:17 94:16	
101 116:3,7 174:21	1994 137:13	25 105:4	64 174:18	
11 1:1 4:10,22 33:25 103:18 128:4 130:22 132:6 167:25 168:9,25	1996 32:10 58:14	26 38:23 72:11	65-page 63:25	
11.15 61:3	1997 141:17	27 41:21 110:24	66 94:22	
11.29 71:18	<hr/> 2 <hr/>	28 85:24 107:6	<hr/> 7 <hr/>	
11.45 71:16,20	2 12:23 48:8 106:23 109:14 126:25 162:14 170:6,22 173:25 174:3	29 104:6	7 27:2 101:20 112:20 168:2	
116 27:5	2,500 20:4	<hr/> 3 <hr/>	71 174:19,20	
117 174:23	2.3 166:13	3 7:23 102:22 153:3	73 97:23	
117 174:23	20 19:23 20:3,7 143:14 162:9	3(g) 68:1	76 97:21	
12 37:10 85:3 107:16 129:10 174:17	2000 152:21	3.06 174:10	<hr/> 8 <hr/>	
12.54 116:24	2002 21:20		8 109:20 168:2	
120 22:25 27:17,24	2004 129:10		80s 123:2 136:5	
127 174:24	2006 130:23 138:4		85 74:20	
128 15:22 18:24 21:23 69:6,15	2008 18:24 68:2 69:6 115:23 132:12		89 75:1	
13 85:3 102:17 110:4	2009 69:8 124:11 128:4		<hr/> 9 <hr/>	
134 174:25	2011 109:25 132:2		9 4:9 32:13	
	2012 8:12 128:10 129:5 138:19		90 74:25	