

<p>1 Tuesday, 6 June 2017 2 (10.30 am) 3 Introductory remarks 4 THE CHAIR: Good morning, everyone. My name is Alexis Jay, 5 and I am the chair of the Independent Inquiry into Child 6 Sexual Abuse. Sitting with me are the other members of 7 the inquiry: Professor Sir Malcolm Evans, Ivor Frank and 8 Drusilla Sharpling. 9 On behalf of the inquiry, I welcome you all to this, 10 the second preliminary hearing in the Roman Catholic 11 Church investigation. This investigation focuses on the 12 experience of victims and survivors of child sexual 13 abuse within the Catholic Church. In a few moments, 14 I will ask counsel to the investigation, Ms Karmy-Jones 15 QC, to provide an update on the investigation. 16 Before doing so, I want to say something about the 17 purpose and scope of the inquiry. The scope of this 18 inquiry is broad and unprecedented. The task of 19 the Chair and Panel is to examine the extent to which 20 public and private institutions in England and Wales 21 have failed to protect children from sexual abuse in the 22 past and to make recommendations to keep children safer 23 today and in the future. 24 Thirteen investigations form part of the public 25 hearings, which in turn is one of the inquiry's three</p> <p style="text-align: center;">Page 1</p>	<p>1 investigations into Cambridge House, Knowl View and 2 Rochdale will take place in October. 3 Finally this year, as part of this investigation 4 into the Roman Catholic Church, public hearings in 5 relation to the English Benedictine Congregation will 6 begin in November. The purpose of today's preliminary 7 hearing is for counsel to the investigation to provide 8 an update on the work done so far and for us to hear 9 submissions in relation to the conduct of the hearings 10 in November and December. 11 Before we hear from counsel, a couple of points on 12 timing. We will take a 15-minute break at around 13 11.45 am and then a break for lunch, if this hearing has 14 not concluded before then, at 1.00 pm. Any decisions 15 arising from this hearing will be published on the 16 inquiry's website shortly afterwards, as will the 17 hearing transcript. 18 We will also observe a one-minute silence at 19 11.00 am as a mark of respect to the weekend events in 20 London. This will be indicated by Ms Karmy-Jones, and 21 there will be no need to stand. 22 I now invite leading counsel to the inquiry, 23 Ms Karmy-Jones QC, to provide us with an update on the 24 Catholic Church investigation. Please go ahead, 25 Ms Karmy-Jones.</p> <p style="text-align: center;">Page 3</p>
<p>1 major strands, the other two being the research 2 programme and the truth project. In order to complete 3 the inquiry's work in a reasonable timescale, we must 4 make sure that each of these areas remains focused and 5 is finished in good time. 6 I want to reiterate that all three of the inquiry's 7 areas of work provide opportunities for victims and 8 survivors to bear witness to the inquiry and would 9 emphasise the importance of the inquiry's truth project 10 and of course to encourage victims and survivors to 11 share their experiences with the inquiry via the truth 12 project. Their experiences are vital to our work. They 13 will be considered by me and the Panel and taken into 14 account when we reach our conclusions and our 15 recommendations for the future. 16 Regarding the public hearings, in December 2016 the 17 inquiry set out a work programme for this year, which is 18 available publicly on the inquiry website. There is 19 a full timeline of hearings which are due to take place 20 this year and in early next year. 21 The first public hearings took place from 22 27 February to 1 March, and concerned part 1 of the 23 child migration programmes case study. Further hearings 24 in part 2 of that case study will take place in July. 25 After that, the next public hearings in the</p> <p style="text-align: center;">Page 2</p>	<p>1 Submissions by MS KARMY-JONES 2 MS KARMY-JONES: Thank you, Chair, members of the Panel. 3 I appear today with my supporting junior Lois Williams 4 and supporting counsel to this investigation. May 5 I begin by making introductions as to the representation 6 of all parties present? 7 F1 to 12 and F13 are represented by Howe &amp; Co and 8 Mr David Enright. Mr Stein QC was unable to attend as 9 he is part-heard in a trial, but he extends his 10 apologies to the Panel and you, Chair. 11 G1 to G5 are represented by Imran Khan and 12 Imran Khan is here to make representations on their 13 behalf; C18 to 19 by Switalskis, and Mr Chapman is here 14 to make their submissions. 15 27 core complainants and one survivor represented by 16 Slater Gordon are represented by Mr O'Donnell. D2 is 17 related by Bhatia Best and Caoilfhionn Gallagher QC. 18 J4, represented by Hugh James and Alan Collins. 19 Short written submissions, I should say, were received 20 from J4 this morning, which should have made their way 21 into your composite bundle. 22 The English Benedictine Congregation, approval also 23 by the Catholic Council for IICSA, represented by 24 Kingsley Napley and Ms Gallafent QC; the Metropolitan 25 Police Service by Jason Beer QC; Ampleforth by Milners</p> <p style="text-align: center;">Page 4</p>

<p>1 and Mr Kelly QC; North Yorkshire Police by Mr Payne;                  2 Adrian Child by Brabners, and Julian King represents.                  3 St Benedict's School and Ealing Abbey are                  4 represented by Howarth &amp; Gallagher and Lord Carlile QC                  5 appears. The Archdiocese of Birmingham is represented                  6 by Farrer, Richard Horwell QC appears. The                  7 Secretary of State for Education, Cathryn McGahey QC                  8 appears.                  9 The Independent Schools Inspectorate is today                  10 represented by Angharad Shurmer of Eversheds and                  11 I understand that she does not intend to make                  12 submissions today, so that the Panel are aware.                  13 Chair, the purpose of today's hearing is, as you                  14 have outlined, to provide an update on the investigation                  15 into the Roman Catholic Church and to seek directions                  16 potentially, if necessary, in respect of its forthcoming                  17 public hearing.                  18 The first public hearing of the case study is due to                  19 begin on 27 November and conclude no later than                  20 15 December of this year. It should therefore be borne                  21 in mind, when considering these submissions, that there                  22 are 15 sitting days available to the Panel at present to                  23 consider any evidence brought, although we propose, as                  24 you will have seen, that the penultimate sitting day is                  25 set aside for preparation of closing submissions, which</p> <p style="text-align: center;">Page 5</p>	<p>1 studies were previously selected and announced at the                  2 hearings in July 2016. One of these was the Archdiocese                  3 of Birmingham, which, as you will know, is one of the                  4 largest administrative units of the Catholic Church in                  5 England and Wales and comprises a significant                  6 geographical area; the other, the English Benedictine                  7 Congregation, a monastic congregation of Benedictine                  8 monks whose affiliated monasteries run or have run                  9 a number of private boarding schools, and whose                  10 operation is somewhat autonomous from the Roman Catholic                  11 Church and from each other.                  12 The inquiry will investigate alleged failings in                  13 relation to a number of orders, abbeys and affiliated                  14 schools where a number of allegations of child sexual                  15 abuse have been made by former pupils of those schools.                  16 Those case studies were previously selected on the                  17 basis of publicly available evidence which showed that                  18 there was reason to suspect significant failures to                  19 protect children from such abuse and to respond properly                  20 to allegations of child sexual abuse in those                  21 communities. Further, it was considered they would                  22 provide insight into the broader institutional                  23 safeguarding failures that are believed to have been                  24 within the Catholic Church.                  25 As I have already said, the first case study hearing</p> <p style="text-align: center;">Page 7</p>
<p>1 will take place on 15 December.                  2 By way of background, the last preliminary hearing                  3 in this matter took place some time ago, on 28 July of                  4 last year. It may therefore assist -- I'm in your                  5 hands -- if I say a few words by way of reminder about                  6 the scope of this specific investigation and provide                  7 thereafter some update as to the course of the inquiry                  8 in the time that has since passed.                  9 Scope. The scope of this limb is to examine the                  10 nature and extent and the institutional responses to                  11 child sexual abuse within the Roman Catholic Church of                  12 England and Wales. In so doing, the investigation will                  13 be focusing on four main themes: first, the prevalence                  14 of child sexual abuse within the Catholic Church;                  15 second, the adequacy of the Catholic Church's policies                  16 and practices in relation to safeguarding and child                  17 protection; thirdly, the extent to which the culture of                  18 the Catholic Church has or does inhibit the proper                  19 investigation and prevention of child sexual abuse; and                  20 fourthly, the adequacy of previous reviews in                  21 safeguarding arrangements, including but not limited to                  22 those such as the Nolan Review and the Cumberlege                  23 Commission, and also looking at the extent to which                  24 recommendations have properly been implemented.                  25 In order to investigate these matters, two case</p> <p style="text-align: center;">Page 6</p>	<p>1 is due to commence on 27 November and accordingly                  2 submissions were sent to all parties setting out the                  3 counsel to the inquiry's proposals for the hearing, and                  4 those were circulated on 3 May.                  5 In summary, our submissions, which follow on from                  6 the representations made by Mr Emerson at the hearing                  7 last year, set out the proposed topics and institutions                  8 for consideration during this first case study at the                  9 end of this year. Submissions from core participants'                  10 representatives were sought by 26 May 2017.                  11 Before I move to the agenda and the submissions upon                  12 it, may I make some brief and general observations in                  13 relation to three core topics which recur throughout                  14 submissions received and which may assist you, Chair,                  15 and the Panel to have in the back of your minds when you                  16 consider the agenda and the submissions you will hear.                  17 First of all, something already referred to by you,                  18 Chair, is the scope. It should be borne in mind that                  19 the Roman Catholic limb of the inquiry is very wide. We                  20 have, to date, received over 11,000 documents,                  21 predominantly in relation to the two selected case                  22 studies mentioned. The Birmingham and Benedictine case                  23 studies previously selected are but two studies within                  24 that wider investigation, and the selection of those two                  25 is not exhaustive, nor does it necessarily preclude</p> <p style="text-align: center;">Page 8</p>

<p>1 other enquiries or other lines of investigation being                  2 pursued or indeed further case studies considered at                  3 a later stage. You will no doubt wish to bear that in                  4 mind when we come to the submissions by the Comboni                  5 representatives.                  6 Secondly, in relation to core participant status, it                  7 must be remembered that when individuals were granted                  8 core participant status, it was made plain in the                  9 notices of determinations that were sent out that the                  10 inquiry is obliged to take a proportionate approach to                  11 its investigation and will not be in a position to                  12 investigate fully the circumstances of each and every                  13 core participant's personal experience.                  14 It must be remembered that there is a difference                  15 between the status of a core participant and a witness.                  16 Individuals have been designated core participants                  17 because they have a significant interest in the matters                  18 under investigation within the Roman Catholic Church                  19 investigation. That allows them to take part in                  20 proceedings, to make submissions, to receive relevant                  21 disclosure and to be represented at inquiry hearings,                  22 but it does not necessarily mean that their evidence                  23 will always automatically fall to be adduced or that the                  24 inquiry will be in a position to investigate their                  25 specific experiences.</p> <p style="text-align: center;">Page 9</p>	<p>1 to sign and return in order that the disclosure process                  2 may begin.                  3 I will deal with the responses and undertakings                  4 received at a later point, but flowing on from this and                  5 the need for undertakings, may I address one further                  6 matter that may have caused you, Chair, and the Panel,                  7 some concern, and that is the two reports that have                  8 appeared in the media within the last two weeks, one in                  9 the Scottish press on 14 May and one in The Times on                  10 29 May.                  11 THE CHAIR: Yes, Ms Karmy-Jones. I want to comment here.                  12 We were indeed concerned to see the press coverage. It                  13 seemed to suggest that I had made a decision to exclude                  14 Fort Augustus and Ealing Abbey. I would like to make it                  15 clear that I have not made any such decision.                  16 MS KARMY-JONES: Yes.                  17 THE CHAIR: The whole purpose of today's hearing is to hear                  18 submissions from you as counsel to the inquiry and any                  19 submissions from other representatives of core                  20 participants, so that myself and the Panel can come to                  21 a view on these matters and make a decision.                  22 Carry on, Ms Karmy-Jones.                  23 MS KARMY-JONES: Yes, that is precisely the concern that we                  24 wish to address because, as indicated, the solicitor to                  25 the inquiry team circulated counsel to the inquiry's</p> <p style="text-align: center;">Page 11</p>
<p>1 The accounts given by core participants will be                  2 considered together with those of non-core participant                  3 witnesses, and a selection will be made on the basis of                  4 those that are most helpful to the Panel in considering                  5 the core issues that you must determine, bearing in mind                  6 the scope as already outlined, and consideration will be                  7 given as to how best to adduce that evidence. There are                  8 many ways that this can be done, and I will come back to                  9 this a little later in my submissions, but some may give                  10 evidence live, some may be read, some may be gisted or                  11 admitted. A decision will be taken in due course.                  12 As far as disclosure is concerned, the next matter,                  13 as the Chair and Panel are aware, there is no statutory                  14 right to disclosure, but fairness will generally lead to                  15 core participants being provided with disclosure of                  16 relevant documentation in relation to those parts of the                  17 inquiry in which they have a clear interest.                  18 The Chair has a statutory obligation to avoid any                  19 unnecessary cost, and the Chair has previously indicated                  20 that it will be appropriate to manage disclosure with                  21 a view to the specific interest of each core participant                  22 within the investigation. A procedural note regarding                  23 disclosure to core participants was circulated on 3 May,                  24 together with our submissions, and together with                  25 a confidentiality undertaking for all core participants</p> <p style="text-align: center;">Page 10</p>	<p>1 submission document for the purpose of today's hearing                  2 on 3 May and it is plain that there has been                  3 misunderstanding not only about the status of that                  4 document and what it represents, but also what it                  5 actually proposes.                  6 There are four matters really that arise. First of                  7 all, those submissions of course are only counsel to the                  8 inquiry's submissions, our proposals. They do not, as                  9 you have indicated, reflect your decisions on any                  10 matters. No decisions have been made, nor will they be,                  11 until the Panel and you, Chair, hear what all parties                  12 have to say.                  13 Secondly, the submissions were circulated with                  14 a covering email which made it absolutely clear that                  15 they were circulated on a confidential basis and they                  16 should not be disseminated more widely than necessary to                  17 take instructions. Notwithstanding that, it appears                  18 because of the news reports that confidentiality has                  19 been breached, and the submissions document prepared in                  20 advance of today's hearing appears to have been misread,                  21 misinterpreted and, as a consequence, our submissions                  22 have been misreported.                  23 Thirdly, the articles published have suggested that                  24 a decision has been made to exclude both Fort Augustus                  25 Abbey and Ealing Abbey and their associated schools from</p> <p style="text-align: center;">Page 12</p>

<p>1 the Roman Catholic investigation. Those reports don't                  2 reflect accurately the true position. They don't                  3 reflect accurately the initial scope of the inquiry, the                  4 initial position, as far as Fort Augustus is concerned,                  5 the counsel to the inquiry submissions made. And they                  6 are unfortunate, not least because of the very real                  7 distress that they will have caused a number of                  8 individuals, including core participants and potential                  9 witnesses to these matters.</p> <p>10 Fourthly and finally, what we ask you, and what we                  11 will ask again at the conclusion of these submissions,                  12 is that greater care is taken with the dissemination of                  13 confidential material so as to avoid things being                  14 misunderstood and misinterpreted, and, as I will come to                  15 a little later, we will be asking firmly for any                  16 outstanding undertakings to be signed in respect of                  17 disclosure.</p> <p>18 If I may, I won't deal specifically with the                  19 positions of Ealing and Fort Augustus now, but come to                  20 them when they come to their place within the rest of                  21 the agenda. The agenda is at tab 1 of your bundle, and                  22 a summary of issues for this hearing is there.</p> <p>23 In short, the main issues which fall for                  24 consideration this morning are as follows: an                  25 investigation update, which I will give in a moment; and</p> <p style="text-align: center;">Page 13</p>	<p>1 LORD CARLILE: Forgive me, madam, but sitting behind                  2 Ms Karmy-Jones, it is quite difficult to hear some of                  3 what is said. It is not her fault. There is an                  4 amplification system, but it is not amplifying very                  5 much. I wonder if it could be turned up, particularly                  6 for those of us who perhaps don't hear quite as well as                  7 some of the younger people in the room.</p> <p>8 MS KARMY-JONES: I don't know if that helps, moving the                  9 microphone. Thank you, Lord Carlile.</p> <p>10 Just to update you, Chair, and the Panel, I am going                  11 to provide a short overview of the work undertaken since                  12 the last preliminary hearing, again some time ago, at                  13 the end of July 2016.</p> <p>14 In summary, we have made requests for disclosure of                  15 the following organisations: the English Benedictine                  16 Congregation for the EBC and also on behalf of various                  17 other EBC institutions: Belmont Abbey, Buckfast Abbey,                  18 Curzon Park, Douai Abbey, Downside Abbey, Downside                  19 School, St Mary's Abbey and Stanbrook Abbey, Worth Abbey                  20 and Worth School; Ampleforth Abbey Trust; Ealing Abbey;                  21 Sussex Police; Lancashire Police; the Archdiocese of                  22 Birmingham; Cumbria Police; Catholic Church Insurance                  23 Association; the Catholic Safeguarding Advisory Service;                  24 the National Catholic Safeguarding Commission; Charity                  25 Commission; various treatment and counselling services;</p> <p style="text-align: center;">Page 15</p>
<p>1 as part of that, we suggest the submissions on behalf of                  2 F1 to F12, represented by Howe &amp; Co, that there should                  3 be a case study concerning the Comboni Missionary Order,                  4 should be heard.</p> <p>5 Submissions then from counsel to the inquiry and                  6 core participants on the proposed institutions to be                  7 considered, namely Ampleforth, Downside and Worth, as                  8 part of which we suggest including submissions as to the                  9 inclusion of St Benedict's, Ealing Abbey and                  10 Fort Augustus.</p> <p>11 Thereafter, specific submissions in respect of                  12 proposed topics for the case study in November; an                  13 update on core participant applications; questions                  14 around disclosure and timetabling; and any directions,                  15 if necessary.</p> <p>16 I may have said in the introduction we received                  17 submissions on behalf of Adrian Child only late                  18 yesterday. I will try to refer to them, along with                  19 other submissions received, in respect of the topics                  20 I have set out. Should any substantial issues arise, it                  21 may mean that we need time to reflect, having only                  22 received those yesterday. Similarly, very brief                  23 submissions were received this morning from J4,                  24 represented by Mr Collins.</p> <p>25 By way of an investigation update, if I may --</p> <p style="text-align: center;">Page 14</p>	<p>1 and the Holy See.</p> <p>2 We have also requested witness statements from                  3 a number of individuals, including Adrian Child, the                  4 former director of Catholic Safeguarding Advisory                  5 Service, which has now been received in draft; Dom                  6 Richard Yeo, Abbot President of the English Benedictine                  7 Congregation, also received in draft; 18 complainant                  8 core participants, 15 of which have been received in                  9 draft. We anticipate making requests of all complainant                  10 core participants over the coming weeks and months.</p> <p>11 In terms of the Archdiocese of Birmingham, prior to                  12 the last preliminary hearing we made a wide-ranging                  13 request for material relevant to this investigation from                  14 the Archdiocese. A significant amount of material has                  15 subsequently been received. Looking forward, it is                  16 likely that we will make further requests for disclosure                  17 relating to the Archdiocese of Birmingham case study.                  18 But as per our submissions today, we propose that our                  19 focus on the forthcoming months be on the English                  20 Benedictine case study at the hearing in November.</p> <p>21 That may be an appropriate moment for the minute's                  22 silence. It is 11.00 am.</p> <p>23 (Minute's silence observed)</p> <p>24 THE CHAIR: Thank you. Please continue.</p> <p>25 MS KARMY-JONES: If I can just now then turn to the question</p> <p style="text-align: center;">Page 16</p>

<p>1 of the Comboni Missionary Order.                  2 COMBONI MISSIONARY ORDER                  3 Submissions by MS KARMY-JONES                  4 MS KARMY-JONES: Core participants F1 to F12, related by                  5 Howe &amp; Co and Mr Enright, have in their written                  6 submissions argued that there should be a case study                  7 concerning the Comboni Missionary Order, which has also                  8 been known as the Verona Fathers. I won't go into                  9 a great deal of detail, but suffice to say that                  10 allegations of abuse are made by pupils at St Peter                  11 Claver College in Yorkshire and it is said the order was                  12 repeatedly made aware of the abuse. The college itself                  13 closed in the 1980s.                  14 This is not the first occasion upon which this has                  15 been raised. Howe &amp; Co submitted an application dated                  16 22 June 2016. A renewed application was subsequently                  17 received on 11 November 2016. It was at that stage                  18 considered that statements from their clients should be                  19 obtained in the first instance, and that any further                  20 steps that may be required could be considered after                  21 that. Those statements were requested from the Comboni                  22 complainants in January and these now have been provided                  23 in draft.                  24 The submissions for today repeat the request to                  25 designate the Comboni Missionary Order as a case study</p> <p style="text-align: center;">Page 17</p>	<p>1 Missionary Order's inclusion carry sufficient weight for                  2 that to be done. But you may wish to hear Mr Enright                  3 make his submissions.                  4 THE CHAIR: Thank you. Mr Enright?                  5 Submissions by MR ENRIGHT                  6 MR ENRIGHT: Good morning, Mr Frank, Professor Jay,                  7 Sir Malcolm, Ms Sharpling.                  8 You will have read our submissions on behalf of F1                  9 to F12, many of whom are here today, some in the room,                  10 some in the adjoining annex, who have travelled a long                  11 way to be here, including from Ireland. My friend has                  12 mentioned that my clients were granted core participant                  13 status almost exactly a year ago. They represent a very                  14 significant proportion of core participants in this                  15 investigation, and it is therefore extremely odd that                  16 the institution from which they come has not been                  17 designated as a case study.                  18 As I said, F1 to F12 have waited a very long time                  19 for this inquiry. However, anxious as they quite                  20 naturally are for the investigation to make rapid                  21 progress, my clients accept the apparently irresistible                  22 logic of the submissions in support of adjourning the                  23 examination of the English Benedictine case study in                  24 November. You will hear more on that, I believe, from                  25 most of the institutional and complainant core</p> <p style="text-align: center;">Page 19</p>
<p>1 and suggest other individuals from whom the inquiry                  2 should obtain evidence. We will consider those in due                  3 course. In very short summary, the basis of the                  4 application is that neither the English Benedictine                  5 Congregation nor the Catholic Archdiocese of Birmingham                  6 can provide the inquiry with sufficient reliable                  7 material or evidence to satisfy the scope of the                  8 investigation.                  9 Again, I will let Mr Enright make his own                  10 submissions, but our position, briefly, so that he may                  11 consider it, is that there have been three occasions                  12 when the submissions have been put forward. Howe &amp; Co,                  13 we note, do not seek the inclusion of the Comboni                  14 Missionary Order at the expense of one of the inquiry's                  15 currently selected case studies. As I mentioned at the                  16 outset, the current focus of this hearing must                  17 necessarily be on the Benedictine case study.                  18 We will also need to progress the Archdiocese of                  19 Birmingham study and it is our view that, given the need                  20 to adopt a proportionate and focused approach to all                  21 investigations, you may wish to keep the matter under                  22 review, certainly until the Benedictine aspect of the                  23 investigation is concluded, at which stage it may be                  24 possible to assess with more certainty whether the                  25 observations provided by Howe &amp; Co for the Comboni</p> <p style="text-align: center;">Page 18</p>	<p>1 participants later.                  2 F1 to F12 do not wish to do anything that would                  3 jeopardise the English Benedictine investigations.                  4 However, if the inquiry agrees to adjourn the                  5 investigation of the English Benedictine Congregation,                  6 then my clients urge the inquiry not to simply shrug its                  7 shoulders and adjourn the scheduled hearing, and to lose                  8 that valuable time, but to use the time already set                  9 aside to make rapid and positive progress towards two                  10 overarching priorities.                  11 In our view, they are to use the next six months and                  12 the two-week hearing to get a true understanding of what                  13 this organisation, the Catholic Church, is: how it                  14 works, how it is overseen and how it is regulated.                  15 Chair, Panel, this organisation oversees the education                  16 of 10 per cent of children in England and Wales. We                  17 must understand what it is and how it works. The shroud                  18 of mystery that surrounds its operation must be drawn                  19 back.                  20 Secondly, madam, we suggest that you use the coming                  21 months and the two-week hearing period for the inquiry                  22 to get the evidence and data and statistics held by the                  23 Catholic Church centrally regarding the prevalence of                  24 child sexual abuse in the Catholic Church institutions                  25 historically and presently across England and Wales.</p> <p style="text-align: center;">Page 20</p>

<p>1 The true extent of the risk presented by the Catholic 2 Church must be understood, so that robust and reliable 3 safeguards can be recommended, and recommended early. 4 Chair, we say that significant progress can be made 5 towards these priorities by doing two things. The first 6 is by designating St Peter Claver College and the 7 Comboni Missionary Order as a case study because it is 8 truly representative of a significant proportion of the 9 Catholic Church, which we say the English Benedictines 10 clearly are not, and I will return to that. Secondly, 11 to invite applications for core participant status or to 12 invite witness evidence from the Archbishop of 13 Westminster and the Secretary General of the Union of 14 Superiors General. 15 Chair, I stress this again: in our written 16 submissions and again today, we stress that we consider 17 the investigation of the English Benedictines to be 18 vital and an important task, not least, of course, for 19 our client F13. However, madam, in our written 20 submissions we went to some length to attempt to explain 21 the truly Byzantine structure of the Catholic Church, 22 with its hundreds of orders and congregations and 23 organisations, and the opaque, complex and fractured 24 nature of that organisation. 25 As I say, it is an organisation that is responsible</p> <p style="text-align: center;">Page 21</p>	<p>1 a couple of independent coffee shops. It just doesn't 2 work. I don't need to repeat those submissions today 3 because, very helpfully, Mr Kelly QC, on behalf of 4 Ampleforth School and Abbey, has very clearly set that 5 out at paragraphs 2 and 3 of his submissions, where he 6 says: 7 "Ampleforth is separate and distinct as a legal 8 entity from the English Benedictine Congregation. The 9 English Benedictine Congregation do not control, nor 10 administer, Ampleforth. Each abbey within EBC is 11 autonomous and self governing. This is acknowledged by 12 all concerned." 13 We therefore know that the English Benedictine 14 Congregation is made up of autonomous and unconnected 15 abbeys, and cannot provide the evidence which the 16 inquiry needs to draw reliable conclusions regarding the 17 Catholic Church generally. We know it. 18 However, St Peter Claver Seminary College and the 19 Comboni Order can provide part of the representative 20 picture that the inquiry is seeking because the Comboni 21 Missionary Order does conform to the norms of a large 22 section of the Catholic Church, unlike the EBC. 23 Madam, you will recall from the draft statements 24 that my friend has referred to that F1 to F12 attended 25 a Catholic seminary college, St Peter Claver Seminary</p> <p style="text-align: center;">Page 23</p>
<p>1 for and plays a significant role in the education of 2 over 900,000 children in England and Wales. It is an 3 organisation that has been dogged again and again by 4 reports, allegations and convictions in relation to 5 child sexual abuse in England and Wales, in Ireland, in 6 Australia and many other jurisdictions. It is an 7 organisation over which a dark and heavy cloud of 8 suspicion hangs, in terms of a widespread view that it 9 has inhibited the discovery of child sexual abuse, 10 inhibited the investigation of child sexual abuse and 11 has, it has been alleged, sheltered abusers in its 12 ranks. 13 Madam, we made detailed submissions to you that the 14 English Benedictine Congregation could not serve as 15 a reliable case study from which the inquiry could draw 16 general conclusions regarding child sexual abuse in the 17 Catholic Church in England and Wales. We submitted 18 that, contrary to the submissions of counsel to the 19 investigation -- she has rowed back from them a little 20 this morning -- each English Benedictine abbey and 21 school are completely separate and autonomous bodies 22 that do not represent either the Catholic Church or each 23 other. 24 Using it as a case study is akin to investigating 25 the financial circumstances of Starbucks Plc using</p> <p style="text-align: center;">Page 22</p>	<p>1 College, which was owned and operated by the 2 international Catholic order the Verona Fathers, now 3 known as the Comboni Missionary Order, who specialised 4 in the education of boys. A number of our clients 5 undertook advanced training on the role to becoming 6 priests of the order. F3 became a brother in the order 7 and worked as a missionary in Uganda. They therefore 8 have very significant knowledge of the operation of this 9 international Catholic order. 10 All 12 of these men credibly claim to have been 11 sexually abused as child seminarians by members of the 12 Comboni Order. It is likely that many more children at 13 that seminary were affected. They maintain that they 14 repeatedly reported the sexual abuse while they were 15 youthful seminarians, and that those reports were made 16 to senior members of the Comboni Order at the time it 17 was occurring. 18 For example, F6, who was the school captain of the 19 seminary college, led a delegation to the spiritual 20 adviser of the college, who advised them to gather 21 statements from other children detailing how they were 22 being sexually abused and to take them to the father 23 rector. He did so, with witnesses, presented the 24 statements from other children. Imagine the courage it 25 took for that boy at the time to confront the head of</p> <p style="text-align: center;">Page 24</p>

<p>1 a seminary college with this evidence. What happened?                  2 The abuser was removed from the school. Where was he                  3 sent to? To Uganda to become the Commissioner of                  4 Boy Scouts for that country.                  5 My clients continued to report that abuse in later                  6 life, up to and including reporting it to the head of                  7 the Comboni Order in the UK and internationally.                  8 Interestingly, those leading members of the Comboni                  9 Order -- the head in the UK, the head internationally --                  10 were also seminarians at this school with my clients at                  11 the time abuse was said to be endemic.                  12 You will be aware, madam, again, for example, from                  13 the witness statement of F3, that in legal                  14 correspondence the Comboni Order has confirmed:                  15 "It would appear that Father X did act                  16 inappropriately towards your client F3, but not with the                  17 intention to deliberately hurt him. Father X deeply                  18 regrets any hurt that may have in fact resulted from his                  19 inappropriate action."                  20 As I say, that priest was moved from the UK, but he                  21 continues to reside in the Comboni Order's mother house                  22 in Verona. Despite the admission in that legal letter,                  23 the Comboni Order did not notify the UK police of the                  24 allegations of sexual abuse regarding this or other                  25 priests of the order. That priest has never faced</p> <p style="text-align: center;">Page 25</p>	<p>1 itself has already written to the Comboni Order twice                  2 advising them to preserve their records.                  3 F1 and F12 are ready right now to step into the                  4 breach potentially created by the adjournment of the                  5 English Benedictine investigation. They are ready to                  6 proceed in November. The Comboni Order has undoubtedly                  7 complied with the inquiry's repeated direction to                  8 preserve their records. They must anticipate that there                  9 is every likelihood they will be designated as a case                  10 study. They will have six months to prepare themselves                  11 to be ready to appear before you.                  12 As we say, madam, the Benedictine Congregation                  13 cannot -- and we know this from their own submissions --                  14 provide you with what you need: a case study from which                  15 you can draw general conclusions. We know it. This                  16 case study can.                  17 My friend has subjected that this is a matter you                  18 can perhaps leave until a later point. You cannot. It                  19 would not be fair to do so. My clients have been core                  20 participants for a year. They have repeatedly applied                  21 for this institution to be designated as a case study.                  22 They have given substantial reasons. They have been                  23 asked to provide statements; they have provided the                  24 statements. They have been with the inquiry for many                  25 months. The most substantial representations have been</p> <p style="text-align: center;">Page 27</p>
<p>1 criminal prosecution, despite that admission. And in                  2 the same letter, madam, the order confirmed that that                  3 priest was to return to active ministry at the end of                  4 the administrative leave next month.                  5 You will recall also, madam, from my clients'                  6 statements, that another priest of the Comboni Order                  7 also attended St Peter Claver College as a student at                  8 the same time as a number of my clients; as I say, at                  9 a time when abuse was said to be endemic. That young                  10 men went on to be ordained as a priest of the Comboni                  11 Order; he went on to lead the Comboni Order in the UK;                  12 he went on to lead the Comboni Order internationally.                  13 That British man has been, and currently is, the                  14 Secretary General of the Union of Superiors General,                  15 that is to say, the person to whom all orders within the                  16 Catholic Church report. He is the man who can give this                  17 inquiry half of the data it needs.                  18 F1 to F12 are highly educated men. They are                  19 articulate, they are motivated. They have demonstrated                  20 this by their years of persistent campaigning and by                  21 their presence today, including travelling from Ireland                  22 at their own expense. They have already provided the                  23 inquiry with a very substantial body of evidence, in the                  24 shape of their draft section 9 witness statements and                  25 very substantially accompanying exhibits. The inquiry</p> <p style="text-align: center;">Page 26</p>	<p>1 put before you, we say, compelling to make the case for                  2 designation to provide you with what you need.                  3 So the time to determine that application is now.                  4 The window is open. They are ready to step into the                  5 breach, so this inquiry can make real progress and not                  6 lose this opportunity until next year.                  7 Secondly, Chair, we have urged you to invite                  8 applications for core participant status from the                  9 Archbishop of Westminster and the Secretary General of                  10 the Union of Superiors General. The reason for this is                  11 simple, and it is compelling.                  12 The Catholic Church freely admits that it is an                  13 exceptionally fragmented organisation. So fragmented is                  14 it that it has created a special council chaired by the                  15 distinguished Baroness O'Loan, supposedly to provide the                  16 inquiry with some kind of a single point of contact for                  17 the hundreds of separate limbs of the Catholic Church.                  18 Madam, notwithstanding the grant of core participant                  19 status to that council in July 2016, it is unlikely in                  20 the extreme that this council can speak for the hundreds                  21 of limbs of the Catholic Church and it is unlikely in                  22 the extreme that this council has any power to compel                  23 the elements of the Catholic Church to provide you with                  24 the evidence that you need.                  25 You have mentioned, madam, the suggestion that the</p> <p style="text-align: center;">Page 28</p>

<p>1 inquiry will be considering whether or not to maintain 2 the core participant status of individuals who were in 3 Fort Augustus in Scotland. One of my clients is 4 affected by that, and Mr Khan and others will be 5 addressing you in relation to that. I would say if you 6 were considering removing core participant status from 7 anyone, it should be the Catholic Council, unless it can 8 persuade you that it does indeed have the power to speak 9 for the Catholic Church and does indeed have the power 10 to compel compliance with this inquiry. 11 However, madam, the Archbishop of Westminster and 12 the Secretary General of the Union of Superiors General 13 are two persons with the authority to speak for the two 14 wings of the Catholic Church in England and Wales; that 15 is, the diocesan structure and the order structure. 16 They are the two persons who have control over the 17 Catholic Church's central records and they can provide 18 you with the data and statistical evidence that you need 19 to get the clear national picture. They are also the 20 individuals who are able to give you the Catholic 21 Church's corporate response to issues of child 22 protection and child sexual abuse. 23 Madam, you will not get that information that you 24 need from the autonomous English Benedictines and you 25 will not get it from the powerless and toothless</p> <p style="text-align: center;">Page 29</p>	<p>1 submissions, and we will give it full consideration. 2 Thank you. 3 Ms Karmy-Jones? 4 Submissions by MR KHAN 5 MR KHAN: Madam, I know that I wasn't indicated as being 6 a speaker on this particular topic, but may I address 7 you, because we do support what Mr Enright has said and 8 I think it is right that we put that on record. So may 9 I do so, for the purposes of the Panel to know that, 10 certainly on behalf of our clients, we agree with the 11 submissions made by Mr Enright this morning. 12 Can I put that on the record as far as our client is 13 concerned, both in relation to the Comboni missionary 14 report and can I add one further -- apologies, I have 15 not been able to address that at this hearing, but we 16 intend to submit -- and we ask for 14 days -- on behalf 17 of G6, who is a core participant, that the Daughters of 18 Charity of St Vincent de Paul, a Catholic order and 19 registered charity with influence in England, should 20 also be made a case study, and not least because the EBC 21 are not representative of how the Daughters of Charity 22 of St Vincent de Paul are governed. We ask for 14 days 23 in relation to that submission, if we may. If there is 24 a need for directions at the end, if we could do that. 25 Also in relation to the core participant</p> <p style="text-align: center;">Page 31</p>
<p>1 Catholic Council. You will, however, get it from the 2 Archbishop of Westminster and from the Secretary General 3 of the Union of Superiors General. 4 So we urge you, madam, to provide applications for 5 core participant status from these men, or to call them 6 as witnesses, so that you and the Panel can get an 7 understanding of the true picture of child sexual abuse 8 within an organisation, an opaque organisation, that has 9 10 per cent of British schoolchildren under its care. 10 With the benefit of this representative case study, the 11 Comboni Missionary Order, and armed with the reliable 12 nationwide data, the inquiry will be in a strong 13 position to begin reaching reliable conclusions with 14 general application regarding the Catholic Church's 15 knowledge of actions and responses to child sexual abuse 16 in England and Wales. 17 Madam, I would urge you in the strongest possible 18 terms to seize this opportunity. My clients are ready. 19 The Comboni Order is ready. It can provide you with 20 what you need. Designate it as a case study. Call the 21 two individuals I have identified as core participants. 22 Thank you. 23 THE CHAIR: Thank you, Mr Enright. You have raised some 24 very important points, both in your presentation this 25 morning and in your very comprehensive written</p> <p style="text-align: center;">Page 30</p>	<p>1 applications, we do also adopt Mr Enright's submissions 2 in relation to the Archbishop of Westminster and the 3 Secretary General of the Union of Superiors General 4 being invited to be core participants, for the reasons 5 he set out. 6 LORD CARLILE: Can you speak up, please. 7 MR KHAN: Of course. 8 Whilst I am on the topic, can I raise the issue of 9 confidentiality. I don't know whether that is going to 10 be a topic of discussion later. But it having been 11 raised in relation to Fort Augustus, it is important 12 that I deal with that, if I can, at this stage, because 13 there are some concerns in relation to the approach 14 taken by the inquiry in relation to those sorts of 15 documents being sufficient documents. 16 I am not aware of the reports that my learned friend 17 is referring to; I have not seen them. The other thing 18 to say is that we take seriously the obligations arising 19 from the undertakings, completely and utterly, without 20 question. However, we do question why the 21 confidentiality agreement should cover the submissions 22 which are made, without consideration of the detail of 23 the individual section. 24 Given that we are in a public hearing, the default 25 position is that everything should be public unless</p> <p style="text-align: center;">Page 32</p>

<p>1 there is good reason why it should not. I couldn't see                  2 anything in those submissions, and certainly in the                  3 submissions by the other party, the core participants,                  4 which would suggest that material should not be made                  5 public, and indeed at this hearing it is being made                  6 public. Notwithstanding what I say in relation to the                  7 obligations, I wonder whether the Panel ought to                  8 consider whether it is right that, in the context of                  9 a public hearing, these documents ought not to be                  10 covered by that obligation. If there are matters in                  11 there which are sensitive, they can be redacted. But                  12 given that we are all going to be hearing about matters                  13 in those documents, I don't see why they should be                  14 covered by that particular undertaking.</p> <p>15 THE CHAIR: Thank you, Mr Khan. Ms Karmy-Jones?                  16 Submissions by MS KARMY-JONES</p> <p>17 MS KARMY-JONES: May I just address three matters.                  18 First of all, in relation to Mr Enright's                  19 submissions, can I be clear that there is no suggestion                  20 that core participant status is being removed from his                  21 clients. That status was granted on 22 June. We don't                  22 suggest that that should be removed.</p> <p>23 Secondly, of course we will give full and proper                  24 consideration to what evidence we may need to obtain,                  25 and from whom, in relation to the wider Catholic</p> <p style="text-align: center;">Page 33</p>	<p>1 address more fully in writing why we say that that is                  2 flawed as a matter of canon law, and we will do so. But                  3 can I make two short points?</p> <p>4 The first is that of course the Catholic Council was                  5 designated not only in this case study but in relation                  6 to the investigation into child migration, where it has                  7 been carrying out the role which it proposed it would                  8 do; that is, to assist the inquiry in marshalling the                  9 information and work from a number of other                  10 organisations and institutions within the Catholic                  11 Church in England and Wales. It has done that, we would                  12 hope, successfully, and will continue to do that during                  13 part 2 of that investigation. It may be, of course,                  14 that not all core participants in this investigation are                  15 aware of the role it has already carried out there. Of                  16 course, if the inquiry has concerns that it isn't                  17 assisting it to its full ability, then no doubt those                  18 would be raised with us, but to date we are not aware of                  19 any such concerns.</p> <p>20 Of course, so far as compulsion is concerned, the                  21 question ultimately is not, does the Catholic Council                  22 have the power to compel any individual constituent part                  23 of the Roman Catholic Church in England and Wales; the                  24 question is whether this inquiry has the power, and of                  25 course it does.</p> <p style="text-align: center;">Page 35</p>
<p>1 investigation. In so doing, we of course are going to                  2 take on board submissions made by him and by other core                  3 participants as to individuals who may be helpful to the                  4 Panel and from whom evidence may be obtained.</p> <p>5 But it is important, thirdly, to remember that not                  6 all parties need to be core participants for statements                  7 to be requested from them. So in due course, should any                  8 of those named by Mr Enright be considered helpful,                  9 should it be necessary to obtain evidence from them, we                  10 can do that, and of course we are going to give that                  11 consideration.</p> <p>12 In respect of Mr Khan's submissions in relation to                  13 undertakings and disclosure, that is part of the agenda,                  14 and may I suggest that we return to that later on,                  15 because I have no doubt that others will wish to make                  16 submissions and the Panel will be assisted by hearing                  17 them all as a piece. But I have no further submissions                  18 to make as far as Mr Enright's observations and                  19 application are concerned at this stage.</p> <p>20 Submissions by MS GALLAFENT</p> <p>21 MS GALLAFENT: Chair, I wonder if I might make a very short                  22 point on behalf of the Catholic Council?</p> <p>23 It has been suggested that, as it were, it shouldn't                  24 be a core participant and others should be core                  25 participants in its stead. We would be very happy to</p> <p style="text-align: center;">Page 34</p>	<p>1 We will then, on the second point, perhaps just                  2 submit in writing why we say the answer isn't as simple                  3 as simply saying that one can substitute us for the                  4 archbishop, Vincent Nichols, and the father, David                  5 Glenday. That simply doesn't work as a matter of canon                  6 law and the jurisdiction that those individuals do or                  7 don't have over other institutions in the Catholic                  8 Church. It is precisely because of those difficulties                  9 that the Catholic Council was put together in order to                  10 assist the inquiry, and we are keen to continue to do                  11 so.</p> <p>12 THE CHAIR: Thank you, Ms Gallafent.</p> <p>13 MS KARMY-JONES: May I then move on to the next matter on                  14 the agenda, which is counsel to the inquiry's                  15 submissions in respect of the English Benedictine                  16 Congregation case study in November and December of this                  17 year.</p> <p>18 The submissions circulated on 3 May focused on two                  19 principal issues: the topics to be covered at the case                  20 study hearing and the selection of institutions. I am                  21 going to touch on the topics proposed and then focus on                  22 the selection of institutions and suggest that I deal                  23 with these together, and then with the question of                  24 St Benedict's and Ealing Abbey and Fort Augustus, after                  25 which you may wish to hear submissions as a piece,</p> <p style="text-align: center;">Page 36</p>

<p>1 because there is a significant amount of overlap between                  2 each of those chapters, if you like, in the submissions                  3 provided to us. Then we will deal with the detail of                  4 topics and suggestions as to amendment thereafter, if we                  5 may.                  6 Dealing first, and just to set the context, the                  7 topics to be considered at the English Benedictine case                  8 study are set out in the document at paragraphs 6 to 9                  9 of our submissions, which is behind your divider 2. To                  10 a certain extent this covers some of what has been said                  11 already. But we do propose, at the outset of the                  12 hearing in November/December, to include some summary                  13 introductory evidence which will cover a series of                  14 topics which will be relevant to the wider investigation                  15 and which the Panel may continue to take into account as                  16 proceedings evolve.                  17 First of all, an overview of the structure and                  18 organisation of the Roman Catholic Church, in particular                  19 in relation to the English Benedictine Church, to set it                  20 in context; the role of central bodies within the                  21 Catholic Church within England and Wales; an explanation                  22 of the central English Benedictine Congregation,                  23 including its structure, safeguarding procedures and                  24 practices, and the relationship that it has with                  25 affiliated schools; the duty of schools in respect of</p> <p style="text-align: center;">Page 37</p>	<p>1 In our document at paragraph 8, we stress that the                  2 focus of the investigation is on the institutional                  3 response to the allegations, and so the evidence in                  4 relation to the topics will be adduced in that context.                  5 Some accounts from complainants should be adduced to                  6 provide general context to the institutional responses,                  7 and we will come on to that again a little later.                  8 A guide to the evidence in paragraph 9 of the                  9 submissions document stresses that the topics listed are                  10 simply a guide to the evidence that's likely to be                  11 heard, but that the scope will be kept under review. It                  12 is possible that further evidence will be received that                  13 indicates that further evidence is required, and so will                  14 be called, on other topics and beyond those listed. If                  15 that should happen, we will notify core participants at                  16 the earliest opportunity.                  17 Moving on to the institutions to be included, again,                  18 the inquiry intends to adopt a proportionate approach to                  19 each of its hearings, and to that end we have gathered                  20 evidence related to all Benedictine institutions within                  21 England and Wales, including to all schools and abbeys                  22 affiliated with the English Benedictine Congregation.                  23 A preliminary review has been undertaken and our                  24 proposal, as set out in our submissions document, is                  25 that the hearing this year should consider Ampleforth</p> <p style="text-align: center;">Page 39</p>
<p>1 child protection and canon law. So setting the scene,                  2 if you like.                  3 We submit that evidence should then be adduced                  4 covering a number of themes specifically in relation to                  5 the English Benedictine Congregation: governance                  6 arrangements; child protection policies in place within                  7 each school and the abbeys, in particular from 1994 to                  8 date, but also including their evolution. So we don't                  9 restrict it to the latter part, but we suggest that                  10 practically it will be inevitable that the focus is on                  11 the latter part.                  12 One of -- I think it may be Mr Khan queries the                  13 selection of the 1994 date. Can I just explain that                  14 that date is the date of a working party report received                  15 by the Catholic Bishops' Council called "Child Abuse:                  16 Pastoral and Procedural Guidelines". It is just                  17 a marker, that is all. That is why the date is there.                  18 But it is not prescriptive.                  19 We also propose to cover recruitment, vetting and                  20 training within the English Benedictine Church;                  21 reporting mechanisms for staff, monks, children, adults                  22 to report safeguarding concerns; the responses to the                  23 allegations of abuse, when reported; and how liaison was                  24 made, and other authorities such as local authorities                  25 were involved, following such allegations of abuse.</p> <p style="text-align: center;">Page 38</p>	<p>1 Abbey, Ampleforth School, including the prep school of                  2 St Martins; Downside Abbey and Downside School; and                  3 Worth Abbey and Worth School.                  4 With respect to Worth, there is a caveat that we set                  5 out at paragraph 10(c) of the submissions document, and                  6 it is simply this: that further evidence has been                  7 requested and a further review of evidence recently                  8 completed. As a result of that, we have asked for more                  9 information concerning potential allegations of child                  10 sexual abuse, and we understand that Kingsley Napley are                  11 now ready to provide that material to the inquiry. That                  12 will need review, and after that the Chair and the Panel                  13 may wish to consider whether it is appropriate to                  14 include Worth Abbey and Worth School within the hearing                  15 in December.                  16 In general terms, it is our submission that the                  17 selection of those three institutions for particular                  18 scrutiny at the hearing will enable the Panel to                  19 consider the thematic issues in sufficient detail to                  20 enable you to make findings and recommendations as                  21 appropriate. There will be evidence, as I have                  22 indicated, in relation to other English Benedictine                  23 Congregation-affiliated abbeys and schools that will                  24 help to inform the Chair and the Panel in relation to                  25 the strand more generally. But it must be borne in mind</p> <p style="text-align: center;">Page 40</p>

<p>1 that the selection of the three abbeys and schools is 2 provisional and it should be kept under review, as we 3 will with all matters that come to light. 4 The three institutions we suggest provide the Chair 5 and the Panel with sufficient evidence to cover the 6 issues, for four reasons that are set out at 7 paragraph 12. 8 First of all, the institutions are still opening, 9 and a key aspect of the inquiry's remit is to make 10 recommendations for the future. To hear this part, the 11 evidence in relation to these three institutions will 12 give the Panel the opportunity to consider how the 13 approaches to safeguarding have changed over time, and 14 to look at how matters are being dealt with up to the 15 present day, and to make recommendations for what may be 16 improved upon. 17 The schools affiliated also contain a boarding 18 element, which may allow appropriate comparisons to be 19 drawn, and those comparisons will assist the inquiry in 20 making an assessment of the safeguarding measures that 21 each has in place, the consistency between them, and 22 again may assist in recommendations the Panel may seek 23 to make. 24 In respect of all three, allegations have been made 25 in the past, and that includes the more recent past,</p> <p style="text-align: center;">Page 41</p>	<p>1 take a break now. 2 (11.38 am) 3 (A short break) 4 (11.58 am) 5 THE CHAIR: Ms Karmy-Jones? 6 ST BENEDICT'S, EALING ABBEY AND FORT AUGUSTUS 7 Submissions by MS KARMY-JONES 8 MS KARMY-JONES: Moving on then to the submissions in 9 respect of St Benedict's, Ealing Abbey and 10 Fort Augustus, which I have already referred to. Of 11 course I know and the rest of the participants know that 12 you, Chair, and the Panel have received written 13 submissions, and really the purpose of this is to 14 amplify on those, but no doubt everyone would wish to 15 make the submissions that they seek to make in due 16 course. I am going to touch on some of the points they 17 raise, no doubt not all. 18 As already indicated, we propose the inquiry should 19 not, in this December hearing, deal with St Benedict's 20 and Ealing Abbey, nor with Fort Augustus, but that 21 Ealing should be revisited and the position insofar as 22 Ealing is concerned be considered at a later date, and 23 that developments in Fort Augustus should be kept under 24 review. The reasons for that are set out in our 25 submissions document on 3 May at paragraphs 13 to 18.</p> <p style="text-align: center;">Page 43</p>
<p>1 which gives rise to the question of whether the culture 2 within each institution has had any impact on the 3 possible failure to protect children from sexual abuse 4 and whether such failures are endemic, but no views have 5 yet been formed by the inquiry in relation to that, of 6 course. 7 Finally, individuals connected with each selected 8 institution, or their affiliated school, have either 9 been convicted or cautioned in relation to sexual 10 offences against children. May I make it plain: this is 11 by no means intended to minimise the position of those 12 complainants whose allegations have either not been 13 pursued to the courts or have not resulted in criminal 14 sanctions, nor to suggest that any such allegations will 15 be disregarded when evidence is selected. But the fact 16 of a conviction of itself is evidence of abuse within 17 the institution, without more, and is a fact that, in 18 our submission, the Panel may take into account, be 19 assisted by, in considering the safeguarding failings as 20 a whole. 21 I see the time, and I know that the Panel will be 22 wishing to take a mid-morning break. I am going to move 23 on to another topic, so if now is a convenient moment? 24 THE CHAIR: Yes, Ms Karmy-Jones. There is some way to go on 25 these matters, so I think it would be appropriate to</p> <p style="text-align: center;">Page 42</p>	<p>1 Dealing first with Ealing Abbey and St Benedict's 2 School, as you know, these were considered for selection 3 along with other institutions, but after the last 4 preliminary hearing in July 2016, counsel to the inquiry 5 became aware that a police investigation had been 6 instigated in relation to a significant individual 7 connected with Ealing Abbey, a senior figure within 8 St Benedict's and Ealing Abbey, over a considerable 9 period. That individual is alleged to have abused 10 a number of children who attended St Benedict's School 11 in Ealing across a number of years, through the '70s and 12 early '80s. 13 The inquiry has liaised with the Metropolitan Police 14 Service in relation to that investigation and have been 15 given to understand that the trial of that individual is 16 due to commence in or around October of this year. We 17 have been informed that the trial is likely to still be 18 ongoing when the inquiry's Benedictine case study 19 hearing begins in November. 20 The Chair and the Panel will be aware that the 21 published "Criteria for Selection of Investigations" 22 specifically states: 23 "The Panel will select situations which ... (c) 24 appear to involve no significant risk to the fairness 25 and effectiveness of any ongoing police investigation or</p> <p style="text-align: center;">Page 44</p>

<p>1 prosecution ..."</p> <p>2 Whilst that criterion primarily applies to the</p> <p>3 selection of investigations as a whole, we consider that</p> <p>4 the principles apply in these circumstances as well.</p> <p>5 It is our submission, as set out at paragraph 14 of</p> <p>6 our document, that consideration of the institutional</p> <p>7 responses to allegations of child sexual abuse at</p> <p>8 St Benedict's and Ealing would, of necessity, result in</p> <p>9 a consideration of this senior figure's role, at least</p> <p>10 to some extent. It is highly likely that there would be</p> <p>11 some crossover in the issues considered within the</p> <p>12 criminal trial and that we would be considering in</p> <p>13 relation to Ealing Abbey and St Benedict's.</p> <p>14 So we contend that it would be wholly inappropriate,</p> <p>15 and contrary to the criteria for selection, for that to</p> <p>16 be included in the case study in November/December, as</p> <p>17 to do so may create a risk of prejudice to those ongoing</p> <p>18 criminal proceedings.</p> <p>19 But we emphasise again, particularly in light of the</p> <p>20 news reports in the last few weeks, that we have not and</p> <p>21 do not suggest that you should at this stage take</p> <p>22 a decision to exclude St Benedict's and Ealing from</p> <p>23 consideration. Rather, we propose that the appropriate</p> <p>24 course would be that the matter be revisited once both</p> <p>25 the hearing in December and the criminal proceedings</p> <p style="text-align: center;">Page 45</p>	<p>1 that material on issues relevant to Ealing are not</p> <p>2 considered in any direct or significant way, to avoid</p> <p>3 the risk of prejudice that I have already averred to.</p> <p>4 Some complainant core participants represented by</p> <p>5 Slater &amp; Gordon make submissions and raise concerns from</p> <p>6 a slightly different perspective. They submit that</p> <p>7 irrespective of whether Ealing Abbey or St Benedict's is</p> <p>8 included in the November/December hearings, the</p> <p>9 Benedictine investigation hearings cannot take place at</p> <p>10 all if the criminal trial of the named individual</p> <p>11 remains ongoing at the time, saying that there is</p> <p>12 a serious risk of prejudicing the criminal trial or</p> <p>13 alternatively inhibiting those involved in these</p> <p>14 hearings from speaking freely.</p> <p>15 They further submit that this inquiry cannot</p> <p>16 properly consider all the issues relating to child</p> <p>17 protection in respect of child abuse in Benedictine</p> <p>18 institutions without examining the issues at Ealing.</p> <p>19 You have heard our submissions in respect of that. We</p> <p>20 don't propose that Ealing should, of necessity, fall by</p> <p>21 the wayside. The inquiry, they say, has already made</p> <p>22 a determination that Ealing Abbey should be included; we</p> <p>23 agree. The Benedictine hearings, they suggest, should</p> <p>24 be adjourned until the new year.</p> <p>25 They say that a separate hearing is impractical</p> <p style="text-align: center;">Page 47</p>
<p>1 have concluded, after which the Panel may take stock in</p> <p>2 the light of the evidence that it has already heard.</p> <p>3 Submissions have been received from the core</p> <p>4 participants and this aspect has caused some disquiet,</p> <p>5 it is fair to say. The Commissioner of the Police of</p> <p>6 the Metropolis endorse counsel to the inquiry's</p> <p>7 submissions. They, in their written submissions, do</p> <p>8 highlight that we suggest the right approach and for the</p> <p>9 right reasons, but emphasise specific concerns in the</p> <p>10 context of the investigation in relation to disclosure,</p> <p>11 an awareness of prejudice by reason of publicity and so</p> <p>12 forth, and also care must be taken in respect of the</p> <p>13 welfare of the complainants and in respect of the</p> <p>14 increased risk of reliance on the privilege against</p> <p>15 self-incrimination.</p> <p>16 Ampleforth, in their written submissions, have</p> <p>17 indicated they do not have an issue with counsel to the</p> <p>18 inquiry's approach. I think that position may now have</p> <p>19 changed, but no doubt Mr Kelly can address you on that</p> <p>20 in due course.</p> <p>21 Ampleforth further go on to suggest that it should</p> <p>22 be clarified if material on issues relevant to Ealing</p> <p>23 will or will not be considered at the substantive</p> <p>24 hearing, and we will keep that under review. However,</p> <p>25 subject to your views on our proposals, we would suggest</p> <p style="text-align: center;">Page 46</p>	<p>1 because it would be impossible to question witnesses</p> <p>2 from the other locations, and specify issues such as:</p> <p>3 why Ealing adopted Lord Carlile's recommendations for</p> <p>4 a reform of governance, but the other houses have made</p> <p>5 no attempt to reform their governance in a similar way;</p> <p>6 why the Catholic Church held an apostolic visitation</p> <p>7 only of Ealing; why the Charity Commission and</p> <p>8 Independent Schools Inspectorate made special enquiries</p> <p>9 about Ealing, but none of the other locations.</p> <p>10 In brief, may I set out our response. We don't</p> <p>11 consider that the criminal trial will be prejudiced by</p> <p>12 your consideration of other abbeys/schools connected</p> <p>13 with the English Benedictine Congregation. The</p> <p>14 Metropolitan Police Service, whom we anticipate are in</p> <p>15 contact with the Crown Prosecution Service, have not</p> <p>16 raised such concerns.</p> <p>17 Likewise, the Met Police do not raise concerns about</p> <p>18 the trial process itself. Those of us who operate in</p> <p>19 the criminal courts are well familiar with situations</p> <p>20 where there is potential for overlap between</p> <p>21 proceedings. We submit that providing those involved in</p> <p>22 the criminal case are kept informed of our proceedings</p> <p>23 and the lines of communication are open, that a strong</p> <p>24 direction can be given by the judge that any press</p> <p>25 reports must be disregarded.</p> <p style="text-align: center;">Page 48</p>

<p>1 We have some material from the Independent Schools                  2 Inspectorate already, likewise the Charity Commission,                  3 and we will consider and keep this under review and make                  4 further requests as is necessary.</p> <p>5 The definition of scope which is quoted by my                  6 learned friend is not a determination. We make that                  7 observation. It is intended to be flexible. It is                  8 a tool for the inquiry, insofar as it provides guidance                  9 as to the area to be investigated. We consider that the                  10 other issues raised can be dealt with effectively during                  11 the hearing, if care is taken and if it is appropriate                  12 for those points to be covered.</p> <p>13 Turning then, before perhaps representations are                  14 sought -- because they do overlap -- to the question of                  15 Fort Augustus: as you know, a school in Scotland                  16 affiliated with the English Benedictine Congregation.</p> <p>17 The former Chair designated as core participants                  18 a number of individuals who allege they were abused at                  19 Fort Augustus. They were designated on the basis that                  20 they allege they were abused by members of the English                  21 Benedictine Congregation, or in one case by clergy from                  22 a Catholic order whose headquarters were in England.                  23 They allege that monks were transferred from the English                  24 Benedictine Congregation's institutions in England and                  25 Wales to Scotland.</p> <p style="text-align: center;">Page 49</p>	<p>1 we suggest that is incorrect. Mr Emmerson was plainly                  2 speaking with the caveat that the scope of the inquiry                  3 was limited to England and Wales, and specifically                  4 references the issue being the movement of individuals.</p> <p>5 The interpretation that seems to have been put on                  6 that passage was raised by Mr Khan after the last                  7 hearing with solicitors to the counsel inquiry team, and                  8 last September in correspondence we clarified the                  9 position and made it quite plain, and that position has                  10 not changed. So the issues related to Fort Augustus                  11 would only ever have come within this inquiry's remit,                  12 we submit, only insofar as the inquiry examines                  13 institutional failures in England and Wales: for                  14 example, the English Benedictine Congregation or other                  15 institutions based in England and Wales. It is beyond                  16 our remit to consider institutions outside our                  17 jurisdiction.</p> <p>18 Of course, since the last hearing, Scotland has now                  19 established its own inquiry, the Scottish Child Abuse                  20 Inquiry. Their terms of reference require it, amongst                  21 other things, to investigate the nature and extent of                  22 abuse of children whilst in care in Scotland, and in                  23 January of this year the Scottish Child Abuse Inquiry                  24 announced that it will be investigating Fort Augustus,                  25 together with a number of other Catholic orders, as part</p> <p style="text-align: center;">Page 51</p>
<p>1 It is important to remember two things, and I deal                  2 with this in some detail because of the news reports.                  3 Firstly, the inquiry's jurisdiction is restricted to                  4 England and Wales. And secondly, rather than the                  5 specific allegations of abuse, the inquiry's remit is to                  6 investigate possible or alleged institutional failings                  7 in safeguarding.</p> <p>8 The matter that seems to have given rise to concern                  9 is an interpretation of a passage from Mr Emmerson's                  10 opening at the preliminary hearing in July 2016, set out                  11 in Mr Khan's document. But just to remind the parties                  12 of what he said, he said:</p> <p>13 "The inquiry's scope is limited to England and                  14 Wales, but because clergy involved in the Benedictine                  15 schools have been moved between Scotland, England and                  16 Wales, and because, despite being in Scotland,                  17 Fort Augustus Abbey and its schools were affiliated with                  18 the English Benedictine Congregation, we will                  19 investigate failures in relation to that school as                  20 well."</p> <p>21 It appears that the last sentence of that passage                  22 has been interpreted as meaning that this inquiry will                  23 investigate Fort Augustus as a whole, including the                  24 nature and extent of allegations of abuse there, and                  25 Fort Augustus as an institution's response to it. But</p> <p style="text-align: center;">Page 50</p>	<p>1 of its work. Their hearing when that was announced was                  2 on 31 January 2017.</p> <p>3 As the Scottish inquiry is itself looking at                  4 Fort Augustus, it is our view that evidence directly                  5 relating to Fort Augustus should not be adduced during                  6 our English Benedictine case study this year. By                  7 "evidence directly relating to Fort Augustus", we mean                  8 that in preparation for and during this year's hearing,                  9 the inquiry will not be investigating specifically                  10 whether there were any failings within the English                  11 Benedictine Congregation or other institutions in                  12 England and Wales in relation to the abuse at                  13 Fort Augustus because it falls into the Scottish                  14 inquiry's geographical area and so it is appropriate for                  15 them to consider it. The Chair and Panel can carefully                  16 consider the outcome of the Scottish investigation in                  17 due course. We will liaise with them over it, as is                  18 required under our terms of reference and theirs.</p> <p>19 However, the context of the consideration of                  20 Fort Augustus in relation to the three proposed selected                  21 institutions is this: that if evidence suggests that                  22 individuals were transferred to other institutions,                  23 which might include Fort Augustus, we suggest that the                  24 inquiry may consider the decision by the sending                  25 institution to transfer an individual and what</p> <p style="text-align: center;">Page 52</p>

<p>1 safeguarding efforts were put in place in relation to 2 that transfer.</p> <p>3 Of course the inquiry is not yet in a position to 4 say whether there will be such instances. Specifically, 5 and to be clear, we do not consider it would fall within 6 the inquiry's remit to investigate potential 7 institutional failures of Fort Augustus itself in 8 connection with any transfer to it.</p> <p>9 In terms of the submissions made, the English 10 Benedictine Congregation agree, I believe, with our view 11 that evidence directly related to Fort Augustus should 12 not be adduced during this case study hearing.</p> <p>13 Those who represent Ampleforth state it is 14 appropriate that allegations and concerns involving 15 Fort Augustus should be dealt with by the Scottish 16 inquiry, therefore they too agree.</p> <p>17 Representations have been made by core participant 18 F13, represented I believe by Mr Enright, who states he 19 was abused at Fort Augustus, and submissions received 20 from Howe &amp; Co on his behalf state that the matters 21 relied upon by counsel to the inquiry in respect of the 22 proposal relating to Fort Augustus were before the Chair 23 and the Panel at the time F13 was granted core 24 participant status. They say nothing has changed.</p> <p>25 It is clear from their submissions that F13</p> <p style="text-align: center;">Page 53</p>	<p>1 status were set out in the letter of the former Chair, 2 which did give that grant and made clear that it would 3 not be possible to investigate fully the circumstances 4 of every experience.</p> <p>5 Being a core participant in this inquiry is no bar 6 to applying for core participant status within the 7 Scottish inquiry. It is not clear from the submissions 8 received whether F13 has in fact applied for core 9 participant status there.</p> <p>10 G1 to G5, who are represented by Mr Khan, also 11 challenge the perceived proposal to exclude 12 Fort Augustus and rely on the commitment they say was 13 already made by the inquiry. They suggest that the 14 inquiry may be renegeing on that commitment and say that 15 G1 to G5 have a legitimate expectation that it will be 16 considered.</p> <p>17 I don't go into their submissions in detail. At 18 paragraph 8 they suggest that distress caused is 19 compounded by the reasons given for the selection of 20 Ampleforth, Downside and Worth, and Mr Khan may wish to 21 address you on that in due course. But again, our 22 response to that is, as with core participant F13, the 23 designation as a core participant does not mean that 24 their experiences will specifically be considered in any 25 event. A number of core participants have been</p> <p style="text-align: center;">Page 55</p>
<p>1 understands counsel to the inquiry's submissions to 2 amount to a proposal to remove Fort Augustus from the 3 English Benedictine case study and to exclude him from 4 the inquiry, which he submits is unfair. They make the 5 point that F13 is not a core participant in the Scottish 6 inquiry and say therefore that the Scottish inquiry will 7 not investigate his claims.</p> <p>8 In response to that, just a reminder that the 9 Scottish inquiry's announcement of its investigation 10 into Fort Augustus was announced after F13 was granted 11 core participant status on 15 July 2016. We maintain 12 that an investigation into Fort Augustus is more 13 properly in their remit.</p> <p>14 Just to reiterate, the fact that a particular core 15 participant's experiences will not be considered by the 16 inquiries as part of its investigation does not 17 undermine their core participant status. We are not 18 suggesting that the Chair withdraws core participant 19 status, and have never done so. The disclosure and the 20 other processes will still be available to them.</p> <p>21 The extent to which this inquiry may be able to hear 22 evidence from core participants is limited, and is 23 governed by questions of scope, relevance and probity, 24 and the core issues upon which decisions need to be 25 made. Again, the terms of granting core participant</p> <p style="text-align: center;">Page 54</p>	<p>1 designated who do not fall within either case study 2 currently selected. Their experiences may of course be 3 relevant to the inquiry's overall considerations and the 4 wider Catholic Church.</p> <p>5 We remind them of the distinction between core 6 participant status and witnesses, which I have already 7 dealt with. And a suggestion that they make at 7(iv) of 8 their document that disparities identified in the topics 9 identified -- put it this way: they, in effect, ask us 10 to investigate what the institutional response of the 11 Scottish institution was, which we cannot do. The 12 inquiry of course will bear in mind that a proportionate 13 approach must be adopted in respect of any hearing and 14 we cannot cover absolutely every aspect within this 15 hearing.</p> <p>16 The core participants represented by Slater &amp; Gordon 17 submit that the exclusion of Fort Augustus is wrong in 18 principle and risks depriving the inquiry of the full 19 picture, saying that there will be no opportunity to 20 investigate any decisions to make transfers from the 21 institutions selected to Fort Augustus. We don't accept 22 that. We can, we suggest, consider transfers from the 23 three institutions, whether or not we specifically 24 investigate the events at Fort Augustus itself.</p> <p>25 Further, we have only said that the evidence</p> <p style="text-align: center;">Page 56</p>

<p>1 directly related to Fort Augustus should not be adduced                  2 during the case study later this year, and we can                  3 consider how matters unfold, and the Panel may wish to                  4 consider this -- how they unfold -- with the Scottish                  5 inquiry later, after this initial case study.                  6 Mr Child has made some submissions as well asking                  7 for confirmation of the basis for selection, and has                  8 said that core participants need to be given disclosure                  9 appropriate for them to make submissions. I suggest                  10 that be dealt with during the disclosure section of our                  11 submissions. But, Chair, you may wish to consider all                  12 core participants' submissions at this stage in relation                  13 to those topics.                  14 THE CHAIR: Thank you, Ms Karmy-Jones. If people could                  15 attempt to be brief, whilst not undermining any of the                  16 important points they wish to make.                  17 Mr Enright?                  18 Submissions by MR ENRIGHT                  19 MR ENRIGHT: Hello again.                  20 Madam, F13 was granted core participant status in                  21 this investigation 11 months ago. In granting the                  22 application for core participant status, the Chair                  23 materially found:                  24 "While the abuse alleged by F13 is alleged to have                  25 taken place in Scotland, the school and abbey were</p> <p style="text-align: center;">Page 57</p>	<p>1 in England and Wales which relate to it. The school                  2 falls within the SCAI's geographical area and it is                  3 therefore appropriate that matters relating to it are                  4 considered by that inquiry in the first instance. The                  5 Chair and Panel can carefully consider the outcome of                  6 the SCAI's investigation in due course. The inquiry                  7 will liaise with the SCAI about this aspect of the                  8 investigation, as it is required to do under its terms                  9 of reference."                  10 We submit, madam, that the proposal put forward by                  11 counsel to the investigation, or the arguments put                  12 forward, flatly contradicts the basis upon which F13,                  13 and I believe also G1 to G6 and C18 and C19, were                  14 granted core participant status in the investigation.                  15 The issues highlighted were known to the Chair and she                  16 has specifically referred to them in her decision.                  17 Nothing has changed since F13, G1 to G6, C18 and C19                  18 were granted core participant status. There is                  19 therefore no proper basis to remove F13 from the                  20 inquiry.                  21 Madam, I also wish to raise that the chilling                  22 effect -- because I hear what my friend says about them                  23 not in fact or technically being removed, but the real                  24 effect is that they will be removed -- is that it will                  25 send a chill down the spines of every core participant,</p> <p style="text-align: center;">Page 59</p>
<p>1 affiliated with the English Benedictine Congregation.                  2 There is evidence of movement of monks between the abbey                  3 affiliated to the Congregation, including between                  4 England and Wales and Scotland. I am aware that the                  5 current Abbot President indicated in 2013 that the                  6 congregation would carry out an investigation into abuse                  7 alleged to have taken place at Fort Augustus. There is                  8 also, in the particular case, evidence that the                  9 Congregation has acknowledged responsibility for F13's                  10 abuse. I therefore consider that F13 has a significant                  11 interest in the matters under investigation with the                  12 Roman Catholic investigation, specifically the case                  13 study relating to the English Benedictines."                  14 The reasons for urging the effective removal --                  15 I hear what counsel to the inquiry says, but the                  16 effective removal -- of F13, as well as G1 to G6, C18                  17 and C19 from this investigation, and to remove                  18 Fort Augustus effectively from this case study, are set                  19 out by counsel to the inquiry's submissions at                  20 paragraphs 13 to 18, but materially at paragraph 18:                  21 "It is our view that the evidence directly related                  22 to Fort Augustus should not be adduced during the EBC                  23 case study hearing this year. The inquiry's remit is                  24 England and Wales and its interest in events at                  25 Fort Augustus is confined to any institutional failings</p> <p style="text-align: center;">Page 58</p>	<p>1 victim core participant, that is to say, because they                  2 will feel that if these individuals, who have been core                  3 participants for a year, who have been requested to give                  4 section 9 statements to the inquiry and have done so, as                  5 F13 has done, who have been requested to supply specific                  6 information relating to important issues in the inquiry,                  7 as F13 has done, but they can then be effectively                  8 removed from the inquiry at any point, seemingly on                  9 a whim, will mean that none of them feels safe in their                  10 core participant status. Why should they? How could                  11 they feel safe in that status? I am sure that's not the                  12 intention of the inquiry, but that's the effect of it.                  13 That is the effect.                  14 It is no answer to say, as counsel to the                  15 investigation says, that these matters can be dealt with                  16 by the Scottish investigation because the proposal to                  17 effectively remove F13, G1 to G6, C18 and C19 was only                  18 made on 3 May, a month ago. The Scottish inquiry has                  19 already begun its work investigating Fort Augustus, they                  20 say, and other Catholic orders. It is already well                  21 under way. There is absolutely no time for my client or                  22 any of the other clients to seek to become a core                  23 participant or to prepare for it or play any meaningful                  24 role whatsoever in that investigation.                  25 Of course, most importantly, all of these core</p> <p style="text-align: center;">Page 60</p>

<p>1 participants, including my client, applied to this                  2 inquiry, which has very different terms of reference to                  3 that Scottish inquiry, and were granted it. So it is no                  4 answer at all to say that an inquiry in another country                  5 that is half-over can somehow ameliorate the loss to F13                  6 and the other core participants.</p> <p>7 Madam, what we say is that the proposal by counsel                  8 to the inquiry to effectively remove F13, G1 to G6, C18                  9 and C19 means that they will be denied the opportunity                  10 to play any meaningful role either in the inquiry in                  11 England and Wales or the inquiry in Scotland, and that                  12 simply cannot be fair.</p> <p>13 Finally, madam, again, the effect of removal of                  14 Fort Augustus from the case study just makes no logical                  15 sense. The English Benedictines do not recognise                  16 internal borders. There is no reason why this inquiry                  17 cannot extend its remit, if it needs to do so, to                  18 consider the actions of the English Benedictines in                  19 another part of the United Kingdom.</p> <p>20 They are our submissions, madam.</p> <p>21 THE CHAIR: Thank you, Mr Enright.</p> <p>22 Mr Khan?</p> <p>23 Submissions by MR KHAN</p> <p>24 MR KHAN: Madam, much of what I want to say has already been                  25 said by Mr Enright, so I will keep my submissions short,</p> <p style="text-align: center;">Page 61</p>	<p>1 English Benedictine Congregation, we will investigate                  2 failures related to that school as well."</p> <p>3 So I take issue with my learned friend as to the                  4 interpretation of that. But also this: if failures are                  5 to be investigated, it must follow that the matters                  6 which gave rise to the concerns will need to be                  7 investigated also, and that must necessarily mean that                  8 allegations made by individuals that they were subject                  9 to sexual abuse needs to be considered by the                  10 investigation.</p> <p>11 So I understand that we are limited in terms of                  12 England and Wales. I completely understand that. In                  13 another context, I have made submissions to this inquiry                  14 in relation to that aspect, particularly in relation to                  15 child migration. But it is accepted I think by counsel                  16 to the inquiry that there has been some movement of the                  17 staff and others between England and Scotland. As                  18 Mr Enright makes clear, the institution does not                  19 recognise borders. Therefore if we are to investigate                  20 the failures, it is very difficult, in my submission, to                  21 be able to divorce looking at that, enquiring into that,                  22 without at least looking into the allegations that gave                  23 rise to those concerns and which led to those failures.</p> <p>24 So I would therefore ask counsel to the inquiry how                  25 it is that they are going to address that, because what</p> <p style="text-align: center;">Page 63</p>
<p>1 if I can.</p> <p>2 There appears to be some misunderstanding of quite                  3 a few things. If we just deal with the press reports                  4 and what appears to be a misunderstanding of counsel to                  5 the inquiry's document.</p> <p>6 If read, and read as I do, at paragraph 18, "It is                  7 our view that evidence directly relating to Fort                  8 Augustus should not be adduced during the EBC case study                  9 hearing this year", it seems clear that that is                  10 excluding -- certainly contemplating excluding --                  11 Fort Augustus in all forms in terms of its                  12 investigation. That's how it reads. If the press have                  13 picked up on that, they have picked up on it, I would                  14 say, rightly so.</p> <p>15 Dealing with the chilling factor, of course it                  16 creates a great deal of distress to our clients. If                  17 I go back to what was said last year by Mr Emmerson QC,                  18 and dealing with that particular paragraph -- it is in                  19 our submissions at paragraph 3, it is the second                  20 paragraph on page 3:</p> <p>21 "The inquiry's scope is limited to England and                  22 Wales, but because clergy involved in the Benedictine                  23 schools have been moved between Scotland, England and                  24 Wales and because, despite being in Scotland,                  25 Fort Augustus Abbey and School were affiliated with the</p> <p style="text-align: center;">Page 62</p>	<p>1 was it in terms of any decision-making within the                  2 English geographical boundary that related to those                  3 failings? You simply cannot divorce the two.</p> <p>4 Therefore, in my submission, it ought to be the fact                  5 that -- of course it may be a selection of abuse that is                  6 looked at which gives rise to the institutional failures                  7 by those in England, but the facts of that sexual abuse                  8 has to be looked at, in my submission, in order to get                  9 a clear picture of what was happening.</p> <p>10 I go on to say at paragraph 4 -- again, it is from                  11 the counsel to the inquiry on that particular day:</p> <p>12 "The investigation will also look at allegations                  13 made against individuals associated with the                  14 Benedictines outside the order's educational                  15 institutions."</p> <p>16 So in my submission those are clear: these are                  17 mandatory. These are legitimate expectations created in                  18 those clients that I represent that these matters will                  19 be looked at. There was no equivocation, as far as                  20 I can see in my interpretation of what was said.</p> <p>21 With that legitimate expectation in mind, it now                  22 seems -- and I put it, I hope, not too crudely -- that                  23 the inquiry has given with one hand and taken away with                  24 the other. So there was distress and has been distress                  25 caused to my clients, and I fear the further distress</p> <p style="text-align: center;">Page 64</p>

<p>1 that will be caused if they are seen to be excluded from 2 this process.</p> <p>3 I recognise my learned friend is saying that we will 4 review this position after the Scottish inquiry, and 5 I welcome that. But if the approach has already been 6 taken by counsel to the inquiry that we are not going to 7 look at specific allegations in Scotland, it doesn't 8 seem to me that that will be a productive review after 9 Scottish inquiry has completed its work.</p> <p>10 In relation to the argument about the Scottish 11 inquiry, as Mr Enright has already said, that has 12 continued. The legitimate expectation arising from this 13 inquiry meant that those individuals that we represent 14 said that they didn't need to go to the Scottish inquiry 15 because their concerns were being addressed by this 16 inquiry. So they didn't feel the necessity to do that 17 because they expected that their allegations would be 18 heard, ventilated and findings made, and that is now 19 seemingly not going to happen.</p> <p>20 The concern that they would have between now and the 21 conclusion of the Scottish inquiry, they will not know 22 whether they have any part to play in this process, and 23 that is the distress that's caused. So I would urge you 24 to make a decision today that regardless of the outcome 25 of the Scottish inquiry, certainly those allegations</p> <p style="text-align: center;">Page 65</p>	<p>1 expectation created by Mr Emmerson, counsel previously 2 to the inquiry, in July 2016 that both Fort Augustus and 3 Ealing would be included as selected institutions. That 4 was emphasised also in the Scope of the Catholic Inquiry 5 document at 3.1.4, where specific reference was made to 6 Ealing and its associated institutions.</p> <p>7 That expectation has been undermined in my learned 8 friend for the counsel to the inquiry's submissions very 9 recently in May and today. We say it is one key 10 principle that those expectations should be preserved. 11 The role of core participants like C19 will be reduced 12 to a nullity. It is not good enough to say, "Well, they 13 can still participate, they will still get disclosure, 14 they can still ask questions", when the very institution 15 which directly concerns them is not being selected.</p> <p>16 The adjournment is the least worst option, which 17 gives appropriate weight to the importance of the 18 criminal trial, but also to the importance of 19 investigating Ealing and Fort Augustus, the significance 20 of those institutions, which has been set out in 21 considerable detail in submissions from the other core 22 participants and complainants that you have.</p> <p>23 What we do ask, ma'am, is that in terms of topics, 24 there should be one additional topic, or rather one 25 which is expanded, and it is 7(v), which should include</p> <p style="text-align: center;">Page 67</p>
<p>1 which gave rise to failings in England, but which 2 occurred in Scotland, will be investigated, in line with 3 promises and commitments made earlier.</p> <p>4 I don't deal with the other matters. Mr Enright has 5 dealt with them in some detail, and you have my written 6 submissions already, so I don't need to trouble you.</p> <p>7 THE CHAIR: Thank you, Mr Khan. 8 Mr Chapman? 9 Submissions by MR CHAPMAN</p> <p>10 MR CHAPMAN: Ma'am, our position is that there should be an 11 adjournment of the whole EBC investigation until March 12 next year, realistically; and secondly, that Ealing and 13 Fort Augustus should remain as selected institutions, 14 untainted by any doubts about whether they will be 15 ultimately included. We make these submissions adopting 16 some of my learned friend's.</p> <p>17 First of all, we accept the force of the 18 Metropolitan Police Commissioner's submissions, and 19 indeed we move further in wondering whether, generally, 20 the investigation proposed for November into EBC will 21 prejudice the criminal trial in any event, with or 22 without Ealing and Fort Augustus. None of the 23 complainants want to prejudice that criminal trial; it 24 is too important. 25 Second, we do say that there was a legitimate</p> <p style="text-align: center;">Page 66</p>	<p>1 the practice of "suspect and move", which is essentially 2 what most of the complainants are chiefly concerned 3 about, which is the practice of a suspected paedophile 4 being simply moved to another institution where children 5 are put at further risk. That should be highlighted and 6 underlined as a key aspect of the inquiry. It is 7 a concern, as far as Fort Augustus is concerned, both 8 ways: paedophiles who are moved to Fort Augustus, and 9 paedophiles at Fort Augustus who are moved back to 10 England.</p> <p>11 Those are our submissions.</p> <p>12 THE CHAIR: Thank you, Mr Chapman. 13 Mr O'Donnell? 14 Submissions by MR O'DONNELL</p> <p>15 MR O'DONNELL: Madam, thank you very much. I would endorse 16 the submissions that have been made. Just to develop 17 them slightly further, the position of the core 18 participant represented by Slater &amp; Gordon is this: we 19 agree that there should be an adjournment of this whole 20 tranche of this module, principally because of the fact 21 of this criminal trial.</p> <p>22 Irrespective of whether or not St Benedict's, Ealing 23 is referred to within these proceedings, our position 24 has to be that there is a senior Benedictine on trial 25 for serious sexual offences and there could be a serious</p> <p style="text-align: center;">Page 68</p>

<p>1 risk of prejudicing that criminal trial, simply by 2 virtue of the fact that other parts of his institution 3 are being referred to within this inquiry. 4 Moreover, to take that point further and look at it 5 from the other side, there is a real issue that the fact 6 of that trial going ahead in the Old Bailey might just 7 inhibit the full coverage by the press of these IICSA 8 hearings, which indeed we would say would defeat the 9 very purpose of what this inquiry is about. It needs to 10 be open, it needs to be transparent, and complainants, 11 victims and survivors must have full confidence in it. 12 In relation to Fort Augustus -- I will take this 13 relatively shortly -- we say in our submissions document 14 that it is wrong in principle and would deprive IICSA of 15 the full picture if that were excluded. We say this is 16 principally an issue of the extent to which monks were 17 sheltered, not ordered. 18 In our submission it is no good simply saying, as 19 counsel to the inquiry seem to be, this inquiry can 20 confine its investigation into Fort Augustus to simply 21 who it was who may have gone north of the border. We 22 need to consider the circumstances in which they were 23 sheltered by Fort Augustus, whether or not those monks 24 were sheltered in circumstances where they had access to 25 children. That must be within the remit of this</p> <p style="text-align: center;">Page 69</p>	<p>1 were considered to be so serious that there was an 2 apostolic visitation; special intervention from the 3 Vatican, in other words. These are extremely rare. It 4 is the sort of thing that this inquiry should be looking 5 at. 6 It is also the only school run by the English 7 Benedictine Congregation where there was an emergency 8 inspection by the Independent Schools Inspectorate. 9 That was ordered by the Department of Education, I'm 10 sure you remember. The charitable trust, which is the 11 legal entity under which Ealing Abbey operates, is the 12 only one of the Benedictine monasteries to have been 13 subject to a statutory inquiry by the Charity 14 Commission. That was in relation to its safeguarding 15 arrangements. So this is a really key institution 16 within Benedictines. 17 In addition to that, Ealing Abbey and St Benedict's 18 School was one of only two houses to have commissioned 19 in relation to it an independent inquiry; that was the 20 one by Lord Carlile QC. There was another one in 21 relation to Ampleforth commissioned by Dr Elizabeth 22 Mann. It seems to us that there is real force in the 23 point that this inquiry should be able to make 24 a comparison of those reviews and consider the manner in 25 which those reviews addressed the issues at those two</p> <p style="text-align: center;">Page 71</p>
<p>1 inquiry. 2 There is a third point -- and I will deal with this 3 very, very briefly now -- that we want to address, and 4 that relates to the issue of confidentiality and indeed 5 the undertaking that's been referred to by counsel to 6 the inquiry. 7 A number of core participants are concerned with 8 what we would describe as the blanket nature of the 9 undertaking they would be expected to sign, 10 specifically -- well, the short point is: these are 11 public hearings and it is a blanket undertaking; is that 12 proportionate and appropriate? Some documents plainly 13 require confidentiality -- all of the core participants, 14 I am sure, accept that as a point of principle -- but 15 not all. 16 I just flag that up for now. It is obviously an 17 issue that may well need to be developed by all of the 18 core participants at a future hearing. 19 Just going a bit further in relation to our position 20 as to why this whole tranche of this part of the module 21 should be adjourned perhaps until February of next year. 22 Ealing Abbey and St Benedict's School are absolutely 23 essential parts of the Benedictine strand. It has been 24 touched upon by counsel to the inquiry. Ealing Abbey is 25 the only Catholic institution in Britain where problems</p> <p style="text-align: center;">Page 70</p>	<p>1 institutions at the same time, rather than simply taking 2 St Benedict's out of this and dealing with it later. 3 Furthermore -- and this isn't addressed in the 4 submissions document -- there is a real concern amongst 5 those survivors whom we represent that if St Benedict's 6 as an institution is taken out of this module and 7 potentially put off until later, as is being proposed, 8 it may be forgotten and not considered. Everyone here 9 knows the inquiry has a tremendous amount of work on its 10 hands. 11 In addition to that, there is the point about 12 potential practicalities. We propose an eight-week 13 adjournment to all of this section of the module, as 14 I have said. That would give core participants what we 15 submit is valuable time to get on top of what's likely 16 to be an awful lot of disclosure, which we may not have 17 if we'd stuck to the current fixture at the beginning of 18 these 15 days of hearings. 19 Unless I can assist further. 20 THE CHAIR: Thank you very much. 21 Ms Gallagher? 22 MS GALLAGHER: I have nothing to add on behalf of D2 on this 23 particular topic. I will have submissions to make in 24 relation to disclosure and timetable. 25 THE CHAIR: Thank you.</p> <p style="text-align: center;">Page 72</p>

<p>1 Mr Collins?</p> <p>2 MR COLLINS: I have no submissions to make at this stage,</p> <p>3 except in relation to disclosure, which we will deal</p> <p>4 with later. Thank you very much.</p> <p>5 THE CHAIR: Ms Gallafent?</p> <p>6 Submissions by MS GALLAFENT</p> <p>7 MS GALLAFENT: Just two points, if I may.</p> <p>8 So far as the question of an adjournment is</p> <p>9 concerned, we submit that is a matter for the inquiry</p> <p>10 and we don't seek to argue either way. We are content</p> <p>11 to leave that in the Panel and the Chair's hands.</p> <p>12 So far as the question of Fort Augustus is</p> <p>13 concerned, you have had our submissions on that. We do</p> <p>14 agree with the proposal by counsel to the inquiry that</p> <p>15 there is a proper distinction to be made between an</p> <p>16 alleged failure on the part of an institution in England</p> <p>17 and Wales that arises from a transfer either to or from</p> <p>18 an institution in England and Wales to another</p> <p>19 institution, wherever that may be, whether in Scotland</p> <p>20 or indeed anywhere else in the world. If it is alleged</p> <p>21 that that institution in England and Wales failed in</p> <p>22 some way by the transfer, then that clearly is a matter</p> <p>23 which is appropriate for this Panel to consider as part</p> <p>24 of its remit.</p> <p>25 We disagree with the submissions made on behalf of</p> <p style="text-align: center;">Page 73</p>	<p>1 but instead from the perspective of a law enforcement</p> <p>2 agency that is seeking to ensure that a man who is</p> <p>3 alleged to have committed serious sexual offences on</p> <p>4 children in his care faces justice before a criminal</p> <p>5 court and has a fair trial.</p> <p>6 You should have been told that the defendant, as</p> <p>7 I am going to call him -- you know who he is -- has</p> <p>8 indicated an intention to apply for the adjournment of</p> <p>9 his criminal trial that is set to commence in the first</p> <p>10 week of October on the grounds that he needs more time</p> <p>11 to prepare for it. That application is, we understand,</p> <p>12 listed before the Central Criminal Court this Thursday,</p> <p>13 6 June.</p> <p>14 So the first of two issues that it seems to us we</p> <p>15 must confront is whether to decide the issue of</p> <p>16 adjournment of the Ealing Abbey case study now or await</p> <p>17 the outcome of the defendant's application. On that</p> <p>18 issue we say that you should take submissions now and</p> <p>19 make a decision in principle now, for two reasons.</p> <p>20 Firstly, if the defendant's application to adjourn</p> <p>21 the criminal trial is unsuccessful and his trial</p> <p>22 proceeds on 3 October, then the inquiry must confront</p> <p>23 the problem raised by your counsel and supported by the</p> <p>24 MPS in any event. By contrast, if his application to</p> <p>25 adjourn is successful and the trial is adjourned until</p> <p style="text-align: center;">Page 75</p>
<p>1 other core participants that it would be appropriate to</p> <p>2 look at the substance of the allegations as to what</p> <p>3 actually occurred at Fort Augustus School, or indeed</p> <p>4 anywhere else that falls outside of England and Wales.</p> <p>5 That clearly is a matter that is going to be considered</p> <p>6 in the Scottish inquiry and, as the inquiry is aware, we</p> <p>7 are very concerned that there be shouldn't be</p> <p>8 duplication, not simply as a matter of resources but</p> <p>9 also because different conclusions might be reached.</p> <p>10 And of course the statutory regime is different in</p> <p>11 Scotland, in any event.</p> <p>12 In our submission the balance has been appropriately</p> <p>13 struck, such that this inquiry will consider failures</p> <p>14 relating to institutions in England and Wales, but will</p> <p>15 leave it to the Scottish inquiry to consider</p> <p>16 institutional failures relating to Fort Augustus, an</p> <p>17 autonomous monastery of course, as we have heard, in</p> <p>18 that context.</p> <p>19 THE CHAIR: Thank you very much.</p> <p>20 Mr Beer?</p> <p>21 Submissions by MR BEER</p> <p>22 MR BEER: Thank you. You have our submissions, seven pages.</p> <p>23 I'm not sure which tab they are in in your bundle.</p> <p>24 They are made from the perspective not of a core</p> <p>25 participant involved in the events under consideration,</p> <p style="text-align: center;">Page 74</p>	<p>1 early 2018, then exactly the same issues still arise.</p> <p>2 Looking at our submissions at paragraph 6, the</p> <p>3 problem of disclosure will still arise: giving</p> <p>4 disclosure to complainants when they are potentially</p> <p>5 witnesses within the criminal trial; giving disclosure</p> <p>6 to a defendant in the context of these Inquiry Act</p> <p>7 proceedings to which he may not be entitled under the</p> <p>8 CPIA.</p> <p>9 Secondly, the problem identified in paragraph 9 and</p> <p>10 following of our submissions will still arise: the</p> <p>11 potential for adverse or prejudicial publicity and the</p> <p>12 potential for a consequent abuse of process submission</p> <p>13 to be made by the defendant. The consequences</p> <p>14 identified in paragraph 12 and following of our</p> <p>15 submissions will still arise, namely the potential</p> <p>16 consideration within the inquiry of evidence that will</p> <p>17 be inadmissible in the criminal proceedings and the</p> <p>18 publication of it, thereby potentially prejudicing the</p> <p>19 criminal trial. And the problems identified in</p> <p>20 paragraphs 13, 14 and 15, which are reasons 4, 5 and 6,</p> <p>21 will still arise.</p> <p>22 So this is an issue that, with respect, must be</p> <p>23 confronted, despite the application of the defendant to</p> <p>24 adjourn his trial.</p> <p>25 The second issue of substance that we say the</p> <p style="text-align: center;">Page 76</p>

<p>1 inquiry must decide: should it adopt the narrower 2 approach focused upon and advanced by your own counsel? 3 It seems to us, having read everyone's submissions and 4 having heard everyone so far, there is actually no 5 opposition to the narrower approach favoured by your 6 counsel, namely of not considering allegations 7 concerning the defendant or Ealing Abbey or 8 St Benedict's at all in November and December, and 9 instead revisiting the need to consider those issues 10 after the conclusion of both the criminal trial and the 11 balance of the EBC module, or the wider approach 12 suggested by Slater &amp; Gordon and now favoured by 13 Mr Chapman, namely adjourning the EBC module generally 14 completely. 15 We, on that issue, understand that the CPS has been 16 in communication with the inquiry and it is our 17 understanding that the CPS has suggested that it 18 believes that, through a range of measures, it would be 19 possible for the inquiry to proceed to hear evidence in 20 relation to Ampleforth, Downside and Worth Abbey, and 21 their affiliated schools, as planned. 22 We suspect that it is rather difficult to address in 23 principle or in the abstract whether or not those range 24 of measures will be successful to prevent prejudice to 25 the criminal trial. It rather depends on exactly which</p> <p style="text-align: center;">Page 77</p>	<p>1 at least three or four months will be necessary fairly 2 to allow a disclosure exercise to take place. 3 That is without going into the granular detail of 4 exactly which documents the inquiry proposes to 5 disclose. But it is a three-month criminal trial: one 6 can imagine that it involves a substantial amount of 7 material. 8 Unless I can assist further, those are the 9 submissions I would make. 10 THE CHAIR: Thank you, Mr Beer. 11 Mr Kelly? 12 Submissions by MR KELLY 13 MR KELLY: Thank you. 14 Our submissions are as set out in the written 15 document which we have put before you. I can't add to 16 what is said in relation to Fort Augustus. Clearly it 17 is a separate jurisdiction. I am not going to add to 18 that. 19 In relation to Ealing, the only thing that I would 20 add -- we stick by what is said in the written 21 submissions, which is that concerns surrounding Ealing 22 Abbey and St Benedict's School are understandable, given 23 that there is an ongoing police investigation and given 24 the criminal trial. We agree that the position be kept 25 under review. However, there should be clarified if</p> <p style="text-align: center;">Page 79</p>
<p>1 witnesses are going to be called; it rather depends on 2 exactly which documents are going to be disclosed; it 3 rather depends on exactly what questions are to be 4 asked. But through a range of measures, including 5 restriction orders, anonymity applications and 6 potentially the limitation of questions, it may be 7 possible in principle, it seems to the CPS, to conduct 8 inquiries into those three institutions and their 9 affiliated schools without risking fairness as to the 10 criminal trial. 11 If, contrary to that position, the inquiry does 12 intend to adjourn the EBC module entirely from the 13 three-week slot commencing at the end of November, it 14 seems to us that the eight weeks proposed wouldn't be 15 long enough. One of the issues we flagged up was the 16 problems of disclosure, giving disclosure to 17 complainants that they wouldn't be entitled to in their 18 capacity as witnesses in a criminal trial, thereby 19 exposing them to at least the suggestion, and maybe the 20 actuality, of being compromised witnesses, tainted 21 witnesses. 22 So all disclosure would have to be held back until 23 the conclusion of the criminal trial, and that would be 24 the starting gun effectively for the disclosure exercise 25 to core participants. It seems to us that a period of</p> <p style="text-align: center;">Page 78</p>	<p>1 material and issues relevant to Ealing will or will not 2 be considered at a substantive hearing, because that is 3 relevant to the preparation for the substantive hearing. 4 It also ties in with a point that I have made -- 5 I can return to this later in a different section of the 6 agenda. But it is perhaps to try to establish some 7 clarity over what is said in paragraph 11 of counsel to 8 the inquiry's submissions: 9 "The Chair and the Panel have considered the 10 thematic issue in sufficient detail to enable them to 11 make findings and recommendations as appropriate. 12 Evidence gathered in relation to other EBC-affiliated 13 abbeys and schools will help to inform the Chair and 14 Panel in relation to this strand of the investigation 15 more generally." 16 I park that, if I may, until a later stage, but it 17 is a real concern that we have. It is dealt with in the 18 submissions. 19 Save that, having read all of the submissions by all 20 the parties, one can well see the force of the argument 21 that, in the normal course of events, it would of course 22 be much better to hear all of the evidence about the EBC 23 in one module at one time, but we understand the 24 position as it is. 25 Unless I can assist you on that one limited issue</p> <p style="text-align: center;">Page 80</p>

<p>1 any further, that's all I propose to say at this stage,                  2 but returning later to the other issues.                  3 THE CHAIR: Thank you.                  4 Mr Payne?                  5 MR PAYNE: I have nothing.                  6 THE CHAIR: Thank you.                  7 Mr King?                  8 Submissions by MR KING                  9 MR KING: Madam Chair, you have the written submissions very                  10 recently provided to you. Apologies are offered in                  11 respect of that. They are prepared by my legal team and                  12 Queen's Counsel. I don't propose to amplify those                  13 submissions that don't deal with disclosure any further,                  14 save for to identify that they deal with an invitation                  15 to the Panel to consider the scope of undertakings, and                  16 secondly to deal with the terms of reference in a wider                  17 context, which are rather distinct areas that haven't                  18 been touched on previously.                  19 I can, if, madam, you require further detail,                  20 provide it, but I think they are laid out as detailed as                  21 they need to be within the written document. So perhaps                  22 there is no benefit in taking that further at this                  23 stage.                  24 THE CHAIR: Thank you, Mr King. I'm grateful for that.                  25 Lord Carlile?</p> <p style="text-align: center;">Page 81</p>	<p>1 language of "legitimate expectation" is not appropriate                  2 to this hearing today.                  3 All the governance and structural issues, and all                  4 the four scope items referred to in Ms Karmy-Jones's                  5 submissions at paragraph 6, can be covered by the                  6 hearing which is proposed for November and December of                  7 this year.                  8 I should add that the new governance of                  9 St Benedict's School is a matter of public record in any                  10 event. There is therefore nothing to inhibit the                  11 inquiry from, if it wishes to -- and I would certainly                  12 desire it to -- comparing that governance structure, the                  13 laicisation of St Benedict's School, with the government                  14 structures of the Benedictine boarding schools.                  15 The next point I would wish to make is: the notion                  16 that an eight-week adjournment would be sufficient is                  17 totally unrealistic. Let us assume that the alleged                  18 perpetrator who is to be tried -- I'm not sure why we                  19 are not using his name, because it is a matter of public                  20 record, but I will stick to the discipline of this                  21 morning. Let's assume that the trial goes ahead on the                  22 date that is stated for three months, as has been                  23 assessed. My years of experience suggest to me that                  24 a trial listed for three months either takes one day or                  25 something like four to six months.</p> <p style="text-align: center;">Page 83</p>
<p>1 Submissions by LORD CARLILE                  2 LORD CARLILE: I am going to confine myself, madam, to                  3 issues relating to Ealing Abbey.                  4 When we received Ms Karmy-Jones's submissions a few                  5 days ago and we'd had the opportunity to consider them,                  6 we indicated by email to the inquiry that we supported                  7 those submissions, and hence we thought that it would be                  8 otiose to repeat that in a written document. Repetition                  9 rarely improves good argument. However, there are some                  10 comments I would like to make, in the light of what we                  11 have heard this morning and the other documents which                  12 I have seen in the last three days or so, one of them                  13 only this morning.                  14 We heard Mr Chapman earlier using the rather                  15 in terrorem words of judicial review, "legitimate                  16 expectation". He referred to what he submitted as the                  17 legitimate expectation engendered at the last directions                  18 hearing that we attended, which was chaired by                  19 a completely different chairman and submissions were                  20 made by a completely different counsel to the inquiry.                  21 We would submit that at that stage the victims and                  22 others involved in this matter had a legitimate                  23 expectation that the inquiry would try to streamline its                  24 processes as best it could to ensure a timely outcome.                  25 That has been done fully, and we submit that the</p> <p style="text-align: center;">Page 82</p>	<p>1 Furthermore, nobody has mentioned the appeal period.                  2 If he is convicted in that trial, then there is every                  3 likelihood that he will appeal against his conviction,                  4 and the likelihood of an appeal being heard within the                  5 next nine months after the end of the trial is extremely                  6 slim.                  7 So the adjournment of this part of the inquiry until                  8 after his criminal process in our submission is wholly                  9 unrealistic.                  10 The next point is I would like to re-emphasise what                  11 has been said this morning about the sound principle                  12 that this inquiry -- and it is stated as a core to this                  13 inquiry -- should not prejudice any criminal                  14 proceedings. To have this inquiry and the criminal                  15 trial going on at the same time is a recipe for a car                  16 crash. There is every possibility that the media, who                  17 are absolutely free to report both sets of proceedings                  18 as they wish, as luridly as they wish, will do so, and                  19 one can foresee applications to adjourn and possibly                  20 legal proceedings seeking to adjourn one or both of the                  21 sets of proceedings. It makes perfect sense to follow                  22 the submission of Ms Karmy-Jones on the merits and                  23 procedurally.                  24 The next point is: what is that criminal trial                  25 about? It is not about procedure. It is not about</p> <p style="text-align: center;">Page 84</p>

<p>1 anything that is at the heart of this inquiry. It is                  2 about whether a former monk is guilty of criminal                  3 offences of indecency against students, pupils,                  4 committed before 2001. He left Ealing Abbey in 2001,                  5 never to return, and was carrying out what appeared to                  6 be an important function in Rome from 2002 until he                  7 chose apparently to go to Kosovo, where he was arrested                  8 whilst writing his autobiography, which presumably will                  9 make very interesting reading.</p> <p>10 I turn then, if I may, very briefly to paragraph 30                  11 of the written submissions of F13. That paragraph in                  12 our submission makes a large and illogical leap. It                  13 says that failing to consider the movement of alleged                  14 child abusers in the Roman Catholic Church would leave                  15 a glaring hole in the inquiry's work and potential                  16 findings. That is related directly to Ealing Abbey                  17 being excluded from that part of the inquiry. But there                  18 is no allegation in relation to this particular person                  19 that there was movement -- which I take to be                  20 a transitive noun -- there was no deliberate movement of                  21 him away from complaints because no complaints have been                  22 made.</p> <p>23 Finally, I would like, if I may, madam, to make some                  24 reference to the reply to the submissions made by                  25 counsel to the inquiry submitted by Switalskis, which</p> <p style="text-align: center;">Page 85</p>	<p>1 THE CHAIR: Mr Howell?                  2 MR HOWELL: None of this touches the charity, madam, and                  3 I have no submissions to make.                  4 THE CHAIR: Ms McGahey?                  5 MS MCGAHEY: No, thank you, madam.                  6 THE CHAIR: Finally, Ms Shurmer?                  7 MS SHURMER: No submissions.                  8 MS KARMY-JONES: Madam, I see the time. I am conscious this                  9 is the time of the lunch break. It also occurs to me                  10 that much of what I would have said in reply has been                  11 covered by others, so I can concertina that a little.                  12 Also with some discussion particularly with Mr Khan, we                  13 can perhaps foreshorten the matters to be discussed                  14 later this afternoon. So if it is an appropriate moment                  15 for a break?                  16 THE CHAIR: Thank you. We will take a lunch break now and                  17 reconvene at 2.00 pm.                  18 (1.06 pm)                  19 (The short adjournment)                  20 (2.03 pm)                  21 Submissions by MS KARMY-JONES                  22 MS KARMY-JONES: Madam, may I very, very briefly address                  23 a few of the points raised in the submissions before                  24 lunchtime, and I do say "briefly" because much of what                  25 I was going to say has been covered by other</p> <p style="text-align: center;">Page 87</p>
<p>1 are one of the documents received in recent days and are                  2 dated 24 May. Those submissions cause us real concern,                  3 and we apprehend that they should cause concern to the                  4 inquiry. If one reads them, they seem to expect                  5 something like a criminal trial in relation to                  6 allegations made by complainants.</p> <p>7 As you made clear, madam, right at the beginning,                  8 that is not what this inquiry is doing. There would be                  9 obvious problems about burden of proof, standard of                  10 proof, how cross-examination could take place, and in                  11 the context of even, if I may say so, as great an                  12 inquiry as this, there is no appropriate procedure for                  13 doing it. So we would simply ask you and your                  14 colleagues to discount those allegations.</p> <p>15 We do have some submissions to make very briefly                  16 later about disclosure and transcripts, but we would                  17 prefer to make those submissions after we know the                  18 result of this morning's hearing, and we can do it in                  19 writing, of course.</p> <p>20 MR ENRIGHT: Just a point of clarification, Chair:                  21 Lord Carlile referred to F4, I think, in error. F4 is                  22 nothing to do with Fort Augustus or the Benedictines.                  23 F4 is Comboni.                  24 LORD CARLILE: Well, F13, sorry. If I said F4, I was behind                  25 myself. Thank you.</p> <p style="text-align: center;">Page 86</p>	<p>1 participants.                  2 I have already dealt with, I think, the submissions                  3 made by Mr Enright and Mr Khan.                  4 In respect of one of the matters raised by                  5 Mr O'Donnell in respect of undertakings, can I just                  6 quote from a letter sent to his team about the                  7 undertakings, in which it was said that:                  8 "It is an important aspect of a fair process that                  9 the inquiry is able to circulate counsel's submissions                  10 on a confidential basis until they are referred to at                  11 an inquiry hearing."                  12 So the point about the undertakings is that                  13 confidentiality not be breached until they come to this                  14 hearing. These are public hearings. We can't bind all                  15 parties at these hearings thereafter.                  16 It is a common practice in legal proceedings, and it                  17 allows for those involved, such as the core participants                  18 here, to consider the submissions provided, to make                  19 legal advice, without the matter being played out and                  20 potentially misreported in the media before they have                  21 all had a fair opportunity to consider the matter and                  22 make any oral submissions.                  23 So that is the context of the undertaking that has                  24 been sent, and that is still strongly requested.                  25 In relation to some of the other submissions, the</p> <p style="text-align: center;">Page 88</p>

<p>1 inquiry, Chair, Panel, you will have in mind the very 2 real imperative there is on this inquiry to hear matters 3 in a timely fashion. 4 Mr Chapman and Mr O'Donnell suggest the adjournment 5 of the whole English Benedictine Congregation hearing. 6 The only date so far that's been suggested as a coherent 7 date or a clear date is February 2018. But I echo 8 Lord Carlile's submissions, and adopt them really, about 9 the difficulties there are in setting any such date. It 10 goes beyond a few months; it goes beyond many months. 11 A criminal trial may not begin. We know that there 12 is an application to adjourn to be heard imminently. 13 A trial may have difficulties. There may be a retrial. 14 There may be an appeal. There may be a retrial arising 15 out of an appeal. It could continue not for months, but 16 potentially for a year or more, and that before a date 17 is set and before disclosure from those proceedings 18 could be undertaken. 19 As Mr Beer QC has highlighted, that would require 20 withholding material from other core participants, and 21 the effect on other core participants who are not party 22 to this limb of the inquiry must also be considered, as 23 they would, in effect, be left in limbo. There should 24 be no concern that Ealing may be forgotten. We propose 25 that it should be mentioned at the conclusion of the</p> <p style="text-align: center;">Page 89</p>	<p>1 response in writing on the issue of the wider 2 application to adjourn the whole EBC module within seven 3 days of the determination of the defendant's application 4 on Thursday. They have an important part to play, and 5 a decision shouldn't be taken without proper CPS 6 involvement. 7 THE CHAIR: Thank you, Mr Beer. 8 Ms Karmy-Jones? 9 MS KARMY-JONES: We have been in contact with the Crown 10 Prosecution Service this afternoon, and I understand 11 that they are going to have a look at the transcript of 12 today's hearing and so will have insight into all the 13 arguments that have been raised, and that they will make 14 some submissions in writing thereafter. 15 THE CHAIR: Thank you very much. 16 MS KARMY-JONES: If I may move on. I am grateful that we 17 broke when we did; I have had some very productive 18 discussions with Mr Khan over the adjournment. I will 19 set out some of the submissions in relation to specific 20 proposals in respect of topics and themes for the case 21 study, but to a large extent I think Mr Khan and I are 22 agreed in terms of the ambit of the proposals as 23 currently set out, which we have taken pains to 24 emphasise are simply a guideline at this stage. 25 It may be -- and indeed it is likely -- that at</p> <p style="text-align: center;">Page 91</p>
<p>1 case study in December, when decisions can then be made 2 as to how things can proceed. 3 Can I just raise one matter. Mr Beer referred to 4 discussions with the Crown Prosecution Service, and we 5 have been in contact with them. Our understanding is 6 that they have not given any indication -- they 7 certainly have not done so to us. So I wonder if 8 Mr Beer would just like to clarify the position for the 9 Panel. 10 Submissions by MR BEER 11 MR BEER: Yes, thank you, Ms Karmy-Jones. 12 It was our understanding that the CPS were to 13 communicate with the inquiry. Plainly, we are the 14 investigators and they are the prosecutors. We, in 15 a sense, bring a case home to port by getting to 16 a charging decision, and a prosecutor should really be 17 making submissions and assisting the inquiry on issues 18 relating to trial management and the fairness of 19 a trial, rather than the investigators. 20 So what we would propose is: if the CPS, contrary to 21 our understanding, haven't communicated substantively 22 with the inquiry, either the inquiry or us should 23 provide them with the submissions of the other core 24 participants, in particular those of Switalskis and 25 Slater &amp; Gordon, and that you direct them to provide any</p> <p style="text-align: center;">Page 90</p>	<p>1 a later hearing we will be able to be a little bit more 2 prescriptive, but at this stage we deliberately seek to 3 keep the guidelines open because they will, of 4 necessity, need to be considered in the scope of the 5 evidence received subsequently and considered. 6 TOPICS AND THEMES FOR EBC HEARING 7 Submissions by MS KARMY-JONES 8 MS KARMY-JONES: So that is the next matter on the agenda: 9 the submissions in respect of the topics and themes for 10 the hearing. Those are set out -- we have already gone 11 through them -- at paragraphs 6 to 9 of our submissions 12 document. 13 I think that Ampleforth Abbey and School agree to 14 the proposal that there should be some summary and 15 introductory evidence called. Whilst they have made 16 some submissions in relation to wording, essentially the 17 topics there are agreed. I think, given what I have 18 said, that those submissions don't need to trouble the 19 Panel this afternoon. 20 Mr Khan's and G1 to G5's submissions ask for 21 a number of amendments to be made to make clear that the 22 affiliated schools referred to are not restricted to the 23 English Benedictine schools and to include an 24 investigation of allegations made against individuals 25 associated with the English Benedictine Congregation</p> <p style="text-align: center;">Page 92</p>

<p>1 outside the order's educational institutions.                  2 In effect, I understand that in terms of the use of                  3 the word "outside", it is to cover the situation where,                  4 for example, a monk may have abused someone in the local                  5 vicinity, and we would certainly consider that type of                  6 situation to be included within the ambit of the topics                  7 set out in our note, so there is no difficulty there.                  8 We suggest that such amendment is not necessary.                  9 It is already included. Our overview is intentionally                  10 broad so as to set the scene.                  11 Disclosure requests, just to put minds at rest, have                  12 never been limited to allegations in relation to the                  13 schools alone. The focus is on the institutional                  14 failings, and we will consider all relevant evidence                  15 within the Benedictine investigation.                  16 G1 to G5 also seek to add a number of topics to our                  17 paragraph 6 in relation to general policy on transfer of                  18 personnel, on disciplinary proceedings and on steps to                  19 be taken. Again, for similar reasons, we consider the                  20 amendment is not necessary.                  21 When you look at the submissions document,                  22 paragraphs 7 and 9 make it clear that these are only,                  23 for the moment, guidelines. The inquiry does anticipate                  24 seeking to gather further evidence in relation to the                  25 topics of policies, and it is implicit within the terms</p> <p style="text-align: center;">Page 93</p>	<p>1 see whether there are any submissions on the issue                  2 around the detail? I don't expect there to be, but just                  3 for confirmation.                  4 THE CHAIR: Any submissions?                  5 Submissions by MR KHAN                  6 MR KHAN: Just to confirm, it has been a productive                  7 discussion that we had over lunch in relation to the                  8 matters raised, so I don't need to add anything more on                  9 that.                  10 Are we dealing with the issue of disclosure now in                  11 general terms or -- we will come back to that in                  12 a second. I just confirm the position that it is                  13 reassuring to know the inquiry is not going to be                  14 prescriptive and restrictive. So the idea of putting                  15 those matters in is to essentially provide a pathway,                  16 a road map -- I hate to use that word -- as to the way                  17 we are going to go down. It is reassuring to know our                  18 clients have been reassured that it is less restrictive,                  19 and absolutely that is the way that we want to go. So                  20 it is reassuring.                  21 Submissions by MR CHAPMAN                  22 MR CHAPMAN: Ma'am, in relation to Lord Carlile's point                  23 about the risk to the criminal trial of the appeal,                  24 which was echoed by my learned friend counsel to the                  25 inquiry, we haven't heard from the police about their</p> <p style="text-align: center;">Page 95</p>
<p>1 of reference that we are not seeking to exclude those                  2 matters. We will keep the topics proposed under review.                  3 Also we make it clear that, in our view, the                  4 transfer of individuals against whom allegations have                  5 been made does already fall within the ambit of the                  6 themes and topics listed in respect of child protection                  7 policies, recruitment, reporting mechanisms,                  8 safeguarding and the response to allegations of abuse,                  9 as set out in paragraph 7.                  10 There may be revision to those topics. Any such                  11 revision will be provided to all core participants at                  12 the earliest opportunity and again may be raised at                  13 another preliminary hearing at a later date.                  14 The English Benedictine Congregation ask whether                  15 consideration is being given, in effect, to evidence on                  16 core topics; and yes, consideration is currently being                  17 given to the question of expert evidence and we will                  18 keep all parties informed.                  19 It is also right to say that insofar as the focus of                  20 the hearing in November is concerned, our proposal is                  21 that it will be upon the three named institutions,                  22 subject to the caveat in paragraph 9 of our submissions                  23 document, which is that the scope of the evidence will                  24 be kept under review, as I have said.                  25 Madam Chair, it may be that you would like to simply</p> <p style="text-align: center;">Page 94</p>	<p>1 view about risk to the criminal trial of an appeal.                  2 What we say is that it is all a question of degree.                  3 The first primary risk is the criminal evidence                  4 itself, the evidence heard at the criminal trial. Once                  5 that is completed, that is an important part of the risk                  6 that goes away. Once the verdict has been delivered,                  7 the jury can no longer be affected by what they might                  8 hear outside the courtroom. That risk goes away. Then                  9 there is the time for appeal, which I understand is                  10 28 days. If there is no appeal, that risk goes away.                  11 Finally, in the long run, he always has the opportunity                  12 of availing himself of the criminal appeals review                  13 commission.                  14 So ultimately it is a question of degree and                  15 balancing the risk of prejudice to a criminal trial                  16 against the need for inclusion of important institutions                  17 in this inquiry. I invite the police to give their                  18 thoughts on that topic, because we haven't heard them.                  19 THE CHAIR: Thank you.                  20 Mr Beer?                  21 Submissions by MR BEER                  22 MR BEER: I'm happy to respond to the invitation. I repeat                  23 what I said earlier: that we think within three to four                  24 months of the conclusion of the criminal proceedings,                  25 the inquiry might be in a position to commence a case</p> <p style="text-align: center;">Page 96</p>

<p>1 study in relation to Ealing Abbey and St Benedict's.                  2 The conclusion of the criminal proceedings might                  3 mean a number of things. It might mean the defendant's                  4 acquittal, which is nice and clear, which might occur                  5 within three months of the start of the criminal trial                  6 on October 3. If he is convicted, obviously one would                  7 have to allow time to elapse -- 28 days -- for                  8 permission to appeal to be lodged. If there is                  9 confirmation that that is not going to occur, then maybe                  10 the three- to four-month period would start to run then.                  11 If he does appeal, then that would have to be put off.                  12 So that is why I didn't name a month by saying                  13 "April" or "May"; rather, three to four months after the                  14 conclusion of the criminal proceedings. That remains                  15 our position.                  16 THE CHAIR: Thank you. Are there any other submissions on                  17 the matters that have been raised subsequent to lunch?                  18 Submissions by MS KARMY-JONES                  19 MS KARMY-JONES: I was just going to reply to the road map                  20 that Mr Khan referred to. Of course that road map will,                  21 of necessity, narrow; it won't be kept open until the                  22 commencement of the case study. As you know, there is                  23 a suggestion that we should have a preliminary hearing                  24 at the beginning of October, by which stage we would                  25 have expected that road map to have narrowed quite</p> <p style="text-align: center;">Page 97</p>	<p>1 investigations are different. The investigation with                  2 which Mr Altman is dealing is different in nature, and                  3 there are limits to the parallels that can and should                  4 properly be drawn between them.                  5 This investigation is considerably larger. Its                  6 focus must be on the failure of any institutions in                  7 responding to allegations of child abuse, as opposed to                  8 the veracity of the allegations.                  9 A finding of fact may be made in relation to                  10 individuals alleged to have sexually abused children,                  11 and also in respect of individuals who failed to                  12 appropriately respond to any allegation of abuse, but                  13 only where relevant to this inquiry's overall terms of                  14 reference, where there is an evidential basis for such                  15 findings in the terms of reference and where they can be                  16 fairly made in all the circumstances.                  17 I am specifically asked to make it clear that we                  18 consider it to be within our terms of reference at this                  19 stage to consider allegations of abuse that may not have                  20 been made at the time, which may have subsequently been                  21 made, but for which there is evidence to suggest the                  22 school was aware of them and it is within our terms of                  23 reference to consider how they responded to them                  24 thereafter.                  25 We can't hear live evidence from each and every</p> <p style="text-align: center;">Page 99</p>
<p>1 considerably.                  2 FACT-FINDING                  3 Submissions by MS KARMY-JONES                  4 MS KARMY-JONES: Moving on to questions of fact-finding and                  5 submissions in respect of our paragraph 8. Again,                  6 I think we have resolved some of this. Paragraph 8 on                  7 our submissions document emphasises that the focus of                  8 the investigation is on the institutional responses to                  9 allegations of child sexual abuse and that the evidence                  10 adduced will be set in that context. Whilst the inquiry                  11 do propose that evidence will be called from some                  12 complainants, it will not be necessary, we submit, in                  13 this instance, for the Chair and Panel to investigate in                  14 detail all underlying factual circumstances in order to                  15 make a finding in relation to an institution's handling                  16 of an allegation.                  17 Mr Khan expresses concern on behalf of G1 to G5 in                  18 relation to that, and relies to some extent on                  19 Mr Altman's submissions in the Rochdale case on                  20 10 May 2017.                  21 Really, in reply to some of his concerns, we would                  22 like to make it clear that the approach to fact-finding                  23 that was outlined by Mr Altman QC, leading counsel to                  24 the inquiry, is that which this investigation will also                  25 adopt, but it must be borne in mind that the</p> <p style="text-align: center;">Page 98</p>	<p>1 complainant core participant; it would not be                  2 proportionate to do so. There are other ways of                  3 adducing relevant evidence: reading statements, gisting.                  4 There is also the truth project, which, although not                  5 evidence, does provide complainants with an opportunity                  6 to voice their experiences and to share them with the                  7 inquiry. The Chair and the Panel of course can take on                  8 board what they hear during those hearings on the truth                  9 project.                  10 The scale of this investigation as compared to                  11 Rochdale is larger, and that must be remembered.                  12 Also one of the reasons for selecting the three                  13 institutions that we have is that individuals connected                  14 with each of them, or the affiliated school, have been                  15 convicted or cautioned, so there is already a factual                  16 foundation upon which to build. That is not to say that                  17 we won't consider other allegations which have not, to                  18 date, given rise to a conviction.                  19 C18 to C19, at paragraph 2 of their submissions,                  20 suggest that, "It will be necessary to collate details                  21 of the actual facts of assaults and who knew what and                  22 when", and that that will necessarily involve taking                  23 evidence from the survivors on the circumstances of                  24 abuse to whom reports were made and who could have known                  25 about the abusive treatment.</p> <p style="text-align: center;">Page 100</p>

<p>1 They submit that piecing together a broad picture of                  2 this type of information from complainants is vital                  3 because there is unlikely to be any documentary record                  4 of the fact of their complaint, and without any record                  5 of their complaint, it will be difficult to draw the                  6 appropriate inference that known or suspected abusers                  7 were moved from one institution to another because of                  8 the complaint.                  9 We do not disagree that frequently there will be                  10 little, if any, documentary record of the complaint.                  11 However, the inquiry has requested, and will continue to                  12 request, statements from core participants and other                  13 complainants, who will be able to explain the context in                  14 which they raised their allegations. We can then                  15 consider what steps thereafter should be taken and                  16 whether any further evidence should be obtained.                  17 Our approach is agreed essentially, we understand,                  18 by Ampleforth. Mr Child and his counsel make                  19 submissions that it is necessary to test the truth of                  20 the allegations of abuse. We don't agree. But,                  21 Madam Chair, you may wish to invite submissions on that                  22 issue, namely the fact-finding exercise and the extent                  23 to which this Panel, and you, would be required to make                  24 findings of fact.                  25 THE CHAIR: Thank you, Ms Karmy-Jones. Shall we check? Do</p> <p style="text-align: center;">Page 101</p>	<p>1 MS KARMY-JONES: Just to update in relation to -- as it is                  2 on the agenda -- the core participant applications, an                  3 application was received by J4 on 19 May for core                  4 participant status, and by notice of determination on                  5 2 June it was granted. Just so that that is on the                  6 transcript.                  7 DISCLOSURE AND TIMETABLING                  8 Submissions by MS KARMY-JONES                  9 MS KARMY-JONES: In terms of disclosure then, as the next --                  10 disclosure and really timetabling, we have made our                  11 first tranche of disclosure to core participants                  12 yesterday. The material disclosed is Catholic                  13 Safeguarding Advisory Service policy and procedure                  14 material. It has been disclosed to all participants as                  15 it is of relevance to the issues to be considered in the                  16 wider Roman Catholic investigation. A schedule                  17 providing some further explanation to that material will                  18 also be disclosed by the solicitor to the inquiry's team                  19 in coming days.                  20 We sent out a procedural note in respect of                  21 disclosure on 3 May, together with our submissions                  22 document, and it is behind your divider 3.                  23 Our proposal, and what we anticipate taking place,                  24 is that further tranches, separate tranches, will be                  25 disclosed in coming months, and as far as possible we</p> <p style="text-align: center;">Page 103</p>
<p>1 you wish to make any submissions, Mr Khan?                  2 MR KHAN: No, simply to agree.                  3 THE CHAIR: No. Ms Gallagher? No.                  4 Submissions by MR ENRIGHT                  5 MR ENRIGHT: Very briefly, Chair, you will have seen the                  6 overwhelming force of submissions today is driving                  7 towards an adjournment of the English Benedictine                  8 Congregation. There are all sorts of difficulties; it                  9 is no longer clear when it can be heard, which                  10 reinforces the submissions I made this morning. We                  11 cannot lose a whole year of this investigation. There                  12 is a case study available that is ready now. Let's take                  13 that chance, so that we can continue to progress forward                  14 whilst we await an opportunity to deal with the English                  15 Benedictine Congregation.                  16 THE CHAIR: Thank you. Lord Carlile?                  17 LORD CARLILE: No, thank you.                  18 THE CHAIR: Ms Gallafent? No. Any further submissions?                  19 No. Thank you.                  20 Submissions by MR CHAPMAN                  21 MR CHAPMAN: I'm sorry, for Switalskis, our submission is                  22 that if there are factual challenges to assertions made                  23 by core participants, complainants, then there will need                  24 to be evidence and fact findings in relation to those.                  25 THE CHAIR: Thank you.</p> <p style="text-align: center;">Page 102</p>	<p>1 are working towards providing disclosure of all material                  2 relating to the English Benedictine case study by the                  3 end of October 2017. It may be that there will be some                  4 disclosure of relevance to the hearing after that date,                  5 because of course as we receive material, that material                  6 will itself generate further requests for disclosure,                  7 almost inevitably. But we will provide updates to core                  8 participants as we go and we will provide disclosure to                  9 core participants that is relevant to their interests.                  10 It is a matter for the inquiry to assess relevance                  11 of material that is gathered, and disclosure will be                  12 provided to core participants in accordance with their                  13 interests to this investigation and the investigation in                  14 which they feature. It is not anticipated, for example,                  15 that each core participant will receive disclosure of                  16 all material in relation to each of the case studies.                  17 For that to be done, we submit, would not be                  18 proportionate; it would dissipate focus and would not be                  19 either a reasonable or an appropriate use of resources.                  20 There have been a number of submissions made.                  21 Mr Khan, on behalf of G1 to G5, has expressed concern                  22 about that. It has been suggested variously that                  23 catalogues of documents should be obtained. But I will                  24 let Mr Khan make his submissions to you.                  25 Mr Child also requests the process for determining</p> <p style="text-align: center;">Page 104</p>

<p>1 relevance and a list of documents held by the inquiry to                  2 be provided within 14 days, so that requests can be made                  3 for consideration of such documents. In respect of his                  4 submissions, or the submissions made on his behalf, we                  5 highlight that his submissions refer to a criminal                  6 process and this is an inquisitorial process, and                  7 relevance again is a matter for the inquiry.                  8 You may wish to hear submissions from Mr Khan and                  9 I think it is Mr King for Mr Child, or anyone else, in                  10 respect of the process to be taken in respect of                  11 disclosure, before we move to timetable.                  12 THE CHAIR: Thank you.                  13 Mr Khan?                  14 Submissions by MR KHAN                  15 MR KHAN: Two short points, if I may, one in relation to the                  16 timing of disclosure.                  17 Simply from experience in the child migration                  18 module, there was a vast amount of material served in                  19 advance of the hearings. Of course that does impact on                  20 the ability of the lawyers involved and the individual                  21 clients, looking at that material, digesting it and                  22 responding to it.                  23 So I would ask that -- I think it is one month in                  24 advance of any hearing is what is being proposed, and we                  25 suggest it should be at least two months. I know the</p> <p style="text-align: center;">Page 105</p>	<p>1 been conducted. By way of example, the National                  2 Archives of Australia, our client was aware that there                  3 was material in there which could have assisted the                  4 inquiry.                  5 So if core participants are aware of what material                  6 is in the hands of the inquiry, if there are matters                  7 which ought to be investigated and there are missing                  8 institutions or missing documents, then we can of course                  9 assist the inquiry in obtaining that. So it assists the                  10 inquiry, because then you will have all of the material                  11 that is relevant to the inquiry before the actual                  12 hearing starts.                  13 The process that has taken place in terms of child                  14 migration is that the core participants have been                  15 provided with what material has been obtained, and if                  16 there are gaps in that, then we can assist the inquiry                  17 with identifying that. That's the reason for it.                  18 I appreciate it is a long, arduous process. It is not                  19 about every single item. It is about who has been                  20 approached, what catalogue there is, what categories of                  21 material there are, and what other categories there                  22 might be.                  23 The third thing we wanted was an up-to-date list of                  24 the sources. I know a list has been provided. But as                  25 we're going along, which institutions have been</p> <p style="text-align: center;">Page 107</p>
<p>1 task of obtaining material, I completely understand that                  2 and I am aware of that from other conversations I have                  3 had elsewhere in other modules. But there is a real                  4 difficulty in core participants meaningfully being                  5 involved in the process, and therefore if we don't get                  6 it in time, it is going to be difficult for them to have                  7 that meaningful involvement. So can I ask that, in                  8 terms of the timetable of the provision of disclosure.                  9 We have set out at page 7 in paragraph 3 -- forgive                  10 me, there are three things that we wanted the inquiry to                  11 deal with. It is not in our submissions. May I deal                  12 with it in short form?                  13 We have set out at paragraph 13 of our submissions                  14 whether evidence has been gathered in relation to                  15 Fort Augustus and in relation to allegations against                  16 individuals associated with EBC outside the order's                  17 educational institutions and whether we can get                  18 a response to that.                  19 Number two is what my learned friend Ms Karney-Jones                  20 has referred to, the catalogue. The reason for that is                  21 this: we have had experience in relation to the child                  22 migration module that although the inquiry has gone out                  23 and obtained material from all manner of institutions,                  24 it became increasingly obvious to us, and certainly our                  25 client, that there were areas of enquiry that could have</p> <p style="text-align: center;">Page 106</p>	<p>1 approached, so we can again assist the inquiry.                  2 And this -- I know this is in relation to Lambeth --                  3 we wanted some idea from the inquiry as to who was                  4 marshalling this evidence. The concern arises about                  5 that because we are concerned the institutions                  6 themselves are taking decisions about what is relevant                  7 to the inquiry. Of course I appreciate the difficulty                  8 the inquiry has: it does not know what an institution                  9 has, short of going into it, in its buildings, and                  10 asking for everything. It is relying on the                  11 institutions to provide what is relevant.                  12 We want to be reassured that there is some oversight                  13 of that process, so that there is somebody at the                  14 inquiry that looks at it and gathers it and makes                  15 enquiries of items that might be missing, considered                  16 relevant or not, so that we are reassured, so that we                  17 can say to our clients that all steps have been taken to                  18 obtain all relevant material, and not as in the case as                  19 it occurred in Lambeth, where Lambeth said, "We have                  20 10,000 boxes and it contains nothing of relevance".                  21 Well, how do we know? At the very least, they should                  22 have provided some indication of what was in those                  23 boxes, so that the inquiry could say it is not relevant                  24 to the issues at hand. So that's the reason for that                  25 particular enquiry.</p> <p style="text-align: center;">Page 108</p>

<p>1 If those can be addressed in due course, that would 2 assist us. 3 THE CHAIR: Thank you, Mr Khan. 4 Mr King? 5 Submissions by MR KING 6 MR KING: Madam, yes. Contained within the written 7 submissions on behalf of Mr Child, running from 8 paragraph 20 onwards, but more specifically 9 paragraph 25, can I start, please, by just echoing some 10 of Mr Khan's submissions that these -- 11 THE CHAIR: Can you speak up, please, or turn your 12 microphone on. 13 MR KING: The proposal to deal with disclosure by way of 14 tranches, and specifically the potential for disclosure 15 just one month before the substantive hearing, it is 16 submitted, is wholly unrealistic in terms of allowing 17 those who must review that material to have adequate 18 time. So I echo those submissions that have been 19 previously made on that topic. 20 Albeit within the written submissions for Mr Child 21 there is a suggestion and a request that disclosure is 22 made now, it is accepted of course there are practical 23 difficulties in respect of ensuring that could happen. 24 What is submitted -- and I echo Mr Khan again here -- is 25 that one month isn't enough; that at least two would</p> <p style="text-align: center;">Page 109</p>	<p>1 Finally, an indication to be given by counsel to the 2 inquiry as to the nature and extent of that 3 documentation, to real detail, to allow proper 4 consideration to be given. 5 Moving forward to the hearing itself, taking into 6 account disclosure, it is submitted that proper 7 understanding of the basis for the selection of those 8 establishments would assist, because that will assist 9 with understanding relevance; and of course disclosure 10 that deals with adequately the background to those 11 survivors and victims, to understand their selection and 12 their participation, to properly understand the scope 13 and the meaning of all that is contained within that. 14 Those are the submissions in respect of disclosure 15 on behalf of Mr Child. 16 THE CHAIR: Thank you, Mr King. 17 Are there other submissions? Ms Gallagher? 18 Submissions by MS GALLAGHER 19 MS GALLAGHER: Thank you. Chair and Panel, you will be 20 aware that I represent just one individual -- I hope 21 I am speaking loudly enough. Please do tell me if not. 22 I'm not usually told I'm too quiet, so I don't think it 23 will be a problem. 24 I represent one complainant core participant, D2. 25 He doesn't have interests which relate directly to the</p> <p style="text-align: center;">Page 111</p>
<p>1 give some time to those that must review this material, 2 some further time, and a chance of being ready, because 3 the real risk of course is that core participants are 4 just not ready and have not had the adequate time to 5 review the material that's before them. 6 Within paragraph 25 of the submissions for Mr Child, 7 four points were raised, one of which was the 8 disclosure, if possible, immediately of documents. But 9 more than that, the second point was for a list to be 10 prepared of the nature and extent of documents that are 11 held. 12 We have heard today that there are, I think it was, 13 11,000 documents identified. It is a large number, of 14 course. It seems, and it is submitted, that it must 15 assist those core participants who need to review this 16 material to have an idea of the spread, the amount and 17 the type of material that is going to be before them, or 18 potentially before them. This is a huge exercise, 19 potentially, and one that must be done carefully ahead 20 of the substantive hearing. 21 There is a request within written submissions for 22 Mr Child that that's done within 14 days. Of course, 23 that is a date plucked to try to assist you. If not 24 14 days, it is asked that some consideration being given 25 to it within a short timescale nevertheless.</p> <p style="text-align: center;">Page 110</p>	<p>1 English Benedictine Congregation, which is why I have 2 been uncharacteristically quiet so far. My submissions 3 can be very brief on this, given the focus of the 4 hearing. 5 In respect of disclosure and also the related issue 6 of confidentiality, we have three submissions to make on 7 behalf of D2, and they also touch briefly on the next 8 agenda item in respect of timetable. 9 Firstly, we wanted to deal briefly with an issue in 10 relation to disclosure as part of the English 11 Benedictine Congregation case study to those core 12 participants like my client, who isn't directly affected 13 by the English Benedictine Congregation case study. 14 Secondly, I wanted to say something brief on the 15 confidentiality issue. And thirdly, I wanted to raise 16 one issue relating to wider disclosure at this stage and 17 timetabling. 18 So firstly, in respect of the English Benedictine 19 Congregation case study, we are very grateful for the 20 procedural note that's been provided, and we note that 21 in paragraphs 1 and 13 of the procedural note, reference 22 is made to disclosure to core participants who are not 23 directly affected by the English Benedictine 24 Congregation case study, who don't have direct 25 experience of or interest in that case study.</p> <p style="text-align: center;">Page 112</p>

<p>1 The phrase that is used, and it was repeated by                  2 counsel to the inquiry today, quite rightly, was:                  3 "Disclosure will be provided that is relevant to                  4 their interests, with relevance to be a matter for the                  5 inquiry."                  6 There is no dispute whatsoever on behalf of my                  7 client that he and others shouldn't receive all                  8 disclosure relating to the English Benedictine                  9 Congregation case study, and to that being                  10 disproportionate.                  11 We certainly agree with the indication given in                  12 paragraphs 1 and 13 that we and other core participants                  13 in this position should receive material which relates                  14 to the broader overview, the intended initial                  15 introductory overarching evidence that's outlined in                  16 paragraph 6 of the submissions.                  17 We just raise one issue. In paragraph 13 of the                  18 procedural note, reference is made -- as it is in                  19 paragraph 1 and as it was today -- to, for example, core                  20 participants such as D2 only receiving material related                  21 to the broader overview evidence.                  22 While of course we should receive that, we are just                  23 anxious to put down a marker that it may be that                  24 evidence outside that will indeed be relevant to us. So                  25 if you look at the submissions, for example, counsel to</p> <p style="text-align: center;">Page 113</p>	<p>1 assume that could be provided relatively easily. It is                  2 a process which has been used successfully in some other                  3 contexts. For example, in the Hillsborough Inquest,                  4 when there were documents which weren't being uploaded,                  5 we received regularly schedules which indicated what the                  6 titles of the document were, and if there were                  7 a question or concern arising, it could be raised in                  8 light of the title of the document.                  9 So it is just a practical suggestion which we hope                  10 would not be disproportionate or time-consuming, and may                  11 aid the inquiry and ensure those of us who aren't                  12 intimately connected with that case study can assist                  13 this Panel and assist you, Chair, in your difficult                  14 role.                  15 The second issue concerns confidentiality                  16 undertakings and the public hearing point. The backdrop                  17 obviously is the concerns expressed this morning in                  18 relation to press reports and also the importance of                  19 confidentiality to many victims and survivors, including                  20 my client, who is deeply concerned about this issue.                  21 Counsel to the inquiry has just made submissions                  22 after lunch responding to Mr Khan's point about there                  23 being a tension between confidentiality and a public                  24 hearing. It may be helpful just to note that the Court                  25 of Appeal in the Guardian News and Media case -- the</p> <p style="text-align: center;">Page 115</p>
<p>1 the inquest's submissions, paragraph 6, it is accepted                  2 that we may receive evidence relevant to that; but in                  3 paragraph 7, some evidence which has been English                  4 Benedictine Congregation focus may nevertheless be very                  5 relevant to the interests of D2 and to other complainant                  6 and non-complainant core participants.                  7 For example, on 7(v), the response to allegations of                  8 abuse when reported, which relates so closely to                  9 paragraph 2.2 of the scope document about institutional                  10 responses and information-sharing, it seems to us that                  11 some of that evidence may well be relevant; it may well                  12 be proportionate to provide it to those of us who                  13 weren't related directly to this particular case study;                  14 it may prevent us re-inventing the wheel when we come to                  15 the Birmingham case study.                  16 One option we wanted to propose, which we hope would                  17 not in fact be very time-consuming for your team, and it                  18 may also provide some reassurance in light of some of                  19 the concerns which were raised by Mr Khan, is that                  20 schedules which simply provide a list of the documents                  21 that have not been disclosed, with the description,                  22 could be provided to those non-ECB case study core                  23 participants.                  24 Given that they are going to be uploaded in any                  25 event to the document management system with a title, we</p> <p style="text-align: center;">Page 114</p>	<p>1 reference is 2012 EWCA Civ420 -- made clear that open                  2 justice is a fundamental principle at common law, it                  3 applies to all tribunals exercising the judicial power                  4 of the state, including this inquiry, and there is                  5 a presumption that when a document is referred to in                  6 open court, it will be disclosed to the press, if it is                  7 required for a proper journalistic purpose, but there                  8 may be countervailing reasons.                  9 That supports the submission that was made after                  10 lunch, and I understand is now not controversial, but                  11 there is a difference, in terms of the chronology,                  12 between documents provided in advance of a hearing and                  13 documents which are referred to during the course of                  14 a hearing. It may well be at a later stage, perhaps at                  15 the hearing that's referred to for October, given the                  16 concerns that have been raised about transparency and                  17 open justice, some thought can be given to whether some                  18 of these judgments should be uploaded post-hearing, so                  19 that they can be more readily available. We thought it                  20 sensible just to flag that point.                  21 The third issue relates to the timetable in respect                  22 of disclosure concerning the second case study, which is                  23 obviously not in the documents before you today.                  24 I raise this because my client has been a core                  25 participant for almost a year, for 11 months. As you</p> <p style="text-align: center;">Page 116</p>

<p>1 will know from previous submissions made on his behalf                  2 and documents provided to the inquiry, he, like many                  3 other victims and survivors, is exceptionally                  4 vulnerable, has post-traumatic stress disorder, and the                  5 uncertainty and lack of even a rough timetable going                  6 forward in respect of the Birmingham case study and this                  7 inquiry overall, rather than just this particular case                  8 study, which doesn't directly affect him, is causing                  9 some distress.</p> <p>10 It would be extremely helpful to him, and I suspect                  11 to others who are in a similar position, if we could                  12 have an indication, even in the broadest terms, in                  13 relation to both (a) when there is likely to be                  14 disclosure of relevant material received from the                  15 Archdiocese of Birmingham -- reference was made earlier                  16 today to there having been a significant amount of that                  17 material received from the Archdiocese of Birmingham.</p> <p>18 We entirely understand, as Ms Karmy-Jones QC said                  19 earlier, that the focus in the forthcoming months,                  20 assuming that there isn't an adjournment or, if there is                  21 an adjournment, it's only a short one, would be on the                  22 English Benedictine Congregation case study. We                  23 entirely understand that. But we would welcome                  24 a reassurance that disclosure in relation to Birmingham                  25 won't be parked until after that has been concluded and</p> <p style="text-align: center;">Page 117</p>	<p>1 for a year, are extremely vulnerable, and consideration                  2 of the documents and preparation time once the documents                  3 have been received is likely to be very time-consuming,                  4 certainly for my client and for others. It would be                  5 very helpful and efficient, we would suggest, if we                  6 could have a broad indication of timing, and if the                  7 disclosure process in respect of Birmingham could start                  8 sooner rather than later, to avoid any delays further                  9 down the line.</p> <p>10 Unless there is anything further, I think they are                  11 the three points we wanted to make. Thank you very                  12 much.</p> <p>13 THE CHAIR: Thank you, Ms Gallagher.</p> <p>14 Submissions by MR KELLY</p> <p>15 MR KELLY: I heard from counsel to the inquiry before,                  16 a little while ago she had said that the first tranche                  17 of disclosure had been made yesterday. Well, that,                  18 frankly, is news to us. We have not had it. We don't                  19 have access to the platform, nor to Relativity. I hope                  20 it is not going to be an indication of how the                  21 disclosure process will be done.</p> <p>22 MS KARMY-JONES: Can I just interject. I understand that                  23 the disclosure was made later on in the day yesterday,                  24 and that may be why Mr Kelly hasn't seen it yet. It was                  25 made, but I think either just later or outside office</p> <p style="text-align: center;">Page 119</p>
<p>1 that some of that material, that substantially amount of                  2 material already received, will start to be filtered                  3 through to us.</p> <p>4 We would also welcome, if it is possible to give it,                  5 in the broadest terms, an indication of the likely                  6 timetable in respect of that second case study, even if                  7 it is a "not before" date. That would be very helpful.</p> <p>8 We ask for that for three reasons. We are very                  9 conscious of the sheer scale of this investigation and                  10 the need for things to be done in stages and in                  11 a proportionate and manageable way, and nothing we say                  12 is intended to detract from that. But it is a matter of                  13 real concern to any client.</p> <p>14 The three points are: firstly, Birmingham has been                  15 designated as a case study from the outset.</p> <p>16 Secondly, as with other allegations, these are                  17 largely historic allegations, many concerning offences                  18 or alleged offences said to have taken place in the                  19 1970s and earlier, and time is getting on. D2 and many                  20 others have waited for many years. There is a real                  21 concern about passage of time, and also there is an                  22 issue which was referred to in Switalskis's written                  23 submissions regarding timing, and perpetrators -- or                  24 alleged perpetrators -- becoming much older and so on.</p> <p>25 The third point is that D2 and others, having waited</p> <p style="text-align: center;">Page 118</p>	<p>1 hours. That sort of matter, of course we can discuss                  2 further and obtain confirmation of it. But I am told                  3 categorically it was done yesterday, although late.</p> <p>4 MR KELLY: Yes. Well, I will not have a ping-pong. It has                  5 been checked and it hasn't happened. Perhaps we could                  6 discuss this later.</p> <p>7 THE CHAIR: Thank you very much. Mr Collins?</p> <p>8 Submissions by MR COLLINS</p> <p>9 MR COLLINS: Yes, thank you. Very briefly.</p> <p>10 Given the themes that you are charged with                  11 examining, it is inevitable, in my opinion, that there                  12 is going to have to be full disclosure. I say that on                  13 the basis of experience. I have the experience of                  14 having been involved in the Jersey inquiry, which had to                  15 examine not dissimilar themes. The disclosure in the                  16 Jersey inquiry was voluminous, and I don't pretend for                  17 one moment that I examined every single document that                  18 was provided.</p> <p>19 But at first blush, when you look at many of these                  20 documents in these sorts of cases, they appear anodyne.                  21 You think, "Well, why do I have this? What is this memo                  22 about? What is this minute about?", and so on.</p> <p>23 But then maybe many weeks if not many months later,                  24 these documents take on a particular significance,                  25 indeed very important significance, particularly when</p> <p style="text-align: center;">Page 120</p>

<p>1 you are looking for patterns. If you are looking for                  2 patterns of behaviour, say, in an institution or                  3 patterns of behaviour when it comes to an individual,                  4 these sort of anodyne documents that at face value seem                  5 to be of no weight whatsoever are terribly significant.                  6 If all of the core participants are going to be                  7 encouraged to engage actively with the inquiry, there is                  8 going to have to be full disclosure. It is not                  9 a question of what may seem to be relevant today,                  10 because what may be irrelevant today turns out to be                  11 relevant next month or next year.                  12 I think that is, on the basis of experience,                  13 a fundamental concern to ensure that all the core                  14 participants do have full access to the material that is                  15 going to be available to the inquiry, in order to help                  16 you.                  17 That's the submission I wish to make. Thank you.                  18 THE CHAIR: Thank you, Mr Collins. Does anyone else wish to                  19 be heard?                  20 Submissions by MS KARMY-JONES                  21 MS KARMY-JONES: Just a few points in reply.                  22 First of all, can I say in relation to my learned                  23 friend Ms Gallagher QC's submissions, we have listened                  24 and heard them and we will consider them. Perhaps we                  25 can discuss the proposals that she makes between</p> <p style="text-align: center;">Page 121</p>	<p>1 consider in considering relevance.                  2 In relation to obtaining catalogues of documents, by                  3 which I anticipate Mr Khan, who raised it, means all                  4 documents held by an institution -- and this has been                  5 raised by others -- to do so would be a wholly                  6 disproportionate task. As with all other inquiries,                  7 institutions are asked to provide potentially relevant                  8 material to the inquiry and it is for the inquiry to                  9 assess relevance. They are specifically told to keep                  10 their parameters wide.                  11 We in principle do not agree to providing a list of                  12 irrelevant material. Again, relevance is a decision for                  13 the inquiry.                  14 In terms of the request for a list of institutions,                  15 that list was given at the outset of this hearing and                  16 will be available to the parties on the transcript. If                  17 there are any difficulties, they can discuss those with                  18 us at a later stage.                  19 In terms of timetable, because that has now been                  20 addressed, preparing documents for disclosure is                  21 a vastly time-consuming process. Redactions need to be                  22 made, ciphers need to be added, a significant amount of                  23 care needs to be put into the preparation for                  24 disclosure. It is not something that can be rushed.                  25 All speed is being taken, and bringing the timetable</p> <p style="text-align: center;">Page 123</p>
<p>1 ourselves, and not deal with them here.                  2 Certainly in relation to the Birmingham inquiry, our                  3 position is that we should focus here on the case in                  4 hand for the hearing in November/December. There is                  5 another preliminary hearing at which an update can be                  6 given by us, and we can consider then whether or not any                  7 timetable can be set down. And if not then, we propose                  8 that at the conclusion of the hearing in December there                  9 should be a further hearing to address the outstanding                  10 issues.                  11 A few bullet points. There cannot be blanket                  12 disclosure. It is for the inquiry to determine                  13 relevance. Disclosure will be on a rolling basis. The                  14 Chair has already previously indicated that there must                  15 be an eye to proportionality.                  16 In respect of institutions and holders of material,                  17 it remains an obligation on the material-holder under                  18 section 35 of the Inquiries Act to retain potentially                  19 relevant material, and in our submission it would not be                  20 proportionate for the inquiry to inspect every document                  21 held by every material-holder. We execute our                  22 responsibilities by continuing to have discussions with                  23 all providers about the approach they take to                  24 potentially relevant material, and in that way to ensure                  25 that they are aware of the parameters that they must</p> <p style="text-align: center;">Page 122</p>	<p>1 forward to that which we suggest will be                  2 counterproductive, in our submission.                  3 That is all I propose to say at this stage in                  4 respect of further disclosure. I don't know whether                  5 there is anything else that anyone wishes to add in                  6 respect of that, but I propose now to go on to some of                  7 the additional issues that have been raised before you                  8 bring these proceedings, Chair, to a close.                  9 THE CHAIR: Are there any other matters? Any more                  10 submissions?                  11 Please proceed, Ms Karmy-Jones.                  12 OTHER MATTERS                  13 Submissions by MS KARMY-JONES                  14 MS KARMY-JONES: In respect of other matters then,                  15 Ampleforth have made submissions to suggest that each                  16 institution produce a list of witnesses that it intends                  17 or suggests should be called, identifying which topic                  18 that witness may be able to speak to. They suggest                  19 a date of Friday, 16 June 2017.                  20 It is perhaps more for the other institutions, but                  21 our response is that we will, of course, consider any                  22 witness list provided. It is for the inquiry to make                  23 a final decision, as I have made clear throughout. But                  24 we are open to suggestions and will take them into                  25 consideration in making a selection. We will also</p> <p style="text-align: center;">Page 124</p>

<p>1 produce a suggested witness list in due course, and the 2 core participants will have an opportunity to make 3 submissions on that. 4 In terms of further preliminary hearings for the 5 Benedictine case, as I have already referred to it, we 6 propose that there should be a further preliminary 7 hearing early in October of this year, and that after 8 the case study hearing -- should there be one -- in 9 November/December, we further propose a further 10 preliminary hearing in order to discuss the next steps 11 in relation to the investigation, at which stage we will 12 be able to provide an update as far as a number of 13 things, such as Ealing and potentially the Scottish 14 inquiry in Fort Augustus and some of the matters that 15 have been raised today, or at least we may be able to do 16 so. 17 THE CHAIR: Thank you. 18 Are there any submissions? 19 Submissions by MR KHAN 20 MR KHAN: Forgive me, I didn't realise that that gap was an 21 invitation for any other matters. There were two short 22 matters I wanted to raise. I didn't want to step on 23 anybody's toes if there are other matters. 24 I need to revisit one issue from this morning, 25 simply because Ms Karmy-Jones referred to correspondence</p> <p style="text-align: center;">Page 125</p>	<p>1 Thus far, thus clear. In seeking clarification on 2 that, a response came back from Mr Oliver Carlyon, the 3 investigation lawyer. I read the second paragraph of 4 that email on 14 September: 5 "The paragraph of my letter ..." 6 The one that I have just read out: 7 "The paragraph of my letter to which you refer was 8 intended to put the Chair's designation decision in 9 context. The inquiry is bound by its terms of 10 reference, which specifically state that, 'The inquiry 11 will cover England and Wales'. As the Chair explained 12 in her decision, because abuse at Fort Augustus School 13 is said to have been perpetrated by monks from the EBC, 14 it was appropriate for her to designate your clients as 15 core participants." 16 This is the important sentence. Forgive me it has 17 taken so long to get to it: 18 "When the inquiry looks at institutional failure by 19 the EBC, it will be examining institutional failure in 20 England and Wales, even in respect of abuse that took 21 place within Scotland, because that is what it is 22 required by its terms of reference to do." 23 That supports our submission that simply because 24 Fort Augustus is located in Scotland, it does not mean 25 that matters can be considered in relation to what</p> <p style="text-align: center;">Page 127</p>
<p>1 between the inquiry and our firm in relation to the 2 issue of Fort Augustus. I wonder whether I could bring 3 that to your attention at this stage? I didn't have it 4 at the time, and over the luncheon adjournment I was 5 able to obtain it. It does assist our submissions. 6 If I may just, if you would allow me to, read the 7 correspondence that passed. There was correspondence 8 between our firm and the inquiry in relation to the 9 terms of reference and the remit, and it is simply this, 10 and I hope I can take it shortly. This is a letter from 11 the inquiry: 12 "As you know, the inquiry is bound by its terms of 13 reference, which confine its remit to England and Wales. 14 However, a number of your clients who allege that they 15 were abused by members of the EBC within Scotland have 16 been granted core participant status. As explained in 17 her notice of determination, the former Chair considered 18 that they had a significant interest in the matters 19 under investigation, specifically the case study into 20 the EBC. In keeping with the inquiry's terms of 21 reference, the focus of that case study will be upon the 22 potential institutional failings of the EBC and other 23 institutions based in England and Wales, rather than 24 institutions in Scotland over which the inquiry has no 25 remit."</p> <p style="text-align: center;">Page 126</p>	<p>1 happened there, and the overriding supervision and 2 control in Fort Augustus by that, which is basically -- 3 that is that point. I thought, given the decisions that 4 have been made, that you ought to be aware of that. I'm 5 sure if I have not included everything, then counsel to 6 the inquiry will inform you. 7 The second thing is a very pragmatic thing, which is 8 in relation to venue. It is of some concern to my 9 clients that they are not here, and the reason they are 10 not here is because there wasn't enough space. They 11 were asked, if they were attending, to share a room 12 where the media would be. Obviously it is difficult for 13 that to happen. That's my understanding. If I am 14 mistaken, then I apologise. 15 But in future, what I would ask the inquiry is to do 16 is to ensure that a venue is obtained which allows for 17 all core participants to be present and to be 18 participating in the inquiry in the actual hearing room. 19 I know that the venue is up in the air. I think at 20 one point Blackfriars was mooted as a particular option, 21 I'm not sure whether that is still there, and I know we 22 have had hearings in Hatton Garden which had a larger 23 overspill room. 24 Certainly as far as our clients are concerned, they 25 would not wish to be present in a room where the media</p> <p style="text-align: center;">Page 128</p>

<p>1 could be making notes, viewing them, particularly if                  2 they are in a distressed state, writing about them and                  3 so forth. They need to have appropriate facilities.                  4 I do consider that to be a very important issue as far                  5 as core participants are concerned.                  6 THE CHAIR: Thank you, Mr Khan.                  7 Are there any other submissions to make on the other                  8 matters raised?                  9 Submissions by MR KELLY                  10 MR KELLY: It is a question really. The agenda suggests                  11 disclosure and then move on to timetable. Most of the                  12 points which I wish to make do concern time, but are                  13 related to disclosure. So the question is: do you want                  14 me to deal with those now or under timetable?                  15 MS KARMY-JONES: I think we have largely concluded all                  16 submissions in respect of timetable. So if Mr Kelly                  17 wishes to amplify, perhaps it should be done now.                  18 THE CHAIR: Yes.                  19 MR KELLY: Much of what I have to say about the timetable                  20 for disclosure depends upon the date fixed for the                  21 hearing. Proceeding on the basis it is as currently                  22 indicated, we would like a fixed date for disclosure of                  23 the material to be relied upon by the inquiry.                  24 Paragraph 12 of the procedural notes suggests that                  25 disclosure in separate tranches over the coming months.</p> <p style="text-align: center;">Page 129</p>	<p>1 an awful lot tighter than, "We will have it done by the                  2 end of October". There is insufficient time on that                  3 rather lax, if not to say elasticated, timetable.                  4 Those are the dates that I suggest on behalf of                  5 Ampleforth in respect of that. Unless I am able to                  6 assist you further.                  7 THE CHAIR: Thank you.                  8 Ms Gallafent?                  9 Submissions by MS GALLAFENT                  10 MS GALLAFENT: I am grateful. Can I deal first of all with                  11 the suggestion that there should be an exchange of                  12 a list of witnesses by next Friday.                  13 So far as the EBC and those of its abbeys and                  14 schools that I represent are concerned, that poses some                  15 difficulty, at least at the moment, because of course                  16 the question of the one of the two abbeys, Worth, is                  17 still provisional. Until the tribunal has had an                  18 opportunity to consider our responses to the various                  19 inquiries and further information to be provided, it                  20 couldn't possibly be right for us to identify witnesses                  21 and provide them to the inquiry at this stage.                  22 There is a more fundamental problem, which is: it                  23 seems to us it is very difficult to see how any core                  24 participant, save where it is an individual concerned,                  25 can properly identify witnesses in advance of</p> <p style="text-align: center;">Page 131</p>
<p>1 I'm afraid that really isn't good enough. We need to                  2 have it. Take, for example, what is said about the                  3 disclosure yesterday, whether it was late last night or                  4 whatever, but it still hasn't turned up with us today.                  5 It is not acceptable also to say that the outside                  6 date is the end of October 2017 because that leaves next                  7 to no time -- 17 days -- for a response. Again, that                  8 cannot possibly be said to be fair in any respect.                  9 We would suggest that disclosure -- even though the                  10 tribunal has had this material certainly from us; we                  11 have cooperated at every stage throughout and provided                  12 a great deal of material. We see no reason why they                  13 couldn't have disclosure by the end of July, identify                  14 that which they intend to rely upon.                  15 That would then enable the institutions and others                  16 to respond, say, by the end of September, say                  17 22 September. I then would suggest a date for                  18 a pre-hearing review on 6 October and then we move into                  19 the hearing. At least there is a degree of structure                  20 and logic to that.                  21 What I think would be a total car crash is if this                  22 is to be a disclosure just as and when we feel like it,                  23 tranches here, tranches there, tranches everywhere.                  24 I can see that that is simply going to lead to                  25 a disaster. There has to be structure, and it has to be</p> <p style="text-align: center;">Page 130</p>	<p>1 disclosure, because in the usual course of events the                  2 disclosure would drive the choice of witnesses who could                  3 then best speak to the particular relevant document.                  4 Of course, the difficulty with the disclosure                  5 process -- and those of us who have been involved in the                  6 child migration case study as well will be very live to                  7 this -- is that there are a number of stages. The                  8 first, of course, is disclosure by the core participant                  9 or by another information provider, because of course                  10 the inquiry has often made requests of those who are not                  11 core participants, disclosure of those documents to the                  12 inquiry.                  13 It then may take quite some time for the inquiry                  14 itself to reach a view on relevance. As Ms Karmy-Jones                  15 accurately points out, ultimately it is for the inquiry                  16 to decide what is relevant, and core participants and                  17 those from whom requests have been made have been told,                  18 who adopt a broad view of relevance, and therefore no                  19 doubt disclosure is wider than it might be, for example,                  20 in civil litigation.                  21 But once the inquiry has gone through that process,                  22 there is the redaction phase. The Panel and the Chair                  23 will potentially be very used to it, and I made the same                  24 submissions at the preliminary hearing in relation to                  25 child migration. That is a very important stage and</p> <p style="text-align: center;">Page 132</p>

<p>1 cannot properly, fairly, be rushed, particularly with                  2 the interests of victims and survivors, because of                  3 course distinguishing identifying information forms part                  4 of a submission I made almost a year ago in relation to                  5 mosaic identification in the event.                  6 We consider it is very important that the process of                  7 redaction isn't rushed. We are acutely aware there can                  8 be large numbers of documents to be looked at, with                  9 relatively short deadlines, and frankly it isn't always                  10 possible, but we do our best. But we don't think it is                  11 appropriate to try and cut out or diminish that                  12 important safeguard for, in particular, the victims and                  13 survivors and those others mentioned in the documents.                  14 Thirdly, having gone through that process, then                  15 there is the question of disclosure by the inquiry to                  16 other core participants. That of course then gives rise                  17 to the question for the inquiry, which is which core                  18 participant needs which part of the disclosure, and                  19 where their interests require or deserve it. Those are                  20 not short processes.                  21 To an extent, as it were, I'm making submissions on                  22 behalf of the inquiry as well as ourselves. But for our                  23 part, whilst we of course concur that the sooner the                  24 disclosure process can be carried out, the better for                  25 all concerned, we would equally be concerned on the</p> <p style="text-align: center;">Page 133</p>	<p>1 Submissions by MS KARMY-JONES                  2 MS KARMY-JONES: Just for the avoidance of doubt, in case it                  3 wasn't clear in the submissions I was making earlier,                  4 the exchange of witnesses -- I think Ms Gallafent                  5 realises this, but for others in the room -- the                  6 exchange of witnesses proposal was not the inquiry's                  7 suggestion but Ampleforth's suggestion, as taken from                  8 their submissions in writing.                  9 Just to deal with one matter raised by Mr Khan, who                  10 suggested that some of his clients were asked to share                  11 a room with the media. I want to clarify that.                  12 All parties have been made aware that space is                  13 always allocated on a first come, first served basis,                  14 and if no space is available, one has to take what                  15 remains. It may well be that what remained today, with                  16 apologies, was in the media room. There was no request                  17 as such. That is what was available, I understand.                  18 So I wish to make that clear, so that it is not                  19 considered that we deliberately put them in with the                  20 media.                  21 THE CHAIR: Thank you, Ms Karmy-Jones.                  22 If there are no other matters, I would like to thank                  23 you all again for attending today, and for your many and                  24 detailed helpful submissions. I am particularly                  25 grateful to all of you who have had to travel quite some</p> <p style="text-align: center;">Page 135</p>
<p>1 other side if it is rushed to the point where, for                  2 example, redactions are not made appropriately or there                  3 isn't the proper sift given to relevance in the first                  4 place.                  5 So I am not proposing to put forward a counter                  6 timetable to that advanced by Mr Kelly. We understand                  7 why he suggests that there should be a timetable. But                  8 with the best will in the world, we can't see a better                  9 course than rolling disclosure in tranches.                  10 It may well be that on a practical level, there may                  11 be better ways in which to communicate that disclosure                  12 has been made and what areas that disclosure might                  13 cover. It seems to us that is a matter that can be                  14 dealt with at solicitor to the inquiry level, with other                  15 solicitors.                  16 But we don't suggest it would be helpful to identify                  17 arbitrary dates and deadlines for disclosure at this                  18 stage, but of course having regard to the end time,                  19 which is of course disclosure should and must be made in                  20 good time before the inquiry hearing starts in October,                  21 to ensure all have a fair opportunity to consider it.                  22 THE CHAIR: Thank you, Ms Gallafent.                  23 Ms Karmy-Jones?                  24                  25</p> <p style="text-align: center;">Page 134</p>	<p>1 distance to be here with us today.                  2 We have heard submissions on a number of important                  3 topics about which it is clear there is significant                  4 strength of feeling amongst a number of core                  5 participants. Along with the Panel, I will carefully                  6 consider all of the submissions we have heard and I will                  7 provide our view in due course.                  8 That concludes this preliminary hearing. Thank you                  9 very much.                  10 (3.10 pm)                  11 (The hearing concluded)                  12 I N D E X                  13                  14 Introductory remarks .....1                  15                  16 Submissions by MS KARMY-JONES .....4                  17                  18 COMBONI MISSIONARY ORDER .....17                  19                  20 Submissions by MS KARMY-JONES .....17                  21                  22 Submissions by MR ENRIGHT .....19                  23                  24 Submissions by MR KHAN .....31                  25</p> <p style="text-align: center;">Page 136</p>

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