

<p>1 Tuesday, 14 January 2020 2 (10.30 am) 3 Welcome and opening remarks by THE CHAIR 4 THE CHAIR: Good morning, everyone. As you all know, I am 5 Alexis Jay and I'm the chair of the Independent Inquiry 6 into Child Sexual Abuse. Sitting with me are the other 7 panel members of the inquiry: Professor Sir Malcolm 8 Evans, Ivor Frank and Drusilla Sharpling. 9 On behalf of the inquiry, I welcome you all to this, 10 the second preliminary hearing in the investigation into 11 child protection in religious organisations and 12 settings. As we have stated previously, this 13 investigation is a thematic one which will review the 14 current child protection policies, practices and 15 procedures in religious institutions in England and 16 Wales. 17 It will not include a detailed investigation into 18 any individual religious organisation. 19 Religious institutions can play a significant and 20 very important role in children's lives and the purpose 21 of this investigation is to understand how they keep 22 children safe. We will also be considering the extent 23 to which there is, or should be, any external oversight 24 of child protection in religious institutions, either 25 from government departments or within local authorities.</p> <p style="text-align: center;">Page 1</p>	<p>1 The purpose of today's preliminary hearing is: 2 1. To update core participants about the work which 3 has been done to date on this investigation and the work 4 which will be done over the course of the coming months. 5 2. To hear about the practicalities for the public 6 hearing in March 2020. 7 3. To hear submissions about applications for 8 restriction orders on behalf of witnesses to this 9 investigation. 10 4. To consider any other issues which core 11 participants wish to raise. 12 I now ask Ms Fiona Scolding QC to proceed. Thank 13 you, Ms Scolding. 14 Opening statement by MS SCOLDING 15 MS SCOLDING: Good morning, chair and panel. I am 16 Ms Fiona Scolding, counsel to this investigation. On my 17 left sits Ms Nikita McNeill and Mr Olinga Tahzib, who 18 are also counsel to this particular investigation. As 19 you have already identified, chair, the purpose of 20 today's hearing is to provide information about the work 21 that this investigation has been carrying out and to 22 discuss the process and framework for the hearings which 23 are scheduled to begin on 16 March 2020. Every core 24 participant has been sent an agenda for today's hearing. 25 I will seek, firstly, to explain the processes we</p> <p style="text-align: center;">Page 2</p>
<p>1 have undertaken and the stage we are at in disclosing 2 material in advance of the hearing. I will then talk 3 about our preparations for the hearing itself. I will 4 then discuss and set out some practicalities about the 5 hearing. I will then turn, chair, to the application 6 for a restriction order which has been made by three 7 individuals known to us as PRX1, 2 and 3, and both 8 myself and Mr Brady, on behalf of the Christian 9 Congregation for Jehovah's Witnesses will make some 10 brief oral submissions based upon the written 11 submissions already filed before you. 12 I will then pass to Mr Barker, who wishes to make 13 some submissions about the elements of the hearing and 14 evidence in respect of the Jehovah's Witnesses. He acts 15 on behalf of a Jehovah's Witness advocate's group of 16 those who have left the organisation. Written 17 submissions were circulated on 7 January 2020, and, 18 again, I will ask anybody who wishes to reply or make 19 any further submissions -- I understand Mr Scorer and 20 Mr Brady are likely to want to make submissions at that 21 stage, and I will then briefly reply to those. 22 Last, Mr Scorer wishes to make some oral submissions 23 about the evidence of his clients at the hearing and any 24 other core participant may respond to those submissions 25 if they wish to do so, and I will then respond to</p> <p style="text-align: center;">Page 3</p>	<p>1 Mr Scorer. 2 Then, if there is any other business, I will then 3 pass over to that. 4 Chair, obviously we have a full house today. I will 5 attempt to correctly identify everyone, but I am going 6 to apologise in advance. 7 To my right, Mr Scorer and Ms Harrison are of 8 Slater & Gordon solicitors who represent the following 9 organisations. Firstly, Migdal Emunah, which is an 10 advocacy group for victims and survivors of sexual abuse 11 within the Jewish community. Secondly, Southall Black 12 Sisters, an organisation representing women and girls 13 subject to violence, including sexual violence, within 14 the African, Afro-Caribbean and South Asian communities. 15 Thirdly, Lisa Oakley, chair of the National Working 16 Group on Child Abuse Linked to Faith and Belief. 17 Fourthly, Yasmin Rehman, the chief executive officer 18 of JUNO Women's Aid, formerly Women's Aid Integrated 19 Services, an organisation representing women and girls 20 who have been subject to sexual violence. Fifthly, 21 Sadia Hameed, the director of Gloucestershire Sisters, 22 an organisation for black and ethnic minority women and 23 girls who have been subject to sexual violence, 24 including sexual abuse. Next, the Interfaith 25 Alliance UK, which is a group of Muslim, Jewish and</p> <p style="text-align: center;">Page 4</p>

<p>1 Hindu faith leaders who work together on issues of 2 sexual abuse found within faith communities. Last, 3 Mr Scorer represents Mr Lloyd Evans, who provides 4 advocacy services for those who used to be Jehovah's 5 Witnesses. 6 Next to him is Mr Samuel Barker, a solicitor at 7 Hugh James, who represents a group of Ex-JW Advocates 8 Opposing Crimes Against Children. 9 Behind me is the Charity Commission represented 10 today by Felix Rechtman, the head of litigation, and 11 Iman Mabrouk, a litigation lawyer. 12 Next to Mr Rechtman are Ofsted, represented by 13 Ms Hannett and Ms de Coverley, as well as Ms Forrester, 14 who I believe is sitting in the public gallery. 15 At the end of the bench is the Home Office, 16 represented today by Ms Walker, Ms Amelia Walker, of 17 counsel and Mr Rapport of the Government Legal 18 Department. 19 Turning to the last bench on that side, chair, there 20 is the Pagan Federation represented today by 21 Ms Sarah Kerr, the vice-president of that organisation, 22 and Ms Emma Hoole, the advocacy officer. 23 On the front row in the middle are 24 Mr Ioannis Athanasiou, the safeguarding advisor for the 25 United Reformed Church, and Mr Richard Church, the</p> <p style="text-align: center;">Page 5</p>	<p>1 deputy general secretary. 2 Next to them is Ms Caroline Sanderson, the legal 3 services manager of the Baptist Union of Great Britain 4 alongside with Ms Rachel Stone, who is the people 5 support and safeguarding manager. 6 Turning now to the benches behind Mr Scorer and 7 Mr Barker, one has in the corner the Christian 8 Congregation of Jehovah's Witnesses represented today by 9 Mr Shane Brady of counsel and Mr Jo Ansong, solicitor. 10 Turning next to them are the United Synagogue, 11 a group of Jewish synagogues, represented today by 12 Mr David Frei, the child protection officer and director 13 of legal services. 14 Next to them are the Union of Hebrew Congregations, 15 represented today by Ms Jefferson of Berrymans 16 Lace Mawer Solicitors. 17 Turning to the second row, Liberal Judaism is today 18 represented by Ms Shelley Shocolinsky-Dwyer, the 19 operations director. 20 And Reform Judaism today is represented by 21 Ms Sharon Daniels, the wellbeing and inclusion manager 22 for that organisation. 23 In the front row, chair, Thirtyone:eight are today 24 represented by Mr Justin Humphreys, their chief 25 executive, and Ms Karen Eakins, who is the head of</p> <p style="text-align: center;">Page 6</p>
<p>1 consultancy and engagement. 2 In the second row, there is the Methodist Church of 3 Great Britain. Present today is Mr Tim Carter, who is 4 the director of safeguarding. 5 Again, next to Mr Barker are representatives of 6 Kol v'Oz, which is a survivor organisation operating 7 internationally for those who have been subject to 8 sexual abuse within the Jewish community, represented 9 today by Ms Julie Taberer and Ms Shannon Moore, 10 solicitors at AO Advocates. 11 And last, but by no means least, is Shema Koli, 12 a small charitable organisation dealing with issues 13 within the Jewish community, including those of sexual 14 violence and sexual abuse, represented today -- and 15 they're sitting in the middle row, in the middle -- by 16 Mr Adam Gersch of counsel and also by -- by 17 Mr Adam Gersch, of counsel, as I understand it. 18 Not present today, but core participants, are the 19 Evangelical Alliance. 20 So, now that I have introduced those individuals, 21 since the first preliminary hearing, I would identify 22 that the following organisations have been designated as 23 core participants. Firstly, the Methodist Church of 24 Great Britain, which is the fourth largest Christian 25 denomination within the United Kingdom. Secondly,</p> <p style="text-align: center;">Page 7</p>	<p>1 Shema Koli, an organisation providing advice and 2 assistance to those within the orthodox Jewish 3 community, or Haredi Jewish community, who have 4 experienced or been affected by sexual, physical or 5 emotional abuse. Next, Kol v'Oz, an organisation which 6 provides advocacy services and representations to Jewish 7 victims and survivors of sexual abuse worldwide. And, 8 lastly, Lloyd Evans, who provides advocacy and 9 representation services for those who used to be members 10 of the Jehovah's Witnesses. 11 Chair and panel, the inquiry team have spent the 12 past six months requesting, collating and reviewing 13 evidence from a large number of organisations who are 14 involved, in one way or another, in child protection 15 within a religious setting. We want to thank each and 16 every one of you who has taken the time and effort to 17 produce evidence for the inquiry. We know how 18 burdensome it can be, particularly for organisations 19 which are largely volunteer led, and are, as ever, 20 grateful for your conscientious and careful attention 21 and for your patience in dealing with our queries. 22 This investigation has cast its net wide in 23 identifying the individuals and organisations from which 24 it has requested relevant evidence. The majority of 25 the evidence received is in the form of witness</p> <p style="text-align: center;">Page 8</p>

<p>1 statements with relevant documentary material exhibited 2 to them.</p> <p>3 To date, we have made requests for over 120 witness 4 statements and have received approximately 90 of them in 5 draft form. The chair has exercised her powers under 6 section 21 of the Inquiries Act 2005, where required, to 7 ensure that information is provided to us.</p> <p>8 We are still awaiting draft witness statements from 9 around a dozen individuals and organisations. We hope 10 to be in a position to have all of those by the end 11 of January. If that does not take place, then, plainly, 12 chair, you may be required to exercise your powers to 13 ensure that those individuals are able to provide us 14 with adequate evidence.</p> <p>15 We have already disclosed 51 witness statements in 16 final form, which amounts to some 11,661 pages of 17 material. We started the process of disclosure on 18 22 November 2019 and have been disclosing material 19 pretty much on a rolling basis since then.</p> <p>20 We are hoping to be in a position to have disclosed 21 the majority of evidence already in our possession by 22 the beginning of February 2020, so approximately six 23 weeks before the hearing. Plainly, as has been 24 identified, there is some material still missing, and 25 that will obviously be provided once the appropriate</p> <p style="text-align: center;">Page 9</p>	<p>1 checks have been put in place and once we have received 2 it.</p> <p>3 At the last preliminary hearing, we identified the 4 themes that we are exploring. Our evidence requests 5 were very much based around those themes in order to try 6 to obtain as much information as possible about those 7 topics.</p> <p>8 We have requested evidence from dozens of religious 9 organisations and have asked all of them about the 10 community religious activities and education they 11 undertake. The answers we have been given about the 12 extent of it have varied considerably. Some 13 organisations provide little or no youth activities 14 expressly badged; others provide a very comprehensive, 15 wrap-around menu of activities, including after-school 16 and holiday provision. But everyone does something 17 which involves children.</p> <p>18 Some organisations have told us that their 19 responsibilities are very limited because children are 20 only ever present with their parents or other family 21 members during religious activity. In those 22 circumstances, the organisation considers that it is not 23 undertaking regulated activity and therefore the 24 oversight and/or training undertaken within those 25 institutions may be limited.</p> <p style="text-align: center;">Page 10</p>
<p>1 Where religious and community activities do take 2 place, we have asked about the current arrangements for 3 ensuring that adequate child protection is undertaken 4 within that context.</p> <p>5 Part of this investigation is about seeking to 6 examine the culture which underpins various religious 7 organisations. By "culture", we mean the values of an 8 organisation in respect of its approaches to child 9 protection, which will then lead to various decisions 10 being made, appointments being taken or action, or lack 11 of action, which then takes place when concerns are 12 raised. We want to know if there are issues about the 13 culture of all religious organisations or some of them 14 or some aspects of the culture of religious 15 organisations which can or have in the past inhibited 16 effective responses to child sexual abuse.</p> <p>17 We have several witness statements from individuals 18 and organisations who have provided us with a collection 19 of examples of accounts of non-recent alleged or proven 20 sexual abuse. Those accounts have informed us, on 21 occasions, that these individuals were disbelieved, 22 belittled or ignored; in some cases they were ostracised 23 from their previous life within the heart of 24 the religious community or blamed for what had happened 25 to them. These individuals, from a variety of religious</p> <p style="text-align: center;">Page 11</p>	<p>1 backgrounds, have also told us in some cases of a desire 2 by the institution not to report the sexual abuse to 3 secular authorities for the fear of the reputational 4 damage it may cause, such fear overriding any concerns 5 about justice for those who were subject to abuse. They 6 have also told us of a desire to deal with matters 7 within the context of the religious organisation, 8 considering that the spiritual authority that they could 9 use against members or religious faith leaders was more 10 powerful a force for good than engagement with the 11 outside authority.</p> <p>12 A number of religious organisations have indicated 13 to us that one of the significant issues they still have 14 is that many within their organisations find it 15 difficult to believe that those active and religious 16 could be capable of sexual abuse. There is often 17 a sense of disbelief and shock when such abusers have 18 come to light, because it is simply felt that that could 19 not happen within that organisation.</p> <p>20 We have also asked organisations about their 21 policies on reporting abuse and, in particular, any 22 whistleblowing practices. Practice, again, varies 23 widely across religious organisations as to whether or 24 not they have any policies and, if so, whether they are 25 implemented. Most religious organisations who have</p> <p style="text-align: center;">Page 12</p>

<p>1 given us evidence to date have little or no experience 2 of someone reporting abuse to them in the recent past, 3 or, if they do have, it is in fairly small numbers -- no 4 more than a handful in most cases. It is not clear, on 5 the basis of the evidence we have currently received, 6 whether this is because abuse has not happened or 7 because individuals do not wish to report abuse which 8 may have taken place to the religious authorities. 9 Witnesses who have reported such abuse have 10 identified, on occasions, concerns about their treatment 11 at the hands of the organisation, as I have already 12 identified. There is very limited data or information 13 about redress and reparations by these religious 14 organisations, as few cases have resulted in civil 15 claims. Internal complaint systems often take 16 a significant period of time. Very few religious 17 organisations have counselling or therapeutic services 18 available easily or as a matter of routine if such 19 disclosures are made. 20 We have also asked various statutory agencies for 21 witness evidence from them. We have limited evidence of 22 information sharing between religious organisations 23 where disciplinary action has been taken in one and then 24 an individual wishes, for example, to worship or 25 undertake their practice within another denomination,</p> <p style="text-align: center;">Page 13</p>	<p>1 for example, or even within the religious organisation 2 itself. The most common way that religious 3 organisations have told us that sex offenders who are 4 within their congregation or within their organisation 5 come to their attention is by contact from the probation 6 services or the police, rather than from internal 7 notification. 8 There is no obligation upon religious organisations 9 at present to report sexual abuse to the police or to 10 Social Services, but we have asked local authorities for 11 information about how they relate to or manage issues of 12 child protection involving sexual abuse in religious 13 organisations which exist in their community. Most 14 local authorities have told us of a relationship they 15 have with the Church of England and some have told us of 16 a relationship they have with the Roman Catholic Church. 17 Some other local authorities have done some work with 18 other religious organisations, but for most local 19 authorities this is at a sporadic and reactive level. 20 Some local authorities are currently working towards 21 mapping religious organisations and trying to form some 22 more formal or informal partnership arrangements, but 23 this is all at a stage which could be considered to be 24 embryonic. 25 Religious organisations have, at their heart of</p> <p style="text-align: center;">Page 14</p>
<p>1 their mission, the care of the vulnerable and the care 2 of those who have offended, including those who have 3 sexually offended. We have asked questions about what 4 processes there are in place of risk assessment if those 5 individuals are likely to come into contact with 6 children and young people to identify, firstly, if they 7 have any such processes; two, if they do, who undertakes 8 those processes and if there is any involvement from the 9 police or probation services; and if there are formal 10 child protection/covenant of care agreements put in 11 place between the worshipper and the religious 12 organisation and how that works in practice. Again, the 13 evidence we have at present demonstrates that practice 14 varies widely between having formal covenants of care in 15 place and not really being engaged in those forms of 16 risk assessment or management at all. 17 We have asked all religious organisations what sort 18 of resources have been provided to them to manage child 19 protection. Again, most of those working in the area 20 have told us that they have some resources, physical and 21 financial, but they have often talked of 22 the difficulties in managing largely volunteer-led 23 organisations where often all the trustees and those who 24 lead the organisation are volunteers rather than 25 employees or office holders.</p> <p style="text-align: center;">Page 15</p>	<p>1 This investigation has also asked if there are or 2 should be any kind of monitoring, auditing, review or 3 assurance process, whether internal by way of someone 4 within the organisation checking what is going on, or 5 some form of external auditing and assurance processes. 6 Again, there is limited evidence of some external 7 assurance by some religious organisations, but it is by 8 no means universal or widespread. 9 We have asked a number of government departments for 10 evidence in an effort to build a picture of who, on 11 behalf of the state, is responsible for ensuring 12 adequate child protection within religious organisations 13 and settings. The Department of Community Housing and 14 Local Government have told us of the work they are doing 15 on something called Strengthening Faith Institutions, 16 a scheme which includes the provision of safeguarding 17 training and a chance for an organisation to undergo 18 a form of audit of their current child protection 19 practices. This is a voluntary programme and around, 20 I think, 300 or 400 religious organisations have been 21 involved to date. The Department for Culture, Media and 22 Sport has also provided support and money for schemes 23 for improved child protection within charitable 24 institutions, as a result largely of concerns which have 25 been raised in respect of a number of charities who have</p> <p style="text-align: center;">Page 16</p>

<p>1 large presences abroad. 2 There is no specific role in the oversight of child 3 protection policies and practices within religious 4 organisations by the Department of Education, Ofsted, 5 the Social Work Inspectorate of Wales or Estyn, the 6 Welsh equivalent of Ofsted, unless those organisations 7 provide nursery education, full-time schooling or 8 registered social care facilities, such as children's 9 homes. 10 The Department for Education is the body which has 11 responsibility for children's social care and so is 12 responsible for the statutory guidance known as 13 Working Together, which has a few paragraphs around the 14 role of religious and other charitable organisations in 15 providing social care and education in this sector, but 16 undertakes no specific work with religious institutions 17 in this area. 18 This investigation has also asked the 19 Charity Commission about its oversight of child 20 protection practices and processes. The 21 Charity Commission requires that every registered 22 charity has a safeguarding policy and trustees have to 23 declare that they have such. On occasions, the 24 Charity Commission has looked at a small number of 25 religious organisations and their child protection</p> <p style="text-align: center;">Page 17</p>	<p>1 policies and has examined the compliance of trustees 2 with those policies by way of what's known as 3 a statutory inquiry, which is a formal, regulatory 4 process. But the role of the Charity Commission, as 5 they have told us, is not to act as an investigator 6 routinely of safeguarding failures, unless there can be 7 seen to be a failure in the actions of the trustees of 8 the charities, and they indicate in their evidence to us 9 that their ability to monitor the number of charities 10 they have or investigate those is at present limited by 11 the resources that they hold. 12 We have also looked at the issue of recruitment in 13 the evidence that we have obtained. The system of 14 mandatory vetting of some of those who work with 15 children is another way in which the state interacts to 16 supervise child protection in respect of children. If 17 individuals undertake what is known as regulated 18 activity, they must apply to the Disclosure and Barring 19 Service for a check as to whether or not they have 20 criminal convictions or other information is known about 21 them or if they are barred from undertaking activities 22 to do with children under various lists. 23 It is not possible, however, for an enhanced check 24 to be asked for if individuals do not undertake what is 25 known as regulated activity. As this chair and panel is</p> <p style="text-align: center;">Page 18</p>
<p>1 more than familiar with, regulated activity, in and of 2 itself, is a complex definition which has been explored 3 in a number of investigations before you, and the 4 definition at present may not capture the types of 5 situations and relationships typically found within 6 religious organisations, which tend to be ones of 7 quality of time rather than quantity of time, which is 8 largely the basis upon which regulated activity is 9 currently defined in law. 10 What checks are made of staff and volunteers if they 11 undertake such activities and what checks are made of 12 those who wish to become religious leaders or elders 13 depends entirely, at the moment, upon whether or not 14 they meet the test of regulated activity. It is not 15 clear at present, and it is not possible for the 16 religious organisations, even if they were to wish to do 17 so, to be able to check or use the vetting and barring 18 processes to look at those who wish to become religious 19 leaders and elders. 20 We will also be looking at whether or not the 21 religious organisations undertake and promote, when 22 examining those who are in relatively senior positions, 23 whether or not they take adequate account of their 24 responses in the past to child protection issues and 25 their ability to manage such.</p> <p style="text-align: center;">Page 19</p>	<p>1 We will also wish to examine within this 2 investigation whether the current guidance available 3 from the Department of Education in England and the 4 Welsh Government provides adequate information for 5 religious organisations and settings as to their roles 6 and responsibilities. The Department for Education did 7 issue a draft voluntary code of practice for 8 out-of-school settings, which it has consulted upon. 9 The results of that consultation are not yet known and 10 so questions will be asked within the context of this 11 hearing as to whether or not that document is the sort 12 of thing which looks like a start, if nothing else, in 13 terms of providing some helpful assistance to religious 14 organisations. 15 From the evidence we have received, the following 16 overall issues have emerged. There is a strong 17 consensus by all who have given evidence to us that 18 those working in religious organisations want to ensure 19 that there are strong and robust child protection 20 procedures in place. However, the number of volunteers 21 and the fact that many organisations are exclusively 22 volunteer led has caused, and causes, practical and 23 logistical problems in ensuring that everyone, for 24 example, has had training and that systems and processes 25 work effectively and are implemented in practice.</p> <p style="text-align: center;">Page 20</p>

<p>1 All seem to welcome some kind of guidance as to what 2 good child protection should, or would, look like, and 3 common training and/or common materials to be circulated 4 seem to find broad favour with all the religious 5 organisations to which we have asked the question. 6 Some organisations would welcome auditing from an 7 external body, providing that that external body clearly 8 understands the religious context in which they are 9 operating, and does not seek to impinge upon their 10 religious freedoms. 11 Some organisations consider that there should be 12 a mandatory code and that local authorities and/or some 13 other form of state body should regulate them. Others 14 feel very strongly that it should be voluntary. 15 Whilst most organisations who have provided evidence 16 to us have some form of policy, there is a wide 17 variation, both in the quality of those policies and the 18 extent to which they are implemented on a day-to-day 19 basis. 20 During the hearings, we will be looking at the 21 following: how far are structures in place within 22 religious organisations which are an effective barrier 23 to deal or manage child protection concerns? 24 Secondly, are there child protection policies? If 25 so, how often are they reviewed and how are they</p> <p style="text-align: center;">Page 21</p>	<p>1 implemented? 2 If the organisation is in more than one place, are 3 there relevant offices at a local, regional or national 4 level to oversee child protection work? And how do they 5 operate? 6 How far do elders, faith leaders or senior members 7 of the organisation deal with issues of child 8 protection, initiate change to improve practice and 9 understand the culture of their organisation and, if 10 necessary, the fact that the culture may need to change? 11 How far are they even aware of the extent of child 12 sexual abuse within their organisation and have they 13 taken any steps to identify or remedy inadequacies? 14 Should there be a common set of basic standards 15 applicable across religious organisations in relation to 16 how they manage and deal with child protection issues? 17 Should there be some form of registration scheme or 18 some form of regulation for bodies which run activities 19 for children which would require the meeting of certain 20 minimum standards in order to keep children safe? If 21 so, should that registration scheme be voluntary or 22 compulsory? 23 Should there be some form of inspection, whether by 24 a body commissioned by the religious organisation, 25 internal to the religious organisation, or an external</p> <p style="text-align: center;">Page 22</p>
<p>1 body, of the provision that is made for children and 2 young people. 3 Whether or not, alongside a common set of basic 4 standards, there could be a common set of policies, 5 training materials or even a common basic qualification 6 for those who work in religious organisations to provide 7 them with some practical assistance and guidance in 8 managing child protection. 9 Last, but by no means least, what does "good" look 10 like in this context? 11 I turn now to the hearing. Chair and panel, you 12 will sit for two weeks from 16 March 2020 to 13 27 March 2020 inclusive. Normal sitting hours will be 14 from 10.00 am to 4.15 pm, and the panel will sit for 15 five days a week, with a break for lunch and also short 16 breaks both during the morning and afternoon sessions, 17 usually at around 11.15 am and 3.15 pm. 18 It will not be possible, within the two weeks that 19 we have been allocated, for us to call all the witnesses 20 who have provided us with evidence. We are intending, 21 therefore, to try and operate the hearing on a thematic 22 basis. However, we will call the most relevant evidence 23 from: survivor groups; those who have made complaints of 24 sexual abuse; religious organisations; local 25 authorities; charities and other third-sector bodies who</p> <p style="text-align: center;">Page 23</p>	<p>1 provide training and support to religious organisations 2 in this field; and central government, in order to get 3 a picture of the current statutory oversight. 4 We will also adduce into evidence some of the other 5 witness statements we have received about current 6 policies and practices to provide a more extensive 7 picture than oral evidence alone can provide to the 8 public. 9 As the chair stressed at the beginning, and I will 10 stress again, this investigation is not about delving in 11 any depth into individual complaints of sexual abuse 12 that may have taken place against particular religious 13 organisations, nor will it be able to examine all 14 aspects of a religious organisation's practices in any 15 detail, but we will be examining the general themes that 16 I have set out and concerns which arise from the 17 evidence as a whole. 18 We are seeking in the next couple of weeks or so to 19 finalise those who we would wish to hear from orally, 20 and we would therefore ask that anyone who has supplied 21 a witness statement to date ensures, if at all possible, 22 that those dates are kept free. We hope to be in 23 a position to provide a draft timetable by 24 early February 2020. 25 Anyone who is asked to give oral evidence will be</p> <p style="text-align: center;">Page 24</p>

<p>1 asked to attend on a particular date and at a particular 2 time. If possible, we do ask that all witnesses try to 3 attend on the date we have given, as the timetable is 4 often worked out so that the material is grouped in 5 topics which relate to each other, and so the evidence 6 of one witness often relates to and reflects on that 7 evidence which is given at the same time. If this is 8 not possible, we will do what we can to try to organise 9 alternatives.</p> <p>10 For some witnesses, we will be asking that they give 11 their evidence collectively, ie, there may well be more 12 than one witness giving evidence in the witness box at 13 the same time. For others, evidence will be given 14 individually. If any witness has any adjustments that 15 they will require to give evidence, we would ask that 16 they provide us with that information as far in advance 17 as possible, so that we can make arrangements as 18 required. The inquiry room has an induction loop and is 19 fully wheelchair accessible. But we know there are 20 a number of other measures which may be required.</p> <p>21 We also can, and do, provide special measures to 22 those who are core participants and witnesses who have 23 anonymity. Witnesses can give their evidence in the 24 hearing room, in that circumstance, but they will not be 25 filmed during their testimony and the camera will be</p> <p style="text-align: center;">Page 25</p>	<p>1 directed at the panel or the lawyers and not them. The 2 voices of any anonymous witness can be distorted if 3 a request is made in advance, to avoid identification. 4 Members of the public and press are excluded from the 5 hearing room during the course of anonymous testimony, 6 but they are able to watch the proceedings in the annex, 7 subject to a three-minute delay.</p> <p>8 We will be liaising with all witnesses in the next 9 couple of weeks, but would ask, in particular, if 10 requests are to be made in respect of special measures 11 over and above those described above, that these are 12 discussed with the solicitor to the investigation well 13 in advance of the hearing. We would also like all those 14 who represent those who are anonymous at present to 15 check that they wish to continue with this position, as 16 we have had a number of situations in the past where 17 individuals, especially those who have spoken 18 anonymously but publicly to the press, wish to waive 19 their anonymity on the day of the hearing. We are 20 unable to take the relevant steps within this timeframe 21 in order to ensure that that can happen, so we would ask 22 that everyone carefully considers their position in 23 advance.</p> <p>24 Prior to the hearing, any witness who is coming to 25 give oral evidence will be given/circulated something</p> <p style="text-align: center;">Page 26</p>
<p>1 called an evidence proposal by the inquiry team. This 2 will indicate if the evidence is to be given 3 collectively or alone and will set out the topics which 4 may be covered in questions, although I stress now there 5 is no guarantee that all those topics will be covered or 6 that other questions will not necessarily be asked. It 7 will also provide a list of references to any relevant, 8 related witness statements and any exhibits attached to 9 either the witness's witness statement or any other 10 witness statement and a list of other witness statements 11 and materials which they may be asked to comment on. We 12 aim to circulate these a couple of weeks in advance of 13 the witness being asked to call their evidence, where 14 possible, although, if material is not available, this 15 can change.</p> <p>16 All evidence proposals are sent to all core 17 participants to review and to provide any comments or 18 submissions on material or issues which they consider 19 should be raised with a witness. A finalised evidence 20 proposal is then circulated.</p> <p>21 At the hearing itself, every witness will be 22 provided with a bundle of material, including their 23 witness statements and any key exhibits which will be 24 provided in paper form. All witnesses will also have an 25 opportunity to have materials put on screen. The</p> <p style="text-align: center;">Page 27</p>	<p>1 inquiry will ensure that all witnesses have a chance to 2 familiarise themselves with the hearing room here at 3 Pocock Street and will provide them with appropriate 4 counselling and emotional support, if required, before, 5 during and after any evidence which is given.</p> <p>6 I must stress again that the inquiry will not compel 7 anyone who is a victim/survivor of sexual abuse to give 8 oral evidence, unless they wish to do so.</p> <p>9 We also can provide facilities for videolink 10 evidence if that is required, but, again, as much 11 advance notification would be extremely helpful, as 12 arrangements can be quite complicated to set up.</p> <p>13 Chair, I now turn briefly to broadcasting. Chair, 14 you made a general ruling -- the previous chair made 15 a previous ruling about broadcasting in April 2016, 16 which was that all hearings would be live streamed, as 17 it is called, subject to a five-minute delay.</p> <p>18 In June 2018, you made a ruling which has been adopted 19 in all investigations so that the delay is now three 20 minutes rather than five minutes. The current 21 arrangements for broadcasting the substantive public 22 hearings are as follows: there is seating, as everybody 23 can see, within the hearing room and in an annex, and 24 the annex shows video of the proceedings with the 25 appropriate delay; text-based communications are</p> <p style="text-align: center;">Page 28</p>

<p>1 permitted from the annex room, but not within the 2 hearing room; a live transcript of the proceedings is 3 provided and is available within the inquiry room and 4 within the annex; and transcripts of oral evidence are 5 posted to the website after the end of the day's 6 hearing.</p> <p>7 I turn briefly to rule 10. Rule 10 of the Inquiry 8 Rules provides that the questioning of live witnesses 9 will be primarily conducted by myself and my fellow 10 counsel, as well as the panel. There is a process, 11 however, whereby core participants can submit requests 12 for questions once they have seen the evidence 13 proposals. Counsel to the inquiry will indicate 14 informally whether or not those questions will or will 15 not be asked and the reasons for such. Following this 16 informal process, if individuals still wish to pursue an 17 application for questions to be asked, under rules 10(3) 18 and 10(4) of the Inquiry Rules 2006, the legal 19 representatives of a witness or core participant may 20 apply to the chair for permission to ask such questions 21 of a witness giving evidence. Those applications must 22 state, firstly, the issues in respect of which a witness 23 is to be questioned, and, secondly, whether the question 24 will raise new issues for that witness other than those 25 already identified by counsel to the investigation, or,</p> <p style="text-align: center;">Page 29</p>	<p>1 if not, why it would be permitted. Any application to 2 ask questions under rule 10 should be provided no later 3 than four working days before the witness is timetabled 4 to give evidence.</p> <p>5 I also identify that all core participants have 6 a right to make opening and closing submissions, again, 7 under rule 11 of the Inquiry Rules 2006. Opening 8 statements will take place on the first day of 9 the hearing, after I have made an opening statement, 10 which is likely to be a couple of hours in length. Core 11 participants should identify by 1 March 2020 if they 12 wish to give an opening statement. Those opening 13 statements are likely to be brief -- around ten minutes 14 or so -- given the large number of individuals that we 15 see in this room today.</p> <p>16 All core participants may also give a closing 17 statements, which will take place on 27 March 2020. The 18 same principles will apply in terms of length. I do not 19 give a closing statement. All core participants may, if 20 they wish to do so, have the chance to file written 21 submissions with the inquiry by 4.00 pm on 22 15 April 2020.</p> <p>23 I stress there is no requirement to give an opening 24 or closing statement or to make written submissions. It 25 does not affect the hearing or prejudice the core</p> <p style="text-align: center;">Page 30</p>
<p>1 participant if they choose not to do so.</p> <p>2 I turn now to the practical issue of seating 3 arrangements. Given the large number of core 4 participants, we are likely only to be able to 5 accommodate two persons on the legal benches per team, 6 rather than the three which has operated in other 7 investigations, absent exceptional circumstances.</p> <p>8 Again, however, it is unlikely that all core 9 participants are likely to wish to attend every day, and 10 there is no compulsion or requirement to do so. It 11 would be useful for all of us to know by the beginning 12 of March, once the hearing timetable has been issued, 13 which core participant teams wish to attend the hearings 14 on that day so that we can manage the space most 15 effectively and, if necessary, give people more of 16 a bench if there are exceptional reasons to do so.</p> <p>17 Anyone who comes to give evidence as a witness will 18 be given a room to meet privately with counsel and their 19 legal representative before they give evidence. There 20 are not, however, rooms for everyone to meet privately 21 with their legal teams. There are two rooms available 22 for core participants to meet with their witnesses, but 23 these are shared facilities.</p> <p>24 Chair, that leaves, shall I say, the housekeeping 25 element of the hearing. I now turn to the areas where</p> <p style="text-align: center;">Page 31</p>	<p>1 submissions have been made by core participants. I will 2 deal first with the issue of the restriction order, then 3 with the issues that Mr Barker has raised and then the 4 issues that Mr Scorer has raised.</p> <p>5 Chair, PRX1, 2 and 3 applied for restriction orders 6 to you in November and December 2019. They wish to have 7 their names anonymised and those who are named within 8 their evidence who are currently, or were, members of 9 the Jehovah's Witnesses, and they wish to have that 10 anonymity to all core participants and to the public, 11 principally because they identify that they fear 12 repercussions for themselves and their families if their 13 identities were to be disclosed.</p> <p>14 I have made written submissions which were 15 circulated on 20 December 2019 as to the legal 16 principles to be applied. Mr Brady of the Christian 17 Congregation for Jehovah's Witnesses has made some 18 observations as to the restriction order, both 19 in December 2019 and on 7 January 2020, and some other 20 core participants have broadly supported the restriction 21 order being made.</p> <p>22 Chair, you made a provisional decision on 23 23 December 2019 that you are minded to grant this order 24 and gave your reasons within that decision.</p> <p>25 I remind you, chair, before passing over to</p> <p style="text-align: center;">Page 32</p>

<p>1 Mr Brady, of the legal principles: section 18 of 2 the Inquiries Act creates the presumption that the 3 public will have access to all proceedings undertaken 4 during the course of a public inquiry. However, under 5 section 19 of the Act, there is a power, chair, for 6 evidence submitted to the inquiry to be the subject of 7 restriction or redaction if this is required. The Act 8 plainly recognises that, in some circumstances, 9 particularly given the context of the sensitive nature 10 of many public inquiries, and given the power that this 11 public inquiry has to see material which would otherwise 12 be considered to be private and confidential, that 13 someone's identity or evidence may require a degree of 14 redaction or anonymity.</p> <p>15 The Act, in and of itself, does not set out 16 a checklist of when anonymity should be granted, no 17 doubt reflecting the very wide variety of circumstances 18 in which a public inquiry can exist. Your power, chair, 19 is to grant a restriction order if it is either 20 "conducive to the inquiry fulfilling its terms of 21 reference" or "necessary in the public interest". 22 Various factors are set out in section 19(4) which are 23 matters which you may wish to consider, which include: 24 the extent to which any restriction order might inhibit 25 the allaying of public concern; secondly, any risk of</p> <p style="text-align: center;">Page 33</p>	<p>1 harm or damage which could be avoided or reduced by any 2 restrictions; thirdly, any conditions as to 3 confidentiality subject to which someone has acquired 4 information; and, lastly, if the absence of 5 a restriction order would cause delay or impair the 6 efficiency of the inquiry.</p> <p>7 Chair, I have already provided submissions on the 8 law, which further suggests that harm and damage 9 encompasses not just permanent harm and damage, but also 10 temporary emotional distress and upset, such as that 11 which may be present in advance of, but will diminish 12 after, a hearing.</p> <p>13 I also submit that, on the basis of the law as it 14 currently stands, there is nothing which suggests that 15 the only harm and damage which you can take into account 16 is that which can be objectively proven on the balance 17 of probabilities. Someone's anxieties and fears and 18 stress which is consequential upon that, even if not 19 proven, can be taken into account, as long as it is not 20 obviously groundless and frivolous, as I have already 21 set out in my submissions at paragraph 16.</p> <p>22 Mr Brady, in his submissions filed on 23 7 January 2020, relied upon some materials which he 24 filed on 3 December 2019. I now briefly summarise those 25 submissions. Firstly, Mr Brady identifies that the</p> <p style="text-align: center;">Page 34</p>
<p>1 submissions made about the risk of harm or damage to the 2 individuals who wish to be anonymous or their families 3 is limited and that there is limited material on the 4 face of the applications made which demonstrate that 5 there would be such harm. Mr Brady also says that such 6 harm would be directly contradictory to the teachings 7 and philosophy of the Christian Congregation of 8 Jehovah's Witnesses who practise passivism and 9 nonviolence at all times.</p> <p>10 Mr Brady further submits that the evidence provided 11 by PRX1 and 2 in support of their application is both 12 supposition and also obsolete, as it dealt with 13 a situation which took place in the United States of 14 America some 20 years ago.</p> <p>15 They also suggest in their submissions 16 of December 2019 and submit that they would not breach 17 confidence if an undertaking had been signed by an 18 individual acting on their behalf as an officer of 19 the court and they also identify that circumstances may 20 arise where names should be identified so that evidence 21 which runs contrary to the allegations which may be put 22 by PRX1, 2 and 3 can be put forward.</p> <p>23 Mr Brady, in his submissions of 2020, puts forward 24 two further issues which I will address briefly. His 25 submissions in January 2020 identify that if, chair, you</p> <p style="text-align: center;">Page 35</p>	<p>1 were minded to make the provisional order final, the 2 Congregation of Jehovah's Witnesses would wish to have 3 some time prior to circulation of the redacted 4 documentation prior to its disclosure to other core 5 participants to examine if this documentation gives rise 6 to any concerns or claims that this has been obtained in 7 breach of confidence. There is a suggestion made within 8 PRX1 and 2's application that some of the material may 9 have been passed to them in breach of such confidence.</p> <p>10 They wish to have a chance to raise any concerns that 11 they have with counsel to the inquiry and the 12 investigation team to determine whether or not 13 disclosure in those circumstances should take place.</p> <p>14 Under section 19 of the Inquiries Act 2005, one 15 factor to consider when issuing a restriction order is 16 whether the material was given in confidence to an 17 individual who has then supplied it to the tribunal, and 18 the Christian Congregation of Jehovah's Witnesses submit 19 that commercial interests and economic interests, 20 alongside the public interest, could, in relevant 21 circumstances, justify the making of an order 22 restricting the circulation or disclosure of evidence 23 obtained by this inquiry.</p> <p>24 However, I stress that information is routinely 25 given to this public inquiry and others which would</p> <p style="text-align: center;">Page 36</p>

<p>1 usually be considered to be confidential, and, in fact, 2 one of the central reasons why public inquiries are 3 often initiated and established is to obtain such 4 materials which would otherwise be held to be private. 5 In this case, it appears that PRX1 and 2 say that they 6 have been passed material which is headed 7 "Confidential". As any lawyer in this room knows, 8 saying it is confidential does not make it so, and 9 certainly does not necessarily mean that this would 10 attract a duty of confidence or that it was a breach of 11 that duty of confidence to pass it to PRX1 and 2, given 12 that a tort of the breach of confidence does not exist 13 where it is in the public interest for such information 14 to be given to an inquiry such as this one. 15 The inquiry considers that it will disclose material 16 which is relevant and, even if it is confidential, 17 unless it is subject to legal professional privilege, it 18 will still seek to exercise its powers, if necessary, in 19 order to do so. If there is any legal issue as to how 20 it came into the possession of the investigation, this 21 inquiry is likely to exercise its powers to ensure that 22 it can continue to hold and use that material if it is 23 appropriate to do so. 24 The next issue raised by Mr Brady is one of conduct 25 in the language used by PRX1, 2 and 3 within their</p> <p style="text-align: center;">Page 37</p>	<p>1 submissions in respect of the restriction order. He 2 complains about the language used in respect of 3 the Christian Congregation for Jehovah's Witnesses and, 4 in particular, PRX1 and 2, in their submission and 5 application for a restriction order, at paragraph 3, 6 identify that they say they would be subject to 7 intimidation and persuasion by the CCJWs not to confirm 8 their account of misconduct and that the attitude of 9 the Christian Congregation of Jehovah's Witnesses is 10 overbearing and "Stasi". 11 Mr Brady also objects to the language used by PRX3, 12 who suggests that family members may be harmed if 13 information is disclosed to the Jehovah's Witnesses. 14 I submit as follows: there is no doubt that 15 Jehovah's Witnesses were persecuted by the Stasi, along 16 with many other religious organisations within the 17 East German society. The language used by PRX1 and 2, 18 whilst often used by individuals to connote an 19 overbearing approach, may have specific resonance and 20 significance for groups who were the subject of 21 a special persecution. 22 I also submit that allegations should not be made 23 sweepingly against entire sections of society or entire 24 religious organisations without a strong foundation in 25 fact. Sweeping statements are capable of resulting in</p> <p style="text-align: center;">Page 38</p>
<p>1 harm and upset against those about whom they are made. 2 Chair, you may recall that in the Westminster 3 investigation, in a determination of 23 February 2018, 4 you identified the need for all legal representatives 5 and those who come to give evidence to choose their 6 words with care, in particular when making contentious 7 submissions with which others may disagree. 8 It is plainly the case that those who have been 9 members of the Jehovah's Witnesses but are no longer 10 members of that organisation and those who represent the 11 organisation hold diametrically opposed views as to the 12 conduct of the Jehovah's Witnesses and how it should be 13 characterised. Those who are no longer members feel 14 they have been socially ostracised and treated poorly by 15 congregations to which they have belonged and by 16 individuals within those congregations as well as the 17 organisation as a whole. When people feel that they 18 have been poorly treated, they will often use emotive 19 language to express their concern, hurt and upset at 20 this treatment. 21 You, chair, have often stressed the need for 22 sensitivity and restraint, and you have also identified, 23 as you did in Westminster, that there are often disputes 24 outside of this inquiry which may involve one or more 25 core participants, and that this inquiry should not be</p> <p style="text-align: center;">Page 39</p>	<p>1 used as an opportunity for publicity or advantage in any 2 collateral dispute which may exist. 3 This investigation respects the rights of all core 4 participants and witnesses to come and speak and wishes 5 everybody to feel able to advance necessary submissions. 6 The inquiry's work often involves individuals making 7 allegations which others may consider to be hurtful and 8 inaccurate. However, as counsel to the investigation, 9 I ask that the language at all times remains civil and 10 respectful in tone. 11 Chair, I ask that you draw everyone's attention to 12 the decision made in February 2018 which is freely 13 available on the website, and in particular the need for 14 language and discourse to be polite, civil and 15 appropriately sensitive. 16 THE CHAIR: Thank you for those comments, Ms Scolding. 17 I agree with your submission, and emphasise, as I did in 18 Westminster, that, as we prepare for this hearing, all 19 core participants should act with civility and respect, 20 and this means that all core participants should choose 21 their words with care when making submissions to this 22 inquiry, and of course avoid the unnecessary use of 23 language or statements which are either offensive or 24 inflammatory. Please continue. 25 MS SCOLDING: Chair, I now pass over to Mr Brady, who</p> <p style="text-align: center;">Page 40</p>

<p>1 I believe wishes to make brief oral submissions on this 2 issue, and you have written submissions from him, 3 I think behind tab 9 of your bundle. There is a variety 4 of submissions behind there. I pass over to Mr Brady. 5 Submissions by MR BRADY 6 MR BRADY: Good morning, chair and panel. As mentioned, I'm 7 Shane Brady, representing the Christian Congregation of 8 Jehovah's Witnesses. 9 To be brief, I largely agree with Ms Scolding's 10 submissions. I would like to just highlight one or two 11 points, if I may, draw to your attention. 12 As far as the application for restriction orders, we 13 have no additional submissions on the merits, and we are 14 content to rely on what's already been submitted. 15 As far as our related submission regarding PRX1, who 16 apparently indicates, at paragraph 5 of his statement, 17 that some information has come into his possession that 18 was marked confidential, I certainly agree with 19 Ms Scolding that saying something is confidential 20 doesn't mean it is necessarily so, and we don't quibble 21 with that at all. 22 Our only request is, we simply don't know what the 23 individual has obtained. What we ask is, is it possible 24 to at least see an advance copy of the documents that 25 PRX1 says are confidential so that if, indeed, we are</p> <p style="text-align: center;">Page 41</p>	<p>1 protected by a legally recognised privilege, and if the 2 Congregation wishes to rely on that privilege, which it 3 may not, we could at least make submissions on that 4 matter. That's as far as our submission goes. It is, 5 could we have an advance look at the material before it 6 is provided to all of the other core participants, in 7 the event there is a legitimate claim for privilege. 8 As far as the second issue, I have nothing further 9 to add to what Ms Scolding has already said. As far as 10 the language that the Christian Congregation takes 11 exception to in the submissions of PRX1, PRX2 and 12 PRX3 -- and, chair, we appreciate the reminder that you 13 have already provided just a few minutes ago of the need 14 for all of us to give attention to the language we use. 15 The Christian Congregation of Jehovah's Witnesses is not 16 asking not to receive criticism, they have no objection 17 to that. Their only concern is that there is a certain 18 line when it passes from criticism to speech that is 19 unacceptable in a democratic society, and we thank you 20 for the reminders that have been provided. Those are 21 our submissions on that issue. 22 THE CHAIR: Thank you, Mr Brady. 23 MS SCOLDING: I'm not sure that anybody else has any 24 submissions they want to make on those issues. I'm 25 looking in particular at Mr Barker and Mr Scorer.</p> <p style="text-align: center;">Page 42</p>
<p>1 Chair, you will have to make a determination whether 2 or not the restriction order should be made final, which 3 we would ask you to issue in due course, and you will 4 obviously need to take into account the submissions that 5 have been made by Mr Brady about advance notice. As 6 counsel to the inquiry, I would simply say, again, the 7 strict proviso to any of those issues in terms of 8 material which is confidential is that, chair, on behalf 9 of the investigation, I will ask you to use your powers 10 to ensure that material is disclosed if it is relevant 11 to do so, even if it is confidential. Thank you very 12 much, chair. 13 Chair, it is 11.30 am. I don't know whether you 14 would like a brief break at this time? We have to hear 15 from Mr Barker and Mr Scorer. I suspect that might take 16 us beyond 11.45 am. I'm entirely in your hands, chair, 17 whether or not you would like to break now or at 18 11.45 am. 19 THE CHAIR: We will take a brief break now, thank you. 20 MS SCOLDING: Thank you very much, chair. 21 (11.31 am) 22 (A short break) 23 (11.45 am) 24 MS SCOLDING: Chair, thank you very much for that brief 25 break. I now pass over to Mr Barker. He has filed some</p> <p style="text-align: center;">Page 43</p>	<p>1 written submissions dated 7 January 2020. He wishes to 2 make three points. Firstly, that the inquiry should 3 seek oral evidence from the branch coordinator in 4 England and Wales and not simply from Mr Paul Gillies 5 from whom the inquiry has received a witness statement 6 on behalf of the Christian Congregation of Jehovah's 7 Witnesses. 8 Secondly, that material which the inquiry sought to 9 preserve in 2016 should be disclosed in this 10 investigation. Thirdly, that particular disclosure 11 should be sought about various issues. 12 I now pass over to Mr Barker. I believe, after 13 that, Mr Brady would like to say something and Mr Scorer 14 would like to say something and I will then make some 15 closing remarks on this particular issue. Mr Barker? 16 Submissions by MR BARKER 17 MR BARKER: Thank you, Ms Scolding. I apologise for my 18 voice. I'm a bit under the weather today. The inquiry 19 has written submissions tendered by my client group 20 which I intend to speak to very briefly now. It 21 obviously goes without saying there are a lot of 22 institutional core participants to these hearings. In 23 light of this, it is our view that the inquiry risks 24 falling short by focusing only on the carefully 25 constructed witness statements from institutional core</p> <p style="text-align: center;">Page 44</p>

<p>1 participants on high-level matters rather than 2 conducting a deep-root investigation in relation to 3 culture via oral evidence from appropriate witnesses. 4 If each institutional witness statement tendered to 5 the inquiry was taken at face value, then the resultant 6 reports from the various hearing stages that have been 7 conducted over the last few years would have read very 8 differently. CCJW's submissions, served last night, 9 only further demonstrates to this inquiry why focus 10 needs to be directed more particularly towards culture. 11 CCJW say, for example, Jehovah's Witnesses do not shun 12 victims of child sexual abuse and quote some policies in 13 support of that. This is simply offensive to a lot of 14 my clients and people across the world, former members 15 across the world, who are, in fact, currently shunned 16 for reporting their abuser or, indeed, for leaving the 17 Jehovah's Witnesses after making a report. 18 The fact is, shunning does occur in this context. 19 I have no less than eight clients who have either 20 personally been shunned or who have family members who 21 have been shunned in relation to child sexual abuse. 22 This can actually be hidden because it could be 23 categorised as being shunned for causing divisions 24 rather than for making a report. It being 25 misrepresented in this way should speak exactly to why</p> <p style="text-align: center;">Page 45</p>	<p>1 it needs to be examined during the hearing stages. 2 The investigation of the Australian Royal Commission 3 into the Jehovah's Witnesses revealed some very 4 disturbing truths. I quote from the final report: 5 "We do not consider the Jehovah's Witness 6 organisation to be an organisation which responds 7 adequately to child sexual abuse. We do not believe 8 that children are adequately protected from the risk of 9 child sexual abuse." 10 The Jehovah's Witnesses uniformly apply the same 11 practices and procedures across the globe. From the 12 United States to Australia, and indeed here in the 13 United Kingdom, the cultural problems in respect of 14 child sexual abuse, too, are similar. The Royal 15 Commission's report ought to weigh heavily on this 16 inquiry as to where attention needs to be focused to 17 address this issue. It is sometimes difficult to pick 18 up and hold up an example of cultural issues that lead 19 to further harm. This is because sometimes these 20 cultural issues can be unseen. My clients submit that 21 shunning is one of those. But if I can draw an example 22 to the inquiry's attention, I refer to a reported 23 decision of R v KR. The citation is in the material 24 before this inquiry, which has been tendered. It is 25 a 2015 decision of the Criminal Division of the Court of</p> <p style="text-align: center;">Page 46</p>
<p>1 Appeal. In broad compass, this involves a 36-year-old 2 woman, a Jehovah's Witness, who engaged in a sexual 3 relationship with a 15-year-old boy in the local 4 congregation. The boy's mother noticed that the boy was 5 acting strangely and placed listening devices in the 6 house which eventually exposed the abusive relationship. 7 Now, I quote from that judgment at paragraph 11: 8 "Faced with increasingly volatile behaviour on the 9 part of R, R's mother asked a member of the congregation 10 to speak with him. In February 2013, her suspicions had 11 not been allayed so she contacted the police." 12 Now, what is not apparent from that quote is the 13 factual matrix that makes up the background to that 14 report to the elder. I am at least apprised of those 15 alleged facts. The mother told that elder of the sexual 16 relationship, the abusive relationship, and handed him 17 the recordings that had been made some two months before 18 the report was made to the police. I must say, this 19 isn't non-recent. This is something that happened in 20 2012/2013. 21 The elder told her to leave it in Jehovah's hands 22 and an investigation was conducted by those elders. 23 During the time of the investigation and when the matter 24 was finally taken to the police some two months later, 25 it is alleged that further incidents of sexual abuse</p> <p style="text-align: center;">Page 47</p>	<p>1 occurred. The boy was, at all relevant times, at risk 2 of further harm. Contrary to what CCJW say is their 3 policy, the matter was not taken to the police. 4 Now, the inquiry must ask why this is the case. The 5 answer is: culture. The mother implicitly trusted that 6 elder and did what the elder told her to do. The elders 7 didn't want to bring reproach on Jehovah. This is 8 a clear reputational concern. So they decided to 9 conduct their own investigation. 10 At every level, this represents bad practice and it 11 arises out of cultural issues, in my clients' 12 submission. The inquiry must investigate this if it is 13 going to effect meaningful change. 14 To this end, my clients submit that, in respect of 15 the Jehovah's Witnesses, this can only be done by 16 requiring oral evidence from the current Branch 17 Committee coordinator and/or the current service 18 department overseer of the British Branch Committee of 19 Jehovah's Witnesses. The fact is, Mr Gillies no longer 20 deals with the day-to-day communications in relation to 21 child safeguarding in England and Wales. He has no 22 official role here in England and Wales. He is 23 therefore, in our view, not the appropriate witness. 24 Finally, my clients have made a number of 25 submissions in relation to disclosure, which, for time</p> <p style="text-align: center;">Page 48</p>

<p>1 reasons, I won't deal with all of them now. I only wish 2 to restate one submission in relation to disclosure, and 3 that is in relation to allegations of child sexual 4 abuse.</p> <p>5 The Australian Royal Commission required and 6 obtained data in respect of allegations made dating back 7 to 1950. If CCJW or any UK Jehovah's Witness entity 8 holds data in respect of allegations of child sexual 9 abuse, in my clients' submission, it has to be turned 10 over to the inquiry. It is relevant to these hearings 11 and it is relevant to the thematic nature of these 12 hearings. If the data discloses a pattern of 13 withholding allegations from police, this is a systemic 14 problem and that's not outside the remit of these 15 hearings.</p> <p>16 Ten years is simply too narrow a window, in my 17 clients' submission.</p> <p>18 To summarise, chair, it is the submission of my 19 clients that oral evidence is required from the current 20 Branch Committee coordinator and/or the current service 21 department overseer and that disclosure should be sought 22 and provided as outlined in my clients' written 23 submissions. Thank you.</p> <p>24 THE CHAIR: Thank you, Mr Barker. Mr Brady? 25</p> <p style="text-align: center;">Page 49</p>	<p>1 Submissions by MR BRADY</p> <p>2 MR BRADY: Yes, chair, thank you. If I may just begin with 3 a response to Mr Barker's providing what appears to be 4 a case study, I can't find a reference to that case in 5 his material, so I just am not in a position to respond 6 to the facts of that particular case. Frankly, I don't 7 think it is necessary, in the context of the current 8 matter, which is looking at current policies of all the 9 religions in this particular investigation.</p> <p>10 Briefly, chair, our position on the application 11 brought by Mr Barker is settled in our submissions 12 dated January 14, 2020. I don't intend to repeat much, 13 other than to emphasise a few key points. As we 14 understand it, and as Ms Scolding has emphasised at the 15 start of this preliminary hearing, this investigation is 16 focused on the nature and adequacy of current child 17 protection policies. It doesn't focus on any particular 18 religion; rather, it is focusing on common issues across 19 religions.</p> <p>20 As far as Jehovah's Witnesses are concerned, they 21 have adopted a worldwide child safeguarding policy that 22 applies in England and Wales. The Congregation -- when 23 it received the rule 9 request for a written statement, 24 the inquiry indicated the Congregation could decide who 25 was best placed to provide that statement in view of</p> <p style="text-align: center;">Page 50</p>
<p>1 the issues that the inquiry was interested in receiving 2 a response. The Congregation decided that that 3 person -- the best-placed person would be 4 Mr Paul Gillies, who is a citizen of the United Kingdom, 5 who served for some 12 years as a member of the Britain 6 Branch Committee and, over the last year and a half or 7 so, is now the director of the Office of Public 8 Information of the World Headquarters of Jehovah's 9 Witnesses.</p> <p>10 In the opinion of the Christian Congregation of 11 Jehovah's Witnesses, Mr Gillies is best placed to answer 12 all of the questions that may come up in the context of 13 this investigation, both as far as that worldwide policy 14 and how it is being applied in England and Wales. The 15 Congregation assures the inquiry that Mr Gillies is in 16 a position to answer all relevant questions that will 17 come up in the context of this inquiry.</p> <p>18 In paragraph 9 of our submissions, we outline that 19 the coordinator of the Britain Branch Committee is not 20 the leader of the Branch Committee; he is just one of 21 equals among the Britain Branch Committee. He is not 22 better placed than any of the other members of 23 the Branch Committee to answer questions. So for the 24 reasons that are outlined in paragraphs 4 to 9 of our 25 submissions, we respectfully submit that the inquiry</p> <p style="text-align: center;">Page 51</p>	<p>1 defer to the Christian Congregation as to the person who 2 they believe is best placed to answer questions relating 3 to the practice of the Congregation, and that is 4 Mr Paul Gillies.</p> <p>5 As far as the issue of disclosure that Mr Barker has 6 raised, we deal with this at paragraphs 10 through 13. 7 Suffice it to say, our position is that the witness 8 statement provided by Mr Gillies appends to it all of 9 the relevant policy documents of the Congregation of 10 Jehovah's Witnesses that relate to issues of 11 the investigation and provides details, at paragraphs 52 12 to 79 of that witness statement, of how that policy is 13 being applied in England and Wales. So all disclosure 14 that's relevant has already been provided to the inquiry 15 by means of the witness statement of Mr Gillies.</p> <p>16 So, for the reasons set out in our statement, 17 inquiry, we respectfully suggest that the panel and the 18 chair, you decline all of the requests made in the 19 submissions made by Mr Barker. Thank you.</p> <p>20 THE CHAIR: Thank you, Mr Brady.</p> <p>21 Submissions by MR SCORER</p> <p>22 MR SCORER: Chair, I respond to Mr Barker's submissions on 23 behalf of my client Lloyd Evans. As you know, Mr Evans 24 is a former Jehovah's Witness and campaigner and 25 documentary maker and he's written extensively on the</p> <p style="text-align: center;">Page 52</p>

<p>1 handling within the organisation, or mishandling, as he 2 would see it, of child abuse allegations. So I make 3 clear that he obviously shares the desire of Mr Barker 4 and his clients to make sure that the Jehovah's 5 Witnesses are held accountable for their action or 6 inaction in relation to child abuse. However, our 7 position, in short, is that we support some of what 8 Mr Barker is arguing for, but not all of it. 9 Firstly, on the proposal that the inquiry should 10 require the Jehovah's Witnesses to provide original data 11 in relation to all allegations of child sexual abuse, we 12 fully support that request. We are very concerned that 13 within Mr Gillies' statement there is a degree of cherry 14 picking of data and of arbitrarily deciding what is 15 institutional and what isn't. So we say that it is 16 incredibly important that you have the opportunity to 17 scrutinise what he says by reference to the original 18 records and make your own judgment as to how those 19 records compare with his assertions, and it is essential 20 that you are able to undertake that independent 21 scrutiny, so we strongly support the arguments from 22 Mr Barker on that, and we urge you to make the necessary 23 disclosure orders if required. 24 Chair, in relation to the other categories of 25 disclosure identified by Mr Barker, we suggest that you</p> <p style="text-align: center;">Page 53</p>	<p>1 might want to consider that in more detail once you have 2 the statement of our client, Lloyd Evans, and once 3 that's been disclosed to core participants, because 4 Mr Evans, in his statement, analyses in detail many of 5 the documents produced by the Jehovah's Witnesses, and 6 he analyses them in considerable forensic detail and we 7 think that it is sensible that the inquiry -- that you 8 look at the question of disclosure more generally in 9 relation to that evidence when you have had the 10 opportunity to consider it, and it may well be that when 11 you have seen what Mr Evans has to say, you actually 12 might feel that the inquiry already has, in the main, 13 possession of the necessary material to be able to reach 14 conclusions about sealed envelopes, the practice of 15 shunning, ecclesiastical privilege, Caesar's law, these 16 issues rightly raised by Mr Barker. 17 Chair, finally, on the issue of Mr Gillies and 18 whether he is a suitable individual to give corporate 19 evidence in this context, on that issue we respectfully 20 disagree with Mr Barker. In our view, he is a suitable 21 individual and has sufficient seniority to do so. It is 22 very clear, as Mr Barker says, that the Jehovah's 23 Witnesses are a profoundly hierarchical organisation. 24 The reality is that policy, whether on sex abuse or 25 anything else, is set by the governing body in the US.</p> <p style="text-align: center;">Page 54</p>
<p>1 No branch office has the power or autonomy to deviate 2 from that. Anything that happens in the UK is dictated 3 by the governing body and it is crystal clear from all 4 of the documents that Mr Evans analyses in his statement 5 that that's the position. So I suppose, in an ideal 6 world, you would actually hear from a member of 7 the governing body, but, as we understand it, none of 8 those people are UK nationals. So we say that in this 9 context Mr Gillies is probably the next best thing, he 10 works closely with the governing body at their American 11 headquarters, he shares an office building with them and 12 reports directly to them but he also has experience of 13 serving on the Branch Committee in Britain. So we say 14 he is suitable to give evidence. 15 What we do say is that it is essential that he is 16 called to give oral evidence at this inquiry so that he 17 can be properly questioned about the assertions that he 18 makes in his statement. Many of those assertions we say 19 are simply wrong or highly questionable. They need to 20 be properly challenged and scrutinised in oral evidence 21 at this inquiry. 22 So, in summary, we are content, from our 23 perspective, for him to be the corporate witness. We 24 just want him here and answering questions because his 25 statement is extremely contentious and, we say, in many</p> <p style="text-align: center;">Page 55</p>	<p>1 respects wrong. So those are our submissions, chair. 2 THE CHAIR: Thank you, Mr Scorer. 3 Submissions by MS SCOLDING 4 MS SCOLDING: Chair, if I can briefly respond to the 5 submissions which have been made by my learned friends, 6 I preface my remarks about these issues to make the 7 point again that this investigation is thematic. The 8 explanatory note of April 2018 issued when this 9 investigation was launched expressly identified to all 10 parties that this is not, and should not be taken to be, 11 a hearing about any one particular religious 12 organisation. 13 The purpose of this hearing is, further, to look at 14 how religious organisations deal with safeguarding today 15 and not what may or may not have occurred in particular 16 cases in the past. It is, therefore, different to other 17 investigations which have taken place. 18 It is therefore inevitable, given this, that we will 19 not be able to look in any forensic detail at all the 20 examinations, policies and practices of any one or, in 21 fact, any religious organisation in total. 22 Mr Barker's submissions amount, in effect, to a wish 23 to have a separate and different investigation into the 24 Jehovah's Witnesses. Whilst obviously, as counsel to 25 the investigation, we are mindful of such, for the</p> <p style="text-align: center;">Page 56</p>

<p>1 reasons spelt out within the note in April 2019 and 2 within the original preliminary hearing in July 2019, 3 the scope of this investigation is not identical to 4 Mr Barker's client's aims and wishes.</p> <p>5 As far as who should give evidence is concerned, we 6 will obviously bear in mind the submissions of Mr Barker 7 and the submissions of Mr Scorer and Mr Brady. It is 8 ultimately -- it is the case that the inquiry has made 9 a rule 9 request to the organisation asking about their 10 structures and governance and, as is always the case, it 11 asks that organisation who is best placed to provide the 12 evidence sought, bearing in mind the issues which are 13 raised. We are not, as yet, in a position to determine 14 who, if anyone, will come and give evidence from the 15 Christian Congregation of Jehovah's Witnesses, but will 16 bear in mind the submissions made by all parties today.</p> <p>17 I would identify in particular, however, in respect 18 of the submissions made by Mr Barker, it is not always 19 the most senior person in England and Wales who is the 20 most appropriate person to give evidence and is best 21 placed to respond to issues relating to child 22 protection. What is important for this investigation 23 are the individuals who have direct knowledge and 24 experience of the way that child protection works within 25 any religious organisation. Again, this is not a case</p> <p style="text-align: center;">Page 57</p>	<p>1 study into one particular religious organisation. 2 Drawing analogies, as Mr Barker seeks to do, within the 3 context of his written submissions, is inapt in these 4 circumstances and is unlikely to be helpful to you in 5 making a decision. And, as has been identified, 6 Mr Gillies, who has provided us with a witness statement 7 on behalf of the Christian Congregation of Jehovah's 8 Witnesses is an individual who holds a senior position 9 within the Jehovah's Witnesses generally. We understand 10 that the organisation does promulgate policies from the 11 centre, so to speak, so from the United States, which 12 are then implemented in different territories.</p> <p>13 Just so you know, in respect of the particular 14 issues which are raised, firstly, we will be disclosing, 15 and we have recently received, evidence about the case 16 study which Mr Barker alluded to, the case of R v KR. 17 We have just recently been provided about that.</p> <p>18 Secondly, we will be disclosing information which is 19 relevant to this investigation which is information we 20 obtained in March 2016 from The Watchtower or the 21 organisation as it was then constituted. We will be 22 providing some of those documents where they are 23 relevant to our current investigation.</p> <p>24 We expect that much of the material -- in fact, 25 having identified all the relevant material and having</p> <p style="text-align: center;">Page 58</p>
<p>1 gone through it, some of the documents which were 2 supplied by the Christian Congregation of Jehovah's 3 Witnesses, or The Watchtower, as they were in 2016, will 4 be provided to all parties in advance of the hearing 5 in March 2020. However, given that the focus of this 6 investigation is on current practices, we will not be 7 disclosing all of that relevant material, but we will be 8 providing that which would be of assistance.</p> <p>9 As far as the issues which are raised by Mr Barker 10 within his oral submissions about various practices, 11 obviously Mr Barker's organisation is a core 12 participant. They can provide us with evidence about 13 the culture -- there are a number of individuals, and 14 they have done so -- of the Jehovah's Witnesses as it 15 operates. If they consider and believe that the 16 evidence of Mr Gillies is inaccurate, then they can 17 always ask us to ask questions under rule 10 or bring 18 that to their attention in the evidence that they file, 19 in order so that we can have an understanding of 20 the accuracy or otherwise of it.</p> <p>21 In particular, we would, however, already suggest 22 that Mr Gillies' witness statement addresses -- maybe 23 not to the satisfaction of Mr Barker, but, however, does 24 deal with -- the various issues which he raises about 25 sealed envelopes, co-operation with secular authorities,</p> <p style="text-align: center;">Page 59</p>	<p>1 shunning or expulsion from membership, and some cultural 2 issues which deal with the Jehovah's Witnesses.</p> <p>3 I would also stress that the issues which are raised 4 by Mr Barker are not issues which are idiosyncratic to, 5 or solely relate to, the Jehovah's Witnesses in and of 6 themselves. We have been provided with evidence from 7 a number of religious organisations, and it seems that 8 the themes which emerge from that is that there are 9 situations in which those who are accused of sexual 10 abuse are not dealt with transparently and the 11 informations and records are not necessarily passed 12 within the organisation from one person to another, as 13 they should be, and that is not something which is 14 idiosyncratic to the Jehovah's Witnesses, that's a more 15 general problem.</p> <p>16 There are also general problems which cross a number 17 of religious organisations that there can be, or has 18 been, isolation from their religious community if they 19 have raised issues around child sexual abuse, which can 20 obviously involve significant harm and disruption to 21 their social kinship and religious networks. That is 22 not something which happens only within the context of 23 the Jehovah's Witnesses.</p> <p>24 Certainly the issue of whether or not religious 25 organisations seek to manage allegations of child sexual</p> <p style="text-align: center;">Page 60</p>

<p>1 abuse in-house or discourage reporting for fear of 2 reputational damage is something which, again, applies 3 to a number of religious organisations. Those features 4 will all be addressed at the hearing, as I have recently 5 identified.</p> <p>6 As to the issue and question of data, we asked all 7 religious organisations simply for ten years' worth of 8 data about any allegations that arose between 2009 to 9 2019. The request is consistent from the Jehovah's 10 Witnesses, as from anybody else. As to whether or not 11 we should look at the raw records rather than the 12 figures in and of themselves, that is something that we 13 will obviously bear in mind, the submissions of 14 Mr Barker on that point.</p> <p>15 As to requiring the Jehovah's Witnesses to provide 16 us all data from 1950 onwards, again, given the thematic 17 nature of this investigation, you may, chair, wish to 18 consider whether that would be proportionate.</p> <p>19 Chair, I will ask you to issue a determination 20 following on from these submissions.</p> <p>21 I now pass over to Mr Scorer, who I understand 22 wishes to speak briefly about a number of topics of 23 relevance to his clients.</p> <p>24 25</p> <p style="text-align: center;">Page 61</p>	<p>1 Submissions by MR SCORER</p> <p>2 MR SCORER: Thank you, chair. As Ms Scolding said, I have 3 some brief general submissions about how you approach 4 the hearings in March. Some of the points I wanted to 5 make have actually been foreshadowed, at least to some 6 degree, by Ms Scolding in her remarks this morning, but 7 I do want to have the opportunity to stress their 8 importance to our clients.</p> <p>9 In essence, chair, I wanted to make three points. 10 Firstly, we are very anxious to ensure that when it 11 comes to the hearing in March, the victim and survivor 12 experience is properly heard. As you know, this hearing 13 is operating differently from other hearings, for 14 example, the Catholic and Anglican ones, and in March 15 you won't be hearing directly from survivors. We 16 understand the reasons for that. We understand this is 17 a thematic investigation and it is being done 18 differently from the other ones. The concern we have is 19 that the risk is that, by not hearing from survivors and 20 by not examining individual case studies, you are at 21 risk of getting a false impression and drawing false 22 comfort about the reality of victim and survivor 23 experiences in the settings that we are looking at; you 24 don't, in a sense, see how bad things are.</p> <p>25 So we say that, in order to ensure that that victim</p> <p style="text-align: center;">Page 62</p>
<p>1 and survivor experience is properly heard, it is 2 imperative that you hear oral evidence, oral evidence 3 from the organisations and individuals who work with and 4 advocate on behalf of victims and survivors, 5 particularly Migdal Emunah, Southall Black Sisters, 6 Sadia Hameed, Lloyd Evans, Lisa Oakley and others we 7 represent. It is imperative that you make space in 8 these hearings to hear from those groups and those 9 individuals, because they are your route to the victim 10 and survivor experience in this part of the inquiry, and 11 if you don't hear from them, that will be lost, is our 12 concern.</p> <p>13 Secondly, chair, and as Mr Barker has already 14 touched on, when you come to the hearings in March, we 15 say that it is essential that you look beyond simply 16 formal safeguarding procedures and that you also focus 17 heavily and strongly on cultural and religious barriers 18 to disclosure, and I am gratified that Ms Scolding, in 19 her comments, highlighted that point. Again, I simply 20 want to stress the importance from our perspective, 21 because a lot of the witness evidence that is coming 22 before you is focusing on formal safeguarding procedures 23 and whether people have been DBS checked and so on.</p> <p>24 Of course that has to be interrogated in detail, but 25 we emphasise that the problem in many of these settings</p> <p style="text-align: center;">Page 63</p>	<p>1 goes well beyond that. The problem in many of these 2 settings is that, for cultural and religious reasons, 3 many victims and survivors are simply too scared to 4 disclose in any formal way in the first place, and if 5 those barriers are stopping victims from disclosing, 6 then formal safeguarding procedures become rather 7 academic because it never gets to that point.</p> <p>8 We have heard about the Jehovah's Witnesses. Then 9 if you look at the statement of Sadia Hameed, for 10 example, you will see her analysis of the various 11 factors which prevent disclosure within Islamic 12 settings. If you look at the evidence from 13 Migdal Emunah, you will see how they talk in detail 14 about how those factors operate in Jewish communities. 15 These are hugely important issues, so what we say is, in 16 addition to examining the whole raft of formal 17 safeguarding procedures, which may or may not be 18 operating in various settings, it is absolutely 19 essential that you examine those cultural and religious 20 barriers that are preventing disclosures in the first 21 place.</p> <p>22 We also say that, in doing that, you need to be 23 robust and unafraid to tackle difficult and sensitive 24 issues. Some of these issues are inevitably sensitive, 25 but we urge you to deal with them robustly and not</p> <p style="text-align: center;">Page 64</p>

<p>1 tiptoe around those issues for fear of causing offence. 2 They need to be dealt with head-on. 3 Chair, finally, in relation to those formal 4 safeguarding structures and how they may or may not be 5 working, you're obviously receiving a lot of witness 6 evidence on that. Our concern, our very real concern, 7 is, how do you actually interrogate that evidence 8 properly? In the Catholic and Anglican investigations, 9 you had the benefit of independent audits from people 10 like Edi Carmi, and, as you know, that auditing work was 11 what exposed some of the most significant failings in 12 those churches. It was only through those granular 13 audits that those failings came to light. 14 But, of course, when you look at the Catholic and 15 Anglican Churches, they have actually been rather more 16 engaged in improving safeguarding than some of 17 the settings being examined here, and some of 18 the settings that you are examining here are perhaps 19 more insular and more cut off from the outside world 20 than the Catholic and Anglican Churches are. 21 So, if the reality is that auditing of the Catholic 22 and Anglican Churches identified serious current 23 problems, then we are concerned that, without some 24 detailed process of the same kind in this investigation, 25 these issues may be missed.</p> <p style="text-align: center;">Page 65</p>	<p>1 It is very easy for organisations to give the 2 impression of compliance, to look like they're ticking 3 the boxes and doing the right things, when the reality 4 on the ground is actually different, but it may only be 5 through detailed auditing that that comes to light. 6 So we raise that point and we urge you to think 7 carefully about how that issue can be addressed. We 8 understand the practical issues in doing any significant 9 auditing work before March. We do think that issue 10 needs to be considered, even if it involves the inquiry 11 actually commissioning some work that takes place after 12 the hearings and in light of the evidence that you hear 13 within the hearings, but we put that concern on record 14 and ask you to consider how it might be addressed so 15 that you can be sure that when people make statements 16 about what they're doing in terms of safeguarding, that 17 you have had the opportunity to interrogate that 18 properly. 19 Chair, those are the points that I wanted to raise, 20 so that concludes my remarks. Thank you. 21 THE CHAIR: Thank you, Mr Scorer. 22 MS SCOLDING: Just to come back briefly, chair. Firstly, we 23 will obviously bear in mind the points made by Mr Scorer 24 about the value of his clients giving evidence at any 25 oral hearing. We are in a position where we will be</p> <p style="text-align: center;">Page 66</p>
<p>1 able to within the next couple of weeks disclose a draft 2 timetable and the inquiry and counsel to the 3 investigation recognises the central importance of 4 having the voice of the survivor heard for two reasons. 5 Firstly, because that is the reason why this public 6 inquiry was set up and, secondly, for the very reason 7 that Mr Scorer identifies, which is they are able to 8 identify cultural practices and deficiencies which 9 otherwise may go unnoticed. 10 In this investigation, we expect that the voice of 11 the survivor will be heard through those who speak 12 collectively on behalf of a number of victims and 13 survivors, as well as individual accounts of abuse. We 14 also, however, have to make sure that we hear from other 15 relevant witnesses and undertake the forensic exercise 16 which Mr Barker and Mr Scorer ask us to do. 17 We are unlikely, therefore, to be able to hear from 18 everyone and the choice of witness will focus upon 19 exploring the issues in a thematic way. 20 Secondly, Mr Scorer has already identified that the 21 issue of culture is of central importance. That is why 22 we have sought the evidence that we have and we hope 23 that everyone will come willing and able to explore with 24 us those difficult and thorny issues about how cultural 25 change can be effected and the cultural barriers to</p> <p style="text-align: center;">Page 67</p>	<p>1 reporting and managing abuse effectively. 2 Lastly, as to the adequacy and the auditing, we have 3 not thus far proposed undertaking an auditing process. 4 The idea of doing that, it would simply not be 5 practicable to undertake a sampling exercise across the 6 range of religious organisations in the way that took 7 place in the Anglican and Catholic churches, and in 8 particular, given that the sampling exercise largely 9 relied upon organisations having sophisticated record 10 keeping and full-time staff members who were able to 11 provide the range of information that was requested. 12 We have asked for details of how religious 13 organisations have dealt with cases brought to their 14 attention so we can examine them to see if what is set 15 out in policy translates into practice and whether or 16 not that is or is not adequate. 17 We also have the great benefit of a number of 18 organisations which provide services across a number of 19 either Christian denominations or a variety of religious 20 denominations who are able to assist us in what 21 normative safeguarding standards and practices should 22 be, as well as obviously having you, chair and panel's, 23 great expertise in this area. 24 We will obviously bear in mind all the submissions 25 made by Mr Scorer and thank him very much for bringing</p> <p style="text-align: center;">Page 68</p>

<p>1 them to our attention. 2 Chair, I don't think anybody else has indicated they 3 want to say anything, but if anybody does, could they 4 now raise their hands or forever hold their peace? 5 Thank you very much, chair. 6 THE CHAIR: Thank you, Ms Scolding. Thanks, also, to 7 everyone for your submissions. I will give them careful 8 consideration and you will be informed of my decisions 9 in due course. Thanks to everyone for their attendance 10 today, and that concludes today's preliminary hearing. 11 (12.20 pm) 12 (The hearing concluded) 13 14 I N D E X 15 16 Welcome and opening remarks by THE1 17 CHAIR 18 19 Opening statement by MS SCOLDING2 20 21 Submissions by MR BRADY41 22 23 Submissions by MR BARKER44 24 25 Submissions by MR BRADY50</p> <p style="text-align: center;">Page 69</p>	<p>1 2 Submissions by MR SCORER52 3 4 Submissions by MS SCOLDING56 5 6 Submissions by MR SCORER62 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 70</p>

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