

1 Friday, 10 July 2020  
 2 (10.30 am)  
 3 THE CHAIR: Good morning, everyone, and welcome to Day 10 of  
 4 this public hearing. Ms Dobbin?  
 5 MS DOBBIN: Chair, may I call the first witness, please,  
 6 Dr Clive Driscoll.  
 7 DR CLIVE JULIAN DRISCOLL (sworn)  
 8 Examination by MS DOBBIN  
 9 MS DOBBIN: Dr Driscoll, can I ask you to give your full  
 10 name to the panel, please?  
 11 **A. It is Clive Julian Driscoll.**  
 12 Q. I think it is right, Dr Driscoll, that you were a police  
 13 officer in the Metropolitan Police Service and that you  
 14 retired in 2014?  
 15 **A. That is correct, ma'am.**  
 16 Q. I think you had 32 years of service when you retired?  
 17 **A. That is correct.**  
 18 Q. Did you retire in the rank of detective chief inspector?  
 19 **A. That is correct, ma'am, yes.**  
 20 Q. I think, in the course of your career, you led a number  
 21 of major investigations, including the investigation  
 22 into the murder of Stephen Lawrence?  
 23 **A. That is correct, ma'am, yes.**  
 24 Q. I also think it is right that you were given an honorary  
 25 doctorate in relation to that work; is that right?

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1 **he explained about Operation Care and, in fact, that**  
 2 **Merseyside were currently doing enquiries within London about**  
 3 **a Mr Michael John Carroll.**  
 4 Q. I wonder if you could help us a bit with Operation Care.  
 5 Was it primarily an operation that was based in the  
 6 north-west of England?  
 7 **A. Yes, it was indeed. It appears to have started in Liverpool.**  
 8 **There was a home in Liverpool, and I believe investigations**  
 9 **into activity around that home led them to actually follow**  
 10 **the almost career path of Mr Carroll. So, as a result,**  
 11 **Mr Robbins, Detective Chief Inspector Robbins, had written on**  
 12 **1 June to the Metropolitan Police Service asking their**  
 13 **assistance, but also setting out what he would expect from**  
 14 **the Metropolitan Police Service. To keep it simple, I would**  
 15 **say, if the panel found it useful, it is worth reading the**  
 16 **letter, because what it was -- to keep it simple, everything**  
 17 **to do with Mr Carroll would be dealt with by Liverpool -- by**  
 18 **Merseyside Police. Everything that came out of that**  
 19 **investigation that wasn't Carroll, so any other suspects, any**  
 20 **other concerns, any other complaints, that would have been**  
 21 **dealt with by the Metropolitan Police Service. The letter --**  
 22 **it is with real clarity. That letter had been agreed prior**  
 23 **to me joining the child protection team, but, had anybody**  
 24 **have actually asked me and shown me the letter, I would have**  
 25 **most certainly said I thought it was a very sensible,**

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1 **A. I'm very grateful that they did. Yes, that's absolutely**  
 2 **correct, ma'am.**  
 3 Q. Was that by the university --  
 4 **A. It was actually De Montfort University, ma'am. It**  
 5 **was January last year, thank you.**  
 6 Q. I think that you became a detective inspector in the  
 7 Metropolitan Police in 1998?  
 8 **A. That's correct, ma'am, yes. I passed the inspector's exam in**  
 9 **1998.**  
 10 Q. Was it at the same time that you joined the child  
 11 protection team in Lambeth?  
 12 **A. Yes, it was. It was my very first posting as an inspector.**  
 13 Q. Did you have any background in child protection at that  
 14 time?  
 15 **A. No. I had -- probably the only protection -- I would say**  
 16 **I had maybe three or four attachments to the Lambeth child**  
 17 **protection team at various times when I was a sergeant.**  
 18 Q. I think that, coincidental with your becoming the  
 19 detective inspector in the child protection team, you  
 20 became aware of an investigation that was being carried  
 21 out by Merseyside Police?  
 22 **A. That would be correct. At the time, Detective Chief**  
 23 **Inspector Gordon Briggs was the detective chief inspector in**  
 24 **charge of a number of child protection teams. He phoned me**  
 25 **at Scotland Yard, which was my previous posting, and indeed**

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1 **commonsense approach to investigating the fact that there had**  
 2 **been a predatory paedophile who had run a care home in**  
 3 **Lambeth for 12 years.**  
 4 Q. Just in terms of tracing or following the trail, as it  
 5 were, Dr Driscoll, the allegations emanated from  
 6 St Edmund's Orphanage?  
 7 **A. That's absolutely correct. I wasn't too sure if I could say**  
 8 **the name, to be fair, but it was the Edmund's Orphanage. It**  
 9 **was an offence which made Mr Carroll a schedule 1 offender**  
 10 **and he then sort of came down to work within Lambeth. So it**  
 11 **was actually following -- they were actually following**  
 12 **Mr Carroll, really, to see where, in fact, he'd worked and**  
 13 **what in fact, if anything -- if there had been other**  
 14 **offences.**  
 15 Q. Can you help us with this: do you know if there were any  
 16 links to Carroll in Liverpool or in the north-west and  
 17 any children's homes in Wales?  
 18 **A. Yes, during -- I will call it Operation Trawler. I know**  
 19 **there's been some conflict around that name, but it was**  
 20 **always Operation Trawler. Yes, there was links to**  
 21 **a Carmarthen youth club and also links to, I think, three or**  
 22 **four or five homes where it appeared that children were being**  
 23 **sent to those homes in North Wales, and hence that was one of**  
 24 **the reasons why I asked the two lads who were permanent on**  
 25 **Trawler to go to North Wales to speak to -- because there had**

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1 been a public inquiry up there which was just coming to an  
 2 end. So I just wanted to see what the outcome of that public  
 3 inquiry -- and any advice that had been given from that  
 4 public inquiry, but also because that's where one of my  
 5 concerns were. With Angell Road, it did appear that children  
 6 were being, if you like, just sent up there and then, who  
 7 checked on them? I don't think anybody did. So there was  
 8 a concern with North Wales, yes.

9 Q. Can I just check with you, was that concern also a sort  
 10 of Lambeth-wide concern? In other words, was Lambeth  
 11 Local Authority sending children in its care  
 12 (overspeaking)?

13 A. Certainly the allegation given to me was that, in fact, that  
 14 was an avenue -- they used to have an expression which was  
 15 "commodity", which was the child, "opportunity", which was  
 16 the children's home, and then "finance", because, in fact,  
 17 Lambeth would pay for it. So there was a suggestion that  
 18 that was a way of maybe earning money, by sending the child  
 19 and actually taking a bribe, effectively, back in the -- so  
 20 there was a concern that it wasn't just Angell Road, but  
 21 obviously, at the time, I was focusing on Angell Road, so  
 22 that was the concern that I had and why I was -- I actually  
 23 asked Detective Sergeant -- well, the DC and the detective  
 24 sergeant to go up to Wales.

25 Q. Can you just help me a bit, then, with that separation

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1 officers coming to speak to a child who had made  
 2 allegations against Steven Forrest?

3 A. Yes, I do. I'm well aware of that, ma'am.

4 Q. Just in terms of the delineation between London police  
 5 role and Liverpool police role, why were Operation Care  
 6 officers coming to London to do that?

7 A. That is exactly what -- if you read the letter, ma'am --  
 8 I think it is either dated 1 June or it arrived on 1 June.  
 9 That was the agreement that had been entered into. So it had  
 10 been agreed to allow officers from Liverpool to come down and  
 11 follow an investigation, because it was -- the other  
 12 agreement was, anything that come out of that investigation  
 13 which would result in a further charge would actually be  
 14 heard in Liverpool. It would be heard in the Crown Court up  
 15 in Liverpool.

16 So I never had -- I noticed in another document that  
 17 you served on me last week that Mr Ranson, who actually  
 18 followed -- he was the DCI on Middleton, said that somehow  
 19 I had allowed the officers to do it. I had no supervisory  
 20 role with Care officers. That was -- they would come  
 21 down, and sometimes I didn't even know they'd been to  
 22 London. They would come down and they would follow  
 23 whatever actions they were being given in their major  
 24 incident room. And one of those was what you're talking  
 25 about, was around Mr Forrest.

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1 between what Operation Care was doing and what police in  
 2 London were doing. If there was a victim, for example,  
 3 of Carroll's in London, would the Operation Care  
 4 officers come to London to speak to them or would they  
 5 ask you to do it on their behalf?

6 A. No, no, there were two police officers that regularly --  
 7 I met them, I think, three or four times. I know their names  
 8 but I'm never too sure if that's what you want me to say.

9 Q. I'm not sure their names particularly --

10 A. A detective sergeant and a detective constable. They were  
 11 working effectively to Mr Robbins. They would obviously  
 12 receive actions to come down. They spoke to children and  
 13 they spoke to other people that were working within  
 14 Angell Road and also they were -- over Blackheath, there was  
 15 a home they were speaking to over Blackheath. I know that  
 16 very early on in this inquiry ten children's names were given  
 17 and, as a result of that, they were following allegations  
 18 that the children were making, but also the possibility of  
 19 other staff members that were -- and had the staff member not  
 20 been Mr Carroll, then that would have fallen to be the  
 21 responsibility of the Metropolitan Police Service. It was  
 22 around --

23 Q. I don't want to interrupt you. It was just another  
 24 point of interest. I'm going to take you to some  
 25 documentation in a little while about Operation Care

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1 Q. It wasn't any sort of criticism. It is just more  
 2 understanding --

3 A. No, I didn't take any. I'm just explaining that's why --  
 4 they were independent, but, by the same token, if they found  
 5 something out which the Met should be -- they would actually  
 6 inform me or they would inform the meetings that we had with  
 7 the council at Mary Seacole House.

8 Q. It might just assist as well to explain that, when  
 9 police officers from one region want to investigate  
 10 something in another police area, is it custom that  
 11 there is some form of formal liaison or formal linkage  
 12 with the force in the other area?

13 A. I have to say, every operation I have done which has been  
 14 either outside London or outside the country, you actually  
 15 need a liaison point because you don't understand anything.  
 16 You know, if I tried to investigate something in Liverpool,  
 17 I probably wouldn't know my way around, for a start, but, at  
 18 the end of the day, I would need to know how their computers  
 19 worked, how their -- because, as much as I think people think  
 20 it is all joined up in the police service, it actually isn't,  
 21 and so different forces -- because there are 53 -- sometimes  
 22 have different computers and different ways of dealing with  
 23 things, and so you would need the liaison point. So it is  
 24 perfectly normal to have a liaison point in, in this case,  
 25 London.

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1 Q. So was your role, or the role of the investigation,  
 2 initially, to provide that focal point for liaison --  
 3 **A. Most certainly, and the DS was the liaison point initially.**  
 4 **But I would have had a role because I was the DI. So I most**  
 5 **certainly would have had a role, yes.**  
 6 Q. I should ask you this first: was Operation Trawler the  
 7 name that you gave to the investigation?  
 8 **A. That, actually, was the second part -- if you read the**  
 9 **letter, you will see quite clearly, it was just a way of**  
 10 **managing resources. If you are putting in overtime and it**  
 11 **was Trawler -- the name was always called Trawler. I noticed**  
 12 **something you served on me yesterday, a decision log, the**  
 13 **first thing written in Mr Orde's decision log says "Trawler".**  
 14 **It was just accepted as Trawler. That would have been how we**  
 15 **managed anything that came from Care that wasn't going to be**  
 16 **dealt with by Care.**  
 17 So the case you just mentioned, Mr Forrest, he was  
 18 deceased, but it appeared to me that we had a paedophile  
 19 and another paedophile in the same home and there was --  
 20 at one of our -- it might have been Dr Goldie said this,  
 21 that there was a worry that paedophiles were employing  
 22 paedophiles --  
 23 Q. Yes.  
 24 **A. -- to bring them in. So we would have taken up that part of**  
 25 **the investigation and looked at the other people. There was**

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1 **getting better, actually. So, yes, I mean, it's like**  
 2 **everybody, you know, everybody has to balance jobs.**  
 3 **That's just life. Certainly, I didn't feel that that was**  
 4 **impossible. I wouldn't want to come here and pretend**  
 5 **I was overworked, because it's just that's how being**  
 6 **a police officer is and, if you don't want to be a copper,**  
 7 **well, clear off. The answer is, that's basically what**  
 8 **being a police officer is. You have to balance your time.**  
 9 **That's what I did with child protection team duties and**  
 10 **what we -- I called Trawler, so that there was a -- so we**  
 11 **knew what each other was doing, really.**  
 12 Q. The reason why I was asking you that, Dr Driscoll, was  
 13 because people might have the idea that if a police  
 14 officer was working on a given case, that's all they're  
 15 doing whilst they're on --  
 16 **A. No, ma'am. I had several cases that were going to court as**  
 17 **well. Because it was a very busy office, Lambeth was quite**  
 18 **a busy office with loads of challenges in it, but I had two**  
 19 **or three court cases that was going to court anyway, so, no,**  
 20 **you'd just balance your time. That's what you do. It's what**  
 21 **you're paid to do. You know, that's what you are paid to do**  
 22 **as a police officer and that's what you do, and no excuses**  
 23 **for anything because that's what you are paid to do.**  
 24 Q. The panel has heard from another witness about the  
 25 general challenges of policing in the borough because of

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1 **a group of people that used to go to Angell Road. We would**  
 2 **have picked up on that to investigate if there were offences,**  
 3 **and, two, who they were. They certainly didn't appear to**  
 4 **have any right to be there. That was a feature --**  
 5 Q. I don't mean to cut across you, Dr Driscoll --  
 6 **A. Please do.**  
 7 Q. I want to take this in an ordered way so the panel can  
 8 understand, first, the setting specifics.  
 9 **A. No problem, ma'am.**  
 10 Q. You have explained you were a detective inspector for  
 11 the whole child protection team in Lambeth. Does that  
 12 mean that during the period you were on  
 13 Operation Trawler, you also had other duties as well?  
 14 **A. One of the reasons why Mr Briggs had asked me to go was**  
 15 **because the previous detective inspector,**  
 16 **a Mr Tony Brightwell, had written -- it was about a foot and**  
 17 **a half high. He'd written a series of letters, memos, really**  
 18 **suggesting that the relationship between the Social Services**  
 19 **and the police had reached, like, an all-time low. So one of**  
 20 **the jobs that I had was basically to manage the child**  
 21 **protection team. Care was just -- it was something within**  
 22 **the child protection team.**  
 23 The majority of my time was taken trying to improve  
 24 relationships. I used to go with the officers to the case  
 25 conferences. And there was signs of -- green shoots of it

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1 the high murder rate and other complexities. Was there  
 2 a high volume of child protection work as well within  
 3 Lambeth?  
 4 **A. Yes, there was. I don't know what the population of Lambeth**  
 5 **is, but if you have that amount of people crammed into**  
 6 **a small area, you are going to get problems and, therefore,**  
 7 **the problems usually are -- when I was at Brixton at the**  
 8 **police station, I ran the vulnerable persons unit. So we had**  
 9 **probably -- on a Friday, you would have generally thought**  
 10 **that it was a refugee camp because we had loads of people**  
 11 **with children, and that's the child protection side. So,**  
 12 **yeah, it was a very busy borough with complex cases, serious**  
 13 **cases, very serious cases.**  
 14 Q. I think you've said in your statement that you think you  
 15 worked on Trawler for about 30 days, all in all?  
 16 **A. Being generous, I worked on 30 days, because I wouldn't want**  
 17 **to sound like I'm diminishing what I did. It was about**  
 18 **30 days, mainly supervising the DS and the DC, but also**  
 19 **attending meetings. We used to have a Friday meeting every**  
 20 **Friday, and so, attending those meetings and anything that**  
 21 **come from it. We arrested a gentleman, and an interview,**  
 22 **charged and he was eventually convicted, so, you know, making**  
 23 **sure that that was A-OK.**  
 24 Q. I'm just going to stop you there. Is that Mr Newcombe?  
 25 **A. It is indeed, ma'am.**

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1 Q. Again, I will come back to him -- I don't want to cut  
 2 you off --  
 3 **A. No, please, ma'am.**  
 4 Q. -- and try to trace what you did. You have helpfully  
 5 mentioned you had Friday meetings. Were they  
 6 Working Together meetings with Lambeth?  
 7 **A. They were Working Together meetings. It really started on --**  
 8 **the very first one of those meetings, if you like, was**  
 9 **17 June. That was the first time I had ever been -- had ever**  
 10 **met, you know, if you like, the Social Services team.**  
 11 **I think I might have put the 23rd, but my book actually**  
 12 **starts -- my blue banner book starts on the 17th, so**  
 13 **I believe it was the 17th.**  
 14 **It was agreed -- 28 August, that was a big meeting,**  
 15 **and we agreed that we'd have Friday meetings from that**  
 16 **moment on, so that was the norm with Friday meetings.**  
 17 Q. One of the things that you have mentioned in your  
 18 statement -- this is page 17, Dr Driscoll, if you need  
 19 to follow at all. You explain that at one of those  
 20 meetings the senior child protection officer,  
 21 Libby Blake, spoke to you afterwards?  
 22 **A. I have to say, it was a very friendly meeting. It was when**  
 23 **they were introducing me as possibly the DI who was coming to**  
 24 **take over the child protection team. As I was leaving,**  
 25 **because Mr Briggs worked at Nightingale Lane and I was at the**

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1 **Mary Seacole House that still were being used as -- the**  
 2 **only way I could describe it is a sadistic sex place, and**  
 3 **also --**  
 4 Q. I just want to ask you if you knew where she had that  
 5 information from or if she --  
 6 **A. I formed the opinion of Ms Blake that she was really trying**  
 7 **to be honourable and this was information that had been given**  
 8 **to her and that she was desperate for it to be -- one of**  
 9 **the things I would say about my time was people seemed to be**  
 10 **desperate for you to investigate things that they'd been**  
 11 **trying for many years, in some cases, to bring to the fore.**  
 12 **So I don't -- I never, ever -- other than the Jim Carlton**  
 13 **file, where I do believe that Ms Blake did have firm**  
 14 **knowledge on and actually had some active input, everything**  
 15 **else I believed that she was telling me was what people had**  
 16 **told her and, therefore, actually needed an investigation to**  
 17 **ascertain if that was just rumour, people not being**  
 18 **particularly nice and making things up about people, or**  
 19 **whether it was fact.**  
 20 **I do remember, and I remember this to this day,**  
 21 **walking out of that meeting and thinking, well, there**  
 22 **couldn't have been anything else wrong with childcare, if**  
 23 **that was true. If what we're saying was true, there**  
 24 **couldn't be anything else that was wrong.**  
 25 Q. Forgive me, Dr Driscoll. If I focus on bits of your

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1 **Yard, Scotland Yard, we were going in different directions.**  
 2 **Ms Blake actually asked me to come -- she took me into an**  
 3 **office and she actually produced a file, which is**  
 4 **a Jim Carlton file, because of something you served on me,**  
 5 **and she was using the file to show that things got covered up**  
 6 **in Lambeth and she was quite --**  
 7 Q. Sorry to stop you. I just want to see if we can be  
 8 specific about the file that she showed you. Was that  
 9 in relation to the child who made allegations in  
 10 respect --  
 11 **A. Yes, indeed. It was actually -- it eventually became the**  
 12 **Barratt Report, but it was the child that you are talking --**  
 13 **and when I was speaking to Ms Blake, I did ask what it is,**  
 14 **and she said it is a welfare issue.**  
 15 **I have to say that I beat myself up a lot that I think**  
 16 **I should have picked up quicker than I did for that file,**  
 17 **because I think what Ms Blake was trying to show me was**  
 18 **that this file was what she felt showed that there were**  
 19 **still problems in Lambeth and she went on to ask me -- you**  
 20 **know, talk about the Appleby Report, which at the time**  
 21 **I didn't realise, but was more about financial corruption.**  
 22 **It was a report into everything to do with**  
 23 **Lambeth Council.**  
 24 **She gave me the contact details of Mrs Anna Tapsell.**  
 25 **She also talked about two premises quite close to**

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1 statement --  
 2 **A. Please do, ma'am.**  
 3 Q. I'm focusing on things that are particularly pertinent  
 4 to children. What you say at page 17 was she thought  
 5 council staff were involved in a wide variety of  
 6 criminal activity, including corruption, bribery,  
 7 child abuse and children being sold into the sex  
 8 industry?  
 9 **A. That was to do with the two homes, the two addresses that**  
 10 **were clubs --**  
 11 Q. The clubs that --  
 12 **A. They were clubs and, as a result -- the general, what she**  
 13 **said, suggested that people were actually making money, and**  
 14 **that was -- well, that was it, really, in a nutshell. So**  
 15 **that would be the sex industry that I'm talking about, the**  
 16 **sadistic (inaudible).**  
 17 Q. Again, insofar as you knew, that was the same  
 18 information that she had generally received from --  
 19 **A. Yes. No, no, I think that -- as I say, I think that Ms Blake**  
 20 **had received that from various people and she was -- I have**  
 21 **no doubt she was being honourable. I never once thought that**  
 22 **she was being anything other than trying to be helpful and**  
 23 **saying, "Look, this is where you should start".**  
 24 **Prior to this, despite what people -- I actually**  
 25 **didn't know a lot about it. When I worked in Lambeth,**

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1 I was a variety of things, but not on child protection.  
 2 So the things I may have known about were not some of  
 3 the things that Ms Blake was telling me about.  
 4 Q. In fact, that's something that I wanted to ask you  
 5 about, was the extent to which you came to the child  
 6 protection unit in Lambeth, already knowledgeable about  
 7 any of this information?  
 8 A. Sorry to interrupt, ma'am. Because I was at Scotland Yard  
 9 and one of my jobs in Scotland Yard -- my job at  
 10 Scotland Yard was sexual offences, child protection team,  
 11 domestic violence and also to be the spot for the paedophile  
 12 unit but also Rohypnol. I used to get sent --  
 13 Commander Kendrick was my commander I was working to. I used  
 14 to get sent to Bristol for meetings on, really, child  
 15 protection and sexual offences. Mr Butler was the  
 16 chief constable. I actually had watched a presentation by  
 17 Mr Robbins. But he only ever talked about Liverpool --  
 18 I think he might have talked about Cheshire but he certainly  
 19 never once mentioned London. If you are asking me, did  
 20 I know Care -- well, I did, but I never actually understood  
 21 the Care bit in London. That came afterwards. I really had  
 22 limited knowledge of other offences that were eventually  
 23 talked about. I actually had to research -- like anything  
 24 when you start, you hit the ground running. I had to  
 25 research most of them to find out really what I should know.

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1 Operation Pragada, Operation Bell and the Bulic Forsythe  
 2 investigation?  
 3 A. That's right. I think -- I know you're probably going to ask  
 4 me this later on, so I apologise for getting out of sync, but  
 5 Clare Whelan and Anna Tapsell, for years, had been trying to  
 6 get the council to disclose things and talk about things, and  
 7 those were the cases that I think were the ones that they  
 8 were focusing on. So, yeah, that's correct, 100 per cent  
 9 correct.  
 10 Q. I think what you say in your statement was:  
 11 "I gave this material to Robbie McDermott?"  
 12 A. Yes, that's the detective constable. He's the DC from --  
 13 I actually think that Mr Fisher's statement, which was done  
 14 on behalf of the complainant -- they had it. I personally  
 15 didn't give them that. What I gave them was some letters and  
 16 correspondence in relation to Michael Carroll,  
 17 Michael John Carroll, but on the 28th -- and I know this is  
 18 contested, I get this. On the 28th -- my very first decision  
 19 in Trawler is actually around Care bringing in Mr Fisher's  
 20 statement and actually referring to it and in the  
 21 statement -- there are loads of names that are in that  
 22 statement. It was after that meeting that I sat down with  
 23 Dr Goldie and Mr Paul Clark of the SSI where Mr Paul Clark --  
 24 because I know that's slightly different in other people's  
 25 statements, but that's when he said he would go and see

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1 Q. I'm going to move on, then, if I can, because I just  
 2 want to go through --  
 3 A. Yes, ma'am.  
 4 Q. -- who you spoke to, if that is all right. You did go  
 5 and see Anna Tapsell, as I understand it?  
 6 A. I think Mrs Tapsell came to see me. I honestly can't  
 7 remember that, but I most certainly went to see Mrs Tapsell,  
 8 and I just formed the opinion with Mrs Tapsell that, for  
 9 years, she'd been trying to get someone to understand about  
 10 Mr Carroll, but also some of the other concerns that she had  
 11 around contracts and -- I remember that she had four massive  
 12 boxes of -- which were not internal memos, but letters she  
 13 sent, memos, emails she sent, and, you know. If you show  
 14 a police officer four boxes, that is a disclosure nightmare  
 15 before we start. I remember thinking that we would have had  
 16 to eventually gone through those boxes, one, to see if there  
 17 was anything -- actionable evidence that we could do, and  
 18 I remember that's where the two-way mirror was, the two-way  
 19 mirror for Angell Road. But other than that, what we would  
 20 disclose to the defence -- if it assisted the defence or  
 21 undermined the prosecution. That's the rules of disclosure,  
 22 yes.  
 23 Q. Just looking at your statement on that, Dr Driscoll,  
 24 what you say was that she had correspondence and  
 25 information and that it also concerned

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1 Mr Frank Dobson, and that's when he actually said that he  
 2 would -- you know, he asked me, for obvious reasons, that,  
 3 you know, we have to be very confidential around a name, so  
 4 that was --  
 5 Q. Dr Driscoll --  
 6 A. (Overspeaking) I didn't give Care --  
 7 Q. I have three different things in my head, just so the  
 8 panel are clear --  
 9 A. Ma'am, I apologise.  
 10 Q. I'm sure it is my fault.  
 11 A. It is not. No, it is not.  
 12 Q. Just so that the panel are clear on each of  
 13 the different things that I think you're talking about,  
 14 and I just want to check and make sure that I understand  
 15 as well and that I'm following you.  
 16 A. Yes, ma'am.  
 17 Q. When you talk about Mr Fisher, are you talking about --  
 18 I'm going to be very careful here, Dr Driscoll, but are  
 19 you talking about the solicitor for the complainant in  
 20 Operation Pragada?  
 21 A. I am. He was appointed by Lambeth Council.  
 22 Q. I just want to be clear.  
 23 A. 100 per cent, yes, it was the solicitor for the complainant,  
 24 who actually wrote the statement. It went to  
 25 Helena Kennedy QC eventually, but it was a statement that was

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1 **written on behalf of the complainant of what she was saying.**  
 2 **I did speak to Mr Fisher many years later and it was just,**  
 3 **you know, her recounting her allegation.**  
 4 Q. I will deal with this now whilst we are on it. Were you  
 5 aware, at that time, that there had been  
 6 Operation Pragada into those investigations?  
 7 **A. The person I worked for at Scotland Yard was Detective**  
 8 **Inspector Jim Mould. When I got the file -- it is**  
 9 **traditional in the police force, if you have got to look**  
 10 **back, you draw the lead file. There is always a lead file**  
 11 **that has bits and pieces in it and you just read it. But one**  
 12 **of the very first names on it was Mr Mould, Jim Mould. So**  
 13 **I had a long conversation with Jim Mould so I was actually**  
 14 **well aware of some of the difficulties within**  
 15 **Operation Pragada. I didn't ever read the medical opinion,**  
 16 **because I didn't, but Mr Mould did give me a -- you know,**  
 17 **a good insight into what the problems were, particularly**  
 18 **around how the identification was made of the various names**  
 19 **in that file, which didn't follow the very strict principles**  
 20 **of identification that a criminal court would require. It**  
 21 **didn't follow that, you know.**  
 22 **Now, I think that's unfortunate for the complainant,**  
 23 **because she wouldn't -- how would she know what the**  
 24 **identification rules and regulations are?**  
 25 Q. If I can just pause you again, this is just so that this

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1 **A. Oh, children, sorry, ma'am, I do apologise. Yes, because,**  
 2 **within that, there was a name that kept being mentioned, and**  
 3 **the complainant to this day still has a fear that it's a name**  
 4 **of a missing person that we have never managed to solve. So**  
 5 **there were children, there were -- it was like a ritualistic**  
 6 **thing with children being involved and all of the nastiness**  
 7 **that you'd expect to find in a movie which is depicting**  
 8 **nastiness, really.**  
 9 Q. I think you have said you didn't actually read the  
 10 investigation file into those allegations, or I take it,  
 11 then, the closing report that had been written about it?  
 12 **A. No. I was aware of the closing report. I don't know if**  
 13 **I read it or not. But I was aware of the closing report, and**  
 14 **Mr Mould was, if you like, fairly -- he actually informed me**  
 15 **what the problems were.**  
 16 Q. You understood there were --  
 17 **A. Really, for the complainant, you know, we must never forget**  
 18 **the complainant, what the difficulties were in relation to**  
 19 **maybe pursuing this in a criminal court.**  
 20 Q. I think that you understood as well that there were  
 21 complexities around the clinical position as well, if  
 22 I --  
 23 **A. Most certainly, yes. There always will be. In that type**  
 24 **of -- you know, and I've said in my statement, and I mean it,**  
 25 **you get such a wide variety of opinion, legally, and also the**

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1 makes sense to people who may not be as familiar with  
 2 the underlying material. Was that in relation to -- in  
 3 terms of the identification, are you describing the  
 4 identification that took place during a Lambeth internal  
 5 investigation, as opposed to --  
 6 **A. No, it was -- it was the Lambeth internal investigation which**  
 7 **led to Mr Fisher's statement, I believe. There were two**  
 8 **incidents, actually. One was a rape in the town hall --**  
 9 **allegation --**  
 10 Q. I'm just being sensitive.  
 11 **A. My apologies. There was an incident in the town hall and an**  
 12 **incident in a place called -- in Vauxhall.**  
 13 Q. As we understand it, there was an adult complainant who  
 14 made a number of allegations and described incidents  
 15 that had happened in those venues; is that right?  
 16 **A. Correct.**  
 17 Q. I don't think we need to go into the ins and outs of  
 18 that?  
 19 **A. Correct. That's correct.**  
 20 Q. It did affect children insofar as the complainant  
 21 mentioned that children may also have been a part of  
 22 that; is that the way to put it?  
 23 **A. What's Trojan, ma'am?**  
 24 Q. Sorry, I think you may have misheard me. It may be my  
 25 accent. I was saying "children".

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1 **medical world, and that will always be a challenge in any**  
 2 **criminal investigation.**  
 3 Q. I think you said that you hadn't read the clinical  
 4 opinion --  
 5 **A. I hadn't. But Mr Mould actually had told me that -- you**  
 6 **know, he had told me the difficulties, and I suppose the best**  
 7 **way I can say that, that I can see why there were extreme**  
 8 **difficulties that I think -- if you -- I'm sure the CPS saw**  
 9 **this. If the CPS had seen it, there would have been enormous**  
 10 **difficulties for them in how to pursue it.**  
 11 Q. I don't want to lose sight, because we are discussing  
 12 your meeting with Anna Tapsell. I know that she spoke  
 13 to you about wider concerns about corruption?  
 14 **A. Yes.**  
 15 Q. And I think you also mention in your statement that she  
 16 spoke to you about two cleaners from Angell Road who had  
 17 tried to report abuse but been sacked; is that right?  
 18 **A. One of the things that you actually sent me yesterday, I'm as**  
 19 **sure as I can be 22 years on that there's a line in there**  
 20 **where -- I never know if I'm offending people. Being an old**  
 21 **police officer, you honestly never know if you're offending**  
 22 **people. But RC3 would be the code that we used to depict**  
 23 **somebody of colour, Caribbean, so there's a line in there**  
 24 **about "females RC3 tried to report", and that is -- as I say,**  
 25 **as much as I can now, 22 years on, that's what that is,**

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1 because two cleaners tried to report quite -- what I was  
 2 told -- you know, poor -- at the very least, poor childcare  
 3 from Mr Carroll and, as a result of that, they were sacked,  
 4 got rid of.

5 Q. Do you know where Ms Tapsell got this information from,  
 6 or is that something you would have --

7 A. That was something from Ms Tapsell's investigation. Bear in  
 8 mind that she had been looking into the problems around what  
 9 she perceived to be Lambeth Council for years, and in  
 10 particular what Mr Carroll was doing for years, and so that  
 11 was part of her investigation.

12 What I did was -- I'm pretty sure she gave me first  
 13 names. I tried to find out from the personnel  
 14 department -- just work it backwards, were there two  
 15 people of colour that were sacked? Do these names fit?  
 16 If so, we must have half a chance of working out that they  
 17 could be the same two people. So it was just going back  
 18 from the allegation and trying to work out whether -- the  
 19 substance of it, et cetera, et cetera.

20 Q. Did you get anywhere with that investigation?

21 A. No, I didn't. I have to say, I probably would have revisited  
 22 that, but certainly with some of the other things which were  
 23 also coming in at roughly the same time, no, I didn't, and  
 24 I don't believe that we got in Trawler -- because bear in  
 25 mind that there were two police officers working on it almost

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1 Q. I'm just going to ask you a little bit about that, if  
 2 I may. I think that she said to you that she had been  
 3 concerned about parties for adults that were --

4 A. Her concerns were that money was being stolen, money for the  
 5 children was being stolen, that food for the children was  
 6 being stolen, that parties were taking place in a flat which  
 7 had the title "John's flat", but that flat -- that wasn't  
 8 a flat. It should have been a rest room of the staff but he  
 9 converted it. That's where the double -- the two-way mirror  
 10 should have been. And people were coming at different times  
 11 to that home, not connected to the home, not people like  
 12 social workers, not people who had a right to be there, and  
 13 were going up to the flat and parties were taking place.

14 Q. I think that you, if I have this right, said that --  
 15 sorry, she said that some of the people were police  
 16 officers, but she didn't know their names or she didn't  
 17 say who they were?

18 A. She did actually say that police officers had attended, but  
 19 she said she didn't know their names. What she did say was  
 20 that she'd got people to sign a book, a visiting book.  
 21 That's what she actually said. "I insisted they signed  
 22 a book". That's what I actually went looking for. I asked  
 23 many times at the meetings on a Friday, "Can I have the  
 24 files, everything to do with Angell Road", and I was always  
 25 told, "We haven't got them. Squatters destroyed them",

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1 full time, I don't believe they actually found out either.

2 Q. Did Ms Tapsell suggest to you that you speak to  
 3 Ms Johnson?

4 A. Yes, she did. It was Theresa Johnson, and she suggested that  
 5 some of the information that I was given had come from  
 6 Theresa Johnson. So she was -- I actually spoke to  
 7 Ms Appleby, Richard Clough, I actually was just following it,  
 8 and then one of the people I eventually spoke to was  
 9 Ms Johnson, who at first was quite reluctant, really, to  
 10 talk. She felt quite let down by the police. But  
 11 eventually, you know, we convinced her that we were just  
 12 trying our hardest and we'd give it as good a go as we could.  
 13 She did come forward and she did give an account of what she  
 14 saw.

15 Q. Can I just ask you about that. So did you establish  
 16 that she had worked for a period --

17 A. She was the manager. She ended up being a manager at  
 18 Angell Road but she'd done a workplace attachment. She'd  
 19 been put into Angell Road -- I think she might have been  
 20 studying to do something and she'd done an attachment. What  
 21 she'd seen was what she was concerned about, and that's what  
 22 she reported -- I only read what you basically gave me, that  
 23 she reported it to her line manager. So her concern, she was  
 24 trying to report upwards at the time, and that was the  
 25 concern she reported to us.

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1 et cetera, et cetera. It was actually Ms Tapsell who told  
 2 me, "Well, no, they would be gathered up and collected", and  
 3 eventually we got them -- I think there's another set of  
 4 papers -- I'm getting out of sync here -- that Mr McDermott  
 5 and Libby Blake were looking at. It's not the same papers,  
 6 but we got some papers to try to find this book, to see if  
 7 what Ms Johnson was saying could be given -- you know, some  
 8 evidence around it to say what she was saying.

9 Q. Again, I have around three points about this to be sure  
 10 this is clear and we are not losing any thread. You  
 11 have referred to two-way mirrors I think twice.

12 A. Yes.

13 Q. I think you explain in your statement that you were --  
 14 did you understand that two-way mirrors had been  
 15 fitted --

16 A. No, it was -- I'm pretty sure the paperwork was that they  
 17 wanted them to be fitted. I don't believe anyone ever told  
 18 me -- and if I conveyed that, then I've got that wrong.  
 19 Nobody ever told me they'd been fitted, but there was more  
 20 than enough document -- internal documentation -- you know  
 21 what I mean. Basically, it was more than that to show that  
 22 that's what he was trying to do, and he had quotes and all  
 23 sorts.

24 Q. The other thing -- yes, the visiting book, then. Did  
 25 you track the visiting book down?

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1 **A. I never found it. But I was looking for it and one of**  
 2 **the things that we discussed at a meeting, which I am sure**  
 3 **you will talk about to me later. But one of those**  
 4 **meetings -- that was on 5 November, and there was some real**  
 5 **positive stuff come out of that. But we got the papers on**  
 6 **6 November. So after asking for it for about six weeks,**  
 7 **I actually got those papers on the 6th, and we listed them**  
 8 **and there wasn't a signing-in book.**  
 9 Q. I will come back --  
 10 **A. Having said that, I don't know about the other papers.**  
 11 Q. I will come back to the meetings. I just want to --  
 12 I think I need to finally ask you this: Ms Johnson also  
 13 told you about a politician who had visited Angell Road  
 14 and spoken to a child?  
 15 **A. Yes, she did. She actually gave an account of what the**  
 16 **politician did. She knew who he was, because she'd seen him**  
 17 **at other events and she also knew other members of his**  
 18 **family, and she insisted that he sign the book, which is why,**  
 19 **along with the others, because there were other people --**  
 20 **I think sometimes -- even now when I read stuff, it seems to**  
 21 **be one person, but there were other people that I was really**  
 22 **concerned about. But the politician was asked to sign the**  
 23 **book.**  
 24 Q. Did she also convey concern to you about John Carroll  
 25 and particularly children in Angell Road Home?

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1 Q. In your notebook, you have made an entry -- I don't need  
 2 to bring it up on screen. I just wanted to ask you if  
 3 this rang any bells, and this corresponds with what she  
 4 told you. We have an entry that says "Angel Town 1981".  
 5 It says:  
 6 "The child followed Carroll everywhere. Secrets.  
 7 And other child excluded from school. Petrified of  
 8 John. Would not talk about anything. Uncle John would  
 9 be angry."  
 10 **A. They're separate children, but they are -- what sometimes**  
 11 **gets overlooked with Mr Carroll, is the actual violence.**  
 12 **Everyone, I guess correctly, talks about sexual abuse, but he**  
 13 **was quite a violent man. So they're two separate children,**  
 14 **but that was really the flavour of what was being said to me**  
 15 **at the time.**  
 16 Q. I think what I was trying to piece together was whether  
 17 that entry in your notebook corresponds with what  
 18 Ms Johnson told you?  
 19 **A. Certainly what Ms Johnson told me. Whether I was writing**  
 20 **that down when I was with Ms Johnson, I wouldn't have a clue.**  
 21 **It's certainly what Ms Johnson told me, and that child that**  
 22 **followed him everywhere, I don't want to say it if -- you**  
 23 **know, if it is going to in any way upset anyone -- had, like,**  
 24 **a nickname. It wasn't his name.**  
 25 Q. I'm just going to interrupt you.

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1 **A. Yes, she did. There was a chap -- a child called [redacted].**  
 2 **Excuse me. There were two or three children that appeared to**  
 3 **go up there --**  
 4 MS DOBBIN: I'm sorry to interrupt you. A legal issue has  
 5 arisen. I wonder if I could ask that the feed is cut  
 6 for a short moment.  
 7 Chair, there has been an inadvertent disclosure in  
 8 respect of the name given to a child. It is a name that  
 9 is in fact ciphered in the inquiry.  
 10 Sorry, chair, I don't know if I lost you for  
 11 a moment and if you heard what I said.  
 12 THE CHAIR: I heard what you said. Do you wish me to make  
 13 a restriction order?  
 14 MS DOBBIN: Yes, please, chair. It is a restriction order  
 15 in respect of the name that was used.  
 16 THE CHAIR: Yes.  
 17 MS DOBBIN: Can I apologise? The screen here went blank to  
 18 it was unclear to us whether you were still there, so  
 19 I apologise. Chair, I think we can resume with the  
 20 witness, if that is convenient.  
 21 THE CHAIR: Please go ahead.  
 22 MS DOBBIN: Dr Driscoll, just in respect of that, so  
 23 Ms Johnson mentioned a specific child in relation to  
 24 Mr Carroll; is that right?  
 25 **A. That's correct, ma'am.**

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1 **A. Please do.**  
 2 Q. The nickname is also ciphered --  
 3 **A. That's what I mean. So, yes, it would have been what**  
 4 **Theresa Johnson was saying to me in the book.**  
 5 Q. In your notebook, we can't find any other reference  
 6 specific to Angell Road and any child in it. Do you  
 7 know whether or not you made notes -- any other notes in  
 8 your notebook about --  
 9 **A. That would -- there are other books, because the police --**  
 10 **I have long since forgotten about them, but the police**  
 11 **actually had them. The very last time I was interviewed --**  
 12 **voluntarily, I hasten to add. But the very last time I was**  
 13 **interviewed, they produced two other books that I hadn't**  
 14 **really seen, which are mine, because they have got my scrawl**  
 15 **in it, but, no, I mean, I know that there were ten children**  
 16 **that I think Ms Scantlebury, Rubina Scantlebury, she produced**  
 17 **ten children that had made complaints about when Mr Carroll**  
 18 **was in charge.**  
 19 Q. Do you know what happened to that list or if it went to  
 20 Operation Care, given that they were --  
 21 **A. It definitely went to Operation Care. It would be in**  
 22 **Operation Trawler's documents. But it certainly went to**  
 23 **Operation Care because I think Mr McDermott actually took**  
 24 **three statements from it. So it certainly went to**  
 25 **Operation Care.**

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1 Q. I'm going to move on to an entirely different topic, if  
 2 I can --  
 3 **A. Please do, ma'am.**  
 4 Q. -- just to cover off another issue, which is the  
 5 Carrolls' fostering application.  
 6 **A. Yes.**  
 7 Q. This is the suggestion that there was an application  
 8 made to Southwark?  
 9 **A. Yes. I actually spoke to the child protection team at**  
 10 **Southwark and also spoke to the chap who was in charge of --**  
 11 **Bernadette Khan had told me about it -- and, in fact, because**  
 12 **-- "Your name is Clive, and I'm Clive". I spoke to him and**  
 13 **it appears that there'd been an attempt to force two boys to**  
 14 **be put in the care -- foster care of Mr Carroll and he had**  
 15 **been turned down because he was a schedule 1 offender, but**  
 16 **the bottom line was that there was pressure being put on.**  
 17 **Certainly Bernadette Khan became ill over it. So did the**  
 18 **social worker --**  
 19 Q. I'm just going to stop -- I don't want to put you into  
 20 difficulty in terms of remembering who said what. What  
 21 I wanted to ask you about was, in your witness  
 22 statement, you suggested that you had met Mr Walsh?  
 23 **A. I never met him. I spoke to him on the phone. I've never**  
 24 **met Mr Walsh at all. I spoke to him on the phone. I never**  
 25 **went to where he worked. It was a phone number supplied to**

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1 **just that. So I was aware before I come here that, in fact,**  
 2 **he said he'd never spoke to the police, but he certainly --**  
 3 **I spoke to someone at Southwark and had that conversation.**  
 4 Q. I'm going to move on to another topic, DI Driscoll.  
 5 This is the difficulties, if I can put it in that way,  
 6 that you encountered during Operation Trawler in terms  
 7 of Working Together. I wonder if I could just bring up  
 8 on screen, please, LAM009435, Mr Hyde. The panel have  
 9 seen this document already, DI Driscoll. I think you  
 10 have too. This is your --  
 11 **A. Yes, I have it here in front of me in my book. So, yes, I**  
 12 **have got it here, yes.**  
 13 Q. I think, helpfully, it sets out some of the dates which  
 14 I will come back to. You had a meeting on 28 August --  
 15 **A. That's correct.**  
 16 Q. -- with Dr Goldie, Mr Clark from the SSI and some of  
 17 the police officers from Merseyside Police; is that  
 18 right?  
 19 **A. Yes, that's when they actually produced the statement of**  
 20 **Mr Fisher.**  
 21 Q. Then we see there that there is another meeting on  
 22 8 September. If we go to the next page, please,  
 23 Mr Hyde, I think you were suggesting -- I think this is  
 24 the fifth paragraph down, please, Mr Hyde.  
 25 **A. Yes.**

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1 **me. And, indeed -- I say Mr Walsh. It was Clive. So, you**  
 2 **know, I know that -- and he just explained what had happened**  
 3 **around the time that he'd rejected it. And then there was**  
 4 **a meeting where there was difficulties at a meeting and then**  
 5 **pressure -- he would say pressure had been put on him.**  
 6 Q. It is really this that I wanted to ask you: in your  
 7 statement you suggested that you spoke to him in or  
 8 around Operation Trawler?  
 9 **A. Oh, no, it was definitely Trawler because I'd met with**  
 10 **Ms Khan, who was the person who actually done the**  
 11 **investigation into it, and then, because she'd said no, it**  
 12 **went off to be -- I think -- I don't fully understand the**  
 13 **system. But because she said no and then they challenged it,**  
 14 **it went off to Southwark to check that she'd been fair, and**  
 15 **so it was definitely after I'd spoken to Ms Khan.**  
 16 Q. It is just that when Mr Walsh gave evidence before the  
 17 inquiry, he said that he hadn't spoken to the police  
 18 until --  
 19 **A. I'm aware of that, funnily enough, because -- not from the**  
 20 **inquiry. I've deliberately not watched anything to do with**  
 21 **the inquiry. But, no, I am aware. But I can only say that**  
 22 **I spoke to -- I get that, but I spoke to someone called**  
 23 **Clive. I don't know what else I can say. Because, at that**  
 24 **time, that's what I was looking at, was around all of**  
 25 **the things that were happening from Angell Road, really, not**

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1 Q. You were suggesting that previous decisions -- and  
 2 I think these were decisions of yours, but tell me if  
 3 I am wrong --  
 4 **A. They are my decisions, and I can say that the relationship**  
 5 **was fine up until, really, other people became prominent in**  
 6 **Angell Road, and then it became very strained. But that**  
 7 **is -- that was my opinion, that every time we went -- I say**  
 8 **"we", it was me. Every time we went -- whereas we'd already**  
 9 **agreed that we would follow other suspects, there was always**  
 10 **an attempt to sort of say, "You won't" -- I don't know if**  
 11 **this is helpful. I have thought long and hard about this.**  
 12 **The only way I can describe that is, if I actually had done**  
 13 **everything the council wanted, so I agreed with every demand**  
 14 **they made at those meetings, I would have become Middleton,**  
 15 **because I've never known what Middleton was until you served**  
 16 **these papers on me, and then Ms Kenward gives a bit of**  
 17 **a blow-by-blow account of Middleton. I would say that -- you**  
 18 **know, I will be upfront: if, at the end of this -- if, at the**  
 19 **end of this public hearing, you find that that way,**  
 20 **Middleton's way, was the correct way, then I have to be**  
 21 **wrong. I can't avoid that, because I was -- I felt that my**  
 22 **independence as a police officer was being threatened every**  
 23 **time I spoke, almost. So -- but looking back, everything**  
 24 **they actually asked me to do ended up, really, to be what**  
 25 **Middleton was, which I -- you know, I probably couldn't have**

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1 worked on Middleton because I would have felt that my  
 2 independence as a police officer was being eroded. But  
 3 I have to say that, because when I read this thing you sent  
 4 me, I thought, well, actually, that's what they wanted.  
 5 Q. Operation Middleton was an extremely large investigation  
 6 with wide terms of reference?  
 7 A. It's more that the way that Middleton got their work. It's  
 8 more the way that the CHILE team -- I'd heard of them but  
 9 I didn't really know what they did. It was the CHILE team.  
 10 Why I had the concerns was because my conversation with  
 11 Ms Appleby and my conversation with Mr Clough and what  
 12 eventually came out in the Barratt Inquiry was the files --  
 13 there had been so much criticism of the files within Lambeth.  
 14 You know, you couldn't rely on them. And so I -- you know,  
 15 I'm not -- I don't know -- you're right, you're absolutely  
 16 right to say I don't know the ins and outs of Middleton,  
 17 because I don't, but it strikes me that that's how the work  
 18 was progressed, that people looked at the files and said,  
 19 "Okay, you can do that". Whereas, I suppose, if I was  
 20 honest, I probably would have followed more what Mr Stevenson  
 21 and Ms Hinton from the Shirley Oaks -- I would have probably  
 22 followed what they did, which was allow the kids to have  
 23 a voice as sensitively as we could and make sure we looked  
 24 after them. That's probably the way I would have gone.  
 25 So I have to accept that that was -- my challenges

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1 you set out were that you were concerned that decisions  
 2 were being overturned, files were being tampered with --  
 3 A. Correct.  
 4 Q. -- and an attempt was being made to control a criminal  
 5 investigation?  
 6 A. Correct.  
 7 Q. Information was being passed by unauthorised channels,  
 8 and that meetings relating to Operation Care were taking  
 9 place without the knowledge of your child protection  
 10 team?  
 11 A. Yes. It was, because even though I couldn't tell Care if  
 12 they could come or go, because I couldn't, but I think out of  
 13 respect for both forces, or services, I think that we should  
 14 have known. If I was doing anything that would have  
 15 interfered in the Michael John Carroll investigation, I would  
 16 have felt a professional courtesy -- I don't know what you  
 17 call it. I would have felt a professional obligation to tell  
 18 them what I was doing.  
 19 Q. I think the point is, Dr Driscoll, that those bullet  
 20 points were very serious criticisms to be making of  
 21 the individuals involved on the Lambeth side of things?  
 22 A. I accept that, but -- I go back to my original point: you are  
 23 paid quite a lot of money to be a police officer. One of  
 24 the things you're paid to be is a police officer for  
 25 everybody. I wasn't a police officer for Lambeth Council.

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1 were about me feeling I was losing my investigative  
 2 independence.  
 3 Q. I don't ask for this document to come back up on screen.  
 4 What you say in the next paragraph in that memo was that  
 5 Libby Blake explained that the investigation of these  
 6 homes would cause embarrassment to social workers  
 7 currently in employment, and you said:  
 8 "I explained that there was evidence of criminal  
 9 investigations which had to be investigated."  
 10 So from your --  
 11 A. That's correct. You can't not go down a road just because  
 12 it's going to embarrass someone. You know, the police are  
 13 paid a lot of money, for God's sake. You can't not go down  
 14 a road just because it is embarrassing. If that's wrong,  
 15 I would have no hesitation in saying sorry, but I don't  
 16 believe it is. I've got -- if I asked anything -- could you  
 17 look at document 40 from Trawler? That would show I never  
 18 actually made a complaint about Ms Blake. I was actually  
 19 still happy for her to work with Trawler, but not on the bit  
 20 which was the Barratt Inquiry. I know it's, "You made  
 21 a complaint". I didn't. But I wouldn't have accepted not  
 22 going somewhere just because it was embarrassing -- for me or  
 23 for anyone. I just wouldn't because that doesn't feel right,  
 24 certainly not for the kids.  
 25 Q. Coming back to your memo, the final bullet points that

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1 I used to say, I am a police officer for the Met because they  
 2 pay me, but I'm also a police officer for the children. And,  
 3 you know, you do have to stand up for what's right. And,  
 4 yes, I'm sure that there were people that had the right hump  
 5 with me. I'm sure of that. But, you know, I wasn't doing it  
 6 because I didn't want to investigate; I was actually doing it  
 7 because I wanted to investigate. So I have to take that on  
 8 the jaw because I just felt that they were trying to stop me  
 9 investigating.  
 10 MS DOBBIN: Sorry to interrupt you, Dr Driscoll. Chair,  
 11 I see the time. There is probably about ten more  
 12 minutes with this witness. Would you rather have  
 13 a break now and come back to him or keep going? I think  
 14 you may be on mute.  
 15 THE CHAIR: Apologies. If you would like to conclude, that  
 16 would be fine.  
 17 MS DOBBIN: I'm grateful, chair.  
 18 Dr Driscoll, then, just coming to the meetings that  
 19 you mentioned before, I think what you say in your  
 20 statement is that you attended a meeting in August 1998  
 21 with officers from Lambeth?  
 22 A. Correct.  
 23 Q. And that you mentioned the names of some people, if  
 24 I put it like that, whose names had come up in the  
 25 course of information given to you?

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1 A. Ma'am, that's 28 August, and that was after we talked  
 2 about -- and Care was not inappropriate in any way, shape or  
 3 form. They were suggesting that if this -- if what was  
 4 contained in Pragada -- and they wouldn't have known -- was  
 5 true, that was how -- I don't think any of us, me included,  
 6 could fully understand how Michael John Carroll survived for  
 7 12 years running a children's home. They were saying maybe  
 8 that's because he had a potential to blackmail other people.  
 9 After that meeting, I sat down with Mr Paul Clark and  
 10 Dr Goldie and, yes, I did definitely -- we talked about those  
 11 names. Hence Mr Clark said he'd go and speak to Mr Dobson.  
 12 Q. I think what you say in your statement -- is this  
 13 right? -- is that he said that some care had to be  
 14 taken. Is that right?  
 15 A. Well, I'd say "care". I think it was a lot stronger than  
 16 that. He was actually saying it was extremely confidential  
 17 and that, you know, we mustn't unnecessarily put names or --  
 18 and I didn't. I used to virtually (inaudible) I used to  
 19 refuse to.  
 20 Q. So you agreed that great care needed to be taken or  
 21 caution exercised?  
 22 A. I did agree with great care, yes, I did, 100 per cent.  
 23 Q. I think what you say is that, after that meeting,  
 24 individuals from Lambeth pressurised you to say the  
 25 names at a later meeting?

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1 conflicting my evidence. But can I just say that there  
 2 was -- in that, it talked about -- it is actually  
 3 paragraph 45 -- page 45, rather, and it talks about a meeting  
 4 where in fact I was talking about -- I took -- I consulted  
 5 Mr Randall and Mr Moffatt. There is nowhere there that said  
 6 I consulted them together. I watched Fulham and West Brom  
 7 this week. They played on different nights. I actually  
 8 never had a meeting with Mr Randall and Mr Moffatt, at all,  
 9 together. I don't think I have been in the same room as  
 10 Mr Randall and Mr Moffatt. All I would say is, in my  
 11 statement, I spoke to Mr Randall, and his view was it's  
 12 a meeting of minds, it's a meeting of minds. But it's my  
 13 responsibility -- I have never ever -- I have had probably --  
 14 I've been interviewed probably between 40 and 50 hours on  
 15 tape with the police, trying to help them. I have never,  
 16 ever said anything other than, when I walked through that  
 17 door -- and I was -- the social workers there were there,  
 18 they weren't young kids and it was a confidential meeting.  
 19 Five area complaints found out. I didn't say, "Guess what  
 20 he's doing?". I actually gave -- "Did A meet B at venue C?".  
 21 That's what the five area complaints found when they  
 22 investigated. It wasn't inappropriate. It is what you would  
 23 expect a police officer, who is trying to find evidence -- it  
 24 is what you expect him to say. I didn't make unbelievable  
 25 allegations. I just said, "Did A", because that was part of

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1 A. Once again, we're focusing on a person, aren't we? But there  
 2 were loads of different people that were connected to  
 3 skulduggery and Angell Road, and I always felt it was the  
 4 other names, really. But, once again, I have  
 5 a responsibility to the investigation, and if I may just say  
 6 this, I did -- I was told to have great care, but -- well,  
 7 ask me a question.  
 8 Q. I think what we are really trying to get to,  
 9 Dr Driscoll, is the idea that you were being pressurised  
 10 from people within Lambeth?  
 11 A. 100 per cent. They wanted me to not go to Angell Road and  
 12 they -- you know, they really wanted to steer the  
 13 investigation. That's the opinion I got. You said I might  
 14 have been harsh with my bullet points, but that was just me  
 15 standing up to it and saying, "Whoof, I ain't going there".  
 16 Q. Dr Driscoll, no criticism from me. It was just trying  
 17 to understand the dynamic --  
 18 A. Can I say, ma'am, I didn't actually take any. I was just  
 19 trying to explain, in my way, that it was me saying that you  
 20 can't control the police, I guess, and me.  
 21 Q. Coming back to this point, were you pressurised into  
 22 naming people at the meeting?  
 23 A. I had a meeting with Mr (inaudible) -- can I just say  
 24 something about -- I know you haven't mentioned it. There is  
 25 actually a police investigation which is really -- it is

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1 what I'd been told, "know B and did they meet at C?", because  
 2 that was what I was investigating.  
 3 Q. It is really just the point about whether or not there  
 4 was pressure applied --  
 5 A. Yes, there was. I mean "pressure" is the wrong word.  
 6 I wouldn't want to say that either officer, or any officers,  
 7 I spoke to pressurised me, but they did, in the strongest  
 8 possible terms, say I should disclose -- at the time Lambeth  
 9 had brought a solicitor along and, at that point, I did make  
 10 the decision -- and it is my responsibility, no-one else's,  
 11 I did make that decision that I would disclose. I have to  
 12 say that, at that meeting, it was nothing but positive. And  
 13 ironically -- I would argue, ironically, the one name that  
 14 appeared in the press on 17 November -- because that's when  
 15 I think Dr Goldie went to see -- can I say the name? To see  
 16 the chief exec, was after a press release. That, I think  
 17 you'll find, was what started it all off, not what I said at  
 18 the meeting, because it was nothing but positive after that.  
 19 That's what five area complaints found anyway.  
 20 Q. In your witness statement you said that it was -- that  
 21 Lambeth were pressurising you to name people?  
 22 A. No, that's correct. That's correct. But that's why I did  
 23 those five points that you read out where you said I was  
 24 being particularly -- that's because I was saying that, you  
 25 know, I wasn't going to, but then I had a conversation with

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1 **Mr Randall, I had a conversation with others, and then, yes,**  
 2 **I did, because I did.**  
 3 Q. Why were Lambeth pressurising you to name people who you  
 4 had already --  
 5 **A. Because I think that Lambeth -- I mean, when I spoke to**  
 6 **Ms Blake, she said there was another seven, and I actually**  
 7 **think that what they were trying to find out is, what does he**  
 8 **know? What doesn't he know? And, you know, I do think it**  
 9 **was possibly a damage limitation exercise. If I had found**  
 10 **out -- I actually always thought they thought I knew more**  
 11 **than I did. But I had actually found out about the Barratt**  
 12 **thing, and I actually think they maybe thought I might find**  
 13 **something else out.**  
 14 Q. I think if I'm fair in summing up your statement,  
 15 I think you have always said that you have enduring  
 16 concerns about whether or not allegations around Forrest  
 17 were properly investigated?  
 18 **A. Yes.**  
 19 Q. And that's -- is that --  
 20 **A. I can't imagine that a paedophile, two of them, could have**  
 21 **acted in a children's home alone, and I've always had a fear**  
 22 **that we missed an opportunity. But I accept people**  
 23 **investigate differently, totally, and I accept that -- the**  
 24 **methodology of Middleton. I accept it is different from**  
 25 **maybe to me, but I wouldn't say I'm right or wrong. I'd say**

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1 **form, I don't know. But what I can say is, please do this**  
 2 **for me: if you find a Freemason that has in any way done**  
 3 **anything wrong, hammer him all day long.**  
 4 MS DOBBIN: Dr Driscoll, I'm just going to pause and ask the  
 5 chair if she has any questions for you.  
 6 Questions from THE PANEL  
 7 THE CHAIR: I have one question, and then I will ask my  
 8 colleagues if they have any questions, Dr Driscoll: just  
 9 for clarity, can you say who specifically in Lambeth  
 10 tried to steer you away from Highland and Angell Road?  
 11 **A. Ma'am, please say that again. I do apologise.**  
 12 THE CHAIR: For the sake of clarity, can you tell us who  
 13 specifically in Lambeth tried to steer you away from  
 14 Highland and Angell Road?  
 15 **A. Ma'am, that was a joint effort. So if you ask a particular**  
 16 **meeting, I might have said it was Libby Blake. If you ask me**  
 17 **another meeting, and I do remember this, it might have been**  
 18 **Mr Clark. But generally speaking, it seemed to be a bit of**  
 19 **a united front. That's why I became -- and that's why**  
 20 **I wrote that memo, was because, if I had have had a person**  
 21 **doing it, it would have been easier to deal with, but it was**  
 22 **more of a concerted effort on behalf of Lambeth.**  
 23 THE CHAIR: Thank you. What do you think was their  
 24 motivation?  
 25 **A. Embarrassment. And I think that maybe people that were --**

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1 **it is different. I have always thought we missed a trick.**  
 2 **I keep coming back to the same thing: how is it that two**  
 3 **incredibly noble people, Mr Stevenson and Ms Hinton, with**  
 4 **even a fraction of the resources that Social Services and the**  
 5 **police have, have managed to put together 600-plus cases and**  
 6 **actually that are tested by Lambeth Council's lawyers and**  
 7 **also a copper that's an ex Fraud Squad and get a £44 million**  
 8 **payout. How has that happened when we were the agency that**  
 9 **should investigate and we were the agency that should have**  
 10 **been focusing on what the victims -- their needs?**  
 11 Q. Dr Driscoll, I just want to ask you a final question,  
 12 because it is an issue of concern in this investigation.  
 13 It is about the influence of Freemasonry in police --  
 14 **A. Can I just say, now you've read my statement, I've been**  
 15 **a Freemason for 30-odd years. If there is a Freemason that**  
 16 **has actually done anything wrong at all, give him double and**  
 17 **then add a bit on. That's all I'd say. If there's been --**  
 18 **I thought that was more about corruption in --**  
 19 Q. I --  
 20 **A. The answer from me is simple: nobody ever -- and dare they,**  
 21 **nobody ever approached me about "looking the other way",**  
 22 **whatever the saying is, and most of what I was talked about**  
 23 **was actually the Catholic version of Freemasonry, which isn't**  
 24 **Freemasonry. It was set up in 1906 and 1908 to rival**  
 25 **Freemasonry. Whether that happened in any way, shape or**

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1 **I worked for an organisation that is very loyal. I have to**  
 2 **say that sometimes that really gets us into trouble, because**  
 3 **I think sometimes we may look at the organisation to protect**  
 4 **it, when, in fact, we need to be open and transparent if we**  
 5 **made a cock-up, because that's what we should be doing.**  
 6 **I think Lambeth realised that, after thinking that in 1996**  
 7 **the Appleby had sorted it out, that here we are in 1998 and**  
 8 **it still looks like a nightmare where files go missing and**  
 9 **bits and pieces. So that's -- I have always believed --**  
 10 **that's my personal belief.**  
 11 THE CHAIR: Thank you, Mr Driscoll. Ms Sharpling?  
 12 MS SHARPLING: Yes, thank you, chair. Just one question  
 13 from me, please, Dr Driscoll. It is a general one,  
 14 actually. Can you describe whether you thought you had  
 15 sufficient resources and whether your team had  
 16 sufficient training to undertake what might have been  
 17 quite a considerable investigation, given what you have  
 18 told us?  
 19 **A. Can I just say, you will never get a police officer to say**  
 20 **anything other than that he doesn't have sufficient**  
 21 **resources. But I never felt that my resources weren't**  
 22 **enough, and the two officers I actually had working on it**  
 23 **were extremely experienced child protection officers who had**  
 24 **actually dealt with -- a major enquiry with a lot of people**  
 25 **is just single cases together, isn't it? So, you know, the**

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1 answer being is, they had more than enough experience, they  
 2 had more than enough enthusiasm, so, no, I didn't worry about  
 3 that at all. I'm not going to say -- the resources --  
 4 honestly, you could always moan about resources. You cut  
 5 your cloth to what you've got. And I was happy with it, so  
 6 that's your answer, ma'am.  
 7 MS SHARPLING: Thank you.  
 8 A. Thank you, ma'am.  
 9 THE CHAIR: Mr Frank?  
 10 MR FRANK: No, thank you.  
 11 THE CHAIR: Sir Malcolm?  
 12 PROF SIR MALCOLM EVANS: No, thank you, chair.  
 13 THE CHAIR: Thank you very much. We have no further  
 14 questions, Dr Driscoll. Thank you.  
 15 A. Thank you, ma'am.  
 16 (The witness withdrew)  
 17 THE CHAIR: We will now take a break and return at noon.  
 18 Thank you.  
 19 (11.45 am)  
 20 (A short break)  
 21 (11.59 am)  
 22 MS DOBBIN: Can I call the next witness, please, Mr Gargini.  
 23 MR RICHARD GARGINI (affirmed)  
 24  
 25

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1 Mr Gargini, you would like to say something; is that  
 2 right?  
 3 A. If I may, yes. On a personal level, I am deeply saddened  
 4 that more victims and survivors had not had prompt access to  
 5 justice which they deserved and continue to deserve. On that  
 6 basis, I wholeheartedly apologise for any failings and/or  
 7 missed opportunities during my tenure as SIO and member of  
 8 the Gold Group for Operation Middleton. Thank you, chair.  
 9 Q. Can I start, Mr Gargini, with the period of time you  
 10 spent in the late 1980s and early 1990s in Brixton. Can  
 11 you explain a bit about that posting in your career?  
 12 A. At that point, I was a uniformed inspector posted to Brixton  
 13 with responsibility for an area of Brixton, geographically,  
 14 which covered the centre of Brixton and to the south of  
 15 Brixton town centre. It was leading two uniformed teams  
 16 dealing with community issues and problem-solving policing  
 17 initiatives.  
 18 Q. Did you have any particular links to Lambeth Council via  
 19 that posting?  
 20 A. I think it would be fair to say that during the course of  
 21 that posting, I would have been speaking to and communicating  
 22 with people from Lambeth Council, but that would have been  
 23 purely on a professional level concerning the work that I was  
 24 undertaking with the communities of Brixton.  
 25 Q. Did you have any particular contacts at Lambeth Council

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1 Examination by MS DOBBIN  
 2 MS DOBBIN: Mr Gargini, can I ask you to give the panel your  
 3 full name, please?  
 4 A. Yes, my name is Richard Gargini.  
 5 Q. I think, Mr Gargini, that you joined the Metropolitan  
 6 Police Service in 1976?  
 7 A. That's correct.  
 8 Q. That you retired in 2010 in the rank of commander?  
 9 A. That's correct.  
 10 Q. Having held a number of positions, including the  
 11 National Coordinator for Counter-terrorism; is that  
 12 correct?  
 13 A. That's right.  
 14 Q. I think in the late 1980s and the early 1990s, you had  
 15 a posting at Brixton?  
 16 A. I did, yes.  
 17 Q. In 1996, you were promoted to detective chief inspector  
 18 at Battersea?  
 19 A. That's right.  
 20 Q. And in 1998, you became a superintendent?  
 21 A. I did, yes. All correct.  
 22 Q. It is right that, for a period of time, you led  
 23 Operation Middleton; is that correct?  
 24 A. That's correct, yes.  
 25 Q. I think before you go on to give evidence to the panel,

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1 or any officers who you knew in particular or indeed  
 2 councillors?  
 3 A. No. Most of the direct contact with councillors was  
 4 undertaken by the chief superintendent.  
 5 Q. Did you have any involvement with any community groups  
 6 in Brixton or sports clubs or --  
 7 A. None at all.  
 8 Q. I want to ask you, if I may, about how you came to be  
 9 involved in Operation Middleton. I think that this  
 10 probably is best to go to about paragraph 39 of your  
 11 witness statement. Was your initial involvement because  
 12 you'd been asked to undertake a review of  
 13 the investigation that's known as Trawler?  
 14 A. Yes, that would be absolutely right. The activity that -- an  
 15 enquiry was being undertaken by an outside force and as  
 16 a result of that enquiry the assistant commissioner wanted to  
 17 reassure himself that the Metropolitan Police were delivering  
 18 the right resources, the right response and, indeed, the  
 19 corporate response was correct in relation to the work that  
 20 Merseyside were doing in relation to John Carroll.  
 21 Q. Was that because, at the time, he had concerns about  
 22 whether or not Operation Care was being appropriately  
 23 supported?  
 24 A. I think there must have been concerns that he was aware of,  
 25 and I was asked by the detective chief superintendent to meet

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1 with the assistant commissioner, when it was explained to me  
 2 that he wanted a review of the Metropolitan Police response.  
 3 Q. Did he explain to you what the concerns were then about  
 4 the response?  
 5 A. Not specifically, no.  
 6 Q. At paragraph 41 of your statement, you said that you met  
 7 with Mr O'Connor to seek instructions, and he outlined  
 8 his concern about the level of oversight and in  
 9 particular the role about the Lambeth CPT.  
 10 A. Yes.  
 11 Q. Was there any further information provided to you about  
 12 what it was about the CPT?  
 13 A. No. He outlined that, and he expressed his concern that, was  
 14 it the right place, was it the right investigative team,  
 15 within a CPT unit to be dealing with issues emanating of this  
 16 scale, and I think that was his concern.  
 17 Q. Did you have any understanding of whether or not those  
 18 concerns had come from Lambeth?  
 19 A. At that stage, no.  
 20 Q. You go on in paragraph 41 to say you wanted reassurance  
 21 that the Lambeth CPT response was proportionate to the  
 22 level of risk.  
 23 A. Yes.  
 24 Q. What does that mean?  
 25 A. The level of risk to the people or the organisations

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1 I arranged with him a meeting which took place the same day.  
 2 Q. Is this the meeting that you had with Dr Goldie --  
 3 A. That's correct.  
 4 Q. -- that you set out at paragraph 70 of your statement?  
 5 Had you had any contact with the chief executive of  
 6 Lambeth prior to that point?  
 7 A. My early recollection was that I had received a telephone  
 8 call from the chief exec. On reflection, that may have been  
 9 as a result -- the telephone call may have come from  
 10 Mr O'Connor as a result of his conversation with the chief  
 11 exec. So I can't be any clearer or I can't recall whether  
 12 that took place, and I don't recall whether I spoke to the  
 13 chief exec on that particular day.  
 14 Q. Just picking up, then, the meeting that you had with  
 15 Dr Goldie, can you just explain what was conveyed to  
 16 you?  
 17 A. Yes. Very briefly, the meeting was -- I was steered, I think  
 18 is the correct way of saying it, into this meeting via the  
 19 information that the chief exec from Lambeth had given to the  
 20 assistant commissioner, so I was interested to know what  
 21 Mr Goldie -- what Dr Goldie wanted to convey. My initial --  
 22 or the reason for me to meet him was to explore what he knew  
 23 about the Operation Care, which was the Merseyside op, and  
 24 what the response was from Lambeth, but also what he wanted  
 25 to tell me about the Lambeth CPT, and in particular

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1 concerned, particularly the Metropolitan Police Service, and  
 2 would there be likely to be criticism of the response, was  
 3 the response sufficient? I think that was his main concern.  
 4 Q. He didn't provide you with anything to go on in terms of  
 5 why that may not have been the case?  
 6 A. Not at the first meeting, no.  
 7 Q. Can you just explain, then, how your review progressed?  
 8 A. Yes. When I came back from the meeting with the assistant  
 9 commissioner, my memory serves me, almost immediately,  
 10 probably the same day or the following morning, I received  
 11 a telephone call to meet with a senior director from --  
 12 a senior Social Services director from Lambeth Council, and  
 13 that telephone call came via the AC's office.  
 14 Q. Did you understand that your being asked to do your  
 15 review was linked to this officer in Lambeth?  
 16 A. Yes.  
 17 Q. Did you go on to speak to him, then, and to have  
 18 a meeting with him?  
 19 A. Yes, I did.  
 20 Q. What happened at that meeting?  
 21 A. Because of the urgent -- well, it was relayed to me that the  
 22 matter was serious and urgent, and that I had to speak with  
 23 him urgently. I contacted this senior officer, senior  
 24 director, from Lambeth almost immediately. I think it was  
 25 within the hour, and spoke to him on the telephone, and then

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1 DI Driscoll.  
 2 Q. We see here a note that you made of the meeting that you  
 3 had.  
 4 A. Yes.  
 5 Q. I think the date of the meeting is 18 November 1998?  
 6 A. That's correct, yes. About 2.30 in the afternoon.  
 7 Q. Is that a note that you made afterwards?  
 8 A. Yes. I made notes of the meeting in my daybook and then,  
 9 when I came back, I transcribed -- or took the notes, which  
 10 were my notes made as soon as practicable after the meeting,  
 11 and then put that into a briefing note which is contained  
 12 within my statement at paragraph 71.  
 13 Q. In terms of the entry in your daybook, do you know when  
 14 you made that entry relative to the meeting?  
 15 A. Immediately afterwards. In fact, I can say that I would have  
 16 made notes during the meeting as well, because from what  
 17 I recall, that meeting with Dr Goldie was very helpful in  
 18 that it laid out for me what the response had been by the  
 19 Metropolitan Police to the Operation Care enquiries.  
 20 Q. I won't read out all of that note, Mr Gargini, but it  
 21 appears there were a couple of issues of concern that  
 22 were raised. One of them was about a leak to  
 23 a newspaper of confidential and very sensitive material?  
 24 A. That's correct.  
 25 Q. It appears from the note that it was accepted by

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1 Dr Goldie that the information could have come from  
 2 Lambeth?  
 3 **A. Yes, he was very clear on that. The facts were that there**  
 4 **was an article in the newspaper which related to a sensitive**  
 5 **matter that had arisen within the local authority. Dr Goldie**  
 6 **had spoken to Mr Driscoll's line manager and had come to the**  
 7 **conclusion initially that that leak had come from the police.**  
 8 Q. So had that concern more or less been assuaged by the  
 9 time you met --  
 10 **A. By the time I met, he was content that, as a result of**  
 11 **a conversation he'd had with Mr Driscoll -- with**  
 12 **Dr Driscoll's line manager, that that matter had been spoken**  
 13 **about, and he was aware that the material could have come**  
 14 **from another source.**  
 15 Q. The next issue that's recorded in your note is reference  
 16 to DI Driscoll having disclosed rumour, it says here, in  
 17 relation to politicians in the presence of junior  
 18 members of the Social Services department. The concern  
 19 that is set out is that Dr Goldie said that DI Driscoll  
 20 failed to understand the impact and the implications of  
 21 that; is that right?  
 22 **A. That's what was said. Yes.**  
 23 Q. How seriously were these concerns taken by you?  
 24 **A. Having heard that, that clearly raises deep concerns with me**  
 25 **and would have resonated with senior officers within the**

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1 **A. Well, my understanding was that it was in a meeting with both**  
 2 **police officers and members of Lambeth Council, but that some**  
 3 **members within that meeting were not directly involved in the**  
 4 **immediate enquiry that was being undertaken, and didn't know**  
 5 **about this. I think the important point is this for me, that**  
 6 **where you have a senior police officer putting this type of**  
 7 **information into a meeting which is being attended by people**  
 8 **that -- and it is highly sensitive, highly confidential,**  
 9 **because there at this point doesn't appear to be any**  
 10 **supporting evidence, it is reprehensible to suggest that at**  
 11 **this point there is a linkage between an individual and**  
 12 **criminality, when the proper enquiries have not been**  
 13 **undertaken, and the appropriate course of action would have**  
 14 **been to seek guidance and permission and consent at the**  
 15 **appropriate level, which in this case would have been the**  
 16 **assistant commissioner.**  
 17 Q. Dr Goldie says that there were two meetings?  
 18 **A. Yes.**  
 19 Q. Do you recollect there being two meetings?  
 20 **A. I don't recollect, but I would not -- you know, I can't**  
 21 **confirm that.**  
 22 Q. Because what he suggests was that he was told that  
 23 DI Driscoll would be disciplined and that there was  
 24 nothing to support the allegations?  
 25 **A. Well, if this second meeting took place and I'd seen**

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1 **Metropolitan Police. The significance of that is that if you**  
 2 **put the name of a high-profile individual into a meeting and**  
 3 **the inference is that there is criminality around that**  
 4 **individual, bearing in mind the importance of that**  
 5 **individual, to do that without the proper level of consent**  
 6 **and knowledge of the most senior police officer on southwest**  
 7 **area would have been regarded as a misconduct issue.**  
 8 Q. Even if it was taking place in the context of  
 9 Working Together arrangements and discussions with  
 10 fellow professionals?  
 11 **A. Mmm. And I think, having explored this with Dr Goldie, and**  
 12 **having asked him a number of times, was there any support --**  
 13 **was there any supporting evidence or information that he**  
 14 **could provide to me that corroborated this, Dr Goldie agreed**  
 15 **with -- or told me, and agreed, that he thought that this was**  
 16 **an inappropriate thing to say, in the context and in the**  
 17 **meeting in which it arose.**  
 18 Q. Sorry, Mr Gargini. To be clear, what I'm asking you  
 19 about is whether or not the weight that you attached to  
 20 this disclosure was justified, given that the  
 21 disclosures had taken place in the context of a meeting  
 22 with people from Lambeth, in other words, social  
 23 workers, so it had taken place in a professional  
 24 context, not that the names were being willy-nilly put  
 25 about, as it were?

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1 **Dr Goldie on a second occasion sometime after the first one,**  
 2 **I would have submitted this briefing note which I have**  
 3 **included in my evidence to Commander Orde, and obviously**  
 4 **Commander Orde, having seen this, he and I would have**  
 5 **discussed the way forward.**  
 6 **The way forward, and my duty at the time, was to**  
 7 **document what I was being told by Dr Goldie and then refer**  
 8 **those concerns to the appropriate investigative team,**  
 9 **which on that particular area was the five area complaints**  
 10 **unit.**  
 11 **Now, at that point, there would not have been any**  
 12 **decision to suspend or, you know, have a chat -- there**  
 13 **wouldn't be sufficient time to investigate the matter. So**  
 14 **I would not have said to Dr Goldie that DI Driscoll was**  
 15 **suspended. Because, at that point, he simply wasn't.**  
 16 Q. Dr Goldie's perception of the meeting was also that he  
 17 was being told to forget about all of this in terms of  
 18 names DI Driscoll had mentioned, and that he came away  
 19 from the meeting feeling quite shaken and that there was  
 20 more to it.  
 21 **A. No. No. Clearly, this matter needed to be looked at and**  
 22 **independently assessed to see whether there were any**  
 23 **misconduct issues here. That process hadn't begun yet.**  
 24 Q. Did you convey to him that he needed to be very careful  
 25 about relaying information about high-profile people in

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1 relation to Lambeth?

2 **A. No, I don't recall doing that. I may have said to him, if**

3 **this second meeting has taken place as he suggests, that**

4 **knowing that the Merseyside investigation had arrested an**

5 **individual, and that individual was going to court, there may**

6 **well be some issues around confidentiality and speaking about**

7 **the matters waiting for court, because they would be**

8 **sub judice. So that would be the only reason that I would**

9 **raise the issue.**

10 Q. Do you think you might have done it in a way that

11 conveyed to Dr Goldie that he was essentially being

12 told, you know, "This ends here. Don't say anything

13 further"?

14 **A. Well, no, I wouldn't agree, but, you know, I mean, if**

15 **Dr Goldie has interpreted it as that, then that would**

16 **certainly not be my -- you know, what I would have intended.**

17 Q. You have that meeting. What was the outcome then after

18 your review took place?

19 **A. So the note that I prepared for Commander Orde went in.**

20 **I then was recalled back to see AC O'Connor, and I -- as**

21 **a result of some very helpful information from Dr Goldie, who**

22 **helped me fill in the gaps as to what was happening here,**

23 **I was able to inform the assistant commissioner that, in my**

24 **view, the response that the Metropolitan Police had put into**

25 **place so far was insufficient, and there needed to be a probe**

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1 **that.**

2 Q. So in terms of how Operation Middleton was different

3 from Operation Trawler, first of all, it had terms of

4 reference; is that right?

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

6 Q. In general terms -- I'm not asking you to read them

7 out -- how could you summarise the terms of reference?

8 **A. I think, in summary, the remit was to investigate child**

9 **sexual abuse within Lambeth, within the 35 Lambeth children's**

10 **homes, over a period of 20 years, from 1974 to 1994, and to**

11 **look at those children that were in the care of Lambeth to**

12 **see whether there was any child sexual abuse and arrest the**

13 **offenders. That, in basic terms, was the remit.**

14 Q. A component of the Working Together, if I can put it

15 like that, was the Children's Home in Lambeth Enquiry,

16 or what's more often referred to as CHILE. Can you just

17 explain the role of CHILE, please?

18 **A. Yes. Operation Middleton was a police enquiry, basically,**

19 **but in order to deliver the outcomes that we wanted, we had**

20 **to have access to the documents, personnel files, children's**

21 **files and other documents like visitors books, which had to**

22 **be identified and obtained.**

23 **Now, there's two ways of doing that, of course. You**

24 **can do it by using those people that are working for the**

25 **local authority or, as in this case, the chief exec**

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1 **or an enquiry into the whole issue of child sexual abuse**

2 **which was being alleged, or appeared to be alleged, across**

3 **Lambeth, and to do that, I made some recommendations, and**

4 **those recommendations included the establishment of a team of**

5 **detectives and child protection experts. That would need to**

6 **be on a full-time basis. That would need to be funded. That**

7 **would need to be properly resourced. And those resources**

8 **would mean -- because of the scale and scope of what I was**

9 **being told by Dr Goldie, it meant that we would need to use**

10 **what one would describe as a computer system to be able to**

11 **manage the huge volume of data and information that was**

12 **likely to come out of this enquiry.**

13 Q. So it was concern, was it, around scale and complexity

14 that led to the institution of Operation Middleton?

15 **A. Yes, it did.**

16 Q. The fact that names of high-profile politicians or

17 persons had also been mentioned in respect of Lambeth,

18 was that also a feature in constituting this sort of

19 enquiry?

20 **A. Well, clearly, it was an issue that needed to be**

21 **investigated, but the main issue here is that the -- I could**

22 **see from the outset that we needed to have and establish**

23 **a proper enquiry. Yes, of course, we knew from Dr Goldie**

24 **that there were links to high-profile individuals, and of**

25 **course that must have been part of the rationale for doing**

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1 **decided that there would be an independent social work**

2 **team of professionals that would work with the police**

3 **element or the police component, and Middleton and CHILE**

4 **would then merge as one investigative team, which is how**

5 **the operation developed.**

6 Q. Were they physically a joint team, or did they operate

7 from separate places?

8 **A. I think, initially, the CHILE team operated from rooms within**

9 **Lambeth Town Hall. It was clear to me and to the head of**

10 **the CHILE team, Helen Kenward, that it would be beneficial to**

11 **have the two teams working together. So we had -- we merged**

12 **the two teams physically into accommodation at Cavendish Road**

13 **Police Station.**

14 Q. Another aspect of Operation Middleton was that it was

15 run on HOLMES?

16 **A. Yes.**

17 Q. If you could explain what HOLMES is and why that might

18 make any difference to a large operation?

19 **A. HOLMES is the Home Office Large Enquiry System. It is**

20 **computer based, and this was HOLMES 1, which was an early**

21 **version. So it is computer based and it allows for**

22 **information to be processed through particular procedures and**

23 **processes that the police have developed so that all**

24 **information was then allocated to an investigative team, it**

25 **was actioned, the actions came back in and the results were**

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1 **then recorded onto the computer system.**  
 2 **The reason why I discussed this with Mr Orde, and the**  
 3 **importance, I think, to stress, is that we needed an audit**  
 4 **trail. We needed to have timed and dated records of when**  
 5 **information came into the system and then be able to -- if**  
 6 **we needed to go back, either within the course of that**  
 7 **enquiry or later on, to go back and relook at that**  
 8 **information to see whether any offenders could be**  
 9 **identified. So it was an extremely important -- I can't**  
 10 **stress how important it was to have that particular**  
 11 **facility.**  
 12 Q. You mention in your statement that Middleton was also  
 13 overseen by a Gold Group. Again, could you just explain  
 14 the significance of that?  
 15 A. **Yes, of course. So the Operation Middleton team were the**  
 16 **front end, if you like, the investigative team. In order to**  
 17 **steer the enquiry and to deal with the strategy -- for**  
 18 **instance, to look at the terms of reference, to make sure**  
 19 **that they were being complied with, to make decisions about**  
 20 **resourcing, you know, whether there was a need to put**  
 21 **additional resources in. Those issues would then go to the**  
 22 **Strategy Group, which was separate to the investigative team.**  
 23 Q. Just to be clear, the Gold Group and the Strategy Group  
 24 are one and the same thing?  
 25 A. **I'm sorry, yes. Yes, exactly the same, yes.**

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1 **the course of Operation Middleton.**  
 2 Q. Was Lambeth Council, as part of the Strategy Group, able  
 3 to steer or influence the direction of investigations in  
 4 Middleton?  
 5 A. **Not the investigations, no. I think it's worth just pointing**  
 6 **out at this point that Middleton, in the terms of reference**  
 7 **at paragraph 2, clearly stated that it was an evidence-led**  
 8 **enquiry. It was not an enquiry which could be steered in any**  
 9 **direction. It went with the evidence. So the prospect or**  
 10 **the potential for interference by Lambeth Council was very**  
 11 **low.**  
 12 Q. Can I just, while we are on this subject of evidence, we  
 13 have just heard evidence from DI Driscoll about the  
 14 approach that was taken in Operation Care, and, as  
 15 I understand it, that was a proactive approach, so  
 16 Operation Care approached people or I think may have  
 17 done a letter drop. I don't know if that accords with  
 18 your understanding?  
 19 A. **Yes.**  
 20 Q. People who had been former residents.  
 21 Operation Middleton didn't take that approach, did it?  
 22 A. **No, you're quite right, and that was my decision. It's**  
 23 **documented within the decision log. The reason for that is**  
 24 **that I took the view, after taking advice from the ACPO lead,**  
 25 **and I believe his name was Mr Butler, that the approach by**

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1 Q. In terms of who sat, then, on the Gold Group for  
 2 Operation Middleton, who was that?  
 3 A. **It started with Commander Orde and the chief exec,**  
 4 **Heather Rabbatts, who attended, certainly from my**  
 5 **recollection, the first group of Gold/Strategy Group**  
 6 **meetings.**  
 7 **Myself, as SIO, Steve Ranson, who was then the deputy**  
 8 **SIO, Helen Kenward, who was the head of the CHILE team,**  
 9 **the assistant chief exec working to Heather Rabbatts,**  
 10 **Chris Lee, and Paul Clark, who was a member of the SSI,**  
 11 **and a representative from the Social Services department**  
 12 **within Lambeth.**  
 13 Q. Why did a representative of the SSI have any role in the  
 14 strategy of Operation Middleton?  
 15 A. **It was not -- I didn't see them there as having a role in**  
 16 **developing strategy. They were clearly -- they had an**  
 17 **inspection function and, for me, it was quite reassuring to**  
 18 **have somebody that was outside of Lambeth sitting at that**  
 19 **Strategy Group, and I developed a very good relationship with**  
 20 **Paul Clark. You know, I was able to check things with him,**  
 21 **to make sure that what I was being told was accurate. So it**  
 22 **wasn't the case that the SSI were steering the**  
 23 **Strategy Group; far from it. They were attending there to**  
 24 **help me and Commander Orde in taking an independent view**  
 25 **about what we were being told and what was happening during**

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1 **letter, so this cold letter approach, without there being**  
 2 **a proper risk assessment around the impact of an approach by**  
 3 **police, asking, in some cases, former children who were**  
 4 **looked after by Lambeth, and possibly surviving CSA -- to do**  
 5 **that without a proper risk assessment and to do that without**  
 6 **accessing personnel files to check that there were any issues**  
 7 **that we might want to deal with, I think was a very**  
 8 **insensitive approach, and the way I wanted to do it, in the**  
 9 **case of Middleton, was to risk assess those files first and**  
 10 **then, after speaking with Social Services professionals, make**  
 11 **a judgment as to whether there should be a visit, and that**  
 12 **visit would be a combined visit between a police officer and**  
 13 **a Social Services professional.**  
 14 Q. So was the methodology in Middleton that CHILE went  
 15 through old files, old information, old complaints, old  
 16 investigations, in order to identify children who may  
 17 have been abused, and that, on the basis of that, the  
 18 police and Social Services would make a joint approach?  
 19 A. **No. It was not -- it was intelligence-driven, as I call it,**  
 20 **not by Social Services department of Lambeth; the distinction**  
 21 **here -- and it is a very important distinction -- is that**  
 22 **there was an independent team of professional social workers**  
 23 **with no connection or affiliation with Lambeth. Although**  
 24 **they were ultimately, if you like, employed, the contract for**  
 25 **the team went into the chief exec's office, there was**

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1 a demonstration of complete independence here, and I think  
 2 that's a -- you know, this is -- I think what made Middleton  
 3 ground breaking, in my view, was that this was the first time  
 4 that an enquiry of this nature had been undertaken jointly by  
 5 police and by an independent social work team.  
 6 Q. Just coming back to the process by which you identified  
 7 people, am I right that it was by a process of going  
 8 through old documentary evidence in order to identify  
 9 children?  
 10 A. That was part of it. The other part was, of course, children  
 11 coming -- or survivors coming forward, and we had a media  
 12 strategy to engage with that.  
 13 It was also by police enquiries into those people,  
 14 staff members, that were in particular children's homes  
 15 where there were concerns. So we had, if you like, at  
 16 least three strands of intelligence coming into the  
 17 investigative team. So, yes, you're right that it was  
 18 based upon documentary -- and the process was to find --  
 19 the raison d'etre was to find survivors and victims of  
 20 CSA.  
 21 Q. In terms of getting children to come forward or people  
 22 who had formerly lived in homes, was that strategy  
 23 successful, to your mind?  
 24 A. Based upon the information we had at the time, I was  
 25 confident or I was comfortable that we were trying to access

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1 Q. I think you have incorporated information into that.  
 2 When you went to see Ms Tapsell, did you already have  
 3 a witness statement from her?  
 4 A. Yes, indeed. This statement was the one that Operation Care  
 5 had taken.  
 6 Q. So what was the purpose of going to speak to her, if  
 7 there was already a witness statement from her?  
 8 A. When I -- in late '98, I had a conversation with  
 9 Clive Driscoll, and he said to me in conversation, "You need  
 10 to go and speak to Anna Tapsell". So that was the first  
 11 steer. The second steer was that her statement had been  
 12 obtained from Op Care in January and it had gone through the  
 13 process of being analysed and researched and there were  
 14 elements in that statement that were -- in relation to Care  
 15 and in relation to Carroll, but there were other issues that  
 16 Anna Tapsell had raised in her statement which related to  
 17 non-Care issues.  
 18 Q. Was that the purpose of your going to speak to her,  
 19 then, to see if she could give you any further  
 20 information about --  
 21 A. Yes, correct. Sorry. I was interested in finding out  
 22 whether she had any more information and giving her the  
 23 opportunity to tell me what she knew.  
 24 Q. What you say at paragraph 171, and I think it is taken  
 25 from the notes:

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1 as much as we possibly could in order to identify where  
 2 criminal activity had taken place, and by "criminal  
 3 activity", I mean specifically child sexual abuse.  
 4 So I think, on that basis, at the time I was fairly  
 5 confident that the methodology that I'd put into place,  
 6 which was then checked with Mr Butler, the ACPO lead,  
 7 which was then put into presentations which I took to the  
 8 ACPO conference and to other national groups, there was  
 9 a recognition that that process was good practice at that  
 10 time.  
 11 Q. I'm just going to move on, if I can, to other people  
 12 whom you spoke to in the course of investigations. We  
 13 have heard from Dr Driscoll about the concerns that  
 14 emerged and the information he gathered during his time  
 15 investigating in Lambeth. Did you act on any of  
 16 the information that he provided in terms of going to  
 17 speak to people?  
 18 A. Yes, I did.  
 19 Q. Was one of those people Ms Tapsell?  
 20 A. Yes, it was.  
 21 Q. We have seen, and it may help -- I think you pick this  
 22 up at paragraph 167 of your witness statement. We have  
 23 seen a note that was taken of a meeting that you had  
 24 with her?  
 25 A. Yes, that's correct.

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1 "I told Ms Tapsell that the investigation would be  
 2 evidence led and that rumour, inference and speculation  
 3 would not be investigated unless there was evidence to  
 4 support the allegation."  
 5 A. Yes.  
 6 Q. Might that have conveyed to Ms Tapsell that you weren't  
 7 interested or concerned about the sort of information  
 8 that she had gathered over the years that she had been  
 9 in Lambeth?  
 10 A. I think it's fair to say that she appeared to be slightly  
 11 frustrated that the material she showed me when I went to her  
 12 home address, which was substantial, was -- which related to  
 13 other matters, was not being included in the  
 14 Operation Middleton investigation, and I think it's also fair  
 15 to say that I was very clear about the terms of reference  
 16 that Operation Middleton were operating to around  
 17 identification of victims and survivors, prosecuting  
 18 offenders and dealing with a certain period of time and  
 19 people within children's homes.  
 20 I think there were other matters which she wanted  
 21 Middleton to become engaged in, yes. So I can see that  
 22 that frustration could have been interpreted by Ms Tapsell  
 23 as me suggesting that we wouldn't be dealing with some of  
 24 her concerns.  
 25 Q. What she says is that she came away from that meeting

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1 feeling as though she were being told, "Keep out of  
 2 this. Don't name names"; that was how she perceived the  
 3 meeting.  
 4 **A. Well --**  
 5 Q. Do you accept that the message that you conveyed to her  
 6 may have had that effect?  
 7 **A. That was, again, certainly not my intention. I mean, the**  
 8 **meeting lasted a couple of hours, at least, and I felt we**  
 9 **were responding to Ms Tapsell's questions and we were giving**  
 10 **her information around the processes and how we were going to**  
 11 **go about things. But I can't see that there's any valid**  
 12 **reason why she should come away with that impression.**  
 13 MS DOBBIN: Mr Gargini, if I can just ask you to pause  
 14 there. Chair, I note that it is 12.45 pm. I think  
 15 there is probably about 15 minutes more for this  
 16 witness. Would you like me to proceed or to resume with  
 17 him after the short adjournment?  
 18 THE CHAIR: Just proceed.  
 19 MS DOBBIN: Another person whom you spoke to, Mr Gargini,  
 20 was a Ms Theresa Johnson.  
 21 **A. That's correct.**  
 22 Q. Had she also made a statement to Operation Care?  
 23 **A. Yes, she did.**  
 24 Q. Again, why were you going to speak to her, if she had  
 25 already made a statement?

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1 **a document or a report that she had made in relation to this**  
 2 **incident, and I was unable, as a result of that, to actually**  
 3 **pick up any credible lines of enquiry.**  
 4 Q. Did she name any child in respect of this allegation or  
 5 anyone whom you could have spoken to?  
 6 **A. No. I have no recollection of anybody else being named,**  
 7 **other than the person that she said she saw.**  
 8 Q. Did that give you a basis for going to speak to the  
 9 person whom she said she saw at the home?  
 10 **A. It was -- at that time, the enquiry was ongoing. In fact,**  
 11 **I think it was during the first year of the enquiry, and**  
 12 **I think it went for five years. At that point, there was no**  
 13 **information which she gave me which led to me having**  
 14 **reasonable grounds to go and speak to this individual about**  
 15 **this sighting.**  
 16 Q. Did that change at all in the course of  
 17 Operation Middleton?  
 18 **A. No, it didn't. There was no further information, or indeed**  
 19 **evidence, that I was aware of, that would have led me to go**  
 20 **and speak to the individual concerned.**  
 21 Q. A different line of investigation you pick up at  
 22 paragraph 216 of your statement. I'll summarise it if  
 23 I can in this way: Paul Clark of the Social Services  
 24 Inspectorate -- so I think it is right the person who  
 25 sat on the Strategy Group for Operation Middleton?

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1 **A. I had read her statement. Theresa Johnson was known to the**  
 2 **enquiry. From memory, I was told that she had information**  
 3 **which she wanted to give to police. So that basically was**  
 4 **the reason for myself and Helen Kenward to go and visit her**  
 5 **at her home address.**  
 6 Q. When you went to speak to her, was she able to provide  
 7 you with any information about her concerns,  
 8 specifically about Angell Road?  
 9 **A. She told me that she had a brief -- she had worked briefly in**  
 10 **Angell Road and she -- on one occasion, sometime, I think,**  
 11 **from memory, back in the early '80s, had been on duty and had**  
 12 **seen an individual enter the home, and that had caused her to**  
 13 **ask that individual what that person was doing there.**  
 14 Q. When you spoke to her, in terms of that information, did  
 15 she provide you with information about that incident  
 16 that you were able to investigate or look at any  
 17 further?  
 18 **A. I found the information to be unspecific. It was about an**  
 19 **individual that was in the children's home. But when**  
 20 **I probed a little deeper, the clarity, the supporting**  
 21 **information, was not there. So I was told that she had**  
 22 **concerns around this individual being there. But,**  
 23 **interestingly, there was no information concerning any**  
 24 **criminal activity. So it was a sighting where it was**  
 25 **unconfirmed, she couldn't steer me into whether there was**

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1 **A. That's correct.**  
 2 Q. He provided information to you in June 1999 which  
 3 Mr Clark had received from a colleague relating to  
 4 a political figure; is that right?  
 5 **A. That's correct.**  
 6 Q. He, I think, spoke to his colleague, who identified  
 7 someone whom she had had information from; is that  
 8 right?  
 9 **A. Yes, indeed.**  
 10 Q. As a result of that, did you go to interview the person  
 11 who was the original source of the information?  
 12 **A. Yes, I did. I went with another officer.**  
 13 Q. Was that person able to give you any information, again,  
 14 upon which you could act or investigate?  
 15 **A. No. The information related to an individual that was,**  
 16 **again, seen -- or allegedly seen in a certain location.**  
 17 **Again, there was no suggestion of criminal activity. It was**  
 18 **a sighting. It later transpired, in her statement from this**  
 19 **individual, from this witness, that she had agreed that she**  
 20 **had ascribed the name of this prominent individual to the**  
 21 **circumstances that were relayed to her by a third person.**  
 22 Q. Just to make it clear, she had associated this person  
 23 with --  
 24 **A. That's probably a better description, yes.**  
 25 Q. As opposed to being told that it was that person; is

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1 that right?

2 **A. Yes, correct.**

3 Q. Can I just ask you this: during the time that you were

4 involved in Middleton, were any allegations made by

5 a victim of sexual abuse against any high-ranking

6 persons or politicians?

7 **A. Not to my knowledge, no.**

8 Q. Can you just help me with this: you led

9 Operation Middleton at the outset; is that right?

10 **A. That's correct, yes.**

11 Q. Did there come a point in time when you stopped having

12 operational lead of it?

13 **A. Yes, there was. This was about November, I believe, in '99,**

14 **when my deputy SIO, Steve Ranson, then became SIO.**

15 Q. Did you still continue to sit on the Strategy Group for

16 it?

17 **A. Yes, I agreed to do that because the Metropolitan Police were**

18 **restructuring and child protection units were being regrouped**

19 **under a new command at New Scotland Yard. So whilst that**

20 **transition was taking place, I sat on the Strategy Group**

21 **until that new team was put into place.**

22 Q. Mr Gargini, concerns have been expressed that

23 investigations into Angell Road and Highland Road were

24 essentially diverted or not followed through in

25 Operation Middleton. Can you tell us, first of all,

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1 **work very hard in making sure that the enquiry was properly**

2 **resourced, which was one of my main functions, and during the**

3 **course of the operation, made a number of requests for**

4 **additional staff. So I think there was an issue about**

5 **resourcing, and I think there -- once the initial**

6 **intelligence was put together and cases were being**

7 **investigated, the available resources were then committed to**

8 **completing those activities around those investigations.**

9 Q. I just want to deal, if I may, with a separate topic.

10 The inquiry has concerns about Freemasonry and the

11 extent to which it may have been capable of influencing

12 any criminal investigations. In your experience in

13 Operation Middleton, were there any links or impediments

14 caused by Freemasonry or by people whom you knew to be

15 Freemasons?

16 **A. Absolutely none at all.**

17 Q. Or, indeed, any difficulties that you perceived or

18 impediments that were caused by people being members of

19 a Catholic society or --

20 **A. Absolutely --**

21 Q. -- any sort of secret society?

22 **A. No. I can say from my knowledge and how the investigation**

23 **progressed, there was no interference whatsoever.**

24 Q. May I ask if you, yourself, are a Freemason?

25 **A. No, I'm not, and I have never been.**

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1 whether or not it is right that there was a change in

2 investigative approach to those homes?

3 **A. I think in an early decision log which I made, which I'm sure**

4 **the inquiry will have access to, I made it clear that**

5 **I prioritised the children's homes that we needed to look at**

6 **in terms of the intelligence case and to find out what was**

7 **going on.**

8 **I think what happened was that the case in relation to**

9 **John Carroll took longer than we had anticipated, so,**

10 **therefore, the involvement of Merseyside and the**

11 **prosecution of Carroll, who was at one of those**

12 **high-priority homes, didn't conclude until the middle of**

13 **2000. So although there was an intelligence -- there was**

14 **intelligence-gathering activity from the outset, the**

15 **activity around those priority homes was put to one side**

16 **until the conclusion of Carroll's case, in particular with**

17 **the Angell Road Home.**

18 **But there was no -- I don't recall making a specific**

19 **decision that we would stop investigating them at all. On**

20 **the contrary, it was my ambition, and clearly the MPS**

21 **needed to know what was going on in those five -- or four**

22 **critical homes, I think there were.**

23 Q. The need for prioritisation, was that driven by

24 available resources?

25 **A. Yes. I think this is something that I worked -- I tried to**

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1 Q. I just want to touch on one topic, if I may, Mr Gargini.

2 As I understand your decision log, you decided to retain

3 the logs yourself in Operation Middleton?

4 **A. Yes.**

5 Q. Was that because of high-profile persons' names being

6 through it?

7 **A. I look back on this, and I think that that was one of the key**

8 **features -- not the only feature, but I think there was an**

9 **element of confidentiality required here, and it was**

10 **a sensitive enquiry.**

11 Q. Are you able to help us -- I think it's right that the

12 names of high-profile persons don't appear on the HOLMES

13 database. Is that right, first of all?

14 **A. As far as I'm aware, the individual that I know about doesn't**

15 **appear on the HOLMES system.**

16 Q. Can you help us with why that might be?

17 **A. Because that individual was never considered by me to be**

18 **a suspect.**

19 MS DOBBIN: Thank you, Mr Gargini. If you would like to

20 wait there, the chair may have some questions for you.

21 **A. Thank you.**

22 THE CHAIR: Thank you, Ms Dobbin. I have no questions.

23 Ms Sharpling?

24 Questions from THE PANEL

25 MS SHARPLING: Thank you, chair. I just have a couple of

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1 quick questions, if I may.  
 2 Thank you, Mr Gargini. You spoke earlier in your  
 3 evidence -- forgive me if I have misunderstood this --  
 4 that there was some media engagement to assist in the --  
 5 I think the implication was to assist in the  
 6 identification of victims and survivors. Can you  
 7 enlarge upon that, or clarify my thinking on that,  
 8 please?  
 9 **A. I think there was quite a lot of discussion, and we asked the**  
 10 **area press officer to help us with this, to manage the**  
 11 **information that was going to the press. So there were**  
 12 **articles in the local press, the South London Press, and**  
 13 **national newspapers, sometimes giving misinformation, and it**  
 14 **was about correcting that misinformation, but at the same**  
 15 **time raising the issue that this enquiry was being undertaken**  
 16 **and asking for any assistance from witnesses or survivors to**  
 17 **come forward, and that was the strategic approach with the**  
 18 **media. It wasn't to keep it a confidential police inquiry at**  
 19 **that level.**  
 20 MS SHARPLING: I see. The information getting to the media,  
 21 do you have any idea where the source of that  
 22 information might have been?  
 23 **A. I don't have any -- sorry, I missed the last bit.**  
 24 MS SHARPLING: It was an active investigation, so you would  
 25 be concerned about leaks to the media?

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1 looked at.  
 2 **I don't -- clearly, I think the outcome is that more**  
 3 **people have come forward now, which is a success, and**  
 4 **that's right.**  
 5 **People may not have been in a position then, in**  
 6 **1998/99, that they would have wanted to come forward. So**  
 7 **circumstances may have changed around those victims and**  
 8 **survivors. So I think at the time I thought what we were**  
 9 **doing was the correct way to manage the information coming**  
 10 **into the system.**  
 11 MS SHARPLING: Thank you very much, Mr Gargini.  
 12 **A. Thank you.**  
 13 THE CHAIR: Mr Frank?  
 14 MR FRANK: No, thank you.  
 15 THE CHAIR: Sir Malcolm?  
 16 PROF SIR MALCOLM EVANS: Just one quick question, if I may.  
 17 In your second witness statement, in paragraph 19, you  
 18 are referring to the meeting that you had with Dr Goldie  
 19 on 18 November 1998. In that paragraph, you're  
 20 explaining that there was nothing secretive about it,  
 21 et cetera, and you said it took place either directly or  
 22 indirectly at the request of Ms Rabbatts. Could you  
 23 explain why you believe that to be the case?  
 24 **A. Yes, I can. There's a direct link between a telephone call**  
 25 **being received in the assistant commissioner's office from**

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1 **A. Absolutely right. That was one of the sensitive issues that**  
 2 **I referred to earlier in relation to keeping the matter**  
 3 **confidential. I think there were leaks because we do know**  
 4 **that articles appeared in particularly local newspapers.**  
 5 **I was concerned because that could have definitely undermined**  
 6 **Middleton, and if we had arrested an individual or we were**  
 7 **looking to arrest an individual and a leak had taken place to**  
 8 **alert that person, then of course there would have been**  
 9 **damage to the inquiry. So, yes, I was absolutely concerned,**  
 10 **which is why we had the APLO, the area press liaison officer,**  
 11 **with us most of the time.**  
 12 MS SHARPLING: One further question, if I may. You said at  
 13 the beginning of your evidence that you were concerned  
 14 to apologise if you had not identified the victims and  
 15 survivors during your tenure as the senior investigating  
 16 officer. Looking back on it now, was there more that  
 17 could be done or has there been a change of practice  
 18 that would have enabled more victims and survivors to  
 19 have been identified?  
 20 **A. My feeling now is that, at the time, a more sensitive**  
 21 **approach, a more sympathetic approach to victims and**  
 22 **survivors, which is what I was trying to explain earlier, was**  
 23 **appropriate and if, towards the end of the enquiry, or indeed**  
 24 **subsequently, a decision was made to contact survivors by**  
 25 **cold-calling or letter drop, clearly that would need to be**

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1 **Heather Rabbatts.**  
 2 PROF SIR MALCOLM EVANS: Why would that entail a meeting  
 3 with Dr Goldie?  
 4 **A. Because Dr Goldie's name and personal telephone number were**  
 5 **provided to me by the assistant commissioner.**  
 6 PROF SIR MALCOLM EVANS: Thank you very much.  
 7 Further examination by MS DOBBIN  
 8 MS DOBBIN: Chair, there is just one matter -- I'm terribly  
 9 sorry. In my haste, I forgot to ask this witness to  
 10 swear his witness statement. May I do that now? Thank  
 11 you.  
 12 Mr Gargini, I'm sorry about this. Can I just  
 13 confirm, you made a witness statement on 11 June 2020?  
 14 **A. Yes.**  
 15 Q. Are the contents of that statement true, to the best of  
 16 your knowledge and belief?  
 17 **A. Yes, they are.**  
 18 Q. You also made a statement dated 3 July 2020. Are the  
 19 contents of that statement true, to the best of your  
 20 knowledge and belief?  
 21 **A. Yes, they are.**  
 22 MS DOBBIN: Thank you, Mr Gargini.  
 23 THE CHAIR: Thank you, Mr Gargini. Thank you very much.  
 24 **A. Thank you.**  
 25 **(The witness withdrew)**

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1 THE CHAIR: We will now take the lunch break, Ms Dobbin, and  
 2 return at 2.05 pm.  
 3 MS DOBBIN: Thank you, chair.  
 4 (1.05 pm)  
 5 (The short adjournment)  
 6 (2.05 pm)  
 7 MS LANGDALE: Chair, may I call, please, Mr McGill.  
 8 MR GREGOR ANTHONY MCGILL (affirmed)  
 9 Examination by MS LANGDALE  
 10 MS LANGDALE: Can you give us your name and occupation,  
 11 please?  
 12 **A. I am Gregor Anthony McGill. I'm Director of Legal Services**  
 13 **at the Crown Prosecution Service.**  
 14 Q. You have prepared for us, Mr McGill, four statements for  
 15 use in this inquiry -- two dated 21 May 2020, the first  
 16 dealing with our case study homes, Ivy House and  
 17 Monkton Street; and the second dealing with Angell Road  
 18 as of that date. Is that correct?  
 19 **A. Yes, that's correct.**  
 20 Q. Can you confirm those statements to be true and  
 21 accurate, as far as you're concerned?  
 22 **A. Indeed I can.**  
 23 Q. You also provided two further statements, dated  
 24 15 June 2020, detailing CPS decision-making in respect  
 25 of Southvale Children's Home and -- it wouldn't have

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1 **a decision has been made on them. So, as set out there,**  
 2 **magistrate court cases are retained for a year following the**  
 3 **final court date, or for the length of the sentence or order,**  
 4 **if that would be a longer period.**  
 5 Q. What about, to cut this shortly, cases of child sexual  
 6 abuse and child sexual offences? How long do you keep  
 7 files in relation to those cases?  
 8 **A. Well, it depends if they -- generally, if they were**  
 9 **a Crown Court case, they will be kept for three years. If it**  
 10 **is a headquarters case, it would have been kept for five**  
 11 **years. But if it qualified as a long-term interest case, it**  
 12 **would be kept indefinitely.**  
 13 Q. What's a long-term interest case? Does that relate to  
 14 the status of the defendant or the status of  
 15 the complaint?  
 16 **A. It generally -- it's about the status of the complaint, and**  
 17 **it's generally if it's relating to a case that carries**  
 18 **a sentence of life imprisonment.**  
 19 Q. Would that apply to indecent assault or gross indecency  
 20 cases or not?  
 21 **A. No, it wouldn't.**  
 22 Q. We are going to, when we particularly look at Southvale,  
 23 look at prosecution decisions that were affected by lack  
 24 of knowledge about what may have happened earlier in  
 25 previous investigations. Given there is no statute of

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1 been the CPS, it's too early, but also Shirley Oaks  
 2 prosecution decisions?  
 3 **A. Indeed that's right, yes.**  
 4 Q. Again, are those two statements accurate, as far as  
 5 you're concerned?  
 6 **A. They are, yes.**  
 7 Q. We appreciate, Mr McGill, you are looking back, in  
 8 preparing those statements, at records that the CPS have  
 9 or information furnished by the police. As we go  
 10 through that, you can make that clear where you see fit.  
 11 **A. Yes. A lot of the information that's here is not within my**  
 12 **personal knowledge. It's come from investigations we have**  
 13 **carried out.**  
 14 Q. You have had an opportunity, with your legal team, to  
 15 look at the various statements from the police and the  
 16 decision-making logs that are there and to compile this  
 17 statement?  
 18 **A. Indeed that's right.**  
 19 Q. Can I then, please, turn to your first statement. We  
 20 will go through the statements in turn, highlighting  
 21 various matters as we go through, please, Mr McGill. At  
 22 paragraph 4, you talk about the CPS record retention  
 23 policy. Can you tell us what that record retention  
 24 policy is?  
 25 **A. It's a policy that sets out how long we keep the files after**

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1 limitations, do you think there is a good argument for  
 2 saying, where complaints arising from a child's  
 3 allegations are concerned, those records should be kept  
 4 for longer?  
 5 **A. I think it's very difficult to come to hard or fast**  
 6 **conclusions on that. Our policy is there to look at the**  
 7 **venue in which the proceedings took place.**  
 8 **At this time, in the '80s, we were prosecuting**  
 9 **2 million to 3 million cases a year, so -- it was**  
 10 **a paper-based system, and keeping files for those sorts of**  
 11 **numbers is very difficult. So it is a logistical**  
 12 **nightmare, and we have to come to a proportionate balance.**  
 13 Q. I agree, it is a logistical problem with those figures,  
 14 but in terms of modern-day retention of records, have  
 15 you reviewed that, in the light of the way information  
 16 can be retained, via disks, et cetera, to reflect the  
 17 fact that it may be relevant, when a young person or  
 18 adult has made disclosures of abuse, to track those if  
 19 the defence argue that's relevant in a particular trial?  
 20 **A. I'm not aware that we have, and I'm not an expert in how easy**  
 21 **it is to store this type of material. I'm not aware that we**  
 22 **changed our procedures.**  
 23 Q. Are you aware whether it continues as of modern day to  
 24 be an issue that people do not know, in cases of sexual  
 25 offences, what has been said in earlier hearings that

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1 may impact on it?

2 **A. I don't know. I do know we keep a lot more -- the police**

3 **keep a lot more on their computer system and that we are able**

4 **to keep a lot more on our computer system. But I don't know**

5 **the precise details.**

6 Q. So it may be something you could go back and just have

7 a look at for us, whether that's ever been reviewed in

8 the light of child sexual offences specifically, and

9 whether they are impacting today on prosecution

10 decisions or the effectiveness of them, where

11 allegations may have been made earlier or in previous

12 proceedings?

13 **A. We can certainly -- if that is something you would like us to**

14 **look at, we can certainly look at that to see what the answer**

15 **to that question is, yes.**

16 Q. In terms of the CPS role generally, you helpfully set

17 out at 11 and 12 what the responsibility is of the CPS.

18 At its inception, was the issue about having

19 a prosecution body independent from the police?

20 **A. Yes.**

21 Q. What was the thinking behind that? Why did you need or

22 why did you decide that there should be an independent

23 body for prosecutions?

24 **A. Well, I think there was a feeling that those who investigate**

25 **should not prosecute as well. There needed to be an**

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1 **A. Well, at court, yes. There is an expectation that the**

2 **prosecution advocate will meet the victim if they are there**

3 **at court. Of course, now, with some of the virtual aids, at**

4 **the trial, the victim doesn't have to attend in some cases,**

5 **and the cross-examination has been done before. But under**

6 **any system, we try to ensure that the victim, if they are**

7 **giving evidence, has the opportunity to meet the prosecution**

8 **advocate.**

9 Q. They can do that remotely, if it is a virtual hearing,

10 can they?

11 **A. Yes. I believe they can, yes.**

12 Q. You set out in your statement, paragraphs 15 and 16, the

13 two-stage test for what's called the Full Code Test.

14 Can you tell us what the first stage is in deciding

15 whether a prosecution should go ahead?

16 **A. It's the evidential stage.**

17 Q. Which is?

18 **A. It requires the prosecutor to ask themselves the question**

19 **whether there's a realistic prospect of a conviction on the**

20 **evidence produced, which means, effectively, is a conviction**

21 **more likely than not?**

22 Q. It says, as you say in your statement, it means an

23 objective, impartial and reasonable jury, properly

24 directed, needs to be more likely than not to convict

25 the defendant. Do you see that as a very objective

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1 **independent, impartial look at the evidence, and to see**

2 **whether there was sufficient evidence to support the charge,**

3 **and whether it was in the public interest to prosecute it.**

4 **So I think it was that overall independence that would**

5 **provide a fairer proceedings.**

6 Q. Do you think, for victims of sexual offences, where they

7 have been communicating with the police and the police

8 are more aware of the circumstances, that that knowledge

9 of victims is perhaps a benefit for police officers

10 driving prosecutions forward and there's a potential for

11 the CPS to become more distant from the victims

12 themselves, or do you think that's not the case?

13 **A. I wouldn't use the word "distant". Prosecutors are meant to**

14 **be objective, independent and impartial.**

15 Q. How do they consult in relation to sexual offences with

16 the complainants of sexual offences about issues such as

17 what's going to happen to charges, whether they are

18 going to lie on the file, et cetera? We will come to

19 those issues --

20 **A. It depends very much whereabouts in the system you are. If**

21 **it's at court, often the prosecutor and the advocate who is**

22 **prosecuting on behalf of the CPS will meet the victim in**

23 **person and explain.**

24 Q. Is the guidance -- is that the expectation, that they

25 will speak with the victim?

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1 assessment, or do you think, like many things in life,

2 we bring in subjective components to how we form

3 decisions or an analysis of that nature?

4 **A. It's an objective test.**

5 Q. Do you, as far as you're concerned, see consistency in

6 the application of that test surrounding sexual

7 offences?

8 **A. Well, I do, and I suppose I pray in aid there the recent**

9 **report from HMCPSI, which took place in December 2019 into**

10 **rape decision-making, which found that we were Code Test**

11 **compliant in 98 per cent of our cases. It tends to indicate**

12 **that there is a certain degree of consistency.**

13 Q. The second stage of the Full Code Test is requirement in

14 the public interest for a prosecution. Can we agree, at

15 the outset, that, as far as offences against children

16 are concerned, and sexual offences in particular, for

17 the purposes of our discussions today, there is always

18 going to be public interest; it will be a very rare case

19 where there is not a public interest for prosecution?

20 **A. Yes, I think we can agree that there's a strong presumption**

21 **in favour of the public interest, but each case has to be**

22 **looked on independently, and each case has to rest on its own**

23 **particular facts, and the Court of Appeal have made that**

24 **clear to us on a number of occasions in respect of many types**

25 **of cases that we prosecute, not just child abuse cases.**

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<p>1 Q. Of course. Each case is an individual case.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Generally, there is a strong public interest, there's</p> <p>4 a presumption around a public interest to prevent</p> <p>5 offenders of sexual abuse?</p> <p>6 <b>A. Yes. It's a serious offence and there should be</b></p> <p>7 <b>a presumption of prosecution unless there are public interest</b></p> <p>8 <b>factors weighing against prosecutions more so than in favour</b></p> <p>9 <b>of, but those are rare.</b></p> <p>10 Q. Can I take you now to a document, CPS002791_001. This</p> <p>11 is a policy document, Mr McGill, helpfully attached to</p> <p>12 your statement. If it could be enlarged slightly,</p> <p>13 Mr Hyde, that would be very helpful, and also to have</p> <p>14 page 2 alongside it, if we could.</p> <p>15 Mr McGill, is this a 1986 document, 1988? I'm not</p> <p>16 quite clear from the statement, or indeed looking at the</p> <p>17 document itself?</p> <p>18 <b>A. I think this is a document that's referred to in paragraph 78</b></p> <p>19 <b>of my statement --</b></p> <p>20 Q. Yes.</p> <p>21 <b>A. -- which is the policy manual.</b></p> <p>22 Q. Yes. So what date?</p> <p>23 <b>A. It says, "Date in force: 1988 to 1992".</b></p> <p>24 Q. So it is 1988, so soon after the inception of the CPS,</p> <p>25 within a couple of years. Can we look at D.1.2(i)</p> <p style="text-align: center;">Page 93</p>	<p>1 "Sexual offences involving children":</p> <p>2 "The credibility and credit of the child will often</p> <p>3 be of limited value and in the case of very young</p> <p>4 children may be nil."</p> <p>5 That's a very striking observation about the value</p> <p>6 of a child's evidence, isn't it, that was the position</p> <p>7 then?</p> <p>8 <b>A. Yes, but I think it reflected the position of the law in</b></p> <p>9 <b>1988. But, yes, looking at it in 2020, we look at things</b></p> <p>10 <b>very differently now.</b></p> <p>11 Q. If you look at paragraph (ii):</p> <p>12 "Apart from such legal considerations, the welfare</p> <p>13 of the child must not be overlooked and it will often be</p> <p>14 necessary to balance the interests of the former with</p> <p>15 the need to bring offenders to justice. More trauma may</p> <p>16 be produced by requiring the child to recount the</p> <p>17 incident in court. Particularly, the public interest</p> <p>18 may require that such difficulties are confronted and</p> <p>19 proceedings commenced. Depending upon the gravity of</p> <p>20 the allegation, the attitude of the child's parents</p> <p>21 should be taken into account and the parents should be</p> <p>22 made aware that criminal proceedings may entail the need</p> <p>23 for the child to give evidence."</p> <p>24 <b>A. Sorry, that's not been highlighted, Ms Langdale.</b></p> <p>25 Q. (ii). Can you see it there?</p> <p style="text-align: center;">Page 94</p>
<p>1 <b>A. Thank you. It's just come up.</b></p> <p>2 Q. You see set out very clearly a perception that there</p> <p>3 must be an assessment of the welfare of the child,</p> <p>4 looking at the welfare of the child in giving evidence?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Do you think, as we go through some examples, that could</p> <p>7 have been a misconceived paternalistic approach to</p> <p>8 children giving evidence when there may be compelling</p> <p>9 reasons, particularly for older children, for wanting to</p> <p>10 give evidence and bring offenders to justice, provided</p> <p>11 they were appropriately supported to do so?</p> <p>12 <b>A. I'm sorry, I'm not sure I understand the question.</b></p> <p>13 Q. This assumes that the welfare of the child having to</p> <p>14 give evidence will always be problematic for the child,</p> <p>15 doesn't it?</p> <p>16 <b>A. It can be read that way, yes.</b></p> <p>17 Q. It does not even bring into the thinking that, for the</p> <p>18 child, particularly the older child, the desire to give</p> <p>19 evidence and see an offender brought to justice may be</p> <p>20 a very real and strong wish?</p> <p>21 <b>A. Yes, I can see that that could be the case. But this was</b></p> <p>22 <b>written in 1988, or even before that if it was published in</b></p> <p>23 <b>1988, and you have to remember that, at that stage, children</b></p> <p>24 <b>had to give evidence in court, there were no special</b></p> <p>25 <b>measures, and that the courtroom could be a very intimidating</b></p> <p style="text-align: center;">Page 95</p>	<p>1 <b>place. So the welfare of the child had to be considered, and</b></p> <p>2 <b>in each and every case each advocate, each prosecutor, had to</b></p> <p>3 <b>make those decisions, and it would be based on the position</b></p> <p>4 <b>of the child in each and every case.</b></p> <p>5 Q. Looking back at it, weren't prosecuting authorities</p> <p>6 looking at it from the wrong angle: not supporting the</p> <p>7 child to give that evidence in a more familiar or an</p> <p>8 easier context, but suggesting it's going to be</p> <p>9 difficult, so don't give the evidence. Do you see?</p> <p>10 <b>A. Well, remember the prosecutors couldn't bring any -- give it</b></p> <p>11 <b>in any other context. Children had to give live evidence in</b></p> <p>12 <b>court, facing their accusers, and that -- there were no other</b></p> <p>13 <b>options. Screens -- the first screen wasn't used until 1987,</b></p> <p>14 <b>and the ability to give evidence by videotape didn't come</b></p> <p>15 <b>until the 1990s. So in the 1980s, it was quite a different</b></p> <p>16 <b>situation and quite a hostile situation for all types of</b></p> <p>17 <b>witnesses, never mind just children.</b></p> <p>18 Q. Perhaps we can agree on that. It was a hostile</p> <p>19 environment for children, wasn't it?</p> <p>20 <b>A. It could be a hostile environment. We operate in an</b></p> <p>21 <b>adversarial system in the criminal courts.</b></p> <p>22 Q. At paragraph 4 of the document -- we don't need to put</p> <p>23 it back up, Mr Hyde -- but there is a reference -- you</p> <p>24 probably have it in front of you, Mr McGill -- to</p> <p>25 charging practice in relation to sexual offences. It</p> <p style="text-align: center;">Page 96</p>



1 says:  
 2 "It will often be necessary to reflect the fact that  
 3 sexual offences have been committed over a considerable  
 4 period of time. On the other hand, the danger of  
 5 becoming overloaded should not be overlooked. The use  
 6 of sample charges should therefore be considered but  
 7 care must be taken to ensure that each charge is clearly  
 8 distinguishable from the other, albeit dates may be  
 9 vague."  
 10 Can you just explain the concept of indictments  
 11 becoming overloaded and what was the issue in relation  
 12 to that?  
 13 **A. Well, the nature of this type of offending meant that there**  
 14 **could be a lot of offences committed over a period of time**  
 15 **and, as a prosecution advocate, and as a prosecutor, you**  
 16 **don't want the indictment to become too long because then it**  
 17 **could become too confusing, and you want to keep the**  
 18 **indictment as short and snappy as possible, but at the same**  
 19 **time provide the sentencing judge, if it gets to the**  
 20 **sentencing phase, with sufficient sentencing powers to**  
 21 **reflect the whole criminality that has been evidenced.**  
 22 Q. Can you sever indictments and have a series of  
 23 complainants on each indictment?  
 24 **A. You can.**  
 25 Q. Because for individual complainants, they may wish that

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1 **powers.**  
 2 Q. So what's the sentencing power in relation to multiple  
 3 victims? Let's say 40/50. When does it cease to become  
 4 impactful in relation to sentence, the number of  
 5 victims?  
 6 **A. It's difficult to say, and it depends on the offences you've**  
 7 **got on the indictment. If you've got multiple offences**  
 8 **punishable with life imprisonment, you have to consider how**  
 9 **many of those you might run. We do have, of course, though,**  
 10 **to take into account the views of the victim. If they are**  
 11 **very serious offences, so if we are talking about murder,**  
 12 **rape, we will always consult the victim to see what their**  
 13 **views are, and our nominal counting guidance will say that we**  
 14 **are obliged to take into account the views of the victim**  
 15 **although the decision ultimately remains one for the**  
 16 **prosecutor.**  
 17 Q. Can we turn, then, please, to Ivy House and it starts at  
 18 paragraph 29 of your statement. As you set out, dealing  
 19 with Ivy House, the inquiry has heard, Mr McGill,  
 20 evidence surrounding a complaint from LA-A26 and how  
 21 that was investigated both within Lambeth and within the  
 22 police. We are going to come to the prosecution  
 23 decision in a moment.  
 24 As you set out when you have analysed the case  
 25 there, the police officer's opinion was that LA-A26 was

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1 their particular allegation is prosecuted, and the  
 2 picture is different the more you have, presumably. The  
 3 more prosecutions and offences overall, affects sentence  
 4 in the end, doesn't it?  
 5 **A. You can sever the indictment and have different trials, if**  
 6 **that's wanted, yes. You can do it in a number of ways. But**  
 7 **it has to be remembered, and it is still the case now, that**  
 8 **the Crown Prosecution Service prosecutes on behalf of**  
 9 **the public, not on behalf of individual victims, and what we**  
 10 **have to do is present a case that tells the full story to the**  
 11 **sentencing court, but at the same time doesn't overload the**  
 12 **indictment and doesn't confuse the jury.**  
 13 Q. The number of victims is relevant to the full picture  
 14 for the sentencing judge, isn't it?  
 15 **A. It can be, yes.**  
 16 Q. When you say it can be, when isn't it? I mean, if  
 17 somebody perpetrated 100 offences against 100 children,  
 18 as opposed to ten, there's a significant difference,  
 19 isn't there, in terms of sentencing?  
 20 **A. There is, but if you have got ten victims, that's a very**  
 21 **serious case. If you get to 20 victims, that's a serious**  
 22 **case. Once you start getting to very large numbers, the**  
 23 **sentence is probably not going to be affected. So you have**  
 24 **to think about the case that you have got and present a case**  
 25 **to the court that gives the court sufficient sentencing**

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1 unable to communicate properly and incapable of forming  
 2 a complete sentence. You say that at paragraph 31.  
 3 We have heard evidence from a social worker,  
 4 Dr Kwhali, who told us it was her impression that staff  
 5 at the home may also have thought she couldn't really  
 6 communicate either.  
 7 We know -- I'm just giving you the picture, because  
 8 you won't necessarily have heard the evidence -- that  
 9 there was a first management investigation, and after  
 10 discussing the statements and talking to the staff, it  
 11 was considered very unlikely that any member of staff,  
 12 male or female, would be in a position to act privately  
 13 with LA-A26, and they also referred to, as part of that  
 14 first management investigation, the very real questions  
 15 over LA-A26's ability to verbalise sentences, and they  
 16 said, taking all these factors into consideration, "it  
 17 was agreed we could not find any suggestion to proceed  
 18 with the charge".  
 19 We know there was a second management investigation,  
 20 which was initiated at the request of Janet Boateng,  
 21 chair of Social Services, who met with the parents, and  
 22 the second investigation produced evidence that you  
 23 refer to, going back to your statement, starting at  
 24 paragraph 34, and you report there that she was  
 25 interviewed, the child, on three occasions using

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25 (Pages 97 to 100)

<p>1 anatomically correct dolls with the social worker who                  2 was experienced in dealing with child sexual abuse, and                  3 she demonstrated sexual activity and she also referred                  4 to the doll as LA-F12. The social worker concluded she                  5 was quite sure she had been sexually abused, and she                  6 opined children do not lie about such things.                  7 We also know, and you refer to it in your statement,                  8 there was evidence available from a distinguished                  9 expert, I don't want to name her, who had been working                  10 with LA-A26 and who told the management investigation:                  11 "LA-A26 has very clear and accurate speech and quite                  12 a large vocabulary. You have to know and understand                  13 LA-A26 to communicate with her fully. She was not                  14 a child who would invent."                  15 We also know LA-A26's mother had reported the                  16 complaint promptly to a social worker, including the                  17 nature of the complaint and the first name of                  18 the alleged perpetrator.                  19 So the position we have -- that's the evidence. We                  20 have a child with an inability to fabricate or invent,                  21 communication skills, when you know the child, that are                  22 much better than the police officer's observation at the                  23 first meeting, and the first name of an alleged                  24 perpetrator.                  25 Dealing with that totality of the evidence, do you</p> <p style="text-align: center;">Page 101</p>	<p>1 think, looking at this case, a greater effort should                  2 have been made to obtain a complaint from LA-A26, for                  3 the police to gather that information around her                  4 communication ability and to take a statement that would                  5 form the basis of a complaint?                  6 <b>A. I can't answer that question. That's a matter that must be                  7 addressed by the police. The police investigate. I can't                  8 answer for the police and what they should have done because                  9 that's a matter of investigation, and what happened in our                  10 system is that the police investigate and we prosecute.</b>                  11 Q. Right. If we look at the prosecutor's decision --                  12 Mr Hyde, can we have OHY007771_025. We see at the                  13 bottom section, "I have read the papers". If we can                  14 highlight that, please, Mr Hyde:                  15 "As the law stands, it is not possible to proceed                  16 against him in view of the inability of the alleged                  17 victim to give evidence in person on oath or otherwise.                  18 There is no corroboration in the way of medical evidence                  19 and the law as it stands is that it is unsafe to                  20 proceed ... I do not even have the benefit of                  21 the victim's evidence ..."                  22 That was the Crown Prosecution Service decision.                  23 That can go down, thank you, Mr Hyde. It appears that                  24 the assumption -- at this point, by the way, the police                  25 had certainly been sent all of the surrounding material</p> <p style="text-align: center;">Page 102</p>
<p>1 surrounding the second investigation -- the expert                  2 report and the other evidence I have referred to. The                  3 position was, there was no statement from the                  4 complainant. My question -- again, you weren't there --                  5 not just in relation to the specific case, is, do you                  6 think more could have been done in relation to obtaining                  7 evidence from the complainant, because there was clearly                  8 evidence to corroborate what she had said with all that                  9 I have told you about, and I recognise corroboration was                  10 required at the time?                  11 <b>A. The law in respect of corroboration, as it was, could only                  12 corroborate the fact that abuse had taken place. It couldn't                  13 corroborate who had committed it. For that, you needed                  14 a statement from the complainant.</b>                  15 Q. Yes, quite. But assuming, as the evidence suggests, the                  16 same first name was used to the various people, you'd                  17 have it from the complainant and potentially the expert                  18 and the social worker, wouldn't you, to corroborate --                  19 <b>A. That would be hearsay, Ms Langdale.</b>                  20 Q. But the complainant, if she had been interviewed and                  21 gave the complaint and the name herself, that's the                  22 primary evidence?                  23 <b>A. That would have been the primary evidence, yes.</b>                  24 Q. But the fact is, no efforts were made at that time to do                  25 that?</p> <p style="text-align: center;">Page 103</p>	<p>1 <b>A. All I can say is, there was no evidence that seems to have                  2 been forwarded to the Crown Prosecution Service that enabled                  3 the reviewing lawyer to see that a statement had been taken                  4 because the reviewing lawyer was very clear there was no                  5 statement from the complainant.</b>                  6 Q. Equally, there's got to be consultation between the                  7 police and the reviewing lawyer, hasn't there? It is                  8 perfectly permissible to say, "Could you try to get                  9 a statement? I haven't seen it. It's an integral part                  10 of a prosecution where we need corroboration, we need                  11 the primary complaint". Just to say "I haven't got one"                  12 is not the most useful for the police, is it, to steer                  13 it, if you have seen other indications about the                  14 communication abilities of the child, it might have been                  15 constructive?                  16 <b>A. This is 1986. Now we have in produce a procedure whereby, if                  17 the police require early investigative advice or                  18 investigative advice, we have a procedure whereby we can                  19 provide that to them. I don't know what the procedure was in                  20 1986, but prosecutors should, if requested by the police,                  21 provide such advice, but it needs to be remembered that we                  22 have no power to direct the police to do anything and we have                  23 no power to direct them to come to us to seek advice. We                  24 will provide advice if asked by the police, but we have no                  25 power to make them do anything.</b></p> <p style="text-align: center;">Page 104</p>

1 Q. I would hope it's more working co-operatively than that,  
 2 isn't it? If they get advice from the CPS generally  
 3 about how to progress a case, one would think, in the  
 4 interests of law enforcement, it is generally a bit more  
 5 co-operative than that, isn't it?  
 6 **A. It is now. It hasn't always been that way during the history  
 7 of the CPS. We are talking about 1986 here, and that was  
 8 just after the CPS were set up, and it has to be remembered  
 9 there were some tensions then between the police and the CPS.  
 10 I don't know if there were in this case, but it was – in  
 11 1986, the relations between the police and the CPS were  
 12 different to the more co-operative, collegiate relationship  
 13 that we have now.**  
 14 Q. Can you expand upon that a bit, then? What was that  
 15 about -- territory and preserving territory or what were  
 16 the difficulties?  
 17 **A. You have to remember, prior to the setting up of the CPS, the  
 18 police had responsibility for the investigation and,  
 19 ultimately, the prosecution of offences, either through their  
 20 prosecuting solicitors department or they instructed local  
 21 solicitors to do the work for them. In 1986, this was the  
 22 first time there was a national independent prosecution  
 23 service who made decisions based on the Code, whether there's  
 24 sufficient evidence and whether it's in the public interest,  
 25 and they made impartial, independent decisions, which**

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1 that at the time, or what?  
 2 **A. I think that this was an investigation in 1986. I think  
 3 police officers were unused, in those days, to probably  
 4 dealing with cases like this, with complex needs. The law  
 5 was very different at that time. I have to say, the officer  
 6 in this case appears to have carried out a very thorough  
 7 investigation. He or she, I'm not sure, I can't remember who  
 8 it is, went off and got a number of statements and did a very  
 9 thorough investigation and found a number of other victims,  
 10 which is perhaps in contrast to the other investigation.  
 11 This appears to have been a more thorough investigation  
 12 without being pejorative about it, if I can use that phrase.**  
 13 Q. Indeed, the officer appears to have approached the CPS  
 14 for an early stage advice and indication, don't they?  
 15 **A. They do.**  
 16 Q. If you look at paragraph 55, will you read out the  
 17 Assistant Branch Crown Prosecutor's advice, what was  
 18 written there? Do you see at paragraph 55?  
 19 **A. I do. David Hewitt, who was the individual concerned, said:  
 20 "Having considered the matter and taken into account  
 21 the fact that the prosecution will derive no assistance  
 22 from any forensic evidence, I am of the view that there is  
 23 insufficient evidence to justify a prosecution against  
 24 LA-F26. I am, as you know, concerned about the  
 25 surrounding circumstances of this case and, if any further**

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1 **sometimes weren't the decisions that the police wanted, and  
 2 there could be tension there. There still can be, but we  
 3 have a better relationship now and we are able, I think, to  
 4 be able to work through that. At the beginning, I think  
 5 everyone was working in a brand new system.**  
 6 Q. In terms of Monkton Street, then, starting at  
 7 paragraph 46, you set out, as we invited you to look at  
 8 the case, how evidence was collected in relation to  
 9 a group of children at Monkton Street, and we know, and  
 10 the inquiry has heard evidence about, how a number of  
 11 children were all medically examined, and you set out at  
 12 paragraph 53:  
 13 "Assuming all of the material was provided to the  
 14 CPS, it would appear that there were a number of  
 15 allegations being made by parents of those who attended  
 16 Monkton Street and medical evidence was supportive that  
 17 this showed signs of sexual abuse. I have not seen any  
 18 statements from any of the individual complainants nor  
 19 any suggestion that such statements were obtained."  
 20 Taking that shortly, there were no statements  
 21 obtained from individuals, all who had complex needs and  
 22 would have required some understanding and work with  
 23 each before even contemplating that. That does not  
 24 appear to have happened at the time. You would say,  
 25 would you, that's because people weren't thinking like

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1 **evidence were to come to light which you considered  
 2 strengthened the prosecution case, then I would ask you  
 3 that the evidence be passed to me immediately."**  
 4 Q. So keeping open that channel of communication in this  
 5 case?  
 6 **A. Yes.**  
 7 Q. We do know one enduring issue from the council's  
 8 perspective was getting access -- after the decision not  
 9 to prosecute and the investigation had been closed,  
 10 getting access to those medical reports which the  
 11 council required for their own purposes. If we can  
 12 have, please, Mr Hyde, on the screen OHY007866\_021. We  
 13 see there, if you can enlarge it slightly, please,  
 14 I would be grateful, that's the director of  
 15 Social Services following up and requesting the medical  
 16 reports which the council were keen to have, and we  
 17 heard the -- Ms Dunipace of the council also referred to  
 18 that. It looks as though those reports, the doctors at  
 19 the time had some issue about whether they could be  
 20 released or not. All I would say is, it seems, in terms  
 21 of Working Together, there wasn't clarity about how  
 22 those children were examined in the first place, where,  
 23 and who should have the information afterwards. Would  
 24 you agree with that, having seen the relevant papers?  
 25 **A. I've seen -- I can see the letter on the screen, yes.**

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1 Q. That can go down now, thank you, Mr Hyde. So  
 2 Working Together, where forensic examinations were  
 3 concerned, it wasn't really Working Together at this  
 4 time, was it, because the local authority was still not  
 5 knowing what those examinations found, they weren't  
 6 being used for the purposes of a police investigation  
 7 anymore or prosecution and the local authority were  
 8 having to investigate for themselves what they could?  
 9 **A. I don't know the particular circumstances of the case. These  
 10 are, of course, statements taken by the police. They are  
 11 police statements. So even if the Crown Prosecution Service  
 12 wanted to disclose them at that stage, we would have had to  
 13 have spoken to the police to get their approval.**  
 14 Q. Indeed, that appears to be what was happening. There  
 15 was discussion between the Crown Prosecution Service and  
 16 the police --  
 17 **A. Nowadays, I think, with the welfare of the child being  
 18 paramount, there's more of a presumption, I think, that such  
 19 statements would be provided.**  
 20 Q. What about in terms of obtaining medical evidence or  
 21 forensic evidence? Would you now suggest that in a case  
 22 of child sexual abuse? Would the CPS have an input as  
 23 to when medical evidence should be obtained or not?  
 24 **A. It would depend if the officers came to us for early  
 25 investigative advice and it would depend on the circumstances**

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1 **the Court of Appeal.**  
 2 Q. Is that discussed with a complainant of sexual abuse,  
 3 whether their count, which, in effect, has evidence just  
 4 like the others, should be left on a file?  
 5 **A. Certainly now we would try to have conversations with  
 6 complainants about pleas that have been offered and we are  
 7 going to accept. Every effort is made to do that. Sometimes  
 8 it can be difficult if they are offered at the last moment.  
 9 We always make the attempt to do so. So it's the sort of  
 10 thing that is required of us under our guidance, and the  
 11 Victims Charter, of course.**  
 12 Q. Can we move to paragraph 35 of this statement and LA-F4.  
 13 LA-F4 was charged with a sexual offence allegation, but  
 14 it was discontinued, and tracking, as you attempted to  
 15 do, via police correspondence, it looks as though the  
 16 main issues concern disclosure of Social Services files  
 17 and the record of the officer at the time is:  
 18 "In this particular trial, a social worker was  
 19 instructed by the judge to read the relevant file and  
 20 inform the prosecution and defence of any relevant  
 21 material. Several instances were outlined, including  
 22 previous sexual incidents and references to character."  
 23 Pausing there, what is the process that is supposed  
 24 to, even then, apply in relation to Social Services  
 25 files? Who should be reading and ultimately making the

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1 **of each case.**  
 2 Q. Can we go to your second statement very briefly. We  
 3 have got five minutes before we take the next break,  
 4 Mr McGill. The second statement deals with Angell Road,  
 5 and I just want to ask you briefly about  
 6 Michael Carroll. You say, at paragraph 9, you  
 7 understand he was charged and subsequently committed for  
 8 trial at Liverpool Crown Court. The files suggest  
 9 a 76-count indictment was before the court and it  
 10 captured offending against 13 children between 1966 and  
 11 1981. It would appear, you say, at paragraph 11, on  
 12 5 April 1989 Carroll changed his plea in respect of  
 13 34 counts, entering guilty pleas in respect of those  
 14 matters:  
 15 "All other charges where a not guilty plea had been  
 16 entered were left to lie on the file."  
 17 Can you just explain, please, what happens to  
 18 a criminal charge that's left to lie on the file?  
 19 **A. Lying on the file means that certain pleas have been accepted  
 20 or guilty pleas have been put in, and that there is  
 21 sufficient evidence to -- there would be sufficient evidence  
 22 to proceed with the other counts, should we need to do so,  
 23 but the public interest doesn't require a prosecution. So  
 24 they're left to lie on the file, and they can't be proceeded  
 25 with, save with the leave of the court, the trial judge or**

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1 decision in terms of what's relevant and should be  
 2 admitted to the court?  
 3 **A. Well, it really depends. At this time, what tended to happen  
 4 was that the social worker brought the Social Services file  
 5 to court, and often the judge would go through the material  
 6 and decide what material was relevant and what material, if  
 7 any, should be disclosed.  
 8 It's slightly different now. We issue a summons,  
 9 generally, for the files, and we try to seek agreement  
 10 with Social Services about access to material because this  
 11 case was, I think, a case in -- pre the CPIA, and we have  
 12 now got a statutory basis for disclosure, whereas before  
 13 this was pre statutory disclosure.**  
 14 Q. No acronyms, if I can ask you not to. CPIA?  
 15 **A. Criminal Procedure and Investigations Act.**  
 16 Q. So the way it was dealt with then, you do not think  
 17 would happen now?  
 18 **A. I don't think -- I think it is a very different procedure  
 19 now, yes.**  
 20 Q. It looks as though, according to that note, it was the  
 21 director of Social Services who said that the file  
 22 should be returned to the office and, in fact, the  
 23 prosecution didn't continue, did it, because of this way  
 24 of trawling through the file and the assumption of how  
 25 material was going to be used?

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1 **A. It looks like a decision was made, and it is unclear how or**  
 2 **who made the decision, but it looks like a decision was made**  
 3 **that the prosecution was not going to continue. I don't know**  
 4 **the reason precisely why.**  
 5 Q. Children in care are very vulnerable, aren't they, where  
 6 people write down, and social workers and others who may  
 7 not even know them very well or may have interests  
 8 steadfastly against the child about whom they are  
 9 writing, who write down various things in their files  
 10 that that can be produced in any court process in a way  
 11 that, for other complainants or other children, there  
 12 just wouldn't be that body of material by which to try  
 13 to challenge any account, would there? They're  
 14 disadvantaged by virtue of having care files and records  
 15 in that way?  
 16 **A. Well, I suppose they can be. I don't know. But if there is**  
 17 **material, it has to be considered.**  
 18 MS LANGDALE: Thank you. If we can take, I suggest, chair,  
 19 a 15-minute break now and resume at 3.00 pm.  
 20 THE CHAIR: Yes, thank you, we will do that.  
 21 MS LANGDALE: Thank you.  
 22 (2.45 pm)  
 23 (A short break)  
 24 (3.00 pm)  
 25 THE CHAIR: Ms Langdale?

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1 impression of what the sentence was, which was  
 2 18 months. You think the PNC will be accurate?  
 3 **A. That's my view, yes.**  
 4 Q. Operation Middleton, then, 2002. Further allegations  
 5 were made in Operation Middleton, and we see from your  
 6 statement the Crown Prosecution Service instructed  
 7 Allison Hunter to provide advice on the evidence, and  
 8 she provided advice that five complainants gave credible  
 9 and coherent accounts and there was sufficient evidence  
 10 to prosecute, and we know that there was a prosecution,  
 11 which I will come on to.  
 12 If you go to paragraph 17, post charge but before  
 13 trial, the MPS had spoken to a further possible  
 14 complainant, who made allegations of sexual assault, but  
 15 that was not added to the charges at the time. That  
 16 could have been, lawfully, couldn't it? It could have  
 17 been introduced, even though it came to the attention of  
 18 the police and the CPS post charge of the original  
 19 complaints?  
 20 **A. When you say it could have been added lawfully, what do you**  
 21 **mean?**  
 22 Q. They could have progressed that complaint at that time  
 23 along with the other ones?  
 24 **A. It depends on what stage it came to light.**  
 25 Q. It's before trial. We know it is before trial.

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1 MS LANGDALE: Mr McGill, can we go to your third statement,  
 2 dealing with Southvale, please, and trace and track  
 3 through the convictions in relation to Mr Paul,  
 4 Mr Leslie Paul. As you set out in your first statement,  
 5 in 1994, as a consequence of Operation Bell, Paul was  
 6 charged in relation to three complainants with nine  
 7 charges, including indecent assault, gross indecency,  
 8 assault with intent to commit buggery and taking  
 9 indecent photographs.  
 10 You set out at paragraph 10, if you can tell us,  
 11 please, what he was found guilty of?  
 12 **A. He was found guilty of counts 5 to 8 on the indictment, and**  
 13 **I think the details of that were set out in my paragraph 11.**  
 14 Q. Without going into the details, broadly, the judge had  
 15 directed not guilty verdicts in respect of counts 3 and  
 16 4, and you say -- what do you give as your most likely  
 17 explanation for that, in paragraph 10?  
 18 **A. It would appear that the judge acceded to an application that**  
 19 **there was no case to answer, in respect of those counts.**  
 20 Q. Paragraph 12, please. Tell us what the sentence is, and  
 21 indeed you went back to look at that for us. So tell us  
 22 what the sentence was at that time, please?  
 23 **A. There's some dispute as to what the sentence was. On the**  
 24 **Police National Computer, it's down as two years, six months.**  
 25 Q. You think that's more likely to be accurate than our

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1 **A. Yes. It depends on the process that you can do that by. If**  
 2 **it was prior to that stage, prior to the committal, you would**  
 3 **be able to add it. If it hadn't -- if it wasn't, you would**  
 4 **have had to have probably gone through a different procedure.**  
 5 Q. So we can try to look for that, then. If it was prior  
 6 to committal, it could, and should, have been added,  
 7 would you say?  
 8 **A. I don't know. It depends. It depends. I haven't got**  
 9 **a file, so it would have to be looked at to see whether it**  
 10 **met the two stages of the Code Test.**  
 11 Q. We know, and indeed you set out, the police summary in  
 12 relation to the case at paragraph 22 and paragraph 24.  
 13 Can you tell us what happened during Trinity? What was  
 14 suggested about how pleas were entered into?  
 15 **A. I'm sorry, I don't understand your question.**  
 16 Q. Look at paragraph 24. The pleas that were entered into  
 17 in relation to this trial. Looking now at the papers,  
 18 what does it suggest about why various pleas were  
 19 accepted in relation to the prosecution, the second  
 20 prosecution, of Mr Paul?  
 21 **A. Well, there's some confusion about this, and I think**  
 22 **Allison Hunter's statement probably helps us a little bit.**  
 23 **It looks like the previous Operation Bell files weren't**  
 24 **available.**  
 25 Q. That appears to have had an impact on the pleas that

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1 were accepted, does it?

2 **A. Well, a prosecutor has to fulfil their disclosure**

3 **responsibilities, and if they can't fulfil their disclosure**

4 **responsibilities, there's a danger that an abuse of process**

5 **application could be launched because there could be material**

6 **which the defence are entitled to, to see and to consider**

7 **prior to the trial.**

8 Q. Indeed, as you say -- it may be convenient to read it at

9 this point, chair. We have obtained a statement from

10 Allison Hunter, now Allison Hunter QC, in relation to

11 that prosecution, reference INQ005701. We don't need it

12 on the screen. She says:

13 "I recall this is the second prosecution of

14 Leslie Paul for similar offences arising out of

15 a similar timeframe against different boys who had also

16 been in his care. He had been convicted of some of

17 the earlier offences and had served a sentence of

18 imprisonment by the time of this investigation.

19 I recall none of the detail in relation to the earlier

20 case against Leslie Paul, only that most or all of

21 the records in connection with that case were lost,

22 unavailable to Operation Middleton, and that was

23 a complicating factor in the prosecution of our case.

24 I recall that it was after a successful ruling upon

25 abuse of process in his favour the defendant offered

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1 **"In view of the similarity in the allegation and the**

2 **judge's remarks on sentencing Mr Paul at the last trial,**

3 **in spite of the credibility of the witness, it would**

4 **appear that, even if Mr Paul were to be convicted on his**

5 **evidence, any sentence would be minimal. Therefore, one**

6 **is forced to conclude, albeit reluctantly, that even if**

7 **one regards the evidential sufficiency criteria of**

8 **the Code for Crown Prosecutors complied with, it would not**

9 **be in the public interest to proceed. In the**

10 **circumstances, the advice is to take no further action in**

11 **relation to these offences. Obviously, if evidence of**

12 **more grave offences came to light, and the evidence was**

13 **sufficiently strong, then those matters would have to be**

14 **considered in the context then prevailing."**

15 Q. That advice is open to criticism, do you think?

16 **A. I don't think it is, no, not in accordance with the law and**

17 **the Code that was in place at the time.**

18 Q. Indeed, by 2015, the decision was taken that that could

19 be prosecuted, that complaint, wasn't it?

20 **A. A different decision was made in 2015, but that's because the**

21 **law had changed and the Code had changed as well.**

22 Q. In what way? How do you say it was different by 2015?

23 **A. Well, if you look at the Code that was in force at the time**

24 **Mr Bowering made the decision, and it is set out in**

25 **paragraph 33.**

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1 guilty pleas to some of the accounts on the

2 indictments."

3 She goes on to say, which is a matter for the police

4 and one of the police witnesses:

5 "I can say that the pleas proffered and the

6 subsequent sentence imposed were not the result of any

7 private agreement between counsel or between counsel and

8 the judge."

9 So it would appear that the absence of records was

10 a complicating factor and a seriously complicating

11 factor?

12 **A. It would appear so.**

13 Q. If you look at paragraph 32 of your statement,

14 subsequent to that prosecution, a further allegation was

15 received by the Crown Prosecution Service against

16 Mr Paul, and we see at paragraph 32, the CPS advice in

17 relation to that allegation. It might help, before

18 I take you to that, to comment, at paragraph 28, that

19 the judge, in sentencing Paul, had praised Paul's

20 efforts to address his problems and described his case

21 as being one of exceptional circumstances.

22 Can you, in that context, read at paragraph 32 what

23 the CPS lawyer advised about the further complaint made

24 pursuant to that prosecution?

25 **A. Yes. He said:**

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1 Q. Yes.

2 **A. "A prosecution is less likely to be required if the court is**

3 **likely to impose a nominal penalty."**

4 **Going over the page:**

5 **"The defendant has already been made the subject of**

6 **a sentence and any further conviction will be unlikely**

7 **to result in the imposition of an additional sentence or**

8 **order unless the nature of the particular offence**

9 **requires a prosecution."**

10 **I don't think those words were in the later Code.**

11 Q. So do you think a single offence didn't merit that, but

12 where there were a number of offences later, that that

13 would merit further prosecution?

14 **A. Well, it is certainly one of the factors that you would take**

15 **into account, and I think that's what the lawyer did take**

16 **into account in Operation Trinity in 2015, I think, wasn't**

17 **it?**

18 Q. Yes, and 13 years' imprisonment was imposed in 2015 for

19 numerous offences?

20 **A. Yes.**

21 Q. You were asked at paragraph 46 to say whether you

22 considered that to be a successful prosecution and an

23 appropriate sentence. What do you say about that?

24 **A. A sentence of 13 years' imprisonment?**

25 Q. Yes.

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1 **A. That's a significant sentence, and it appears to be in line**  
 2 **with the sentencing guidelines in force.**  
 3 Q. Let me move to LA-F8, please. That's below,  
 4 paragraph 48. So LA-F8. There was a particular  
 5 complainant who did not make an allegation of child  
 6 sexual abuse against F8 in 1991, but went on in 2003 to  
 7 make an allegation. If I can take this neatly, the CPS  
 8 advice in 2003 was that LA-F8 should not be charged  
 9 because Operation Bell papers were missing and the  
 10 prosecution would not be able to deal with an abuse of  
 11 process argument surrounding what the complainant had  
 12 or, in this case, had not said at an earlier date.  
 13 **A. That's broadly the case, yes.**  
 14 Q. That's broadly it, isn't it, without going through all  
 15 those pages?  
 16 **A. Yes.**  
 17 Q. First of all, that would appear -- the interpretation of  
 18 that lawyer, and I will come on to that in a moment,  
 19 around Operation Bell not having those papers was fatal  
 20 to that prosecution, as far as the CPS were concerned?  
 21 **A. It was the basis on which he made his decision, yes.**  
 22 Q. Because of your concerns about, how do you disclose to  
 23 the defence and there could be an abuse of process  
 24 argument; yes?  
 25 **A. Yes, and because I think that it was because of the previous**

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1 Q. They don't have to put the defence case, though, and  
 2 believe it is to be established, do they? You have  
 3 to --  
 4 **A. You have to ask yourself the question, and you have to**  
 5 **understand what the law on abuse was in 2003, and abuse of**  
 6 **process applications were much more likely to succeed in 2003**  
 7 **under that -- the state of the law as it was then. It wasn't**  
 8 **altered until 2007, with the Abu Hamza case, where the judges**  
 9 **said, for there to be an abuse, it had to be an affront to**  
 10 **justice. That's a very high threshold. If I can put it, the**  
 11 **threshold before was a bit lower.**  
 12 Q. Paragraph 76, please, LA-F5. You refer here to  
 13 a complainant giving evidence and, during the course of  
 14 evidence -- and the complainant was only 12 -- broke  
 15 down and was unable to continue, and the judge directed  
 16 the jury to return a not guilty verdict.  
 17 That example, and we have another, is a compelling  
 18 example of how the criminal justice system, at that  
 19 time, was failing young people, wasn't it? Children  
 20 giving evidence in court, unable to continue, and the  
 21 prosecution being stopped, instead of the system looking  
 22 at support mechanisms for children to give evidence,  
 23 special measures and the like, which we know we have  
 24 now, that in effect the prosecution was arrested because  
 25 of a young person's inability to continue to give

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1 **decision taken not to charge, and we didn't know -- I think**  
 2 **the lawyer in that case didn't know what had been said about**  
 3 **that in the Operation Bell case, and that was a real problem**  
 4 **for him, I think.**  
 5 Q. In this case, there had been no complaint, so there was  
 6 no cross-account, if you like, to examine in relation to  
 7 the complainant; he hadn't made the complaint before?  
 8 **A. Yeah, I don't know what was in the mind of the prosecutor at**  
 9 **the time.**  
 10 Q. But --  
 11 **A. But the law in relation to abuse was very different in 2003**  
 12 **than it is now.**  
 13 Q. But before the argument was even raised, it seems,  
 14 I suggest, a pre-emptive decision about, "There's no  
 15 point trying this because we don't have the earlier  
 16 material", when, in fact, there was no cross-account to  
 17 deal with because, as we know, with complainants of  
 18 sexual abuse, accounts can take some time before they  
 19 are first made?  
 20 **A. But if you look at my paragraph 53, Ms Langdale, the code in**  
 21 **force at the time required the prosecutor to make those**  
 22 **decisions. It says:**  
 23 **"Crown Prosecutors must consider what the defence case**  
 24 **may be and how that is likely to affect the prosecution**  
 25 **case."**

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1 evidence?  
 2 **A. Well, the criminal justice system -- I think this is a case**  
 3 **from 1993? The range of special measures that are available**  
 4 **now were not available in 1993. So, as I said before, the**  
 5 **circumstances in which young people gave evidence was very**  
 6 **different to the circumstances now. Now you have ground**  
 7 **rules hearings where the judge and the advocates agree in**  
 8 **advance what the questions will be and how the**  
 9 **cross-examination will take place.**  
 10 **As I said before, under this system, the child**  
 11 **generally had to face the accused in court, and it was**  
 12 **a much more -- a much more intimidating environment. It**  
 13 **was different.**  
 14 Q. Dealing now with your Shirley Oaks statement, if I may,  
 15 and of course this predates the inception of the Crown  
 16 Prosecution Service, so you're looking at prosecution in  
 17 a different context and at a different time. If we look  
 18 at William Hook, firstly, on page 3 of your statement,  
 19 paragraph 13, you refer there to the guilty pleas that  
 20 were entered and the acceptance of pleas. At that time,  
 21 would there have been consultation, as far as you're  
 22 aware, with complainants or not?  
 23 **A. Yes. I think it would, and, again, if you look at my**  
 24 **paragraph 17, the Code for Crown Prosecutors in force at that**  
 25 **time says:**

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1 **"It is important that a victim is told about**  
 2 **a decision which makes a significant difference to the**  
 3 **case."**  
 4 **So, yes, you would expect there to be consultation.**  
 5 Q. You --  
 6 **A. I make that point in paragraph 19, Ms Langdale, as well.**  
 7 Q. You also say in paragraph 19:  
 8 "The discount for guilty pleas."  
 9 Can you explain that to us, please? What would be  
 10 the position on sentence for somebody who had made  
 11 guilty pleas or given guilty pleas?  
 12 **A. Generally, guilty pleas are considered, in the criminal**  
 13 **justice system, to be a good thing, because it saves court**  
 14 **time, but it also saves complainants or witnesses having to**  
 15 **give evidence in court. So there is an incentive for**  
 16 **defendants to plead guilty. And generally, at the time,**  
 17 **a discount of a third of the expected sentence was given by**  
 18 **judges. So if you were expected to get 15 years, if you**  
 19 **pleaded guilty you could be -- have five years knocked off**  
 20 **that sentence and get ten years, if that makes it clearer.**  
 21 Q. Again, it is case specific, isn't it: for some  
 22 complainants, they may wish to give evidence against the  
 23 person that is accused and has committed the offences,  
 24 and do you think, in those circumstances, the impact of  
 25 their testimony does impact on the sentence and the

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1 what support would be offered?  
 2 **A. There, of course, we would seek to communicate with the**  
 3 **victim and explain the outcome. Of course we don't sometimes**  
 4 **know why juries come to the decisions that they make. But we**  
 5 **would seek to explain and seek to answer any questions that**  
 6 **the complainant or witness had.**  
 7 Q. Finally, in this section, LA-F37, please, the case that  
 8 begins at paragraph 113. The inquiry has heard some  
 9 evidence about this case and a child describing an  
 10 incident of indecent assault, the house father from next  
 11 door coming into her bedroom during the night, and the  
 12 house mother went to the girl's room and seeing a man  
 13 behind the door. In this analysis of decision  
 14 surrounding prosecution, it would appear -- you don't  
 15 need to go to the ciphers -- that the two different  
 16 ciphers apply and the concern relating to the impact of  
 17 any prosecution doesn't relate to the complainant, it  
 18 relates to somebody else, another child who was there  
 19 and the impact upon that child. Do you see?  
 20 **A. Can you point me to the exact --**  
 21 Q. The case is dealt with from paragraphs 113 to 120. The  
 22 CPS decision made clear it wasn't going to be in the  
 23 public interest because it was apparent that it would  
 24 have an adverse impact on a particular child. My  
 25 question, really, is, there was evidence, wasn't there,

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1 gravity of the sentence?  
 2 **A. Obviously, it could. But, of course, the prosecutor has to**  
 3 **look at the overall criminality and has to analyse whether**  
 4 **the pleas offered address the overall criminality and,**  
 5 **crucially, give the judge adequate sentencing powers to deal**  
 6 **with the criminality that is shown by the evidence.**  
 7 Q. Mr Patrick Grant. You say at paragraph 18, and can you  
 8 just confirm, the CPS didn't provide any advice  
 9 regarding Grant in Operation Middleton. You weren't  
 10 consulted about that?  
 11 **A. That appears to be the case, yes.**  
 12 Q. The trial of Mr Hosegood. The inquiry has heard  
 13 powerful evidence about the lack of support for victims  
 14 in that trial, following on as well from the direction  
 15 of acquittal. Tell us now, what would happen where  
 16 a child, or an adult recounting abuse as a child, gave  
 17 evidence and there was an acquittal for whatever reason.  
 18 Would a victim get support following on from that?  
 19 **A. Could you just point me to where in my statement this is,**  
 20 **please?**  
 21 Q. In relation to Mr Hosegood, it is at paragraph 31. You  
 22 were asked about support to complainants. The inquiry  
 23 already knows the lack of support that was offered at  
 24 that time. My question is, what would you do now where  
 25 someone has given evidence and there's an acquittal, and

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1 as you say, even aside from the complainant, surrounding  
 2 that allegation at the time, and it was much more  
 3 complex than that analysis would suggest?  
 4 **A. Well, it could be, and we don't have the papers at this**  
 5 **stage, so I don't precisely know. What the reporting of**  
 6 **the CPS decision was is what someone else's rationale is for**  
 7 **the CPS decision. We haven't been able to find any papers.**  
 8 **So I don't know what the CPS decision -- what the rationale**  
 9 **for the CPS decision was.**  
 10 Q. Indeed, the modern guidelines are much more reflective  
 11 about children in care, aren't they? If we can go to  
 12 those. I'm looking at the adverse factors that may  
 13 impact unless prosecutors are careful to think about  
 14 them upon decisions surrounding whether or not to  
 15 prosecute a complaint of abuse. Can I ask, for these  
 16 purposes, Mr Hyde, if you could put up on the screen  
 17 CPS002811\_001. These are guidelines on prosecuting  
 18 cases of child sexual abuse, Mr McGill, and these are  
 19 the 2017 guidelines. Are they the latest version?  
 20 **A. I think there's some in 2019 as well.**  
 21 Q. These were the ones that we had following on from your  
 22 statement. Let's have a look at page 5, "Supporting  
 23 victims and witnesses".  
 24 **A. There are some guidelines of CPS safeguarding children as**  
 25 **victims and witnesses in October 2019.**

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1 Q. Have a look at 17 and 18. You may not know immediately  
 2 how it's been improved since then. But this was what  
 3 was attached to your evidence. We see there at 18:  
 4 "It is also important to recognise that since many  
 5 of the victims and witnesses will be children or young  
 6 people, the support available before, during and after  
 7 trial in court should be explained to them in  
 8 age-appropriate terms ... so that they understand what  
 9 is being discussed ... parents or guardians are  
 10 involved ...", et cetera, et cetera?  
 11 **A. Yes.**  
 12 Q. We see -- Mr Hyde, if we can go to page 6 of the same  
 13 document, "Independent sexual violence advisors". We  
 14 see there -- when were they introduced, Mr McGill?  
 15 **A. I can't remember the exact date, if I'm honest.**  
 16 Q. Do all victims of child sexual abuse have access to  
 17 independent sexual violence advisors? How does it work?  
 18 **A. I think that there are gaps around the country, if I'm**  
 19 **honest.**  
 20 Q. We want you to be honest, Mr McGill. We rely on it. So  
 21 what are the gaps around the country surrounding this?  
 22 **A. I think there's been some funding issues, and I think there**  
 23 **have been some difficulties in getting support for certain**  
 24 **victims, and I know victims groups complain about that.**  
 25 Q. Those who do have the benefit of an ISVA, do they

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1 specifically stereotyping around children and children  
 2 in care at 48 and 49, 50 and 53 we see, "Children or  
 3 young people" -- paragraph 53, thank you:  
 4 "Children or young people who have been in the care  
 5 of, or have come to the attention of, Social Services  
 6 will inevitably have a great deal of information about  
 7 them contained within Social Services records compared  
 8 to other children or young people. Every episode of  
 9 'bad' behaviour, even of the most minor nature, is  
 10 likely to be a matter of record. Most children  
 11 misbehave but not every child has their misbehaviour  
 12 recorded. Victims who are, or have been, in the care of  
 13 Social Services should not be disadvantaged in the  
 14 criminal process by this fact and prosecutors should be  
 15 prepared to address this issue as part of  
 16 the presentation of the prosecution case."  
 17 Looking back, as we have been able to do, would you  
 18 say, looking back at the records in the cases we have  
 19 looked at, it was certainly the case historically that  
 20 children were disadvantaged in the way this guidance  
 21 seeks to address head-on?  
 22 **A. I don't have a direct answer to that. What I can say, the**  
 23 **documents that you put up talking about myths and**  
 24 **stereotypes, there is no evidence in the documents that**  
 25 **I have seen that prosecutors fell into myths and stereotypes**

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1 describe that to be of great assistance, of real  
 2 assistance?  
 3 **A. Yes. I think, you know, there will be individual cases, but,**  
 4 **generally, I think the more support you can give victims, and**  
 5 **the more specialist support you can give them, can only**  
 6 **benefit them.**  
 7 Q. Is that a resource issue on the ground, or an awareness  
 8 of what's already available?  
 9 **A. The honest answer to that is: I don't know. I know that**  
 10 **there have been gaps around the country.**  
 11 Q. Do you collate that evidence, as an organisation, to  
 12 monitor how well you're doing in terms of supporting  
 13 victims?  
 14 **A. Well, independent sexual violence advisors aren't -- isn't**  
 15 **a CPS resource.**  
 16 Q. No, but in terms of people going through the prosecution  
 17 system, the victims and complainants, do you have any  
 18 way of analysing how they find the criminal process or  
 19 do you regard that for someone else to do?  
 20 **A. No, we regularly run surveys to ask victims and witnesses how**  
 21 **they found their experience in the criminal justice system.**  
 22 **We run those every couple of years.**  
 23 Q. Can we have, please, Mr Hyde, pages 10 and 11 of this  
 24 document. "Credibility or reliability of a child or  
 25 young person". We see there guidance that addresses

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1 **in their decision making. I do accept that the whole system**  
 2 **in which victims gave their evidence previously was very**  
 3 **different, and perhaps more challenging, and there are more**  
 4 **support services available for victims today.**  
 5 **But looking back over these decisions, I see no**  
 6 **evidence that prosecutors took any irrelevant or**  
 7 **inappropriate things into account in making their**  
 8 **decisions as to whether to prosecute or not. They were**  
 9 **applying the law and the Code as it stood at the time.**  
 10 Q. What about how a defence case might be put and analysing  
 11 how a defence case might be put? That was accepting  
 12 that stereotypes would be put rather than confronting  
 13 those stereotypes and dealing with them head-on at the  
 14 time. The code didn't prevent that. The code didn't  
 15 prevent people looking at what credibility meant and how  
 16 it should be assessed for a child in care, did it?  
 17 **A. No. I accept that. But the prosecutors could only look at**  
 18 **the code as it was at the time, and, of course, now these**  
 19 **cases -- and, you know, cases involving children have always**  
 20 **been looked at by experts, child abuse experts, and now**  
 21 **they're looked at by child abuse experts and RASO experts**  
 22 **operating within specific expert teams. So these decisions**  
 23 **are made by properly trained lawyers and presented by**  
 24 **advocates who are on the sexual offences trained**  
 25 **Advocacy Panel. So they're (overspeaking) --**

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1 Q. Let's --  
 2 **A. -- and presented by experts.**  
 3 Q. Let's see how that's working when we talk about experts  
 4 and how it is happening in practice. Can we look,  
 5 please -- you have had this, obviously, in advance -- on  
 6 the screen at the joint inspection report 2014,  
 7 MOJ000916\_001, "Achieving best evidence in child sexual  
 8 abuse cases - a joint inspection". So this is a joint  
 9 inspection and we see chief inspector of the CPS --  
 10 page 7, I think, Mr Hyde, is the foreword. I think  
 11 that's probably the most useful. That is the foreword  
 12 of that inspection. Let's see, when you say it is now  
 13 handled in a completely different way, what's recorded  
 14 there, particularly paragraph 4. "In short, the  
 15 inspection found that the guidance" -- just to pause  
 16 there. Achieving best evidence guidance. That's about  
 17 how to get children's evidence, isn't it? To obtain  
 18 cogent allegations of abuse?  
 19 **A. Yes.**  
 20 Q. Interviewing children, interviewing them appropriately  
 21 to make sure they are enabled to give their best  
 22 evidence that will stand up in court to demonstrate what  
 23 they are saying has happened. That's what we are  
 24 talking about here, how that guidance operates?  
 25 **A. Those are the interviews carried out by the police officers,**

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1 the best evidence. This is due in part to poor  
 2 compliance by interviewers and the failure to properly  
 3 record decisions and actions, with the rationale  
 4 underpinning these. Immediate improvements could be  
 5 achieved through better planning at the outset,  
 6 supplemented by improved supervision of interviewers and  
 7 better quality assurance of the recording. In turn, the  
 8 CPS needs to improve feedback to the police about the  
 9 quality of individual ABE interviews viewed for  
 10 pre-charge advice and subsequently about their use and  
 11 effectiveness as evidence from the advocate to the case  
 12 lawyer and police officer in charge. There is also an  
 13 underlying tension between the need to obtain  
 14 investigative material and the evidential package, which  
 15 will invariably form the child witness's key evidence in  
 16 the case. Although the guidance is clear about how to  
 17 obtain both elements with a degree of separation, this  
 18 is currently not happening in practice. This lack of  
 19 clarity needs to be addressed through improved training  
 20 and additional guidance."  
 21 If we look, please, Mr McGill, at key findings under  
 22 the executive summary on page 9, please, Mr Hyde, and  
 23 page 10, if we can put them next to each other, I would  
 24 be grateful. Enlarge them both so people can read as  
 25 they choose, but, for my purposes, highlight

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1 **yes.**  
 2 Q. And that the CPS can advise on. Let's be clear: the CPS  
 3 can receive those interviews, watch them and advise on  
 4 further interviews?  
 5 **A. You can, but, generally, we receive those interviews after**  
 6 **they have been carried out by the police officers.**  
 7 Q. Yes, that may be the case. But you could still advise  
 8 on the quality of the interview and whether further  
 9 interviewing is indicated, couldn't you?  
 10 **A. You can, but you have to be very -- you have to be very**  
 11 **careful about putting a child through another traumatic**  
 12 **interview.**  
 13 Q. Of course. There are lots of parameters around how  
 14 interviewing is done safely and properly. But if there  
 15 are gaps or if there are issues of evidential  
 16 sufficiency that you think can be addressed, you can  
 17 give that advice if you choose, as a CPS reviewing  
 18 officer?  
 19 **A. You can. You can give it in advance if the police come to**  
 20 **you and ask for that advice. You can give advice or make**  
 21 **suggestions as to evidential gaps when you review the case**  
 22 **after it's come to you, yes.**  
 23 Q. If we look at paragraph 4:  
 24 "In short, the inspection found that the guidance is  
 25 not achieving what it set out to do, which is achieving

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1 paragraph 1.6. At 1.6, can we see particularly,  
 2 Mr McGill, what's said there:  
 3 "... very little early investigative advice from  
 4 the CPS which could have been used to speed up the  
 5 process and prevent lengthy delays between arrest and  
 6 charge. The CPS pre-charge advice did not refer to the  
 7 quality of the ABE recorded interview, nor was there any  
 8 quality assurance of these interviews by CPS managers.  
 9 There was limited feedback between the CPS and police  
 10 about the quality of individual ABE interviews ... about  
 11 their use and effectiveness as evidence from the  
 12 advocate to the case lawyer or police. Although there  
 13 was greater awareness by the CPS than the police of  
 14 the benefits of intermediaries at trial, special  
 15 measures meetings with the child about how their  
 16 evidence would be given, which were often combined with  
 17 court familiarisation visits were conducted in the  
 18 absence of the lawyer due to resource issues."  
 19 That doesn't look great, does it; far from it?  
 20 **A. Well, I think we would accept that there's always more that**  
 21 **we can do, but we have to remember that these are interviews**  
 22 **carried out by the police. Now, as I said earlier on, we can**  
 23 **provide advice to the police, but we can't provide advice if**  
 24 **we are not asked for the advice, and so it is a matter for**  
 25 **the police whether they come in to us and ask for advice**

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1 **prior to doing the interviews.**  
 2 **After the interviews have been carried out and sent to**  
 3 **us, yes, we can provide the advice, and we do regularly**  
 4 **provide that advice, because we put in place things since**  
 5 **2014 that have enabled us to improve that system.**  
 6 Q. I'm going to ask you what specifically has been put in  
 7 place, but if you look at page 12, please, of the same  
 8 document, we see there recommendations that the  
 9 achieving best evidence interview is of sufficient  
 10 visual and sound quality for the prosecution team,  
 11 defence and court. We see at number 6, please, that is  
 12 at its most basic, isn't it, the most basic as of 2014,  
 13 that the interview should be of sufficient visual and  
 14 sound quality for the prosecution team, defence and  
 15 court. Was that your experience, that they weren't of  
 16 sufficient sound and quality?  
 17 **A. Well, there would have been individual cases where we**  
 18 **probably had to amplify things. But, again, I would say**  
 19 **these are interviews carried out by the police on police**  
 20 **equipment. This is not CPS equipment. So we can advise**  
 21 **after the event and advise after it's happened, but we don't**  
 22 **carry out these interviews.**  
 23 Q. At paragraph 5 above it:  
 24 "The CPS should ensure intermediaries are considered  
 25 for use at court in every case involving a child witness

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1 with children?  
 2 **A. It refers to ABEs as well. So it depends on how you get**  
 3 **their evidence. It refers to the use of ABEs and ensuring**  
 4 **that they are properly used. We introduced the CPS**  
 5 **Advocate Panel Scheme, where CPS advocates had to be rape and**  
 6 **child abuse specialists. They have all had to undertake the**  
 7 **advocacy and the vulnerable training either through the CPS**  
 8 **or through Bar providers.**  
 9 Q. Does that training deal with stereotyping of the type we  
 10 have canvassed today?  
 11 **A. It deals with myths and stereotypes, yes. We have put**  
 12 **guidance out in respect of child sexual abuse, guidelines on**  
 13 **prosecuting cases of child sexual abuse, in 2018, and that**  
 14 **talks about how you approach the decision makers in these**  
 15 **sorts of cases. We have got the CPS rape and sexual offences**  
 16 **legal guidance that was published in March 2019, which**  
 17 **specifically deals with the quality of visually recorded**  
 18 **interviews, and we had the CPS Safeguarding Children as**  
 19 **Victims and Witnesses in October 2019, which gives practical**  
 20 **and legal guidance about ABEs, how to carry them out and what**  
 21 **prosecutors should do. There is independent evidence that**  
 22 **this has made a difference to how we approach these cases,**  
 23 **because I mentioned earlier on the HMCPSI report**  
 24 **in December 2019 into allegations of rape and that was**  
 25 **allegations of rape across the whole spectrum, and the**

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1 and a written record is maintained of the decision,  
 2 particularly of the rationale where an intermediary is  
 3 not used."  
 4 This investigation is going to examine  
 5 intermediaries and the use of intermediaries. What's  
 6 your evidence about how effective the CPS is in ensuring  
 7 those measures assist with prosecutions and witnesses  
 8 giving evidence at court?  
 9 **A. Well, intermediaries were, I think, introduced in 2007, and**  
 10 **I think they're vital in getting the best evidence from**  
 11 **children. My experience is that the CPS use intermediaries**  
 12 **more and more and recommend the use of intermediaries more**  
 13 **and more.**  
 14 Q. That can be taken down now, thank you, Mr Hyde. So what  
 15 specifically since 2014 and that joint inspection do you  
 16 say has been introduced or happened?  
 17 **A. In 2015, there was a protocol between us and the police about**  
 18 **the prosecution of rape, in which the use of intermediaries**  
 19 **and early investigative advice was specifically mentioned.**  
 20 Q. Is that rape? Is that between adults? Are you talking  
 21 about child offences?  
 22 **A. Children and adults. Rape as an offence, not based just on**  
 23 **age.**  
 24 Q. That wouldn't be ABE interviews, though, would it? I'm  
 25 asking in relation to achieving best evidence interviews

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1 **inspectorate did conclude that our handling of these cases**  
 2 **had improved markedly from 2016, when they previously came**  
 3 **in, to 2019, in that, in 2016, they found that 10 per cent of**  
 4 **our cases were charged not in accordance with the Code but by**  
 5 **2019, 98 per cent of our cases were Code compliant. They**  
 6 **also found that we were not risk averse in our decision**  
 7 **making.**  
 8 **So that is an independent finding that our procedures**  
 9 **and practices and how we approach these cases is much more**  
 10 **successful than perhaps it was in the past.**  
 11 Q. The 2019 report, that relates to complaints of rape and  
 12 child sexual offences, does it?  
 13 **A. It goes across the whole spectrum of rape, I think, yes.**  
 14 Q. Can you provide us -- I'm sure you will be able to  
 15 subsequent to the giving of this evidence -- with that  
 16 report, please?  
 17 **A. Yes, it won't have details of individual cases.**  
 18 Q. No, no.  
 19 **A. It is publicly available.**  
 20 Q. Right. We can have that, then.  
 21 So what's your experience on the ground? Do you  
 22 consider -- I don't know how many of these cases you see  
 23 or deal with. How do you think achieving best evidence  
 24 interviews is going on the ground? What is the quality  
 25 of them?

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1 **A. I think now all these cases are looked at by specialist**  
 2 **lawyers in RASO teams. They are all highly trained: they are**  
 3 **trained on myths and stereotypes; they are trained in case**  
 4 **strategy; they know how to charge these cases and take them**  
 5 **through to a successful conclusion. We also instruct**  
 6 **properly trained advocates to present these cases in court.**  
 7 **My experience is that we are more successful in**  
 8 **prosecuting these cases than we have ever been, and that**  
 9 **we have a highly motivated, highly efficient, highly**  
 10 **trained, highly dedicated set of prosecutors who take this**  
 11 **work very seriously.**  
 12 **So I think the whole practice, procedure and the way**  
 13 **these cases have been dealt with is in a different place**  
 14 **now to what it was even five years ago, but is completely**  
 15 **different to what it was 10, 15, 20 years ago. The**  
 16 **inspectorate report is independent evidence of that,**  
 17 **I would say.**  
 18 MS LANGDALE: There may be further questions from the panel,  
 19 Mr McGill.  
 20 Chair, may I invite that that report, the inspection  
 21 report, with the unique reference number MOJ000916, is  
 22 uploaded in full.  
 23 THE CHAIR: Thank you. I have no questions. I will check  
 24 with my colleagues. Ms Sharpling?  
 25

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1 the problems that you have discussed today has been  
 2 access to justice for those who are less able to  
 3 communicate.  
 4 **A. Yes.**  
 5 MS SHARPLING: One of the challenges for those who cannot  
 6 communicate, what efforts are made to ensure that they  
 7 give their evidence where they can, and things have  
 8 moved on, you say, since the inception of the CPS and  
 9 today. If faced with somebody who had difficulty  
 10 communicating today and you got an early advice for  
 11 advice from the police about what they should do, what  
 12 would that advice be?  
 13 **A. Generally, it would be that we should seek to find a means by**  
 14 **which we could facilitate that complainant being able to give**  
 15 **their evidence, and generally the first stage that we -- the**  
 16 **first thing that we would do would be to try to sort an**  
 17 **intermediary that would enable that child to give evidence in**  
 18 **a way that could be admitted by the court.**  
 19 MS SHARPLING: I think you have answered this, so forgive me  
 20 just for clarifying it: are intermediaries used on  
 21 a regular basis?  
 22 **A. Yes. It is my experience that they are, yes.**  
 23 MS SHARPLING: I see. Thank you.  
 24 THE CHAIR: Mr Frank?  
 25 MR FRANK: Yes, just one thing, Mr McGill. It is right also

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1 Questions from THE PANEL  
 2 MS SHARPLING: Just a couple from me, Mr McGill, thank you.  
 3 One thought that occurs to me, that, as a prosecutor,  
 4 and having had concerns about the quality of the ABE  
 5 interviews, has any thought been given to a more radical  
 6 change of specially trained prosecutors interviewing  
 7 victims and survivors themselves, perhaps jointly with  
 8 the police or jointly with the Social Services, as an  
 9 alternative arrangement from the one that currently  
 10 exists?  
 11 **A. Well, no thought -- I'm not aware of any thought, and that**  
 12 **would require a change in the nature of the way these cases**  
 13 **are investigated and prosecuted, because, as you know, madam,**  
 14 **the police investigate and we prosecute. That would --**  
 15 MS SHARPLING: In other jurisdictions, for example, for  
 16 a prosecutor to be involved in the interviewing of  
 17 a witness --  
 18 **A. Yes, and, of course, they often direct the interview as well,**  
 19 **as you know. The system here is very different.**  
 20 **So I'm not aware of any discussions going on at the**  
 21 **moment. I do -- what I do agree with is that we get the**  
 22 **best results where prosecutors and police officers work in**  
 23 **partnership together from the earliest stage of an**  
 24 **investigation.**  
 25 MS SHARPLING: I see. Another question, if I may: one of

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1 that you have been telling us about the various  
 2 improvements there have been in the system as far as  
 3 prosecutors are concerned.  
 4 It is right also to say that the courts have also  
 5 implemented a number of changes and improvements in  
 6 respect of the defence conduct of trials involving  
 7 vulnerable witnesses, specifically so that there are  
 8 special regulations applying to vulnerable witnesses  
 9 and, indeed, a requirement that advocates representing  
 10 defendants are trained in new ways to protect vulnerable  
 11 witnesses. That's another aspect in which the system  
 12 has improved over the years?  
 13 **A. Yes, sir, that's correct. I mentioned in my evidence the use**  
 14 **of ground rules hearings in which the judge brings in the**  
 15 **prosecution advocate and the defence advocate, and**  
 16 **effectively the questions that can be asked and also the way**  
 17 **they can be asked is agreed, and the judge is very firm about**  
 18 **which questions are allowed and which questions aren't**  
 19 **allowed.**  
 20 **Of course, there is, around the country, some pilots**  
 21 **relating to section 28 of the Youth Justice and Criminal**  
 22 **Evidence Act from 1999 which allows pre-recorded**  
 23 **cross-examination of young people so that can be played at**  
 24 **a later trial. So there are very different things in**  
 25 **place now and the judges have driven a lot of that, yes.**

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<p>1 THE CHAIR: Sir Malcolm?                  2 PROF SIR MALCOLM EVANS: No, thank you, chair.                  3 THE CHAIR: Thank you, Mr McGill.                  4 <b>A. Thank you, chair.</b>                  5 <b>(The witness withdrew)</b>                  6 MS LANGDALE: Chair, that concludes proceedings for this                  7 week. Next week is a non-sitting week, of course, and                  8 we will resume on 20 July. 20 July we will be hearing                  9 complainants' evidence, so we won't be live streamed.                  10 THE CHAIR: Thank you, Ms Langdale. We will reconvene, as                  11 you say, on 20 July. Thank you.                  12 (3.45 pm)                  13 (The hearing was adjourned to                  14 Monday, 20 July 2020 at 10.30 am)                  15                  16                  17 I N D E X                  18                  19 DR CLIVE JULIAN DRISCOLL (sworn) .....1                  20 Examination by MS DOBBIN .....1                  21 Questions from THE PANEL .....47                  22 MR RICHARD GARGINI (affirmed) .....49                  23 Examination by MS DOBBIN .....50                  24 Questions from THE PANEL .....80                  25 Further examination by MS DOBBIN .....84                  26 MR GREGOR ANTHONY MCGILL (affirmed) .....85                  27 Examination by MS LANGDALE .....85                  28                  29 Page 145</p>	

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