

<p>1 Tuesday, 20 October 2020</p> <p>2 (10.30 am)</p> <p>3 IN OPEN SESSION</p> <p>4 THE CHAIR: Good morning, everyone, and welcome to Day 7 of</p> <p>5 this public hearing. Ms Carey?</p> <p>6 MS CAREY: Good morning, chair. Chair, the first witness</p> <p>7 this morning is John Sinnott.</p> <p>8 MR JOHN SINNOTT (sworn)</p> <p>9 Examination by MS CAREY</p> <p>10 MS CAREY: Mr Sinnott, good morning. I would like to start,</p> <p>11 please, by asking you a few questions about your</p> <p>12 background. You have made a 113-page statement to the</p> <p>13 inquiry on behalf of Leicestershire County Council.</p> <p>14 Help us, please, what is your current role with the</p> <p>15 council?</p> <p>16 A. I'm the chief executive and head of paid service to the</p> <p>17 council.</p> <p>18 Q. I think you have been in that position since 1994; is</p> <p>19 that right?</p> <p>20 A. That is correct.</p> <p>21 Q. Prior to that -- you, in fact, have been employed by</p> <p>22 Leicestershire County Council since 1987?</p> <p>23 A. Yes.</p> <p>24 Q. So over 30 years of service with Leicestershire County</p> <p>25 Council, or LCC, as we have been calling it for short.</p> <p style="text-align: center;">Page 1</p>	<p>1 Mr Sinnott, before I ask you a number of questions</p> <p>2 really about the background to Leicestershire County</p> <p>3 Council in particular in the 1970s and 1980s, I just</p> <p>4 want to understand, please, how you have come to prepare</p> <p>5 such a long statement. I think the position is this,</p> <p>6 that you have no personal or direct knowledge of</p> <p>7 a number of historic matters that we are going to look</p> <p>8 at this morning, but your knowledge has been gleaned</p> <p>9 from documentation that has been made available to you</p> <p>10 and, given your longstanding career with Leicestershire</p> <p>11 County Council, you perhaps have more knowledge than any</p> <p>12 member of the public would of some of the matters we are</p> <p>13 going to look at, but one should not interpret that as</p> <p>14 meaning personal knowledge of some of the things we are</p> <p>15 going to discuss. Is that a fair way of putting it?</p> <p>16 A. It is a fair way, yes.</p> <p>17 Q. You have, however, had access to a large amount of</p> <p>18 documentation that was held by LCC which has helped you</p> <p>19 in preparing the matters set out in your statement?</p> <p>20 A. It has.</p> <p>21 Q. Just by way of background, Mr Sinnott, the chair and</p> <p>22 panel will be aware from the gist table that we looked</p> <p>23 at in the first week of the hearing that a number of</p> <p>24 the complainants who made allegations against</p> <p>25 Lord Janner were residents in children's homes in</p> <p style="text-align: center;">Page 2</p>
<p>1 Leicestershire in the 1970s and 1980s. I think you're</p> <p>2 aware that a number of those complainants were residents</p> <p>3 in those children's homes; is that right?</p> <p>4 A. I am aware.</p> <p>5 Q. So that we can provide some context to that matter, and</p> <p>6 help us with the background, I would like to ask you,</p> <p>7 please, some questions about the structure of LCC and</p> <p>8 some of the response from LCC to general concerns about</p> <p>9 children's homes in the 1970s and '80s. At the outset,</p> <p>10 is it right to acknowledge, Mr Sinnott, there are</p> <p>11 allegations of both physical and sexual abuse by others,</p> <p>12 not just Lord Janner, including staff, made over that</p> <p>13 period of time?</p> <p>14 A. Yes, there are.</p> <p>15 Q. Going back to the '70s and '80s, in relation to corporal</p> <p>16 punishment, was there a general policy within LCC that</p> <p>17 when looking after children in children's homes, it</p> <p>18 might be necessary, on occasion, to control a child by</p> <p>19 physical restraint in order to prevent them hurting</p> <p>20 themselves or others or causing damage to property?</p> <p>21 A. No.</p> <p>22 Q. You're not aware of that policy?</p> <p>23 A. I am not.</p> <p>24 Q. What I was going to go on to say was that, from 1973</p> <p>25 onwards, I think the then Director of Social Services</p> <p style="text-align: center;">Page 3</p>	<p>1 introduced a policy that corporal punishment, in the</p> <p>2 form of striking or cuffing or shaking, should not be</p> <p>3 used?</p> <p>4 A. I was aware of that. I'm sorry if I misunderstood your</p> <p>5 question.</p> <p>6 Q. I just want to help you there. Clearly, there was</p> <p>7 a policy from '73 onwards that there should be no</p> <p>8 striking, cuffing and the like, but that, prior to that,</p> <p>9 some form of restraint might be necessary in order to</p> <p>10 prevent harm to the child or harm to someone else?</p> <p>11 A. Yes.</p> <p>12 Q. Save for one particular children's home, is it right</p> <p>13 that the corporal punishment policy, ie, that there</p> <p>14 should be none, was, in fact, adhered to in the main?</p> <p>15 A. As far as I am aware, yes.</p> <p>16 Q. It might help in understanding a little about the</p> <p>17 structure of LCC in general terms, and I wonder if the</p> <p>18 easiest way to do this is to ask you this: obviously</p> <p>19 there were staff in the children's homes, and there was</p> <p>20 an officer in charge of each home. Is that right?</p> <p>21 A. Yes.</p> <p>22 Q. The officer in charge would report to a principal</p> <p>23 assistant; is that right?</p> <p>24 A. That is my understanding.</p> <p>25 Q. It might help you and everyone else following this if</p> <p style="text-align: center;">Page 4</p>

<p>1 I could call up on screen, please, LCC000142_344. There</p> <p>2 is a hierarchy I am going to show you which might set</p> <p>3 out the structure a little more clearly for you,</p> <p>4 Mr Sinnott. If you want to look at it, it is behind</p> <p>5 your tab B/1. It might just be easier to use the</p> <p>6 screen. Can I go to the next page, _345. Mr Sinnott,</p> <p>7 this is obviously just a snapshot of the structure as it</p> <p>8 was in '74 to '86. I'm not so worried about the names</p> <p>9 of the people in the post, so that you understand, but</p> <p>10 just so that we can understand how the structure worked.</p> <p>11 You've told us there was the officer in charge of</p> <p>12 the home, and, as you understand it, they would report</p> <p>13 to the principal assistant. One can see there, above</p> <p>14 the line "RCO", a number of principal assistants over</p> <p>15 the course of the years. Can you help with -- what does</p> <p>16 "RCO" stand for?</p> <p>17 A. I took it to mean residential care officer.</p> <p>18 Q. Is that the same thing as the officer-in-charge?</p> <p>19 A. I have taken it to mean that, yes.</p> <p>20 Q. That would make sense, then. So there would be a number</p> <p>21 of officers-in-charge, or residential care officers,</p> <p>22 reporting in to various principal assistants; above</p> <p>23 them, a principal officer of residential care; and above</p> <p>24 them, assistant director, who was responsible for</p> <p>25 residential and daycare. Can you give us any help with,</p> <p style="text-align: center;">Page 5</p>	<p>1 back in 1974 to '86, roughly how many homes were there</p> <p>2 that LCC were responsible for?</p> <p>3 A. I'm sorry, I couldn't tell you an exact figure.</p> <p>4 I couldn't give you an approximate figure either. You</p> <p>5 don't want me to guess, do you?</p> <p>6 Q. No, I don't. Thank you very much. We can take it as</p> <p>7 read that there were a number of homes, and I'm sure we</p> <p>8 can find that information with some degree of</p> <p>9 particularity.</p> <p>10 Above the assistant director, if we could go back to</p> <p>11 page _344, we should see there "Assistant directors" in</p> <p>12 the middle of the page. To the right in this example,</p> <p>13 the residential and daycare assistant director was</p> <p>14 Mr Naylor, and reporting up from there to the Director</p> <p>15 of Social Services was, at the time,</p> <p>16 a Ms Dorothy Edwards.</p> <p>17 So that's a rough outline of the hierarchy.</p> <p>18 Can I ask you this, please, turning to your</p> <p>19 paragraph 21 in your statement, is the position this,</p> <p>20 that LCC accepts that its procedures for detecting and</p> <p>21 responding to abuse within residential homes in the</p> <p>22 period of 1960 to 1980s was inadequate?</p> <p>23 A. Yes, that is accepted.</p> <p>24 Q. You go on to say in your paragraph 22 that complaints of</p> <p>25 abuse -- do you mean by that, Mr Sinnott, both sexual</p> <p style="text-align: center;">Page 6</p>
<p>1 and physical abuse?</p> <p>2 A. Yes.</p> <p>3 Q. They were not properly dealt with, investigations were</p> <p>4 carried out on an ad hoc basis, and there was little</p> <p>5 oversight from senior management.</p> <p>6 A. Yes, I accept that.</p> <p>7 Q. Just thinking about the two hierarchies that we have</p> <p>8 shown on screen, when you say that there was little</p> <p>9 oversight from senior management, what do you consider</p> <p>10 to be senior management, looking at those various</p> <p>11 different levels of people within LCC?</p> <p>12 A. The three layers which are shown on page_344. In other</p> <p>13 words, assistant director, deputy directors and</p> <p>14 director.</p> <p>15 Q. If anyone reads in your statement references to "senior</p> <p>16 management", we are talking assistant director level and</p> <p>17 above?</p> <p>18 A. Correct.</p> <p>19 Q. The people at the assistant and principal officer level,</p> <p>20 are they middle management, to use that phrase?</p> <p>21 A. They would be in my terms, yes.</p> <p>22 Q. So your acknowledgement there is that, at the assistant</p> <p>23 director level and above, there was little oversight of</p> <p>24 the complaints of abuse that were made; is that right?</p> <p>25 A. Yes, it is.</p> <p style="text-align: center;">Page 7</p>	<p>1 Q. The Director of Social Services for some of the period</p> <p>2 that we are looking at was Ms Dorothy Edwards. I think</p> <p>3 she was in position from 1974 to 1980. I'm taking this</p> <p>4 from your paragraph 153, if you want to look at it,</p> <p>5 Mr Sinnott.</p> <p>6 A. Yes.</p> <p>7 Q. She had, I think, a Home Office certificate in</p> <p>8 childcare, but her successor was a gentleman called</p> <p>9 Mr Rice. He had a background in mental health, but not</p> <p>10 any qualification or expertise in relation to childcare;</p> <p>11 is that right?</p> <p>12 A. Correct.</p> <p>13 Q. We can take down the structure, thank you. In relation</p> <p>14 to the complaints of abuse, I think you say at your</p> <p>15 paragraph 23 that LCC accepts it received numerous</p> <p>16 complaints during this period and many of those</p> <p>17 complaints reached senior management?</p> <p>18 A. I do.</p> <p>19 Q. Those complaints -- is this right, Mr Sinnott? -- came</p> <p>20 from the children who are resident in the homes</p> <p>21 themselves?</p> <p>22 A. Yes.</p> <p>23 Q. Sometimes their parents?</p> <p>24 A. Yes.</p> <p>25 Q. Sometimes there were complaints made by staff?</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 A. Yes.</p> <p>2 Q. Foster carers?</p> <p>3 A. Yes.</p> <p>4 Q. And teachers, to name but a few sources of those</p> <p>5 complaints?</p> <p>6 A. Yes.</p> <p>7 Q. In terms of training, I think it is right to say that on</p> <p>8 behalf of LCC you have sought to investigate whether,</p> <p>9 prior to 1986, there was any specific training in</p> <p>10 relation to sexual or other forms of abuse. I am</p> <p>11 looking now at your paragraph 162.</p> <p>12 A. Yes.</p> <p>13 Q. Have you been able to ascertain whether there was, in</p> <p>14 fact, any systematic training in relation to child</p> <p>15 sexual abuse or physical abuse?</p> <p>16 A. No, I have not been able to find any evidence at all to</p> <p>17 that effect.</p> <p>18 Q. Was there any record of any training taking place?</p> <p>19 A. Not in a systematic sense, no.</p> <p>20 Q. Can you help us with who was responsible for any</p> <p>21 training? Was it at the care home level?</p> <p>22 A. I can only make an assumption that it would have been</p> <p>23 the senior management.</p> <p>24 Q. So no evidence of any systematic training. I think you</p> <p>25 said that you thought there might have been some</p> <p style="text-align: center;">Page 9</p>	<p>1 external training for staff at a residential home, but</p> <p>2 that was left to the discretion of</p> <p>3 the officer-in-charge?</p> <p>4 A. That is correct, in paragraph (4), yes.</p> <p>5 Q. Certainly no oversight of what training was or was not</p> <p>6 provided?</p> <p>7 A. No.</p> <p>8 Q. Within the homes themselves, is it right that training</p> <p>9 of junior staff was in the hands of officers and deputy</p> <p>10 officers-in-charge?</p> <p>11 A. That appears to have been the case, yes.</p> <p>12 Q. But on behalf of LCC, I think you set out there that the</p> <p>13 training was not consistent?</p> <p>14 A. I do.</p> <p>15 Q. And it was dependent on how many people within the homes</p> <p>16 were committed to providing that training?</p> <p>17 A. Yes.</p> <p>18 Q. In general terms, are you able to help with this: you</p> <p>19 have said that the procedures back in the '70s and '80s</p> <p>20 for detecting and responding to complaints were</p> <p>21 inadequate. Could you give us an overview of why you</p> <p>22 say those procedures were inadequate?</p> <p>23 A. I formed an opinion, based on my reading, that the</p> <p>24 complaints were simply not listened to in the way that</p> <p>25 you would expect them to be listened to and that senior</p> <p style="text-align: center;">Page 10</p>
<p>1 management did not take a serious grip of, clearly, the</p> <p>2 problem.</p> <p>3 Q. We have looked at potentially a defect in the way the</p> <p>4 training was handled. Are there any procedures that you</p> <p>5 have identified that were inadequate?</p> <p>6 A. The reporting procedures, such as they were.</p> <p>7 Q. Was there even a policy in place about telling staff how</p> <p>8 to respond to a complaint of abuse, or anything of that</p> <p>9 nature, that you have been able to find?</p> <p>10 A. Not that I recall, a policy, no.</p> <p>11 Q. Any kind of documentation setting out what staff should</p> <p>12 do if a complaint was made to them?</p> <p>13 A. I may have seen something in my research, but I couldn't</p> <p>14 identify it at this moment in time.</p> <p>15 Q. Right.</p> <p>16 A. But it wasn't anything which I would regard as a policy.</p> <p>17 Q. Certainly nothing standardised, from what I gather from</p> <p>18 what you say, across LCC as a whole?</p> <p>19 A. Certainly not, no.</p> <p>20 Q. Can I ask you about, please, access to children's homes</p> <p>21 at a general level. It might assist you to look at your</p> <p>22 paragraph 198 in your witness statement.</p> <p>23 A. Yes.</p> <p>24 Q. Is it right that, where a child was resident in</p> <p>25 a children's home, there was the option of having an</p> <p style="text-align: center;">Page 11</p>	<p>1 adult visitor or a befriender come to see them?</p> <p>2 A. I have not been able to find any reason why that would</p> <p>3 not have been allowed.</p> <p>4 Q. Can I take a step back before we get into why that was</p> <p>5 or wasn't allowed. What was the idea behind having</p> <p>6 someone come in to visit the children or befriend them?</p> <p>7 A. It seems to me to have been a general recognition that</p> <p>8 some sort of befriending scheme could potentially have</p> <p>9 been helpful to children in care.</p> <p>10 Q. Was that, sort of, to use perhaps a more modern term,</p> <p>11 a way of mentoring them, perhaps showing them</p> <p>12 a different side of life, particularly if they'd come</p> <p>13 from an unhappy or unstable background? Was that the</p> <p>14 general idea behind it?</p> <p>15 A. I'm reluctant to use any modern term to describe what</p> <p>16 happened then, but essentially I would agree with what</p> <p>17 you have said, yes.</p> <p>18 Q. Was there any formal policy in respect of adult visitors</p> <p>19 or bendifenders between 1965 and 1990?</p> <p>20 A. There was not.</p> <p>21 Q. I think you set out at your paragraph 198 there was</p> <p>22 perhaps an informal element to this, where people</p> <p>23 contacted the home directly and the officer-in-charge of</p> <p>24 the home effectively decided whether the adult visitor</p> <p>25 or the befriender should be allowed to come and visit</p> <p style="text-align: center;">Page 12</p>

<p>1 the child?</p> <p>2 A. Yes, that appears to have been the case.</p> <p>3 Q. Was there any requirement that the officer-in-charge</p> <p>4 should take up a reference to ascertain the background</p> <p>5 of the adult coming to visit?</p> <p>6 A. Not as far as I'm aware, no.</p> <p>7 Q. But I think you say that you've seen some evidence that</p> <p>8 some officers-in-charge took up references, but it was</p> <p>9 very much up to the discretion of the officer-in-charge?</p> <p>10 A. Yes, and I couldn't, in all honesty, say that whatever</p> <p>11 happened then would meet current standards about taking</p> <p>12 references.</p> <p>13 Q. Looking at your paragraph 201, I think you say there</p> <p>14 that the LCC acknowledges that the lack of any coherent</p> <p>15 and standardised vetting system for those befriending</p> <p>16 and visiting children left children exposed to risk?</p> <p>17 A. Yes, that is correct.</p> <p>18 Q. In terms of oversight of a home, is this the position,</p> <p>19 that children's homes should have been visited by the</p> <p>20 principal assistants, at that level, on a regular basis?</p> <p>21 A. At the very least, by someone with that rank, yes.</p> <p>22 Q. I think there was a regulation in 1972, the Community</p> <p>23 Homes Regulations, which required the authority to visit</p> <p>24 the home at least monthly?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. In general terms, have you seen evidence to suggest that</p> <p>2 there were variations in terms of the frequency of</p> <p>3 people attending homes to inspect them?</p> <p>4 A. Yes.</p> <p>5 Q. Perhaps "inspect" is not quite the right word, but</p> <p>6 certainly to visit them in accordance with those</p> <p>7 regulations?</p> <p>8 A. Yes, but not in any sense which would suggest that the</p> <p>9 arrangements were satisfactory.</p> <p>10 Q. Forgive me. You have seen some evidence that there were</p> <p>11 some homes visited, firstly, perhaps, not with the</p> <p>12 frequency they should have been, and then, when you've</p> <p>13 seen reference to the homes being visited, the content</p> <p>14 of what was looked at and what was discussed and what</p> <p>15 was seen and observed, again, there's variations about</p> <p>16 how that was reported and recorded?</p> <p>17 A. Yes. Certainly variations.</p> <p>18 Q. Have you seen anything, Mr Sinnott, that caters for the</p> <p>19 situation where there was no visiting every month? Was</p> <p>20 that ever picked up higher up the chain?</p> <p>21 A. I'm not aware that it was.</p> <p>22 Q. So not only do we have a problem potentially of a lack</p> <p>23 of monthly visits, but also, where those visits didn't</p> <p>24 take place, that not coming to the attention of more</p> <p>25 senior staff and something being done about it?</p> <p style="text-align: center;">Page 14</p>
<p>1 A. That is my understanding, yes.</p> <p>2 Q. I'd like to ask you just a bit about the modern practice</p> <p>3 in relation to independent visitors, as I think they are</p> <p>4 now called, and you deal with that at your paragraph 273</p> <p>5 in your witness statement. Is it right that, since</p> <p>6 1991, there has been an independent visitor defined in</p> <p>7 law?</p> <p>8 A. Yes.</p> <p>9 Q. Can you help us, Mr Sinnott, what is the thinking behind</p> <p>10 the independent visitors now, in terms of the law from</p> <p>11 1991? What is it that they are intended to do or to</p> <p>12 provide?</p> <p>13 A. As I say in my statement, they are people who are</p> <p>14 required to act in the best interests of the child in</p> <p>15 question.</p> <p>16 Q. Do I take it from what you say that that would include</p> <p>17 helping a child and/or making a report if the child told</p> <p>18 them about abuse in a home?</p> <p>19 A. Yes.</p> <p>20 Q. Clearly, acting in the best interests of the child,</p> <p>21 though, may be wider than that and may be helping them</p> <p>22 with something -- furthering their career, with personal</p> <p>23 problems: it may cover a whole range of topics?</p> <p>24 A. It could do, yes.</p> <p>25 Q. Right.</p> <p style="text-align: center;">Page 15</p>	<p>1 A. As indeed it should.</p> <p>2 Q. I think, from 2011, an authority looking after a child</p> <p>3 has a duty to appoint a person to be the child's</p> <p>4 independent visitor; is that right?</p> <p>5 A. Yes.</p> <p>6 Q. Within LCC, there is now a process set out as to who can</p> <p>7 be recruited and assessed to be suitable as an</p> <p>8 independent visitor?</p> <p>9 A. There is.</p> <p>10 Q. There is a Safer Recruitment policy for those who want</p> <p>11 to act as an independent visitor?</p> <p>12 A. Yes.</p> <p>13 Q. And independent visitors are provided with supervision?</p> <p>14 A. Correct.</p> <p>15 Q. I think the aim, I think you say there, is really to set</p> <p>16 up the right person with the right child?</p> <p>17 A. That is correct.</p> <p>18 Q. I think is it right that, nowadays, a looked-after child</p> <p>19 should not be introduced to an independent visitor's</p> <p>20 family or go to the independent visitor's home?</p> <p>21 A. Nowadays, yes, sir.</p> <p>22 Q. Just looking at your paragraph 282, please, Mr Sinnott,</p> <p>23 you make reference there to the designated officer.</p> <p>24 That is not a phrase we have come across. What is</p> <p>25 a designated officer?</p> <p style="text-align: center;">Page 16</p>

1 **A. It's someone given a particular responsibility to deal**
 2 **with concerns which come in to the council by any**
 3 **particular route about an individual.**
 4 Q. So if an independent visitor received a complaint or an
 5 allegation of abuse, would it be to the designated
 6 officer that they turn?
 7 **A. Yes.**
 8 Q. We have looked at there, very briefly, a change from the
 9 position of those who were visiting children's homes
 10 back in the '70s and '80s to more modern-day practice.
 11 Are you able to give us an idea of what other systems
 12 and policies are now in place, that were not in place in
 13 the 1970s, that might help to protect children?
 14 **A. Well, in general terms, it is a very, very different**
 15 **position now from that which applied in the 1970s, but**
 16 **I'd like to refer you, if I may, to the statement by**
 17 **Mrs Moore, the Director of Children's Services. She has**
 18 **set out the current procedures which apply in the county**
 19 **council and which are recognised as best practice.**
 20 Q. I was going to come on to that as the final topic that
 21 I wanted to deal with in the open session. The
 22 statement of Mrs Moore will be adduced in due course,
 23 which sets out in full the position of LCC now. But if
 24 I ask you, please, about your paragraphs 6 and 7 at the
 25 start of your statement, I think you say there that

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1 child protection in Leicestershire is now unrecognisable
 2 from the 1970s and '80s. Obviously Mrs Moore's
 3 statement goes into detail, but, Mr Sinnott, from you,
 4 please, why do you say that Leicestershire is now
 5 unrecognisable from the position in terms of child
 6 protection as it was back in the '70s and '80s?
 7 **A. Because there is in place a range of processes and**
 8 **procedures, regulation and inspection, which simply was**
 9 **not the case in the 1970s.**
 10 Q. Help us: was that unique to Leicestershire or was that
 11 the same across different county councils in the UK?
 12 **A. It should be the same across all councils, but I only**
 13 **speak with knowledge of Leicestershire.**
 14 Q. I think nowadays people may be familiar with Ofsted
 15 inspections, which include inspections of safeguarding
 16 and looked-after children; is that right?
 17 **A. Yes, it is.**
 18 Q. You've set out at your paragraph 6, I think, the most
 19 recent Ofsted report in 2019, in November, rated LCC as
 20 "Requiring improvement overall but good for the
 21 experiences of children in care, care leavers and for
 22 leadership and management"?
 23 **A. That is right.**
 24 Q. Finally, this, please: is it right that LCC no longer
 25 operates any residential children's homes in

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1 Leicestershire County Council?
 2 **A. That is correct, not since 2018.**
 3 Q. The last residential children's home stopped admitting
 4 children in April 2018?
 5 **A. Yes.**
 6 MS CAREY: Chair, they are all the matters I propose to deal
 7 with in the open session. I am going to ask now,
 8 please, for Mr Hughes to arrange the position so that we
 9 can move into closed. Chair, there may be a slight
 10 pause while we make that transition.
 11 THE CHAIR: Thank you. Understood.
 12 (11.00 am)
 13 (The hearing went into closed session)
 14 (3.50 pm)
 15 (The hearing was adjourned to
 16 Wednesday, 21 October 2020 at 10.30 am)
 17
 18
 19 I N D E X
 20
 21 MR JOHN SINNOTT (sworn)1
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 23 Examination by MS CAREY1
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