

1 Thursday, 19 October 2017
 2 (10.30 am)
 3 THE CHAIR: Good morning, Ms Dobbin.
 4 MS DOBBIN: Good morning, chair. Chair, you are going to
 5 hear evidence this morning from Mr Stephen Bradshaw, who
 6 came to give evidence yesterday but has kindly returned
 7 in order that he can give it today. You are also going
 8 to hear evidence from Dr Hodge and Mr Paul Rowen. There
 9 was a witness who was due to give evidence yesterday,
 10 Mr Shepherd, and we very much hope that his evidence
 11 will be rescheduled next week.
 12 THE CHAIR: Thank you.
 13 MR STEPHEN WALLACE BRADSHAW (sworn)
 14 Examination by MS DOBBIN
 15 MS DOBBIN: Mr Bradshaw, can I ask you to give your full
 16 name to the panel?
 17 **A. Stephen Wallace Bradshaw.**
 18 Q. Mr Bradshaw, were you the headmaster of Knowl View
 19 School between 8 April 1991 and July 1994?
 20 **A. Yes.**
 21 Q. Prior to that, had you been the deputy head at another
 22 residential school, Clarence House?
 23 **A. That's correct.**
 24 Q. Was Clarence House in the Wirral, just outside
 25 Liverpool?

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1 **A. It is in Formby, North Liverpool.**
 2 Q. Was that another school for children who had emotional
 3 and behavioural --
 4 **A. It was exactly the same setup as Knowl View.**
 5 Q. When you left Knowl View School, did you take up another
 6 head teacher's post outside of Bath?
 7 **A. Yes, I did.**
 8 Q. Did you go on to open three schools yourself?
 9 **A. Yes. In 1994, I started Farleigh College. I did**
 10 **North Hill House and Farleigh College sixth form.**
 11 Q. Again, were those schools for children who had --
 12 **A. They were slightly different.**
 13 Q. -- emotional and behavioural needs?
 14 **A. They were for children with Asperger's syndrome, as**
 15 **opposed to what we now regard as SEMH, which is social,**
 16 **emotional and mental health. It is the same category**
 17 **now.**
 18 Q. Were those residential schools?
 19 **A. Yes, they were all residential.**
 20 Q. Thank you. I think it is right that you sold the
 21 schools that you had started to the Priory Group?
 22 **A. Yes.**
 23 Q. You then went to work for the Priory Group as a managing
 24 director?
 25 **A. Yes.**

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1 Q. For them, you went on to open a further 19 schools?
 2 **A. That's correct.**
 3 Q. Were those schools that catered for children --
 4 **A. There was a cross-section. There were some day schools,**
 5 **some residential and some 52-week.**
 6 Q. Were those schools for children that had those
 7 specialist needs?
 8 **A. Yes, with all special education needs.**
 9 Q. I think, after that, you went on to hold a number of
 10 executive roles. Were you the chairman of
 11 the Options Group?
 12 **A. I was, yes.**
 13 Q. Again, does that provide care and education for
 14 children --
 15 **A. Yes, that is 12 schools and colleges.**
 16 Q. After that, did you become the managing director of
 17 the Cambrian Group in 2014?
 18 **A. Cambrian, yes. It is the Cambrian Group, but, yes,**
 19 **I did.**
 20 Q. Again, was that a similar thing, that it provided --
 21 **A. Yes.**
 22 Q. -- specialist --
 23 **A. I started there. There were nine schools and, when**
 24 **I left, there were 38.**
 25 Q. I think your current role is that you're the chief

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1 executive officer of the Aurora Group?
 2 **A. Yes.**
 3 Q. Again, is that a specialist provider of education --
 4 **A. It is. We have 13 schools and colleges.**
 5 Q. I think the terminology has changed, hasn't it?
 6 **A. Yes, it has.**
 7 Q. These days, they would be described as schools for
 8 children with Social, Emotional and Mental Health Needs?
 9 **A. That's correct.**
 10 Q. Although that terminology has changed --
 11 **A. It is the same type of youngsters.**
 12 Q. It is the same sort of child you are caring for --
 13 **A. Yes, it is.**
 14 Q. -- as you would have been caring for at Knowl View
 15 School. I might ask you later on to reflect on Knowl
 16 View School, having regard to all the experience that
 17 you have had since. But just for the moment, I want to
 18 focus on what you knew at the time --
 19 **A. Okay.**
 20 Q. -- whenever you went to Knowl View School.
 21 I think, when you arrived, you came with your wife
 22 and two small children; is that right?
 23 **A. Yes. Emily was 5 and Edward was just 12 months.**
 24 Q. Did you move into the headmaster's house --
 25 **A. Yes, it was the commission of the post. It was**

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1 a residential post, so we moved into the first corner,
 2 which was the residential head's house.
 3 Q. When you arrived, had numbers at the school dwindled?
 4 A. Yes, I think when I arrived there were something like 16
 5 out of 40 places.
 6 Q. Did you understand that that was because the educational
 7 psychologist at Rochdale had stopped sending children
 8 there?
 9 A. Yes. Richard Flammer was also the placement officer.
 10 Often in local authorities you have two people. One is
 11 the principal education psychologist who does the
 12 reports and then someone who decides where they're
 13 placed based on those reports. In Rochdale, it was the
 14 same person, Richard Flammer, and he was using other
 15 schools outside the borough. I mean, I knew that as
 16 a fact because he was placing children in
 17 Clarence House, when I was there, from Rochdale.
 18 Q. That's exactly what I was going to ask you.
 19 A. Sorry.
 20 Q. Did you know why he was sending children to your school
 21 as opposed to --
 22 A. You need to ask Richard that, but my summation is he
 23 felt the quality of education and care at Knowl View was
 24 substandard.
 25 Q. Before you went to Knowl View School, did you know of

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1 its reputation?
 2 A. No, I was interviewed in February and it was my first
 3 headship. I'd been a deputy for three years. So I was
 4 keen to get headship. It is one of those things, you
 5 never actually take a school as perfect. So I wasn't
 6 aware of the reputation until the first meeting I had,
 7 which was after my appointment.
 8 Q. How candid had Rochdale Borough Council been with you
 9 about the sort of difficulties that the school was
 10 facing?
 11 A. Well, the answer is, not very. I think it was
 12 a difficult situation, because I don't think they knew
 13 what they didn't know. They hadn't discovered the whole
 14 piece of it. What was explained to me was that they had
 15 an incident where an adult -- which we refer to as the
 16 Hilton incident -- had actually entered the school and
 17 abused a couple of children. But there was no sort of
 18 indication that this was systemic child-to-child abuse.
 19 Q. So you did have some awareness of the Hilton incident?
 20 A. Yes.
 21 Q. But you hadn't been told anything about concerns about
 22 peer-on-peer sexual activity?
 23 A. No.
 24 Q. Or anything about children from the school being
 25 exploited in public places?

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1 A. Nothing.
 2 Q. As regards the Hilton incident, were you told the full
 3 extent of what had happened in September 1990?
 4 A. No, it was more anecdotal from the staff. I was made
 5 aware by the local authority that he'd been charged and
 6 actually was serving a prison sentence in there and it
 7 was a one-off incident that had happened where the
 8 youngsters actually let him in. But that's all I was
 9 aware of. Obviously, with having two very small
 10 children on site and a wife that was very nervous about
 11 sort of them being anywhere near, we were keen to know
 12 what the issues were. There was very little passed on.
 13 Q. Were you aware from the outset that it was actually
 14 a group of children that had been involved in the Hilton
 15 incident as opposed to just one?
 16 A. Yes, I was.
 17 Q. Did anyone suggest to you that there might have been
 18 more to it --
 19 A. No.
 20 Q. -- than just one child being sexually assaulted?
 21 A. No.
 22 Q. Was that something that you came to work out later?
 23 A. Yes, later on.
 24 Q. Were you told that he'd actually previously been
 25 convicted in 1984 --

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1 A. No, I wasn't.
 2 Q. -- in respect of sexual offences on two other Knowl View
 3 children?
 4 A. No. I know you will come to it, but we were very
 5 nervous about this individual and I liaised with the
 6 police when he was being released, because obviously he
 7 was attracted to the school, and he did come back to the
 8 school. You've probably seen from the documentation
 9 that we were very keen -- the police were excellent at
 10 the time, but he'd actually sort of pitched his tent
 11 just over the fence from Knowl View, and we could see
 12 him. You know, I contacted the police straight away.
 13 I really wanted to have an enforcement order to keep him
 14 away from the school.
 15 Q. Mr Bradshaw, I am going to come and deal with that in
 16 a little more detail once we have gone through the
 17 chronology a little. I just wanted to ask you this, and
 18 I know it may seem like an obvious question, but how
 19 significant would an incident like the Hilton incident
 20 be in the life of the school?
 21 A. It is a major issue. In a school with that type of
 22 youngsters, you're always going to get certain incidents
 23 and issues, a one-off issue. It is not actually the
 24 incident, it is how it is dealt with that is really
 25 important. But something that the -- I mean, I have

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1 never come across it and I have been working since 1973,
 2 and it's the only time I have had an incident or heard
 3 of an incident in any of the schools, and I don't even
 4 know how many schools I have been associated with, but
 5 it is a lot. This is a sort of unique incident.
 6 Q. What should the school's immediate response have been to
 7 that incident?
 8 A. Well, I mean, it's fairly clear. I mean, it is one of
 9 those things that it should have been reported straight
 10 away to social services, as in part of child protection
 11 because it was a straight issue. It should also be
 12 reported to the police and to the education authority
 13 and the social services. Now there is one body, which
 14 is the local authority designated officer. So it's
 15 simple that you actually report directly to the LADO and
 16 then they decide whether they are going to take it on
 17 board --
 18 Q. Sorry, I am going to interrupt you because I just want
 19 to focus at the time.
 20 A. At that time, it was up to you, as a head, to report it,
 21 certainly to child protection, social services, the
 22 police and education.
 23 Q. Can I take it from that, then, that the school itself
 24 wouldn't have embarked on interviewing its pupils --
 25 A. No --

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1 Q. -- about an incident like that?
 2 A. -- they shouldn't.
 3 Q. You would have left it to specialists to do that?
 4 A. Yes, and the reason is, they should be interviewed once
 5 rather than being interviewed by the school, the
 6 Education Department, social services and the police.
 7 There needs to be sort of one process.
 8 Q. Thank you. Would you have informed the parents of
 9 children at the school?
 10 A. Not directly. But you would have asked the local
 11 authorities to make sure that the parents are informed
 12 straight away that there had been an incident, almost
 13 immediately, and it was going to be fully investigated.
 14 Q. Would that information have gone to every parent of
 15 a child at the school or just the children whose --
 16 parents whose children were involved?
 17 A. First of all, you are talking about at the time. The
 18 process has changed since then. But at the time, it
 19 would be done through the education welfare officer, all
 20 right, that the local authority would ask them to do and
 21 there would be a different communication to all of
 22 the parents, but they all would have been informed that
 23 there had been an incident. Because what you are trying
 24 to do -- we always talk about a three-legged stool in
 25 terms of, there's the social worker, there's the child,

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1 actually, and the parents and the school, and the
 2 communication has got to be really tight. So if you
 3 don't inform all the parents of the school, then you get
 4 parents that are very anxious about, "Was my child
 5 involved?". The last thing they want to hear is
 6 something anecdotal or through the press.
 7 Q. How important would it be to the school to have a clear
 8 understanding of what had actually happened?
 9 A. Very. They have to work with the young people day in,
 10 day out. Often, with that type of child, anxiety and
 11 worry manifests itself through behaviour, so they would
 12 become aggressive, they would become sort of, you know,
 13 withdrawn, they would become very anxious, and the whole
 14 piece. There are certain triggers that you have to then
 15 look back to see what was the behaviour. Sexual abuse
 16 is classic for altering children's behaviour
 17 dramatically, and it is hardly surprising.
 18 Q. Of course. Can I ask you then what about internally
 19 from the school's perspective or a headmaster's
 20 perspective?
 21 A. It is head teacher. Sorry to keep correcting you.
 22 Q. I'm very old fashioned, I'll try to say "teacher".
 23 What about staff? Presumably a head teacher would
 24 want to know how it is that an incident like this was
 25 able to happen?

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1 A. Certainly. It is not that you go into a blame culture
 2 but there is accountability. That actual incident, it's
 3 strange that -- you know, anecdotally, the staff had
 4 said the person supposed to be on duty sleeping in that
 5 night wasn't actually on the premises, and that doesn't
 6 seem to come out in any of the reports, yet that was
 7 something the staff had mentioned at the time. So it is
 8 a bit like, you really need to make sure that you have
 9 got processes in place and people follow the process,
 10 and then, if something does happen, at least you can
 11 deal with it.
 12 Q. What about -- I have asked you how it was able to happen
 13 as regards staff. Then what about the physical security
 14 of the building?
 15 A. You will probably come on to it, but you have to
 16 remember, going to the school -- you know, apologies if
 17 you already have this, but the environment of this
 18 school was not conducive to good supervision. There was
 19 no lights around the outside. I had to get money from
 20 Safer City to do that. So any intruder could get right
 21 to the door without being noticed at all. There was no
 22 front gate. There were 12 different entrances to it.
 23 There was no door access system. There was no alarm on
 24 it. All the living units -- there were four -- were
 25 open plan. So each child's bed could see another child.

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1 So it is a bit like the whole environment, if you like,
 2 was conducive to poor supervision and poor monitoring.
 3 Therefore, you started on the back foot, because if
 4 a youngster does want to play around in the evening, if
 5 they want to throw their plimsoll at another child, they
 6 can do that quite easily. It moves from that horseplay
 7 and that normal adolescent bit about, "I don't want to
 8 go to sleep so nobody else is going to sleep", to that
 9 sort of experimentation to actually to the
 10 child-on-child abuse. There was nobody actually sort of
 11 monitoring each stage. So it was hardly a surprise that
 12 it progressed. It was, you know -- in hindsight, it was
 13 a disaster waiting to happen.

14 Q. I think that gives rise to two issues which I am going
 15 to ask you about in due course. The first is, the
 16 building itself gave rise to risks?

17 A. Yes.

18 Q. The second thing is then, as a matter of urgency after
 19 the Hilton incident, the issue of security needed to be
 20 addressed?

21 A. Yes.

22 Q. When you arrived at the school, did you find that any of
 23 those things had actually been done?

24 A. No, nothing had happened. It was exactly the same. The
 25 reason that Hilton was able to get in is that downstairs

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1 from the living unit was Yale locks. So you could
 2 actually put the Yale on the clip. So anybody could get
 3 in without anybody being aware and let themselves out.
 4 So there was no door access system, there was no alarm
 5 at all. And, no, those things hadn't changed at all.

6 Q. Was one of the first things that you did, then, to
 7 introduce alarmed doors to the school?

8 A. Yes. And also make the front door the point of access
 9 for everybody to go in and out. Because there'd been
 10 a culture that everybody, including officers from the
 11 local authority and the unions, would go around to
 12 different things. So I remember a union member coming
 13 into the kitchens and having a meeting with the kitchen
 14 and I actually emailed him and said, "There was a rumour
 15 that you were on site yesterday. I'd appreciate it if
 16 you came through the front door", and I got a one-line
 17 reply saying, "I don't respond to rumours". So I was
 18 like, "Okay". So I just issued an edict that everybody
 19 that actually came to the school needs to sign in
 20 through the front door. But the culture before that was
 21 not.

22 Q. On that point, did you find then that children at the
 23 school were scared or anxious at night about the safety
 24 of the building?

25 A. Well, yes. It's like any of us. You have to remember,

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1 the children there were from 7 to 16, that whole range.
 2 If you sleep in a strange building, you hear strange
 3 noises the whole time. Even just going to the loo,
 4 you'd go through two separate doors which would creak,
 5 so the children were very nervous about anything that
 6 happened in the building.

7 Q. Presumably, all the children in the school knew about
 8 what had happened with Hilton as well, even if they
 9 hadn't been involved?

10 A. Yes, yes.

11 Q. Again, as regards the security of the school at night,
 12 did you introduce waking night staff?

13 A. Yes, I did have a battle with the local authority trying
 14 to actually sort of fund that.

15 Q. But in due course, was that something that you were able
 16 to implement?

17 A. Advertised straight away within the first two months and
 18 we appointed, I think, September of that year.

19 Q. Were those members of staff who slept in the school all
 20 night but who were available if anything happened or
 21 were they people who stayed awake?

22 A. It was a two-tier system, or three-tier, if you want to.
 23 There was a waking night staff who did a 20-minute round
 24 and actually made a note in the log sheets. There
 25 weren't even log sheets when I arrived, in other words,

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1 what was happening, it was just an entry in the diary if
 2 anything happened. Then we had individual student file
 3 occurrence sheets that was on there. Then there was
 4 a senior sleeping in as well and then there was someone
 5 residential, either myself or the deputy, on site. So
 6 it meant that, if there was an incident, they could get
 7 the person sleeping in up or contact me.

8 Q. Did you know why none of these things had been
 9 implemented or changed?

10 A. I think it was to do with cost, you know, and to try and
 11 be fair to the education authority, they had no idea how
 12 to run a residential school. It was their only
 13 residential school. The comparison was with how they
 14 funded a primary school, so they wanted to keep the
 15 costs down.

16 Q. Did that lack of understanding go beyond funding the
 17 school?

18 A. To be fair, yes.

19 Q. Maybe we can explore that through some of the other
 20 issues that arise.

21 A. Certainly.

22 Q. You have mentioned there briefly about there not being
 23 any logs. Was there actually any system in place --

24 A. Just the diary.

25 Q. -- for recording?

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1 **A. Just the diary. That's all there was.**
 2 Q. There was no record by which significant incidents were
 3 separately recorded for staff to look at?
 4 **A. The diary became a sheet with just dates in rather than**
 5 **a formal diary and it was loose leaf. So it's something**
 6 **that you would never do now because loose-leaf files**
 7 **mean you can actually take a page out, so it's basically**
 8 **pointless. Everything was in there from "We have run**
 9 **out of coffee" to actually "So and so absconded". It**
 10 **wasn't a good record of sort of record keeping against**
 11 **that, because then you don't know which incidents are**
 12 **sort of really key. In fact, the staff needed a lot of**
 13 **training on that because, when I introduced individual**
 14 **file notes for each individual student and each**
 15 **individual logs, they would actually sort of write**
 16 **nothing. So I said, "Right, you need to write**
 17 **everything in there during the night" -- they would**
 18 **write nothing because they wanted to say there was no**
 19 **incident, there was no problem -- and then they did**
 20 **write every single thing. So it is a bit like they**
 21 **would say, "He had a cup of tea at 7 o'clock and then he**
 22 **got a bit upset and then he had a bacon sandwich". It**
 23 **was like, "No, I need to know the relevant things". The**
 24 **only way I could get them to do it was go through and**
 25 **highlight what we felt was relevant and we RAG stuated**

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1 **that into green, amber, red that needed to be passed on**
 2 **so the staff got it. But they hadn't had that level of**
 3 **training.**
 4 **Sorry, one of the main issues with the school, they**
 5 **hadn't had a head teacher for three years, and, I mean,**
 6 **it is like the same in any organisation: if there is no**
 7 **leader or no good leader, then the school will flounder**
 8 **and they hadn't actually addressed that process at all.**
 9 **So when I arrived, and I assumed that these things**
 10 **were in place, they just weren't.**
 11 Q. What it sounds like, from everything that you are
 12 saying, is the very basic infrastructure that you would
 13 have in the school so as to protect children just wasn't
 14 in place?
 15 **A. Exactly.**
 16 Q. I wonder if you could then give us a snapshot, perhaps,
 17 Mr Bradshaw, of different aspects of the school when you
 18 arrived. Can you tell us a little bit, please, about
 19 the physical conditions of the school?
 20 **A. Well, it was a tired building. It was a '60s**
 21 **flat-roofed building built around two quads where the**
 22 **downstairs base at the front was offices and the rear**
 23 **were classrooms with a separate craft and design**
 24 **classroom and the next layer was basically residential.**
 25 **Then at every corner of the school there was a staff**

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1 **accommodation.**
 2 **It was a tired building. Money hadn't been spent on**
 3 **that. We talked about planned preventative maintenance,**
 4 **that there is a cycle. What would happen is that when**
 5 **money got tight with the council, they wouldn't do one**
 6 **year's planned preventative maintenance. You'd think,**
 7 **well, does that matter? Well, actually, it matters if**
 8 **you don't actually prime windows to paint them the**
 9 **following year because they end up falling out. So this**
 10 **building was built I think in the late '60s and it**
 11 **was -- basically sort of needed a lot of money spent on**
 12 **it that they didn't have.**
 13 Q. I see we can see from the records it had been about
 14 14 years since it had last been updated. I wonder if we
 15 could take you to a document on the screen, RHC001235,
 16 page 1. Do you recognise that?
 17 **A. Yes, I do.**
 18 Q. That is a report that you wrote on 17 April. So it
 19 would have been very shortly after you arrived?
 20 **A. Yes. I think I arrived on around 7 April. Easter that**
 21 **year was around 31 March and I would have started in the**
 22 **beginning of that term.**
 23 Q. I think if we look at the first paragraph, it seems that
 24 it was pursuant to a meeting that had taken place with
 25 social services?

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1 **A. Yes.**
 2 Q. If we go down a little bit, you can see that you
 3 described it as cold, institutionalised and
 4 inhospitable?
 5 **A. Yes.**
 6 Q. But that you did think that if it was improved and if it
 7 was made better, it might have a real impact on the
 8 children's behaviour?
 9 **A. We did. We took one unit and we redesigned one unit**
 10 **with the youngsters, so I mean we actually put walls and**
 11 **made them into bedrooms and talked about sort of, you**
 12 **know, fundraising for furniture.**
 13 Q. I think if we look down a little further, that's exactly
 14 the point that you are making, that the children
 15 essentially had open-plan bedrooms, that they didn't
 16 have any privacy, they didn't have any space to
 17 themselves, and that, equally, they didn't have any
 18 privacy in the bathrooms either, because there is
 19 reference to needing shower curtains as well?
 20 **A. No, there were ablution blocks. It is stuff we would**
 21 **never do now, showers without cubicles, without shower**
 22 **curtains, bathrooms. We just would not do that. There**
 23 **was no privacy at all.**
 24 Q. As regards the children's living area, you referred to
 25 the fact that the furnishings had been taken out and

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1 replaced with plastic chairs?
 2 **A. Yes.**
 3 Q. That there was fluorescent strip lighting?
 4 **A. It was the worst thing you could want.**
 5 Q. And there were no toys or games?
 6 **A. Nothing.**
 7 Q. So nothing in this environment that would have made it
 8 homely or comforting for the children who were there?
 9 **A. Not at all.**
 10 Q. I think when we go down to look, for example, at what
 11 the bedrooms were like, they didn't have walk-in
 12 wardrobes or, again, any of the basic things that --
 13 **A. They had -- the doors had been sort of ripped off and**
 14 **therefore they were never replaced. The excuse was,**
 15 **"Well, the children will damage it". But that's not**
 16 **true because it is a bit like -- it is the broken window**
 17 **syndrome. If there is a broken window in the house,**
 18 **there will be more broken windows. You need to replace**
 19 **and repair in a timely fashion. Actually, these**
 20 **children, the main point is, they deserved better than**
 21 **this. They were there because they had**
 22 **emotional/behavioural difficulties. They weren't there**
 23 **as a punishment. You know, they deserved more than**
 24 **this. They weren't being given that opportunity.**
 25 Q. It seems from that report that you were looking at it in

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1 two ways. First of all, again, it was the issue of
 2 the risks that the layout gave rise to, the lack of
 3 privacy that children had. And then, on the other hand,
 4 the fact that it was so dismal that it was bound to
 5 impact upon their behaviour as well?
 6 **A. Yes, it would do. I mean, you know, it is a harsh**
 7 **environment and you will develop a macho culture. That**
 8 **definitely will happen.**
 9 Q. Moving on from that, Mr Bradshaw, how did you find the
 10 staff culture when you first arrived?
 11 **A. It is difficult because there was a mix. There was an**
 12 **excellent female teacher, who was superb, and a couple**
 13 **of care staff who were very good, but the general**
 14 **culture was that the world owed them a living and it was**
 15 **a macho culture.**
 16 **It was interesting. My first meeting with the**
 17 **teachers -- you have to remember with the Special**
 18 **Education Needs, Special Education Needs has always been**
 19 **the poor relation, has always been the Cinderella piece.**
 20 **At that time, the government brought in a national**
 21 **curriculum. Whatever you think of government policy,**
 22 **actually it was really good for special needs because**
 23 **it's the first time that we were going to actually**
 24 **deliver the same curriculum as mainstream schools. So**
 25 **you thought, we are now getting to a level playing**

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1 **field. We weren't funded for it but we were going to do**
 2 **that. So that was excellent.**
 3 **But the teachers there were saying, "It's just**
 4 **another initiative, keep our heads down". We used to**
 5 **have these bright orange folders. They had a cupboard**
 6 **of these bright orange folders that weren't opened. It**
 7 **is a bit like, keep your head down, it will go away. It**
 8 **was a culture of contain and entertain.**
 9 Q. That was the phrase I was going to ask you because
 10 I think a number of people have used that. But it
 11 wasn't about educating the children --
 12 **A. Not at all.**
 13 Q. -- it was essentially about controlling them?
 14 **A. Again, you have to remember that education is a therapy.**
 15 **Basically, as an educationalist, you can give children**
 16 **self-confidence, self-esteem and success through**
 17 **education attainment. It is not something that they are**
 18 **impaired with, provided they are given the**
 19 **opportunities. You were really, again, with the**
 20 **youngsters there, doing them a disservice by not**
 21 **allowing them -- so if they don't become employable,**
 22 **then the cycle continues.**
 23 Q. There are a number of documents that refer to the fact
 24 that there were children of very different abilities at
 25 the school as well. But presumably there was no

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1 differentiation between the children as regards how they
 2 were taught?
 3 **A. No, there was no differentiation at all. It was just**
 4 **class teaching.**
 5 Q. Just returning to staff culture, again, the
 6 contemporaneous documentation tends to suggest that
 7 there were incredibly high levels of absenteeism.
 8 **A. Yes.**
 9 Q. That staff were claiming payments for duties that they
 10 weren't actually doing. So it wasn't just a culture of
 11 not educating, there was also a culture of, as it were,
 12 taking from the school as well. Is that a fair
 13 reflection?
 14 **A. Totally. Totally. Again, what was amazing is people**
 15 **were just saying, "Well, why are you questioning it?"**
 16 **Basically, because they had had a difficulty, they**
 17 **stopped working weekends, so it became four-night**
 18 **boarding rather than termly boarding. But the kitchen**
 19 **staff were still paid for weekend duties. When**
 20 **I challenged it, they said, "Well, why not?" It was**
 21 **just as if, "Why are you making a fuss?" Not that,**
 22 **actually, this is fraud, that, you know, we need to have**
 23 **a moral -- we need to have an understanding. I'm not**
 24 **trying to take stuff off you, because we will**
 25 **redistribute your hours. If you are supposed to work**

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1 **40 hours a week and you're only working 30, you should**
 2 **either be paid for 30 or we should have 10 hours spare**
 3 **to use in different ways. It just seemed logical to me.**
 4 Q. Thank you, Mr Bradshaw. What about the boys at the
 5 school when you first arrived? What were the boys like,
 6 in terms of their needs and vulnerabilities?
 7 **A. To use the word "normal" is a difficult one, but within**
 8 **that setting, these were a sort of an average set of**
 9 **youngsters with those type of difficulties for that type**
 10 **of school. There wasn't anybody there that you would**
 11 **say was so sort of disturbed or had mental health issues**
 12 **that shouldn't have been at Knowl View. These were**
 13 **youngsters that just didn't have any boundaries and the**
 14 **school hadn't created any boundaries and hadn't really**
 15 **given them any focus. So they were manageable, the**
 16 **youngsters. They weren't horrendous and sort of**
 17 **thinking about -- because often people talk about the**
 18 **complexity of a youngster, "This is going to happen",**
 19 **but this was an average type of residential school and**
 20 **the population.**
 21 Q. So, in other words, Mr Bradshaw, the children at Knowl
 22 View School weren't any more difficult to educate and
 23 care for --
 24 **A. No, they were never the problem, never. Because that's**
 25 **what they were there for.**

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1 Q. Similar to the sorts of children that you had educated
 2 and cared for at Clarence House?
 3 **A. Yes. Also, you need to remember that within that field**
 4 **you have students that will attend on a day basis,**
 5 **students that will attend on a weekly basis, students**
 6 **that attend on a termly basis and those that are there**
 7 **52-week. The complexity will often get more and more**
 8 **difficult. These were weekly boarders. So if you like,**
 9 **of the four stages, they were on stage 2. Does that**
 10 **make sense?**
 11 Q. Yes, I think I understand what you mean. Had you
 12 encountered any of the sorts of difficulties that were
 13 confronting Knowl View School at Clarence House? I'm
 14 talking, for example, of the peer-on-peer --
 15 **A. You'd always had sort of sexual experimentation among**
 16 **children, you'd always have that issue where children**
 17 **with unclear boundaries would want to know, "Is it**
 18 **appropriate to get in bed with another child?", and the**
 19 **easiest response to that is, if there are clear**
 20 **boundaries and they are told no and explained why, then**
 21 **that is basically sort of an issue you deal with. If**
 22 **they are not checked and that progresses on and on to**
 23 **further, it becomes child-on-child abuse. So it is how**
 24 **you deal with it. So the answer directly to the**
 25 **question, I never had any of those incidents at that**

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1 **level that were explained at all at previous schools or**
 2 **even schools since. That was 1994. We are now, you**
 3 **know, a long way forward. I haven't had any of those**
 4 **occurrences since.**
 5 Q. I am going to explore that with you in a little bit more
 6 detail. I just wanted to ascertain what you had perhaps
 7 encountered at Clarence House.
 8 **A. Yes.**
 9 Q. Had you ever encountered child exploitation at
 10 Clarence House or in your previous career?
 11 **A. Not in the school, but children that had had**
 12 **exploitation outside the school and then they were**
 13 **coming in and we would have counselling or there would**
 14 **be an individual care plan on youngsters that had been**
 15 **extremely vulnerable.**
 16 Q. As I say, I am going to come back and ask about how
 17 schools might tackle these sorts of issues. One of
 18 the things I haven't asked you about, and it is probably
 19 important I do, is just to ask you about the general
 20 vulnerabilities of children who lived in residential
 21 care, especially in schools of this nature. I wanted to
 22 ask you whether or not they are more vulnerable than
 23 other like children? First of all, because they are
 24 living away from their families and their siblings?
 25 **A. Yes. It is the nature of the youngster. They are far**

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1 **more vulnerable. These youngsters are there because**
 2 **they have had a lack of boundaries, it may have been**
 3 **through poor parenting skills, they may have had in the**
 4 **past emotional abuse and physical abuse, it may be**
 5 **a cycle of abuse. They are the most vulnerable**
 6 **youngsters in society in terms of a residential school**
 7 **and a care home. Therefore, it is really important that**
 8 **you are clear on what your processes are, because you**
 9 **will attract the paedophile as a member of staff, you**
 10 **will attract people coming in. It is a fairly**
 11 **obvious -- this is a group of vulnerable youngsters who**
 12 **have had not love or they mix up love with, actually,**
 13 **attention and they are desperate for attention and they**
 14 **will do anything for attention. What you do as**
 15 **a school, you try to make sure that attention is done on**
 16 **a positive way. So it is either done on the sports**
 17 **field or done on an activity or done on a sort of --**
 18 **doing something really well. It is not a negative**
 19 **piece. It is the same as children absconding. You have**
 20 **to make the buzz bigger for them to stay than to go**
 21 **because they will be attracted and they are vulnerable.**
 22 **It is a bit like, what 11-, 12-, 13-year-old wouldn't**
 23 **want to be cool and drink and smoke and have adult**
 24 **attention, but it needs to be positive rather than**
 25 **negative.**

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1 Q. Just concentrating for a moment on the vulnerabilities.
 2 Vulnerable because of their backgrounds?
 3 **A. Yes.**
 4 Q. And because of the nature of their needs as well. We
 5 have seen some documentation or reports about children
 6 in residential schools becoming isolated?
 7 **A. Yes.**
 8 Q. And the need to try to avoid that. Is that something
 9 that you have experienced?
 10 **A. Definitely.**
 11 Q. Then in addition to that, children with --
 12 **A. The thing is with youngsters in residential settings,**
 13 **they have real difficulty in articulating their**
 14 **anxieties and worries. It normally comes out through**
 15 **their behaviour. So the aggressive piece and the sort**
 16 **of inappropriate pieces are to try to find out where the**
 17 **boundaries are. I mean, we talk about appropriate and**
 18 **inappropriate sexual behaviour. It is quite clear, when**
 19 **you're doing sexual education, there are things that you**
 20 **can do in private that you can't do in public. I mean,**
 21 **the obvious one is getting undressed. Just very**
 22 **obvious. Getting undressed in your bedroom is an**
 23 **acceptable form. In the middle of Marks & Spencers,**
 24 **it's not that acceptable. But I have had children that**
 25 **have tried to get undressed in the middle of Marks &**

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1 **Spencers to try a pair of trousers on but they didn't**
 2 **realise it was inappropriate. So they have to learn the**
 3 **public -- you could continue with that. It is**
 4 **obviously -- you know, as adolescence and puberty**
 5 **develops, masturbation is appropriate on your own or in**
 6 **your own bedroom, but it is not appropriate with other**
 7 **people or in a public place. It is very obvious. But**
 8 **those youngsters do not know that unless they are told**
 9 **and explained why. You know, that whole piece.**
 10 Q. What I think you are saying is that one of the primary
 11 functions of a residential school like this is to teach
 12 children where the boundaries lie?
 13 **A. Exactly that, and reinforce them. Because all children**
 14 **will test the boundary and push and push and push.**
 15 Q. Mr Bradshaw, I am going to go back to what you were
 16 learning about Knowl View School whenever you first
 17 arrived. I wonder if I can have a document on the
 18 screen, please, RHC001731. This is a memo that you
 19 wrote to Diana Cavanagh?
 20 **A. Yes, that was very early.**
 21 Q. What you say in that memo is that there are numerous
 22 facts emerging from different sources in the present
 23 staff group; that you were concerned about the press
 24 involvement and the way that they would interpret
 25 events?

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1 **A. Yes.**
 2 Q. Then you go on to talk about events being handled by
 3 a management team of Mr Andrews, Mr Hutchinson and
 4 Mr Eaton and Mr Cohen and Mr Found -- I am going to come
 5 back to him -- and that some of the mistakes were major
 6 ones.
 7 Then if we go to the bottom of the memo, you say:
 8 "I seem to be taking more and more responsibility
 9 for events and mistakes made at Knowl View prior to my
 10 arrival."
 11 It would appear that that was a memo about the
 12 Hilton incident?
 13 **A. Yes.**
 14 Q. What were the facts that were emerging when you first
 15 arrived?
 16 **A. Well, it was like I had said before, there was a meeting**
 17 **in March that I attended that it was mentioned that**
 18 **there had been an intruder called Hilton that had come**
 19 **into the school and that had been dealt with. Once**
 20 **I arrived at the school, there were lots of other**
 21 **pieces, and one of the pieces that I mentioned before is**
 22 **that the person that should have been on duty that night**
 23 **was actually in Sheffield, wasn't actually sleeping in.**
 24 **It was a bit like, no one person had taken**
 25 **responsibility to find out what actually happened, in my**

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1 **view. There didn't seem to be one key person either**
 2 **from education, social services, the police or anyone,**
 3 **who had actually pulled it together and said, "This is**
 4 **what happened. This is the chronology". Because it is**
 5 **really important that you understand what happened and**
 6 **then you can work out why it happened and then your**
 7 **action plan can come from that, about how to ensure it**
 8 **doesn't happen again. But also how to support people in**
 9 **doing their right job. I don't think these people knew**
 10 **what their job was.**
 11 Q. From your perspective, when you first arrived, the
 12 Hilton incident was completely unresolved?
 13 **A. Yes.**
 14 Q. And nobody had actually --
 15 **A. I think people felt it was resolved because he was**
 16 **serving a prison sentence. But, again, I had no idea**
 17 **when that prison sentence was, when he had been**
 18 **convicted, how long it would be, would he be back in the**
 19 **locality. I had to ask those questions all the time.**
 20 Q. That sounds as though nobody was able to give you
 21 a clear answer --
 22 **A. No.**
 23 Q. -- as to what --
 24 **A. No, it was all anecdotal.**
 25 Q. -- had happened to him. Now, that memo mentioned

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1 Mr Found.
 2 **A. Yes.**
 3 Q. He was the school caretaker whom you had inherited from
 4 the previous acting headmaster?
 5 **A. Yes.**
 6 Q. He was someone who was regarded as a member of the care
 7 team, wasn't he? And also --
 8 **A. Sorry, I half giggled. I had a process where, because**
 9 **they had gaps in their rotas for the care team, they**
 10 **would ask other staff, whether they were admin staff or**
 11 **caretaking staff, whether they would do an extra shift,**
 12 **which seems quite logical, at that time, to do it.**
 13 **Unfortunately, Mr Found, who was called the keeper but**
 14 **he was a school caretaker, was doing shifts and also at**
 15 **the time he should be working as a keeper, as**
 16 **a caretaker, so he was basically being paid twice and**
 17 **claiming it. So it is a bit like, okay, then. But that**
 18 **practice -- there was no-one monitoring that practice**
 19 **across the board. They were just filling in gaps on the**
 20 **rota if someone could do it.**
 21 Q. Should a school caretaker be --
 22 **A. No --**
 23 Q. -- a member of care staff?
 24 **A. -- before you ask the next question. That's why**
 25 **I stopped it and that's why Mr Found left.**

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1 Q. He didn't have any qualifications, did he, to be
 2 a member of the care staff?
 3 **A. No.**
 4 Q. Does that tell us something about the regime that had
 5 previously been --
 6 **A. It does. You may come on to it, but can I just say that**
 7 **there was a culture within Rochdale that Special**
 8 **Education was right at the end of the spectrum which was**
 9 **this Cinderella service, that you were not allowed to**
 10 **appoint -- I think I was the first external appointment**
 11 **for some years -- externally because the unions would**
 12 **complain. If there was someone being redeployed or made**
 13 **redundant, they would have to be transferred or offered**
 14 **that post for a start. So all the teachers at**
 15 **Knowl View had come from somewhere else and most of**
 16 **the care staff had worked -- I can't remember, before**
 17 **I went, if there was anybody that had actually been**
 18 **appointed fresh.**
 19 Q. I think we are going to see that in correspondence --
 20 **A. Sorry.**
 21 Q. -- that you suggest that in fact the school really did
 22 need to be recruiting people from outside of the local
 23 area?
 24 **A. Yes, because you are just maintaining the same culture**
 25 **all the time.**

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1 Q. Culture is one of the things that we are very interested
 2 in, so I am going to take you to some of the materials
 3 that shows how the culture developed. Before I do that,
 4 though, can I ask you about the Shepherd Report and
 5 whether anybody drew it to your attention when you first
 6 started at the school?
 7 **A. Yes. I mean, this is something that really bugs me**
 8 **because I have explained to you I never saw**
 9 **a Shepherd Report or knew there was a Shepherd Report.**
 10 **I knew that Mike Poulton, who was a temporary head, and**
 11 **in fact Mike was a really nice guy, but he was from**
 12 **mainstream. No idea why he was brought into Knowl View**
 13 **because he had no experience of Special Education. But**
 14 **he'd asked Phil Shepherd to come in to do a training**
 15 **session. The staff had basically, as they do with**
 16 **everybody that had come to Knowl View, poured their**
 17 **heart out and said, "Were you aware this is what's**
 18 **happened?" Phil Shepherd then wrote that down, and**
 19 **obviously you have seen in the documentation, so I never**
 20 **regarded that it was a report as such. It was an**
 21 **indication. But I never had a copy of that, which seems**
 22 **really strange because, if you look at the dates of it,**
 23 **I had already been appointed there and there was**
 24 **reference made to me. So why would the incoming head**
 25 **teacher not have a copy of a report or an indication of**

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1 **what had happened or what the staff were feeling at that**
 2 **time?**
 3 Q. Do you recollect having any conversations with
 4 Mr Shepherd --
 5 **A. Not at all. Not at all.**
 6 Q. -- after the event? Is that something that you might
 7 have forgotten about with the passage of time?
 8 **A. I doubt it. I really doubt it with me. I've got a very**
 9 **good memory for significant events.**
 10 Q. All right. Because the other thing is, we are going to
 11 see in due course that obviously you conducted your own
 12 investigation as such in order to find out what had been
 13 going on?
 14 **A. Yes.**
 15 Q. Is it possible, in light of that, that you have
 16 forgotten --
 17 **A. I may have done. I mean, I can't swear that I've never**
 18 **spoken to him. But I certainly didn't meet him.**
 19 Q. We saw from the 11 April memo that there had already
 20 been social services involvement at that point in time.
 21 Do you have any recollection then of what it was that
 22 social services were doing with you about the school at
 23 your arrival?
 24 **A. Well, on the ground there was Freema Taylor and**
 25 **Janet Bowyer who were really trying to be quite active**

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1 on that. I know with Janet Bowyer that I tried to get
 2 counselling for what I regarded was the group of
 3 youngsters that had been involved in the Hilton episode.
 4 I actually did a memo to Freema Taylor about, you know,
 5 "This is what I have found out".
 6 Q. Yes.
 7 A. But it just seemed to go into an abyss. It was quite
 8 strange. Because the Rochdale Education Offices was
 9 blown as "the black box" literally, and it was referred
 10 to as "the black hole" because basically everything that
 11 went into there never came out. The departments were on
 12 different floors. The staff used to joke that actually
 13 the floors -- the lift didn't go up, it only came down,
 14 so they couldn't get access to the whole thing.
 15 It was strange that when we passed information on,
 16 there didn't seem to be any response.
 17 Q. I am going to take you through some of
 18 the correspondence to see if it is clear what happened.
 19 I wonder if we could have up on screen, please,
 20 GMP000392, page 26.
 21 This was a letter that you wrote on 10 May to
 22 Janet Bowyer regarding your concern that the child
 23 protection procedures weren't being implemented?
 24 A. Yes.
 25 Q. I think in that letter you also point out that

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1 Manchester had implemented child protection procedures
 2 in respect of one of its children?
 3 A. Yes.
 4 Q. So it would appear that at that point in time nothing --
 5 A. No, nothing had happened.
 6 Q. -- formal was happening under the child protection
 7 guidelines?
 8 A. No, nothing at all.
 9 Q. You don't recollect if anything ever did happen using
 10 child protection guidelines?
 11 A. I know that out of what I regarded as the group of sort
 12 of five, there were three youngsters that were actually
 13 leaving that summer that were there. They did receive
 14 counselling. I know Freema Taylor did organise that.
 15 Apart from that, nothing.
 16 Q. Do you know who the counselling was provided by?
 17 A. No. But it was through the Social Services Department.
 18 Q. I am going to take you to another letter that was
 19 written at about this time. This is RHC001755 at
 20 page 1. Again, this is very early in your time at
 21 Knowl View. In this letter, it was said that a prowler
 22 had attempted to get into the school and the police took
 23 a long time to respond. What is notable about that
 24 letter is that you don't mention Mr Hilton.
 25 A. No.

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1 Q. Was that someone else trying to get into the school?
 2 A. Well, Hilton was in prison -- to my understanding, he
 3 was in prison. It was someone else.
 4 Q. Did that make you think then --
 5 A. Sorry, can I just take you back? It is quite important.
 6 Knowl View was on the edge of sort of a group of shops
 7 and it was in Bamford, and there was a piece of land
 8 before it that was open, and then there was the fence
 9 and the playing fields. Apologies if you already know
 10 this. But in the right-hand corner there was a little
 11 coppice of wood and the children used to gravitate down
 12 there to smoke. Now, in my second day, and I remember
 13 clearly, I stopped them doing that and we talked about
 14 the whole thing, but I later discovered that was where
 15 Hilton and anyone else would come to give the children
 16 cigarettes and have a chat about it. It was a bit like
 17 the Smith Street toilets. It was this sort of -- people
 18 were aware of it, but no-one seemed to grasp the nettle
 19 and say, "This is an area of concern that is actually
 20 sort of adults and children are gravitating towards in
 21 that way". So my concern was that the access to that
 22 site was totally open. In fact, on the other side,
 23 there was another sort of estate and houses and on the
 24 left-hand side was a public footpath that went all the
 25 way up onto the moors. So the public could actually

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1 walk. Many times they would walk their dogs across the
 2 schools. I used to -- I mean, we had two dogs and
 3 I used to challenge people and just say, "Look, I don't
 4 want to be rude, but actually, this is private property,
 5 you shouldn't be walking" -- but it was assumed that
 6 everybody could use that area.
 7 Q. You said something quite important in that answer, which
 8 was that Roderick Hilton and Smith Street toilets were
 9 a bit like each other, in that it was accepted. Do you
 10 mean by that that it had just become normal and part
 11 of --
 12 A. Yes, it was a bit like sort of, "So what" was the piece.
 13 It was just mentioned. No-one seemed to challenge and
 14 nor did anyone assume that if a youngster went down to
 15 Rochdale town centre, they wouldn't actually go shopping
 16 in Marks & Spencers or wherever, they would actually
 17 gravitate -- they didn't think that way. It should be
 18 the opposite. You should be thinking about, if they are
 19 unsupervised, then these youngsters will get up to
 20 mischief. That's the nature of the youngster.
 21 Q. Mr Bradshaw, did that mean that at the time staff didn't
 22 really consider exploitation at Smith Street toilets to
 23 be child abuse?
 24 A. That's a difficult one, but I would probably say yes.
 25 Q. I am actually going to deal with that in more detail,

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1 but it is helpful, given that you have raised it now?
 2 **A. There were a couple of phrases that I picked up when**
 3 **people said, "Well, this is just normal behaviour", and**
 4 **it is a bit like, "No, it is not normal behaviour. This**
 5 **is not normal behaviour for a boys' residential school".**
 6 **In fact, we wouldn't do boys' residential schools now,**
 7 **we do mixed schools, but it is not normal behaviour.**
 8 Q. Mr Bradshaw, the other part of that answer was really
 9 about Hilton may have been in prison or not on the
 10 scene, but was there still a risk that other people,
 11 other men, were trying to --
 12 **A. I think there's a definite risk. It is back down to,**
 13 **this is a group of vulnerable youngsters, than being**
 14 **paranoid about attracting the paedophile or someone with**
 15 **an unhealthy interest in children. Also, I had two very**
 16 **small children on site.**
 17 Q. So that's really it: there was a real concern about
 18 other men being attracted to the school?
 19 **A. There were two concerns. I had my wife screaming at me**
 20 **about -- "We brought our family to live here. You need**
 21 **to make sure first and foremost", in her view, her**
 22 **family, and my family, are safe, but also that the**
 23 **children are safe. I thought it was an obvious example.**
 24 **I was trying to use it, "Look, you know, we don't have**
 25 **any lighting that comes on, can I just do that?", and it**

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1 was a really slow response.
 2 Q. I think we can see that as we go through.
 3 **A. I have to say, the police got better and better.**
 4 **I wouldn't say I bullied them, but I pestered them to**
 5 **respond. I also used to have a scheme where we would**
 6 **give them tea and coffee and, if it was after 12.00, we**
 7 **would give them a bacon sandwich. It was really**
 8 **helpful, because what it encouraged is that there was**
 9 **a normal thing for a police car to be parked outside the**
 10 **school, not because there was an incident. That's**
 11 **a real change in culture.**
 12 Q. Just to finish off on this, though, I just want to be
 13 clear about this: were you then concerned that other men
 14 were also targeting the school?
 15 **A. Yes.**
 16 Q. You have already referred to it, but it was around this
 17 time, then, that you tried to put together what had
 18 happened to the boys who were at the school, and perhaps
 19 if we bring that up on screen. Sorry, in fact, we are
 20 not going to bring this up on screen. For the core
 21 participants, this is GMP000358, and, panel, it is in
 22 core bundle 4 at tab 64.
 23 Mr Bradshaw, the reason we are not going to bring
 24 this up on screen is because of the sensitivity of some
 25 of the information in it. I think you have a copy of

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1 this document, don't you?
 2 **A. Yes.**
 3 MS DOBBIN: Chair, perhaps if we arrange for you to get
 4 copies and Mr Bradshaw can begin to give some evidence
 5 about it. You have heard about this document already.
 6 It is the document called "Who is doing what to whom?".
 7 If I get him to explain a little bit about it, then it
 8 will become clear.
 9 Mr Bradshaw, if we look at the covering letter to
 10 this document, it is dated 17 May 1991. It is addressed
 11 to Freema Taylor?
 12 **A. Yes.**
 13 Q. Can you recollect whether or not she asked you to put
 14 this together?
 15 **A. No. This is me trying to find out exactly what the**
 16 **title was: "Who is doing what to whom?"**
 17 Q. Was this because you anticipated that social services
 18 would use this information?
 19 **A. Well, I hoped they would use the information, because**
 20 **I don't -- I hadn't seen any evidence that anybody had**
 21 **pulled together that information. All this was**
 22 **available anecdotally or in the diaries at school. So**
 23 **it just seemed logical that someone should have the**
 24 **whole piece.**
 25 Q. Are the notes written in your handwriting?

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1 **A. No, they're not. No. I don't actually recognise the**
 2 **handwriting. But it would have been sort of one of**
 3 **three people. It might have been Martin Digan or, you**
 4 **know, Duncan Eaton. Or it may have been the secretary,**
 5 **pulling all this stuff out of the diary.**
 6 Q. It is in two parts. The first part of the document has
 7 "Fact" at the top of each page.
 8 **A. Yes.**
 9 Q. Were those pages comprised of the records in children's
 10 files?
 11 **A. Yes, that's where that came from.**
 12 Q. Then the second part of the document is the allegations.
 13 Where had the allegations come from?
 14 **A. They were hearsay and they were staff view about what**
 15 **activity they thought children were getting up to.**
 16 Q. Did you speak to the staff about that?
 17 **A. Yes, I did.**
 18 Q. I think some bundles may just have arrived.
 19 **A. I think part of my strategy was also, it is a bit**
 20 **like -- not that the practice continued, but there was**
 21 **a reason for increasing supervision, and there was**
 22 **a reason for putting processes in place. What I was**
 23 **looking for was the sort of -- not hard evidence, but an**
 24 **indication that, you know, the children weren't safe.**
 25 Q. Yes. It is tab 64. So we have just looked at the

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1 covering letter. We are now going to go on and look at
 2 page 4 of that document. Do you have that in front of
 3 you, Mr Bradshaw?
 4 **A. Yes.**
 5 Q. I am not going to use the ciphers of the individuals who
 6 are named in this document, but if we look at page 4,
 7 you assisted me outside court by confirming who that
 8 child was?
 9 **A. Yes.**
 10 Q. Can you confirm to the panel that this record is about
 11 one of the very youngest children in the school?
 12 **A. Yes, it is.**
 13 Q. We won't say his age, but we know that the school had
 14 children from aged 7 onwards and he is a child at the --
 15 amongst the youngest?
 16 **A. Yes.**
 17 Q. It says as regards him that he was found in bed with
 18 another child, and we know that to be an older child;
 19 that he was playing games in the toilets late at night
 20 involving a number of other boys, and that he was being
 21 encouraged into another boy's -- or onto another boy's
 22 bed at night?
 23 **A. That's correct.**
 24 Q. So to be clear about these concerns, they weren't
 25 limited to the older children in the school --

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1 **A. No, they weren't.**
 2 Q. -- at all?
 3 **A. It was as if a culture was actually running all the way**
 4 **through.**
 5 Q. If we go to page 5 -- again, I am not going to use this
 6 boy's cipher, but from this we are able to tell that it
 7 was recorded in his records that he was associating with
 8 rent boys and I'm using the language of the record, that
 9 he had been cottaging at Smith Street toilets?
 10 **A. Yes.**
 11 Q. That he was friendly with a named convicted
 12 child abuser, that when he absconded he had items and
 13 cash on him, and I presume the implication of that is
 14 that it could only have been from activities at
 15 Smith Street toilets; that he had absconded for several
 16 days and that he was found to have visited a flat in
 17 Manchester?
 18 **A. Yes.**
 19 Q. I think, again, the implication of that was that he had
 20 been visiting men?
 21 **A. Yes, he was involved in those activities, yes.**
 22 Q. And that in fact he had visited -- he had been out with
 23 the police as well to see if he could identify the
 24 abusers?
 25 **A. Yes.**

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1 Q. And this was a boy -- we have seen reference to this
 2 already -- who was found in possession of poppers as
 3 well that he had managed to get from a sex shop?
 4 **A. Yes.**
 5 Q. I think, looking at this individual child, it is
 6 difficult to see how his situation could be any more
 7 serious than is conveyed by this record?
 8 **A. No, it couldn't, no.**
 9 Q. I'm not going to go through every record, but I just
 10 want to highlight some of the other entries. If we turn
 11 to page 8, this is a boy who had been found in bed with
 12 one of the younger children, but we see reference in
 13 this record to the fact that he had been involved in
 14 sexual activities with a male friend whilst baby-sitting
 15 a 4-year-old?
 16 **A. Yes.**
 17 Q. That he had been coercing younger boys into toilets late
 18 at night at the school in order to talk dirty to them,
 19 and that he was also a child who was involved in
 20 cottaging as well?
 21 **A. Yes.**
 22 Q. I think the point here, Mr Bradshaw, is it is not just
 23 the risk that a child like this was at himself --
 24 **A. No.**
 25 Q. -- or the risk that he posed --

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1 **A. The abused becomes the abuser.**
 2 Q. We see then risks to children possibly outside the
 3 school as well?
 4 **A. And also their siblings.**
 5 Q. If we look at page 13. This is a different boy. We see
 6 that he was a participant in group masturbation. So it
 7 would appear by this stage, Mr Bradshaw, you had been
 8 able to glean this from the records --
 9 **A. Yes.**
 10 Q. -- that this was going on?
 11 **A. Yes.**
 12 Q. He had observed other boys having oral sex, he had
 13 participated in oral sex. The suggestion was that he
 14 had forced another child to participate in oral sex, and
 15 also the concern here that he had been acting sexual
 16 play at his foster parents' home as well with young
 17 children. So again, the suggestion of risk outside the
 18 school as well?
 19 **A. Was very high.**
 20 Q. So without going through every record, then, what you
 21 discovered, Mr Bradshaw, was that the records referred
 22 to a number of children being involved in cottaging,
 23 being found engaged in sexual activity with each other,
 24 them being known to, or even friendly with, convicted
 25 child abusers, being involved in group masturbation at

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1 the school and involved in sexual activity with younger
 2 children, either inside the school or outside the school
 3 as well?
 4 **A. Yes.**
 5 Q. All of that you conveyed to social services?
 6 **A. Well, I sent these files straight on. I think my letter**
 7 **was to Freema Taylor.**
 8 Q. What steps did you take, then, within the school to do
 9 what you could to address what had been going on?
 10 **A. It was a complete sort of look at policies and**
 11 **procedures, to look at sort of how you ensure that**
 12 **youngsters were safe. I mean, I said before that the**
 13 **numbers had gone down to sort of, you know, 16, and**
 14 **there were also sort of five children leaving that**
 15 **summer because of their age. So there was 11 students**
 16 **left. Still very vulnerable youngsters and very sort**
 17 **of, you know, at that stage of could be exploited. But**
 18 **we changed the safety of the environment, we changed the**
 19 **sort of process of supervision. Children were not**
 20 **allowed to go down to Rochdale unsupervised in that**
 21 **nature. We talked to the parents. We talked to the**
 22 **social workers about doing that.**
 23 My assumption when I was -- when this -- when
 24 I passed this on to Freema Taylor, that we would have
 25 a full investigation of the whole thing, and actually

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1 what came back is, "Well, don't worry, because we are
 2 going to get Val Mellor", who was very respected in the
 3 area, "to have a look at that", and I know you are going
 4 to come on to that later. But I looked at every policy
 5 and procedure, every piece that needed to be done, from
 6 the environment, so it is a bit like sort of, you know,
 7 when you look at it, we looked at the place, we looked
 8 at the people, so we looked at the staff, how we did
 9 that, we brought in extra staffing, we made sure they
 10 were on shift. I kept the four-night boarding because
 11 it was simple to do a rota because you could do an
 12 early/late, early/late. Therefore, you only needed two
 13 sets of shifts. We made sure there were two members of
 14 staff on duty at night, and a cover and a senior on
 15 that. We looked at the recording process. We had
 16 regular meetings at the beginning of the week, staff
 17 meetings. So it was clear on that what we were doing.
 18 We introduced sex education, we introduced individual
 19 care plans and -- this is all the norm. You know, it is
 20 one of those things that you think, well, you would
 21 assume this would have been in place anyway before you
 22 started. We also did training all the way through with
 23 the staff because there was an assumption that the
 24 caretaker and the cleaners and the kitchen staff didn't
 25 need any training, but they were the ones that actually

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1 **picked up the vibes and the conversations and the**
 2 **children -- they are as important as, you know, the rest**
 3 **of the staff in dealing with that. I introduced the key**
 4 **worker system, so every child had an adult and they were**
 5 **part of that decision about who they wanted to be -- who**
 6 **looked at, and the key worker made sure they did the**
 7 **home liaison, home visits, they did the reviews, they**
 8 **oversaw the individual care plan and they reviewed that.**
 9 **We looked at how we recorded pieces. I have to say that**
 10 **the governors under John Humphreys was actually very**
 11 **supportive in that, because they saw it as a way to sort**
 12 **of improve the school and move on. Things did start to**
 13 **improve and get better in that way.**
 14 I have to say it was a real battle, though, to get
 15 anything -- it was a resource. Whether it was staff or
 16 lighting or a gate or anything of that nature.
 17 Q. Was part of the problem about resources because numbers
 18 were low, the school wasn't entitled to funding?
 19 **A. The way the education piece is set is that we used to**
 20 **have a sort of census on 7 January and that sets the**
 21 **budget for the following year, so what you tried to make**
 22 **sure is that your census on 7 January is as high as you**
 23 **can get it. You know, so that's the process. The**
 24 **Department of Education sussed it out slightly, because**
 25 **they then decided to do one in October as well, but that**

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1 was part of -- so you have your budget set for the
 2 previous year, but the budgets were really, really low.
 3 I'd come from Clarence House, which was an independent
 4 special school, in which we were spending, in education
 5 terms, around £40,000 per student. Rochdale was
 6 spending £4,000 for all of the students.
 7 Q. The discrepancy was that much?
 8 **A. It was massive. There was no spare cash at any stage.**
 9 **The money that we got was from different grants or from**
 10 **careers, you know, piece -- there was a good network of**
 11 **special schools in Rochdale. The heads were very**
 12 **supportive. We actually got more money from sort of,**
 13 **you know, Safer City or fundraising than we got from the**
 14 **education authority. But the staffing was solely**
 15 **determined by the education authority. The process with**
 16 **education is that we moved on to what we call local**
 17 **management of schools and there was a local management**
 18 **of special schools where the school sets the budget and**
 19 **oversees it, but we were still a special schools then**
 20 **under the control of the local authority.**
 21 Q. The only reason why I asked you whether or not a number
 22 of children that you had in the school had a bearing on
 23 funding is because, when we look ahead to what happened,
 24 it appears as though you were under a lot of pressure to
 25 extend --

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1 A. **Totally, totally, yeah, very quickly.**
 2 Q. It seems as though you were under a lot of pressure to
 3 extend numbers very quickly?
 4 A. **Yes, that's correct, yes. In fact, I had six referrals**
 5 **in my second week, and I was told that I should take all**
 6 **of them. It was one of those things where you think**
 7 **about, well, being head teacher is quite a lonely job**
 8 **because it is a bit like, who do you moan to? You can't**
 9 **moan to your partner because she thinks you have to be**
 10 **capable of doing this. But we had a good network of**
 11 **special school heads. So literally, what I did, I rang**
 12 **up my colleague around the day school, John Novak, and**
 13 **said, "What should I do?". He said, "Well, meet me at**
 14 **the pub at 6 o'clock", and he had two other colleagues**
 15 **there, and we talked about how to manage the Education**
 16 **Department when you get edicts like that. That's what**
 17 **we did. You know, we assessed the youngsters, we looked**
 18 **at them and we took two out of six, but there was a lot**
 19 **of pressure.**
 20 Q. You had doubled the numbers pretty much by the following
 21 year?
 22 A. **Yes.**
 23 Q. I'm going to come back to that. I just want to ask you,
 24 in terms of what the school could achieve by itself,
 25 there must have been a limit to that, given that

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1 children were going home at weekends and you had no
 2 control over what was going to happen to them at
 3 weekends or what they would do?
 4 A. **Yes.**
 5 Q. I think we see an example of this, if we could bring it
 6 up on screen. It is the document GMP000371 at page 3.
 7 This is a Social Services Department document about the
 8 boys who were at the school. I think this is in the May
 9 time. If we go over the page, this is referring to the
 10 boys in the health authority report. So I think that's
 11 probably a reference to the Shepherd Report.
 12 If we look down a couple of entries, we see
 13 reference to cottaging and to the boys who were involved
 14 in that who are boys who are named in your report.
 15 A. **Yes.**
 16 Q. What it says is:
 17 "The cottaging was taking place during Monday to
 18 Friday whilst in Knowl View care -- now definitely not
 19 the case, though it is thought it continues at weekends
 20 and holidays."
 21 A. **Yes.**
 22 Q. Did you ever get information from social services that
 23 they were aware --
 24 A. **No.**
 25 Q. -- that children were still involved in cottaging?

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1 A. **No, because it would become part of their care plan, and**
 2 **also it is a bit like, you would want to work closely**
 3 **with them so there wasn't a difference between what**
 4 **happened between Monday and Friday and what happened at**
 5 **the weekend or holidays. It was the same programme.**
 6 Q. From the school's perspective, presumably you would have
 7 wanted to know --
 8 A. **Definitely.**
 9 Q. -- information about what children were doing at
 10 weekends if social services had it?
 11 A. **Yes.**
 12 Q. Can I also then show you a document which comes a little
 13 bit later, and this is GMP000410. This isn't
 14 particularly easy to read, Mr Bradshaw, but we can see
 15 it is a social services document. I wonder if we could
 16 have it expanded, please. This is a record about one of
 17 the boys who was in the school. I think, in fact, we
 18 may have skipped the first page of it. We have taken
 19 out all of the details about this boy, Mr Bradshaw, but
 20 he was a pupil at the school. This document is
 21 dated October 1991. We can see that there is reference
 22 there to him having been placed in Knowl View School,
 23 that he had been received into care on two occasions to
 24 give his mum a break. He had previously been involved
 25 in the rent boy scene in Rochdale, and then we see that

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1 he had been well known to adolescent services. If we go
 2 down a few lines, we can see he was going to be reviewed
 3 at the school because his attendance had been really
 4 poor since the start of the autumn term. So if this was
 5 written in October, that must be a reference
 6 to September. It is said that he had been missing from
 7 home for approximately a month and that during this time
 8 Manchester CID had observed him at three addresses in
 9 Manchester which appeared to be part of a network for
 10 young boys -- we think that that says "are being hoarded
 11 and abuse is occurring".
 12 Then it is part of his plan that he is going to be
 13 kept under strict supervision and that his movements
 14 will be monitored so that he wasn't able to meet up with
 15 this network in Manchester.
 16 A. **Yes.**
 17 Q. Have you a recollection of ever being told by
 18 social services that one of your pupils was thought to
 19 be part of a network or being abused by a group of men?
 20 A. **No.**
 21 Q. Did you know that any of the pupils in the school were
 22 being observed by police in Manchester --
 23 A. **No.**
 24 Q. -- as regards this?
 25 A. **No.**

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1 Q. Again, is that information that would have been critical
 2 for the school to know?
 3 **A. Oh, it would have been, yes. Can I just comment on, you**
 4 **know, the piece there? I started picking up attendance,**
 5 **in other words, when students weren't in, and asking**
 6 **education welfare officers to visit the home and find**
 7 **out -- previously, it was just seen as a freebie, in**
 8 **other words, that people were quite happy that students**
 9 **didn't attend because they weren't in their class, so**
 10 **there wasn't a follow-up procedure, a record, for doing**
 11 **that.**
 12 Q. This record obviously demonstrates the sort of risks
 13 that children are at when they are missing from home and
 14 from school?
 15 **A. Yes.**
 16 Q. Does it also illustrate why social services' involvement
 17 in the school or in an investigation at this time --
 18 **A. Crucial.**
 19 Q. -- would have been really, really important?
 20 **A. It would have been crucial.**
 21 Q. Because it would have meant that every part of
 22 the picture was there?
 23 **A. Yes.**
 24 Q. Did you know that social services had taken a decision
 25 that what had happened at Knowl View School didn't fall

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1 within the parameters of child protection?
 2 **A. Not overtly. I assumed that that's what they were**
 3 **considering, but no-one had actually said that to me.**
 4 MS DOBBIN: Mr Bradshaw, I have just been passed a note
 5 saying "Break", which you might be grateful for, so I am
 6 going to ask you if you don't mind pausing there.
 7 THE CHAIR: Thank you, Ms Dobbin, we will return at 12 noon.
 8 (11.45 am)
 9 (A short break)
 10 (12.01 pm)
 11 MS DOBBIN: Mr Bradshaw, before that adjournment, I was just
 12 asking you questions about the decision of
 13 social services not to be involved.
 14 **A. Yes.**
 15 Q. You have already referred to the fact that it was at
 16 this point that Mrs Mellor came on the scene. Did you
 17 understand then that she was being instructed to provide
 18 a report about Knowl View School?
 19 **A. Yes.**
 20 Q. Did you welcome that? Did you think that it was a good
 21 idea?
 22 **A. Yes. In fact, it was mentioned at a meeting -- I can't**
 23 **remember the exact date, but very early on -- that there**
 24 **was going to be a report and an investigation, and I was**
 25 **very pleased about that, because it seemed as if one**

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1 **person was going to pull all the strands together.**
 2 Q. Is what you thought was needed, then --
 3 **A. Definitely.**
 4 Q. -- someone who could look at all of the different
 5 angles, as it were, and present a holistic picture of
 6 what had happened?
 7 **A. Yes.**
 8 Q. What did you hope would be achieved by doing that?
 9 **A. It needed to be a cathartic exercise for the staff, so**
 10 **they felt they had been listened to. I think also for**
 11 **the students, they needed to draw a line under what had**
 12 **happened and to move on, rather than it just be one**
 13 **incident of a number of things. We needed to have**
 14 **a clear action plan where all the services were**
 15 **involved, the police and the social services and the**
 16 **education worked together, because it was quite evident**
 17 **that the youngsters at Knowl View also resided in some**
 18 **social services' care homes as well. So the problem is**
 19 **not isolated just to one individual school.**
 20 Q. Would it have been important, from your perspective, to
 21 ascertain why it was that children were getting
 22 involved, for example, in exploitation in the first
 23 place?
 24 **A. Oh, definitely. Yes, most definitely.**
 25 Q. And how it was then as well that the children were able

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1 to get involved in that whilst they were apparently
 2 residing at school as well?
 3 **A. Yes.**
 4 Q. I don't know if you recollect, Mr Bradshaw, but in fact
 5 there was a series of meetings with Mrs Mellor which you
 6 attended?
 7 **A. Yes.**
 8 Q. Do you remember those meetings?
 9 **A. I do.**
 10 Q. I am going to ask you a little bit about this because we
 11 haven't really seen those yet. Can I have up on screen,
 12 please, RHC001271, and it is page 9. Mr Bradshaw, this
 13 was a meeting that you can see took place on 4 June --
 14 **A. Yes.**
 15 Q. -- 1991. We can tell from the first paragraph that
 16 Mrs Cavanagh was introducing Mrs Mellor to everybody.
 17 **A. Yes.**
 18 Q. And explaining, as we look down the page, what had
 19 actually happened since the Hilton incident.
 20 **A. Yes.**
 21 Q. If we go over the page, please, that's page 10, if you
 22 just look at the middle of the page, Mr Bradshaw, can
 23 you see a reference to:
 24 "Mr Mansoor Kazi later attended a meeting on
 25 11 April chaired by Mrs Janet Bowyer and attended by

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1 Mr Bradshaw, it was agreed that Mrs Bowyer would
 2 interview three pupils. Mr Kazi stated that after six
 3 weeks Mrs Bowyer had reported her view that the three
 4 pupils looked at were likely to have been abusers rather
 5 than the abused and undertook to investigate a further
 6 three."
 7 Was it your understanding then that she hadn't
 8 interviewed those three children?
 9 **A. I couldn't say that, but my view is that they weren't**
 10 **just abusers.**
 11 Q. I was going to ask: do you think that that was
 12 a satisfactory way to leave things?
 13 **A. No. No, definitely not.**
 14 Q. Why was it important that those children were
 15 interviewed and what had taken place understood?
 16 **A. When it is back to your previous point of trying to**
 17 **ascertain, first of all, the opportunity that these**
 18 **youngsters had, but also that they were vulnerable and**
 19 **what led these incidents to happen, they don't just**
 20 **happen in isolation. They lead up to something and**
 21 **there is -- you know, there is often a confusion about**
 22 **where boundaries are, and children have difficulties**
 23 **with their own sexual identity, which is perfectly**
 24 **natural and normal, but they can't coerce other children**
 25 **because it then becomes abuse.**

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1 Q. If we just look down the page a little bit, there is an
 2 entry there in respect of you, and it is said that you
 3 expressed the view that there was an underlying
 4 subculture that had existed at the school involving
 5 12 boys whose activities went beyond exploration and
 6 some were believed to have been engaged in cottaging
 7 around the town centre?
 8 **A. Yes. That related to the previous questions you asked**
 9 **me about, you know, what information had I got from the**
 10 **staff and the staff logs and passed on to them.**
 11 Q. If we look on this page -- sorry, I should have drawn
 12 your attention to this on the first page -- all of
 13 the people who were involved in this meeting were people
 14 who were from the Education Department?
 15 **A. Yes.**
 16 Q. There wasn't actually anybody from the Social Services
 17 Department involved in this meeting, was there?
 18 **A. No. That was the trend.**
 19 Q. If we go forward a couple of pages to page 12, and if we
 20 look down that page a little bit, there is an entry that
 21 reads:
 22 "Mrs Mellor asked if a video recording might be used
 23 when pupils were interviewed in case a child disclosed
 24 information about sexual abuse not previously
 25 revealed -- in order to operate within the

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1 recommendations of the Cleveland inquiry.
 2 "Mr Bentley and Miss Simpson expressed reservations
 3 about this proposal."
 4 Do you have any memory of how children were being
 5 interviewed being discussed at that meeting?
 6 **A. No. Again, it is normal practice that they are**
 7 **interviewed once and a video recording now is the norm.**
 8 **At that stage, it wasn't the norm, but it was good**
 9 **practice.**
 10 **Apart from that comment, it wasn't -- it's**
 11 **a difficult one because it -- the feeling I got there is**
 12 **people wanted this to go away.**
 13 Q. Yes.
 14 **A. They didn't want it to be a headache. They wanted it to**
 15 **just be something in a little box that they could then**
 16 **put the lid on and put back in the cupboard. They**
 17 **weren't really thinking that this was symptomatic of**
 18 **failings across the board, not only of the school but at**
 19 **other areas.**
 20 Q. Do you mean that people at this meeting might have been
 21 against videotaped interviews because it was making, in
 22 a way, a bigger deal --
 23 **A. That's my opinion.**
 24 Q. -- of all of this than they thought that it was?
 25 **A. Yes, but that's my opinion.**

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1 Q. So was the sense that you got then that certain people
 2 at this meeting just wanted it kept as low key as
 3 possible and as informal, in a way, as possible?
 4 **A. Yes, I would say that.**
 5 **Can I also say, it was my view that my role was seen**
 6 **as, "Can you take the school forward and not worry about**
 7 **what has happened?", but it is one of those difficult**
 8 **things, there is no way you can take something forward**
 9 **until you understand what has happened and why, rather**
 10 **than just sort of, you know, start again.**
 11 Q. Just before we leave this meeting, did you have any
 12 sense, or did anyone suggest at that meeting, that what
 13 had gone on at the school was normal or taken the line
 14 that these were the kind of things that you might expect
 15 to happen at a residential boys' school?
 16 **A. The answer is, no, but there was occasionally people**
 17 **saying that a lot of the behaviour that has happened is**
 18 **normal behaviour for that type of school, but**
 19 **I challenged that all the time, because, as I said to**
 20 **you previously, one incident may be normal, sexual**
 21 **exploration, but basically, as it gets more and more and**
 22 **it becomes coercive, then it is certainly not that.**
 23 Q. Have you any memory of who the individuals were who
 24 tried to downplay it?
 25 **A. Cliff Bentley was very supportive and excellent, but his**

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1 view -- he actually said to me, "I don't know how we
 2 missed this. I have no idea. I wish it would go away".
 3 Me, being my opinionated self, said, "Well, I think you
 4 missed it because you weren't looking at it". You know,
 5 there was no governance at the school either from the
 6 governors or from the education authority.
 7 Q. Is Mr Bentley one of the people, then, who may have --
 8 A. Yes.
 9 Q. -- taken that sort of line, that "We don't want to make
 10 too much of this because" --
 11 A. I think he was taking it very seriously, but I think he
 12 thought a lot of the behaviour was sort of -- you know,
 13 "Can it please go away now?".
 14 Q. If we go over the page, please, this is page 13, this is
 15 a further meeting of 25 June. Again, I think if we look
 16 at this meeting and who attended it, we can see that
 17 everybody was either education -- we had Mrs Mellor at
 18 it, but, yes, I think everybody else was from the
 19 Education Department. Yes?
 20 A. Yes.
 21 Q. If we look down the page, and look at the very final
 22 paragraph, Mrs Mellor informed the meeting that she had
 23 "spoken with Detective Inspector Henderson of
 24 the Greater Manchester Police to ascertain if there were
 25 any ongoing police enquiries involving pupils at

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1 Knowl View, but there were said to be none nor were
 2 there any ongoing concerns about activities related to
 3 the town centre toilets. Inspector Henderson had
 4 promised to keep Mrs Mellor informed [about that]."
 5 Were you satisfied with that at the meeting? Was
 6 that enough to give you peace of mind that the
 7 activities had stopped?
 8 A. The clear answer is: no, on that. Because it is not
 9 just a one thing. I was surprised at the comment that
 10 they said there was nothing happening, because --
 11 I mean, it is like your previous piece: there's always
 12 ongoing. Youngsters don't start to do things and then
 13 suddenly stop.
 14 Youngsters will always look at things, and it is
 15 what they do. It is the fear of being caught or
 16 actually sort of altering their behaviour which is
 17 a long process. It just didn't suddenly stop because
 18 the dates happened.
 19 Q. So you could do something about not giving them the
 20 opportunity to get out of school?
 21 A. Yes.
 22 Q. But, as we have seen, there is a limit to which you
 23 could limit their ability to get into town or go to
 24 Manchester?
 25 A. Definitely, yeah, and it wasn't a secure provision and

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1 we didn't have a full care order. So we had no legal
 2 right in actually restraining or keeping the children
 3 in. We just had to have processes and systems that kept
 4 them safe.
 5 Q. I am going to ask you to look over the page at page 14.
 6 Again, if we go to the very bottom of this page,
 7 Mrs Mellor told the meeting that she had come to some
 8 tentative conclusions "and thought that it would neither
 9 be right nor necessary to interview boys in school
 10 because:
 11 " (1) it was too long after the event.
 12 "(2) too many changes had occurred.
 13 "(3) it would be dredging up facts from which the
 14 boys had moved on.
 15 "There was no indication that any inappropriate
 16 sexual behaviour was [going on at that stage]."
 17 Mr Bradshaw, did you agree that it wasn't worthwhile
 18 not interviewing the children at that stage?
 19 A. The clear answer is: no. Everything that Val says there
 20 is true and correct. It had been a long time and it
 21 would drag it all over. But there hadn't been closure
 22 about it. Although there were no indications there was
 23 inappropriate sexual behaviour continuing at the school,
 24 that didn't mean to say that there wasn't other evidence
 25 that it would have continued.

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1 Q. If you read that, it looks rather as though the
 2 incident, or the event, that's being referred to might
 3 be the Hilton incident?
 4 A. Oh, it is. It was all about that one incident.
 5 Q. But what about the boys that were being exploited and
 6 the children who may have been abused in the school by
 7 other children?
 8 A. That wasn't focused on as much as the sort of Hilton
 9 incident that happened. It was more seen that that was
 10 a continuation of normal behaviour.
 11 Q. Right. So, in other words, from the perspective of
 12 the school, it was the Hilton incident --
 13 A. Yes.
 14 Q. -- that really mattered?
 15 A. Yes.
 16 Q. Are you saying that Mrs Mellor's focus then wasn't
 17 really on the cottaging activity or --
 18 A. Her focus was on two things. One was the actual Hilton
 19 incident and how did that occur and what can we learn
 20 from that, and, secondly, was there a culture of
 21 continuation of sexual abuse and coercion.
 22 As far as I know, there was very little emphasis on
 23 what was done outside the school or a wider issue
 24 regarding that.
 25 Q. How was she going to get to the bottom of whether or not

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1 things were carrying on or continuing if she wasn't
 2 actually going to speak to any of the children who had
 3 been affected by it?
 4 **A. I don't know. You would need to ask Mrs Mellor that.**
 5 Q. But that was something that was of concern to you?
 6 **A. Yes, it was a concern.**
 7 Q. Thank you.
 8 **A. I think, sorry, the other piece on this, the staff still**
 9 **felt aggrieved that they hadn't actually been**
 10 **interviewed about the incident themselves, and that**
 11 **actually sort of began the Phil Shepherd report, because**
 12 **they wanted to have their say.**
 13 Q. We know that the staff were interviewed on
 14 4 and 5 October, I think it was, 1990. I have been
 15 corrected, it was 11 and 12 October.
 16 **A. I wasn't aware of that.**
 17 Q. Yes, I was going to say --
 18 **A. No, I wouldn't have been aware, sorry.**
 19 Q. Two things, then: one, the staff didn't tell you that
 20 they had been interviewed; and, two, the Department of
 21 Education presumably didn't tell you that they'd
 22 interviewed the staff?
 23 **A. No.**
 24 Q. I am going to come to the staff grievances in just
 25 a second.

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1 **A. Yes.**
 2 Q. But I just want to finish off, if we can, this section
 3 by looking at the final meeting that we are going to
 4 look at. If we could have on screen, please, RHC001956,
 5 and that's page 3. So this was the meeting that took
 6 place on 12 September?
 7 **A. Yes.**
 8 Q. Again, it was the same people who attended, except that
 9 there was an administrative officer there again, but all
 10 education. I just want to look at what Mrs Mellor said,
 11 at the very bottom of that page. She's talking about
 12 Mr Hilton here and she said:
 13 "However, it appeared that no prompt or positive
 14 action had been taken by them. It seemed to be accepted
 15 that the person concerned (RH) was not seen as external
 16 to the school but very much a part of school life."
 17 If we go on to the next page, page 4, you
 18 acknowledged "the general feeling (in school) that
 19 nothing could be done added to which there was a feeling
 20 of agency 'sympathy' for RH rather than the school.
 21 Concern was expressed about the security at the school
 22 and the possibility of some duplicate keys being readily
 23 available."
 24 I just really wanted to ask you, if I may, first of
 25 all, about the observation that there was agency

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1 sympathy for Mr Hilton?
 2 **A. That's my phrase, really. I definitely think there was.**
 3 **When I tried to get a restraining order on him, it**
 4 **was -- people were very reluctant to do it. Yet**
 5 **I couldn't see -- it seemed simplistic for me: he'd**
 6 **committed an offence against the school and he was**
 7 **returning back to the scene of his crime. It did seem**
 8 **that he was a part of the furniture, really.**
 9 Q. I think here you are reflecting on what had happened
 10 prior to your arrival?
 11 **A. Definitely.**
 12 Q. Was that something that you picked up, having spoken to
 13 staff about what their attitude was towards Mr Hilton?
 14 **A. Yes. I mean, they knew him by name. You know, they**
 15 **could address him, which all, for me, was a bit sort**
 16 **of -- really difficult to understand, why you would --**
 17 **you know, you would address someone by their first name**
 18 **that you had known had been a known offender.**
 19 Q. We are going to look at a document in a little while,
 20 but I think you in fact discovered that staff had
 21 allowed Hilton to sleep in the school minibus and in the
 22 school on occasions?
 23 **A. Yes.**
 24 Q. As I understand what you were saying --
 25 **A. Can I respond to that?**

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1 Q. Yes.
 2 **A. I think "allowed" is probably the wrong word, but they**
 3 **were aware he was doing that.**
 4 Q. And they didn't stop him?
 5 **A. Right. So that was just the difference I wanted to**
 6 **make. But yes.**
 7 Q. I will show you that document in a little while because
 8 I think information was coming out all the time. Just
 9 picking up here the reference to duplicate keys as well,
 10 were you concerned that people outside the school had
 11 keys?
 12 **A. Yes.**
 13 Q. Or --
 14 **A. Yes, very much so.**
 15 Q. Where did that concern come from?
 16 **A. It's the old piece, isn't it, about, you know, if the**
 17 **coffee cup is moved in the morning and no-one's been in**
 18 **the room, you just wonder why. I'm not suggesting that**
 19 **happened, but what I'm suggesting is, there were just**
 20 **occasions where you had that feeling that people had**
 21 **access to it. I changed all the locks.**
 22 Q. I think we see, following on from this meeting, that's
 23 what you do.
 24 **A. Because it just seemed an obvious thing to do. I was**
 25 **really surprised that, if you like, the day after the**

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1 incident, we didn't, you know, change all the locks
 2 and -- I know it's closing the stable door after the
 3 horse has bolted, but there needs to be a symbolic piece
 4 of actually sort of making children safer than they
 5 were.
 6 Q. I'm going to read down a couple of paragraphs to what
 7 Mrs Mellor says here. Again, she's talking about the
 8 caretaker and commenting on the responses he gave, and
 9 she expressed the concern that he gave the impression of
 10 being in charge of the school. Was that an observation
 11 or a concern that you shared?
 12 **A. Yes, we parted company.**
 13 Q. Yes, I think you --
 14 **A. Any educator will tell you that the caretaker runs the**
 15 **school anyway, because that's the assumption, and they**
 16 **actually are a very valuable member of staff. But he**
 17 **actually felt that he controlled who came in, who came**
 18 **out of the school.**
 19 Q. It went beyond that, though, didn't it? We have seen
 20 reference in the records in this investigation to the
 21 school keeper going with another member of staff to the
 22 home of one of the boys at school to talk about his
 23 being sexually bullied, and that shouldn't happen,
 24 should it?
 25 **A. No, not at all.**

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1 Q. You mentioned there just about staff grievance and what
 2 relations were like between you and the staff that you
 3 inherited. Were they difficult at this point, given --
 4 **A. They were variable. There were some very supportive**
 5 **staff. There was an excellent admin and bursar, an**
 6 **excellent teacher and a couple of very good care staff,**
 7 **you know, Martin Digan and Duncan Eaton, they were very**
 8 **supportive. So it was a variable piece. But I think --**
 9 **I was encouraged by the education authority to sort of**
 10 **weed out what they regarded as sort of poor practice but**
 11 **without the support from them. There was a little bit**
 12 **of sort of, "You're on your own".**
 13 Q. Was it difficult to get staff to move on who weren't up
 14 to the job?
 15 **A. Yes.**
 16 Q. Can we just look at a document that might demonstrate
 17 that, please, and this is GMP000359, page 3. This is
 18 notes of the care staff meeting.
 19 **A. Yes.**
 20 Q. I don't know if the first few words say it all, but what
 21 you have said is:
 22 "Disappointment, self-destruction, wanting to work
 23 with and caring for children, need to look at yourself.
 24 "There has always been an attitude of 'It's someone
 25 else's fault' at Knowl View."

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1 **A. Do you want me to comment? I think that sums it up,**
 2 **really. It was, "The world owes me a living". Not**
 3 **everybody, but predominantly it was a bit like, "Let's**
 4 **keep our heads down and we'll get paid".**
 5 Q. I think this note then must reflect your trying to pull
 6 those people up to the standards that you would have
 7 expected of care staff?
 8 **A. Yes.**
 9 Q. If we look down a couple of paragraphs, I just wanted to
 10 ask you about this. If you see the paragraph that
 11 starts:
 12 "I saw the Director of Social Services, the
 13 Assistant Director, Jane Held, training officer ...
 14 persuaded them to put on a series of courses", and you
 15 got some money for this. And then you say "to be told
 16 by Mike Cavanagh that he refuses to come back to
 17 Knowl View". If we look at the last paragraph:
 18 "I would hope that you, both individually and as
 19 a group, were concerned about what professional opinion
 20 is about Knowl View School, yet incidents such as Friday
 21 just reinforce this poor opinion of Knowl View School."
 22 If we go over the page, you say:
 23 "The care staff asked that they be regarded as
 24 professionals and have some parity with the teachers,
 25 yet once again there is an opportunity to reinforce this

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1 and it's thrown away."
 2 It sounds as if you had arranged training for staff
 3 and there had been some sort of incident whereby the
 4 trainers said they wouldn't come back?
 5 **A. Yes.**
 6 Q. Can you recollect what that was about?
 7 **A. Basically, they didn't rate the trainer and they told**
 8 **him so, which is an unfortunate start. So he decided**
 9 **that if they weren't going to be receptive to training,**
 10 **then there was no point in actually trying to deliver**
 11 **something. That was it.**
 12 Q. So was this part of the problem, then, that you had
 13 a lot of people in the care staff who weren't even
 14 receptive to training --
 15 **A. Yes, to do the training.**
 16 Q. -- or to doing things in a different way?
 17 **A. Yes.**
 18 Q. If we just look down, then, at the next paragraph, you
 19 said:
 20 "When I arrived at Knowl View in April, the school
 21 was basically at rock bottom, it had a child protection
 22 enquiry that would have made the Pindown experience look
 23 like a day at the seaside. The staff at that time were
 24 blaming all other factors for that happening, no-one
 25 asking themselves if any of their actions had

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1 contributed. Val Mellor still can't complete her report
 2 for fear of naming individuals who may have
 3 contributed."
 4 I wanted to ask you about that and whether there was
 5 some difficulty with Mrs Mellor naming people whom she
 6 thought to have been to blame?
 7 **A. I was disappointed that people weren't named in the**
 8 **report. It is not that you want a blame culture, but,**
 9 **you know, the obvious example is that if someone was**
 10 **paid and supposed to be sleeping in on the night that**
 11 **there was an intruder there, surely they were**
 12 **a contributing factor to why it happened? It's not to**
 13 **say that it would not have happened, but it would have**
 14 **been much more difficult to happen if people were in**
 15 **post in that way. So not following procedure and that.**
 16 **So I was disappointed that people weren't named.**
 17 Q. This is suggesting that Mrs Mellor's report hasn't come
 18 out yet, so this hints that there might have been some
 19 difficulty around --
 20 **A. What was the date of this? Because the report didn't**
 21 **come out for quite a while.**
 22 Q. That's right. It is only going -- we don't have a date
 23 for this, but it says "Val Mellor still can't complete
 24 her report for fear of naming individuals who may have
 25 contributed?"

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1 **says, "I need to get to know the school better". It is**
 2 **a bit like, "Hang on a minute, your job is to advise the**
 3 **school. Therefore, you should know the school". So**
 4 **making a comment after an incident that says, "I need to**
 5 **get to know the school better" for me is a bit like,**
 6 **"Hang on a minute, I thought that was your job?"**
 7 Q. She was the Special Needs adviser at Rochdale?
 8 **A. Adviser. She was the adviser. And there were only six**
 9 **schools that were special schools. So it is not as if**
 10 **you had a case load of, you know, 200 primary schools**
 11 **that you were trying to get to.**
 12 Q. Did that mean that there was some distance between the
 13 local authority and the school?
 14 **A. There was a chasm.**
 15 Q. You have mentioned the fact that Mrs Mellor didn't in
 16 fact provide her report for a very considerable time.
 17 We know that she was first introduced to everyone
 18 in June 1991 and her report was written
 19 in February 1991. I am not going to take you to the
 20 report, but was it of value to you?
 21 **A. Yes, it was. The report was of value. My feeling was**
 22 **it didn't go far enough, but it was of value.**
 23 **I actually really enjoyed working with Val and I thought**
 24 **she was excellent. But my feeling -- and I have no**
 25 **evidence for that -- is that she was quite constrained**

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1 **A. Yes, it would have been before.**
 2 Q. That suggests that there may have been some issue at
 3 that point in time --
 4 **A. There was.**
 5 Q. -- with her being able to name people?
 6 **A. Yes, there was.**
 7 Q. Was there pressure coming from somewhere that she not
 8 name people who may have been culpable in some way as
 9 regards what happened?
 10 **A. I couldn't comment on that because I wasn't aware of it,**
 11 **but there could have been.**
 12 Q. Can you understand why there should have been any
 13 reluctance to name people who may have been to blame?
 14 **A. Well, I think that the whole -- no-one was blameless in**
 15 **this. I mean, you know -- in fact, you know, I started**
 16 **to take responsibility for a school and, as soon as you**
 17 **become head teacher, you take responsibility for**
 18 **everything that is happening there and has happened, and**
 19 **I think people were reluctant to actually look at**
 20 **themselves, right from social services, education**
 21 **officers, you know, and say they could have done more --**
 22 Q. Yes.
 23 **A. -- that would have actually stopped this. I mean, there**
 24 **is a comment in your previous documentation from**
 25 **Marilyn Simpson, who actually was excellent, but she**

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1 **about what she could actually do or say.**
 2 Q. Did the report tell you much that you didn't already
 3 know yourself?
 4 **A. No.**
 5 Q. So why was it useful for you to have that report?
 6 **A. Well, one, we had -- you know, it is always useful to**
 7 **have an external review of an incident and someone else**
 8 **to actually say, "These are the recommendations". It is**
 9 **a bit like -- you then have a clear report that you can**
 10 **follow that you agree with. I was grateful for that.**
 11 Q. I presume as well it is also a bit of a weapon to have
 12 to hand if you need to get things moving?
 13 **A. As you can see, many times -- in fact, I even wrote to**
 14 **Val, there's documentation in there, to say, "I'm**
 15 **getting battered over staff. Can you just help and**
 16 **nudge?"**
 17 Q. Funnily enough, I am going to ask you about that
 18 document in a little while, but I just want to take you,
 19 if I may, to another document that came out after the
 20 Mellor report, and that's RHC001340. I think looking at
 21 it, Mr Bradshaw, you will see it is dated 27 March 1992.
 22 **A. Yes.**
 23 Q. It appears to be your own take on things at this point
 24 in time --
 25 **A. Yes.**

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1 Q. -- that you want to make clear to the governors.
 2 I think as we see if we look at the second paragraph:
 3 "There have been a number of incidents dating back
 4 as far as 1981, mentioned in the logbook of a sexual
 5 nature ..."
 6 The point you seemed to be making in that paragraph
 7 is, they had been recorded but they didn't ever seem to
 8 have been acted on. Was that the position?
 9 **A. I think that was the culture with everything, that staff**
 10 **felt, if they recorded it, it was resolved. There were**
 11 **a number of things that there was no resolution ever**
 12 **given to.**
 13 Q. Then if we look at that same paragraph, you say:
 14 "The regime was certainly oppressive, male
 15 orientated with coercion being the main form of
 16 control."
 17 You go on to say:
 18 "The staff culture developed into what it is today
 19 over a number of years ..."
 20 When you talk about it being male orientated,
 21 coercive, oppressive, do you mean that it was a violent
 22 sort of school or that physical violence was used as
 23 a form of control?
 24 **A. No, I meant that restraint -- I mean, you will always**
 25 **have -- it is normally de-escalation of incidents. You**

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1 will always have a need to protect youngsters from
 2 themselves or property or other people, so there will be
 3 a certain level. The thing is, if you ever get to the
 4 stage where you need to restrain a youngster, then you
 5 really need to do a debrief very carefully. But the
 6 whole crunch of that is to make sure that you
 7 de-escalate these, and normally, with these youngsters,
 8 by knowing what the trigger points are and making sure
 9 that they understand that.
 10 Now, the culture at Knowl View was that they used
 11 restraint as the first form rather than the last form.
 12 So there was no de-escalation, there was no talking to
 13 youngsters. I mean, it was an obvious piece.
 14 For these type of youngsters, what you have to avoid
 15 is total confrontation. In other words, "You will do it
 16 because I have told you you will do it", because they
 17 just react to it. Whereas, if you turn it around and
 18 say, "Wouldn't it be nice if we did this?", you will get
 19 the same result, but it is not in the same way and it is
 20 not oppressive. And the gender balance was
 21 predominantly male. When I arrived, it was 80/20, in
 22 that way. There is always a danger that people will use
 23 their physical presence to actually influence or control
 24 youngsters. You will probably see I had to go through
 25 three disciplinary procedures with members of staff --

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1 Q. That's exactly what I was going to --
 2 **A. -- who I felt had used inappropriate, excessive force.**
 3 **You can tell them and you can do the training and the**
 4 **whole piece, but unless people actually know what is**
 5 **acceptable and not acceptable, you have to go back to**
 6 **the sort of disciplinary action.**
 7 Q. Again, that had been part of the staff culture: too
 8 ready a recourse to physical restraint?
 9 **A. Yes.**
 10 Q. When you came on board, there were in fact a number of
 11 staff whom you had to subject to misconduct proceedings
 12 for precisely --
 13 **A. Yes, exactly that.**
 14 Q. If I may, then, I am going to go on to another document.
 15 This is RHC002408, and it is page 1 of that document.
 16 Do you recollect -- first of all, we have assumed
 17 that this is your document, Mr Bradshaw --
 18 **A. Yes, it is.**
 19 Q. -- because it is in the font that you use. It is your
 20 document?
 21 **A. Yes, it is, definitely.**
 22 Q. Can you recollect what it was prepared for?
 23 **A. Yes, it was for a governors' meeting. If you go back**
 24 **right to the first page, at the top -- on the previous**
 25 **document you showed me, which is part of the same thing,**

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1 **it says that it is for the governors -- I wanted to**
 2 **bring the governors up to date with the whole thing, so**
 3 **I started with the background. It was also a document**
 4 **that I wanted to get their support on what I was trying**
 5 **to do. You will also see some documentation where**
 6 **I think, following this, John Humphreys actually wrote**
 7 **to the Education Department saying, "Are you going to**
 8 **back the school or are you not going to back the school?**
 9 **Because we need to do (a), (b) and (c)."**
 10 Q. I wanted to touch on this because I think there is some
 11 information we may not necessarily get anywhere else.
 12 Again, there is reference to the fact that the record of
 13 events went back to 1981, when Matt Ingoe was
 14 a governor. I think he was still a governor whenever
 15 you joined the school?
 16 **A. When I started, he was the chair of governors. Just**
 17 **before I arrived, the week before I arrived,**
 18 **John Humphreys took over.**
 19 Q. I am going to ask you to stop there. I am just for the
 20 moment going to concentrate on Mr Ingoe. Do you
 21 recollect he was also a Conservative Councillor?
 22 **A. Yes.**
 23 Q. I am just going to ask you then about this document.
 24 What we can see, it is the fourth paragraph down, it was
 25 in the summer of 1990 that incidents of sexual

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1 experimentation came to light in certain of the units.
 2 You were going to give the detail of those verbally. We
 3 can see that from the paragraph just after the list of
 4 names. Then you make the point there that staff weren't
 5 on site when they should have been sleeping in or not on
 6 site when they should have been on senior cover. Did
 7 that mean that children were actually in units
 8 completely alone at night before you came?
 9 **A. Yes.**
 10 Q. Just on that point, there is reference in another
 11 document -- I don't want to take you to it -- that
 12 a number of the flats in the school weren't in use when
 13 you arrived?
 14 **A. One.**
 15 Q. One wasn't in use?
 16 **A. Yes.**
 17 Q. Do you know if children had been using that flat?
 18 **A. Sorry, you need to rephrase the question. In what way?**
 19 Q. There is a document that refers to children not being
 20 allowed to use the empty flat or the empty flats
 21 anymore. Was that anything you remember --
 22 **A. Well, that was only because the numbers reduced. So**
 23 **basically it was a four-unit school with ten spaces in**
 24 **each unit, and when the numbers decreased, they just**
 25 **used three of them, logically. So the back unit, which**

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1 **is Egerton, hadn't been used. But to my knowledge,**
 2 **no-one had access to that and it wasn't used.**
 3 Q. But certainly children were on their own?
 4 **A. Yes.**
 5 Q. If we go over the page, this is when I referred you to
 6 the information about the minibus. It says here:
 7 "Hilton, a known sex offender, was encouraged or at
 8 least not discouraged from visiting Knowl View.
 9 "He frequented the wooded area ..."
 10 You have referred to that:
 11 "He had on a number of occasions been allowed to
 12 sleep in the minibus and actually in the school and club
 13 room, with the knowledge of staff."
 14 **A. Yes.**
 15 Q. That doesn't sound as though it was something --
 16 **A. No, I remember writing that. That's so. I was trying**
 17 **to be sort of kind to the staff, that basically it is**
 18 **not that they opened the door and said, "Sleep in**
 19 **there", but they knew it was happening. Can I just**
 20 **refer to the top -- the notes as well at the top?**
 21 Q. Yes.
 22 **A. That had actually seen him with a sleeping bag coming**
 23 **across the fields at night, which from my point of view**
 24 **seems fairly obvious that he's looking for somewhere to**
 25 **sleep rough, which would have been a real sort of**

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1 **indicator of, "Well, shouldn't I tell the police?" or in**
 2 **the past, if he is a known perpetrator.**
 3 Q. Does that mean that his presence at the school and his
 4 sleeping over at the school was tolerated by staff?
 5 **A. It certainly seems that way.**
 6 Q. You then go on to talk about the actual incident with
 7 Hilton and you say the first time he came and stayed
 8 over that the school was aware of, he went down to the
 9 club room and partied. There were sexual games,
 10 et cetera, and he probably stayed in the club room after
 11 the children returned to bed. That seems like a clearer
 12 explanation of what had happened than we get from other
 13 sources?
 14 **A. Yes.**
 15 Q. Where did you get that information?
 16 **A. That was from the staff. That was by talking to the**
 17 **staff about what actually they understood happened that**
 18 **evening.**
 19 Q. If we look at the second night:
 20 "The second night, the boys were shattered and went
 21 to sleep fairly early but Hilton was let in and slept
 22 under A14's bed, waking up to sexually abuse A14 and
 23 anyone else that was available."
 24 I don't want any mention of any names, but was then
 25 there information that other children had been sexually

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1 assaulted as well?
 2 **A. Only anecdotally from the staff that -- you know, when**
 3 **they talked to the youngsters about what had happened.**
 4 Q. But there hadn't been any investigation into that?
 5 **A. No.**
 6 Q. No account taken from the other children who were
 7 involved that night?
 8 **A. No.**
 9 Q. As to what had happened?
 10 **A. Sorry, I am surprised to hear you say that the staff**
 11 **were interviewed in October.**
 12 Q. Yes.
 13 **A. If I had got this information around sort of April/May**
 14 **of the next year, why it wasn't then followed up,**
 15 **because this information was available from the staff**
 16 **themselves.**
 17 Q. Yes. Thank you. Then just if we go down a couple more
 18 paragraphs, it says:
 19 "Hilton is now serving three years' sentence for
 20 abusing children in the Bamford area, using the
 21 technique of having a small puppy with him and a bag of
 22 sweets or fags and offering the puppy or sweets or fags
 23 in return for sexual favours, usually oral sex."
 24 **A. Yes.**
 25 Q. So, again, you were fully aware --

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1 **A. Yes, what his modus operandi was.**
2 Q. That will be important, I think, when we come to look at
3 what happened after he was released. Then you go on to
4 say:
5 "The routine now established in Norden and Ashworth
6 continued.
7 "Sexual games in the toilets and a way of earning
8 extra cash.
9 "Norden were involved in fairly heavy mutual
10 masturbation, oral sex sessions."
11 Then, that appears to be a more graphic account of
12 the reality of what was happening after Hilton got
13 involved?
14 **A. Yes.**
15 Q. Was what happened with Hilton then regarded as pivotal
16 or as having in some way precipitated more extreme
17 behaviour then on the part of the children?
18 **A. I think it sort of -- it upped the ante to more extreme**
19 **behaviour.**
20 Q. I am just going to move along a little bit in the
21 chronology. We had the Mellor Report being circulated
22 to staff at the end of March 1992. Do you recollect
23 that there was then another investigation after the
24 Mellor Report that was instigated --
25 **A. Can I just go back a piece?**

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1 Q. Yes.
2 **A. My understanding is the Mellor Report was actually**
3 **published but staff didn't have a copy.**
4 Q. That's right.
5 **A. But they requested a copy. Then there was a meeting at**
6 **Knowl View with all the staff --**
7 Q. That's right.
8 **A. That Diana Cavanagh attended and gave all the copies out**
9 **and collected them all back in.**
10 Q. That's actually a good point. The staff didn't get the
11 whole report either, they didn't get the appendix that
12 set out specific information about individual children.
13 Do you recollect whether or not that was something that
14 you saw?
15 **A. No, because when -- when I was interviewed previously by**
16 **sort of the QC Garnham, he referred to two Mellor**
17 **reports.**
18 Q. Yes.
19 **A. I had only ever seen one report and I haven't seen the**
20 **appendix either.**
21 Q. Is there any reason why you, as the headmaster, wouldn't
22 have been allowed or not permitted to see the appendix?
23 **A. No. I mean, obviously, I would be instrumental in sort**
24 **of, you know, actioning the action plan or key to it.**
25 Q. I was just asking you then about what happened

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1 thereafter. What was staff reaction like to the
2 Mellor Report?
3 **A. Well, their view is that it was a little bit of**
4 **a whitewash, that -- you know, not everything was -- had**
5 **come out as it should have done and they thought it**
6 **should have been a bit more hard hitting.**
7 Q. Were you sympathetic to that point of view?
8 **A. Yes, very much so. I think, you know, from their point**
9 **of view -- the difficulty with the staff, it's a bit**
10 **like sort of -- what they were saying was correct, but**
11 **also they took no responsibility for their own actions**
12 **or their own part of it. It was a bit like sort of --**
13 **everybody wanted to blame everybody else, apart from**
14 **themselves. There really needed to be a collective**
15 **responsibility: "This happened on our watch as the**
16 **school staff", and no-one said, you know, "Even if**
17 **I wasn't part of it, I was culpable because the**
18 **environment allowed this to happen". No-one really took**
19 **that responsibility. But I was sympathetic with the**
20 **staff that they hadn't been given a clear indication or**
21 **the opportunity to. Their big grouse was that there was**
22 **no management available and it was somebody else's**
23 **fault. In their view, they had been telling people,**
24 **both social services and education, that something like**
25 **this could happen.**

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1 Q. I'm just going to, while we are on this topic, ask you
2 first of all whether or not you ever saw the report by
3 Diana Cavanagh that emerged from that investigation?
4 **A. Not that I can recall. There was a letter that I'd seen**
5 **from Diana Cavanagh about that meeting, but I didn't see**
6 **a report.**
7 Q. A report on staff behaviour?
8 **A. No.**
9 Q. I am not going to take you to it, because if you don't
10 remember, it is probably going to be of limited
11 assistance.
12 One of the things that it says is that staff had
13 been involved in activities when they were staying at
14 the school at night, and the implication is that they
15 were sexual activities, which meant that they hadn't
16 noticed things that were going on at around the time of
17 the Hilton incident. Again, I wondered whether or not
18 that was something -- part of the culture that you had
19 encountered as well?
20 **A. No. There was talk of sort of, you know, in previous**
21 **years there were parties at the school and the children**
22 **went -- went in there, but there was nothing that I was**
23 **aware of or happening.**
24 Q. And your attention hadn't been drawn to that specific
25 issue?

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1 **A. No, not at all, no, and there was no-one residential on**
2 **the site anyway.**
3 Q. Was it only you at that stage?
4 **A. Only me, yes, solely.**
5 Q. I think it is throughout the course of your being head
6 at Knowl View School a number of staff were subject to
7 misconduct procedures for a range of different
8 wrongdoings, so there were some staff you have already
9 mentioned were disciplined because of using excessive
10 physical force.
11 **A. Yes.**
12 Q. I think you also had some staff who were disciplined
13 because they didn't have the qualifications that they
14 said they had?
15 **A. Yes, and lied on their application forms.**
16 Q. I think that accounted for two staff.
17 **A. Yes.**
18 Q. I think there were other things that went on at that
19 time as well --
20 **A. Yes.**
21 Q. -- just as regards the ongoing staff culture, so there
22 were leaks to the newspapers?
23 **A. Yes.**
24 Q. And there was also a listening device planted in a staff
25 meeting as well?

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1 **A. Yes.**
2 Q. Was that given to the press as well?
3 **A. Yes.**
4 Q. I think a copy of the Valerie Mellor report --
5 **A. Yes, that went as well.**
6 Q. -- went astray and surfaced in an industrial tribunal
7 hearing as well?
8 **A. Yes. It went to the union UNISON.**
9 Q. Is it fair to say, then, Mr Bradshaw, that difficulties
10 with the staff culture at Knowl View School persisted
11 throughout your headship?
12 **A. I think the first two years certainly, you know --**
13 **I mean, I was only there three years, but the first two**
14 **years certainly were a battle with the culture with the**
15 **staff. But I think, once we got it established, you**
16 **know, we did have quite a good 18 months.**
17 Q. I think one of the things that happened that was
18 obviously very significant as regards the staff was
19 the -- I'm afraid we are calling it the "sex in a tent"
20 incident --
21 **A. That's what the papers called it.**
22 Q. -- because that's what the papers called it, exactly.
23 I think it's correct that the staff who were involved in
24 that had in fact been new staff who had been brought
25 into the school?

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1 **A. Yes.**
2 Q. You must have felt very let down that, after all of your
3 work, new staff were apparently becoming a part of
4 the culture that had existed?
5 **A. It was a classic sort of, you know, staff away in France**
6 **with a group of young children, decided to have a night**
7 **where they drank and then the next stage is the sort**
8 **of -- I had a phone call, I sent the deputy straight**
9 **over there to bring youngsters back and the whole piece,**
10 **but, yes, you are right, really disappointed with the**
11 **staff, and we followed up with disciplinary procedures**
12 **following that incident.**
13 Q. Does that mean that new staff were being infected by the
14 culture that had already existed before they arrived?
15 **A. I don't think they were being infected by the culture**
16 **per se. It is a difficult one, but the Rochdale area**
17 **didn't -- it wasn't a great catchment area. It was**
18 **fairly colloquial and it is quite sort of introvert.**
19 **You didn't get a lot of choice of new blood coming into**
20 **the area. That is not to say that we didn't have some**
21 **excellent staff there among them. I don't think they**
22 **got sort of contaminated, I think it was an incident --**
23 **it was a continuation sort of thing. I don't really**
24 **think they got contaminated.**
25 Q. I am going to move on to a different topic now, which is

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1 to just ask you about the support that the school got
2 after you took over from Rochdale Borough Council. In
3 short, did the school get the sort of support that it
4 needed in order to not just survive, but to thrive?
5 **A. I think the answer is that it was variable. To answer**
6 **the question directly, the answer would be no. Because**
7 **support is -- okay, it comes in two forms, really, it**
8 **comes in emotional support and actually support for what**
9 **you're doing in terms of getting the resources or the**
10 **tools to do the job. So there was quite a bit of sort**
11 **of emotional support and a rah-rah piece of, let's get**
12 **it all done. But when it came to the crunch, the**
13 **resources were very difficult to argue.**
14 Q. Was it mainly about resources?
15 **A. Yes.**
16 Q. I want to bring you to a document to see if it
17 encapsulates that, RHC001731, page 6. You have already
18 referred to this, Mr Bradshaw?
19 **A. Yes.**
20 Q. But that was your memo to Val Mellor?
21 **A. Yes.**
22 Q. It is dated 11 March 1992. It says:
23 "This term, Val, I am feeling totally shell-shocked
24 from the battering I seem to be taking from the local
25 authority. The main points I feel we should make are:

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1 (a) what happened at Knowl View was symptomatic of
 2 a staff culture and could happen again, we are not out
 3 of the woods yet.
 4 (b) appointments to the school should be from
 5 outside the authority, and be personnel who have
 6 experience and qualifications in this field. Not just
 7 fitting in any staff.
 8 (c) the school and head need every assistance they
 9 can get from the authority or the school will not
 10 survive."
 11 Then you go on down that page to talk about
 12 appointments being blocked?
 13 **A. Yes.**
 14 Q. Mr Bradshaw, does that then encapsulate --
 15 **A. Yes, it does.**
 16 Q. -- what essentially was --
 17 **A. My first port of call was not Val Mellor. I had**
 18 **actually raised this with most members of the Education**
 19 **Department.**
 20 Q. So was this a last resort then?
 21 **A. Yes, it was a bit like, "Can you help me, please?"**
 22 Q. Was this because you thought at this stage of
 23 the investigation and with her involvement in the
 24 school, she might be able to move things along --
 25 **A. Yes.**

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1 Q. -- when you couldn't?
 2 **A. Yes.**
 3 Q. Then, on a similar topic, I wanted to ask you about
 4 Mr Hilton and what happened after he was released from
 5 prison.
 6 **A. Yes.**
 7 Q. Because we can see from the records that he continued
 8 to, I think we can safely say, plague the school -- is
 9 that an accurate way of putting it?
 10 **A. Yes, I think it was the day he was released he was**
 11 **spotted with his tent on the footpath.**
 12 Q. Again, I am going to try to take you to a document that
 13 might just sum up the situation, but if we could look at
 14 RHC001654, and that's page 1. Mr Bradshaw, this is
 15 a memo that you sent to Mrs Cavanagh. This is
 16 in January 1993. You refer there to the fact that you
 17 had a problem with Hilton "at the end of last term":
 18 "This culminated in him being arrested for a breach
 19 of the peace after waiting at the end of the drive for
 20 children to leave the school. He was also camping on
 21 the land at the back of the school."
 22 You say there that you had spoken to numerous people
 23 about this, that you had spoken to Liz Dobie,
 24 Adele Bebb, the police and Bill Lawley about the
 25 problem. Liz Dobie and Adele Bebb were from the

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1 Education Department, weren't they?
 2 **A. Yes. Bill Lawley was the legal --**
 3 Q. Was the legal adviser.
 4 **A. At the Education Department.**
 5 Q. That memo refers to the fact that, as far as you were
 6 concerned, he was going to pursue an injunction so that
 7 Mr Hilton couldn't get within 100 yards of the school,
 8 with police powers of arrest.
 9 In the bottom paragraph, you refer to the fact that
 10 Mr Hilton had at that point been rehoused in the centre
 11 of town, but that didn't matter because he was still
 12 coming back to the school all of the time?
 13 **A. Yes.**
 14 Q. To your knowledge, was there ever an injunction to stop
 15 Mr Hilton coming to the school?
 16 **A. No. No.**
 17 Q. Was that something that you raised with a number of
 18 people?
 19 **A. I mean, I was getting battered by my wife on a daily**
 20 **basis. We could see his tent from our child's bedroom**
 21 **window, so you can imagine the emotive response to that.**
 22 **I have to say, the police were excellent, but the**
 23 **police had no powers, but they actually arrested him and**
 24 **moved him for a breach of peace which they created,**
 25 **rather than -- I won't say any more, put it that way,**

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1 **and I was very grateful they did do, but there was never**
 2 **any restriction, which meant that on the public footpath**
 3 **he had a right to actually wander up and down that all**
 4 **the time.**
 5 Q. Did anyone ever explain to you why they couldn't apply
 6 for an injunction?
 7 **A. No.**
 8 Q. Mr Bradshaw, I am going to ask you about one final
 9 topic, so we may just finish your evidence before lunch.
 10 I wanted to ask you, please, about Harry Wild --
 11 **A. Yes.**
 12 Q. -- and about his involvement with Knowl View School.
 13 I am just going to be quite careful with names when I go
 14 through this with you.
 15 **A. Yes.**
 16 Q. When you started, you mentioned the fact that there had
 17 been a governor at the school called Mr Ingoe?
 18 **A. Yes.**
 19 Q. He was then replaced by another governor whose name
 20 doesn't matter.
 21 **A. Yes.**
 22 Q. Is it right then that Harry Wild wanted to replace that
 23 second governor?
 24 **A. That's correct.**
 25 Q. Because he wanted to be the head of the governors at the

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1 school?
 2 **A. Yes.**
 3 Q. Did he browbeat you into supporting him to be the head
 4 of governors?
 5 **A. Yes.**
 6 Q. How did he do that?
 7 **A. Well, he made -- basically, he said that he had plans**
 8 **for the school, and he was backed by Cyril Smith, who**
 9 **I had never met and didn't -- wasn't aware of, of how he**
 10 **wanted the school to go, and I was either to go with him**
 11 **or I would become an enemy of his and I wouldn't last**
 12 **very long.**
 13 **Now, I was fairly sort of abrasive, anyway, as**
 14 **you're aware, so -- I did discuss it with colleagues.**
 15 **In fact, I was doing a Masters in Education and**
 16 **I discussed it with colleagues in Manchester, but I felt**
 17 **it wasn't strong enough to make a formal complaint.**
 18 **I did go along with him in terms of that I could have**
 19 **had the casting vote. So, yes, I was browbeaten and it**
 20 **was quite --**
 21 Q. Did you take his threat seriously?
 22 **A. Yes.**
 23 Q. Was that because you knew that he did have quite a lot
 24 of sway or power in Rochdale?
 25 **A. Yes.**

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1 Q. When you were interviewed by Neil Garnham, you said that
 2 you had real concerns about Harry Wild as regards
 3 children. What made you have those concerns? What was
 4 it about him?
 5 **A. As I said at the time -- and I had no concrete evidence,**
 6 **I just had a gut reaction of someone that had an**
 7 **interest in children that wasn't totally sort of**
 8 **professional. That's as far as it went.**
 9 **I mean, I work with gut reaction a lot of time, but**
 10 **I had no real evidence. But it made me very aware of**
 11 **when he was actually coming to meetings or on site or**
 12 **being signed in or access to it. Just totally.**
 13 Q. You have answered my next question. So he was someone
 14 who visited the school? He actually came to the school?
 15 **A. He came to the school for meetings, only for governors'**
 16 **meetings.**
 17 Q. Does that mean then that you were careful to make sure
 18 that he was escorted --
 19 **A. Yes, very.**
 20 Q. -- whenever he came to the school?
 21 **A. Very. The other thing that concerned me, when**
 22 **I resigned and I left, they advertised the post but**
 23 **didn't appoint.**
 24 **Now, one of the people that actually sort of applied**
 25 **for my post was John Novak, who was the head of**

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1 **Brownhill school, very well qualified, extremely good**
 2 **head, but they didn't appoint anyone.**
 3 **Now, John went on to Director of Education in**
 4 **different authorities and had a very successful career,**
 5 **and it just seemed very strange for someone that was**
 6 **very qualified, very experienced and knew Rochdale was**
 7 **not appointed for some reason in that way. They didn't**
 8 **appoint at all. As you know, the school closed within**
 9 **12 months. It just felt that there was an ulterior**
 10 **motive.**
 11 Q. You were concerned then that Mr Wild may have been
 12 taking far too much of an interest in who became the
 13 head than was right or appropriate for a school
 14 governor?
 15 **A. Yes.**
 16 Q. You have mentioned Cyril Smith, and I just want to deal
 17 with this very briefly: was he a governor whenever you
 18 were at the school?
 19 **A. No.**
 20 Q. Had you ever met him or had any dealings with him?
 21 **A. I have never met him in my life nor did he ever visit**
 22 **the school.**
 23 Q. I was going to ask you, were you ever aware of his
 24 having visited the school?
 25 **A. No, never.**

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1 Q. Were you ever informed or made aware of an incident
 2 whereby he was seen in the school at night?
 3 **A. No, never.**
 4 Q. Is that something that could have happened whilst you
 5 were the headmaster of the school?
 6 **A. No.**
 7 Q. We have a couple of moments, Mr Bradshaw, and the chair
 8 might have some questions for you, but I just wanted to
 9 ask you a couple of broader things about the provision
 10 of residential care for children with educational and
 11 behavioural needs.
 12 First of all, do schools like Knowl View School
 13 still exist?
 14 **A. Yes.**
 15 Q. I think you have referred to the fact it is rare for
 16 them to be single-sex schools anymore; is that right?
 17 **A. Yes.**
 18 Q. But residential care is still common in that sector?
 19 **A. Yes.**
 20 Q. Do residential schools still cater for children across
 21 that sort of age range?
 22 **A. Yes. Can I explain that the model has slightly changed.**
 23 Q. Please do.
 24 **A. The model that we had in '60s, '70s, '80s and '90s was**
 25 **basically "the house on the hill" which was**

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1 a residential special school where the children resided
 2 up to numbers of 60 actually on the site. What the
 3 model is now is a hub-and-spoke model, in that there is
 4 a day school and the children will live in individual
 5 children's homes, four- or five-bedded, and travel in to
 6 the day school.

7 Q. Does that mean that children might be educated during
 8 the day at the same establishment but that they don't
 9 all live together in a mixed age group at night?

10 A. That's correct.

11 Q. Is the model still that children live in those schools
 12 five days or sometimes seven days a week?

13 A. Well, it's rare now because if you take the model as
 14 being either day, weekly, termly or 52 week, the
 15 education authority, again being aware of budgets, will
 16 say, "If a child can last every weekend and every
 17 holiday at home, why are they needing to be residential
 18 placed for just five nights?" So, basically, we either
 19 have day or we have 52 week. It is very rare now that
 20 we have weekly boarding or termly boarding.

21 Q. Thank you. That is helpful.

22 Looking back at Knowl View School, with all the
 23 experience that you have amassed in the years since, are
 24 you able to identify from your perspective now the
 25 things that had gone wrong at that school which meant

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1 that the sort of abuse that happened was able to happen?

2 A. I think it's one of -- the answer is, yes. But every
 3 piece of it was wrong. So if you look at it, the place
 4 was wrong. The environment was not conducive to, as you
 5 said, warm, caring, cosy piece for children, it was very
 6 stark, so the environment was wrong. The people were
 7 wrong. They didn't have any leaders. The governance
 8 was wrong. The curriculum was wrong, in that it didn't
 9 meet the needs of individual children. Most of all, the
 10 sort of -- the monitoring and the governance didn't take
 11 place.

12 Q. Do you mean that from -- as regards the local education
 13 authority --

14 A. I mean that from -- I mean, there are three levels of
 15 governance. There is basically the head and the senior
 16 staff knowing what's happening in the school and doing
 17 that.

18 There's the governors that would have, you know,
 19 monthly KPIs. I mean, now we do weekly KPIs, monthly
 20 and termly KPIs. There were no key performance
 21 indicators, you know, at that time actually put in
 22 place. The obvious one is occupancy, which is a daily
 23 register. There wasn't even a KPI for occupancy, so
 24 nobody knew how many children were actually in on
 25 a daily basis before I arrived.

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1 Then, obviously, it was a local authority school,
 2 and the governance from the local authority and the
 3 social services, because lots of the children were in
 4 the care of the social services, they should have known
 5 exactly what was happening in there and had processes to
 6 do that.

7 Things should have been escalated up. At the
 8 moment, I am CEO of a group of 13 schools, but I check
 9 the KPIs on a weekly and a monthly basis and we have
 10 a clear indication of what you elevate upwards. I mean,
 11 one of the simple things is a parent complaint. You
 12 know, it will be elevated up. A parent complaint will
 13 definitely have a process that you respond to. There
 14 has to be a resolution. But it is -- so it was
 15 a mistake waiting to happen, really.

16 MS DOBBIN: Thank you, Mr Bradshaw. If you just wait
 17 a second. Chair, do you have any questions for
 18 Mr Bradshaw?

19 Questions from THE PANEL

20 THE CHAIR: Can I just ask you about the role of
 21 the teaching staff? You haven't referred a lot to them,
 22 perhaps naturally, because the focus has been more on
 23 the care staff from the point of view of the issues we
 24 have been discussing. Do you have any comment to make
 25 about what their role in the events at the school was?

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1 A. The process then -- apologies if you have already had it
 2 explained -- was the teachers also did an evening
 3 activity, so there was an integrated -- which is a good
 4 policy and it uses skills for them to do that.

5 But basically the teachers' view of the care staff
 6 were as child minders, and there was not a link between
 7 them. Now, we started to create a better system when
 8 you had key workers and you talked about the whole thing
 9 across, but the teachers' view -- there was one
 10 excellent teacher, which was, you know, out of the norm,
 11 who -- she was superb and got some great results from
 12 the youngsters, but the others regarded the job as
 13 somewhere to come during the day and leave at 4.00 pm
 14 and not really worry about what has happening, so they
 15 were fairly removed from that in that way.

16 THE CHAIR: What was your view of the quality of
 17 the teaching that went on?

18 A. Very poor. It was very basic, apart from one teacher,
 19 it was a real contrast. It was one of those things --
 20 HMI did visit and they asked, "Where did you get her
 21 from?" Because the comparison was so stark in that way.

22 THE CHAIR: One last question: regarding the resourcing
 23 tensions with the local authority, was it the case that
 24 budgetary constraints and savings were applied evenly,
 25 or did you form the impression that Knowl View School

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1 was categorised, if you like, as a very low priority
 2 when it came to what services should be protected and --
 3 **A. I think the latter. I mean, it was a Cinderella**
 4 **service, very much.**
 5 THE CHAIR: Thank you very much. Thank you.
 6 MS DOBBIN: Thank you, chair.
 7 THE CHAIR: We will return at 2.00 pm.
 8 (1.10 pm)
 9 (The short adjournment)
 10 (2.00 pm)
 11 MS DOBBIN: Chair, the next witness is Dr Selwyn Hodge.
 12 DR SELWYN JOHN HODGE (affirmed)
 13 Examination by MS DOBBIN
 14 MS DOBBIN: Dr Hodge, can you give your full name to the
 15 panel, please?
 16 **A. Selwyn John Hodge.**
 17 Q. Dr Hodge, did you first come to work at Rochdale Borough
 18 Council in 1988?
 19 **A. I did, indeed.**
 20 Q. Was that as a general adviser to schools?
 21 **A. It was, general adviser responsibility for science**
 22 **education.**
 23 Q. Does that mean that your remit in those days was very
 24 much confined to issues about science teaching in
 25 schools?

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1 **A. It was, yes. Fundamentally, working with schools on the**
 2 **new science orders in the national curriculum, working**
 3 **with a small team of advisory teachers for science that**
 4 **government grant had allowed us to set up, and also with**
 5 **a patch of schools -- we all had a group of schools**
 6 **within the borough we had responsibility for, and I had**
 7 **three secondary schools and I think there were about ten**
 8 **primary schools that I had responsibility for.**
 9 **In addition to that, we also were looking at a whole**
 10 **raft of issues around government changes at that time.**
 11 **In particular, the authority was reorganising its**
 12 **secondary and primary provision, and that was**
 13 **a consuming activity, obviously, it was a very big**
 14 **activity, and that was also combined with changes in the**
 15 **further education sector where we were changing the**
 16 **number of colleges we had. So a lot of the work I was**
 17 **doing initially was very much directed not by the**
 18 **schools but by government and by local authority**
 19 **policies.**
 20 Q. If I can just stop you there, I think the implication of
 21 that is that between 1988 and 1991 you didn't have
 22 anything to do with special schools within Rochdale; is
 23 that right?
 24 **A. That's absolutely right. The schools I was responsible**
 25 **for were primary and secondary schools. I didn't see**

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1 **inside any special school until I became chief adviser,**
 2 **and I certainly don't remember actually visiting**
 3 **Knowl View until I had been in post as chief adviser for**
 4 **some time.**
 5 Q. I am just going to go through the different roles that
 6 you had to make sure we have understood them properly.
 7 You took over the role of special adviser in 1991;
 8 is that right?
 9 **A. Of chief adviser.**
 10 Q. Yes.
 11 **A. Yes.**
 12 Q. That was whenever Cliff Bentley retired?
 13 **A. That's right.**
 14 Q. So you took over his position?
 15 **A. That's right.**
 16 Q. Can you just explain briefly, please, what that role
 17 involved?
 18 **A. Yes. I think the central point, really, was to give**
 19 **advice and information to the Director of Education,**
 20 **elected members on all educational matters in the**
 21 **authority and how these might affect local educational**
 22 **establishments and the area itself. Because there was**
 23 **a lot happening in education, clearly it was my role to**
 24 **try to interpret that as to how it would affect Rochdale**
 25 **and what Rochdale might need to do in terms of planning**

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1 **for the future. That was the first thing.**
 2 **But I was also head of the advisory service and**
 3 **I was therefore working to improve and develop**
 4 **educational standards across the authority by giving**
 5 **appropriate advice and support -- a lot of my role was**
 6 **involved in in-service training for teachers, and**
 7 **therefore we were looking at ways of improving the**
 8 **in-service training to match the demands being made,**
 9 **particularly by central government, for changes in the**
 10 **curriculum and teaching styles and then all the changes**
 11 **that came in very quickly after that, in terms of**
 12 **the assessment process.**
 13 Q. I am just going to stop you there. Was that work
 14 confined to children who were at primary and secondary
 15 schools, as opposed to special schools in Rochdale?
 16 **A. It was, because although the national curriculum did**
 17 **eventually become also there for special schools,**
 18 **initially it was very much seen as for primary and**
 19 **secondary schools, and therefore our work was mainly**
 20 **with those primary and secondary schools. We did have**
 21 **an adviser for Special Needs at the time, who was**
 22 **Heather Shaw, and her responsibility was to work with**
 23 **the special schools and also to look at how children in**
 24 **mainstream schools could be better supported.**
 25 Q. Was she replaced in due course by a woman called

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1 Marilyn Simpson?
 2 **A. She was indeed, in about 1990/'91, I think, something of**
 3 **that order.**
 4 Q. Did you manage Marilyn Simpson?
 5 **A. I did. She was one of my team.**
 6 Q. Does that mean that you had some responsibilities, then,
 7 for special needs school in Rochdale?
 8 **A. Oh, absolutely, in the sense that my brief as chief**
 9 **adviser was very much for looking at the education**
 10 **across the whole of Rochdale. I did have responsibility**
 11 **in that sense. And I met regularly with Marilyn to look**
 12 **at issues that she was coming across and we had**
 13 **conversations about that.**
 14 **Occasionally, we had conversations about Knowl View,**
 15 **and you will probably come on to this later in more**
 16 **depth, but she was certainly concerned about some of**
 17 **the standards at the school, having very recently been**
 18 **appointed. She was only appointed probably six months**
 19 **before I was appointed as chief adviser. She'd come, by**
 20 **the way, from a position as head teacher of a special**
 21 **school, so she was very experienced.**
 22 Q. I am going to stop you there because I just want to make
 23 sure that we have the chronology clear. You were made
 24 the chief adviser in 1991 and then I think nine months
 25 after that you became the Assistant Director of

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1 Education. Is that correct?
 2 **A. No. I didn't become, in fact, the assistant director**
 3 **until about 1993/'94, I think it was. When I first**
 4 **became chief adviser, it was part of a senior management**
 5 **team in the Education Department that had inherited**
 6 **a number of officers from other parts of the council,**
 7 **because the council had entered into neighbourhood**
 8 **services and community education, and as a result there**
 9 **was a general reorganisation of staffing posts across**
 10 **the authority. Some of the staff in the senior**
 11 **management team were not originally from the Education**
 12 **Department, but had briefs in other departments of**
 13 **the council before that.**
 14 **That model did cause us a number of difficulties, in**
 15 **terms of how the team worked and how it related to the**
 16 **staff for whom those various offices were responsible.**
 17 **So it was decided after some time that there would be**
 18 **a reorganisation of responsibilities and I then became**
 19 **the Assistant Director for Pupil Services and Curriculum**
 20 **Services, which covered not just the advisory team, but**
 21 **all issues to do with schools in relation to the**
 22 **curriculum, in relation to pupils, in relation to**
 23 **admissions, exclusions, responsibility for the Education**
 24 **Welfare Service, so looking at issues around truancy and**
 25 **so on, Special Educational Needs as well, obviously not**

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1 **discharging all of those responsibilities myself but**
 2 **through officers who were themselves appointed to do**
 3 **that. For Special Educational Needs it was**
 4 **Elizabeth Dobie, who had replaced Brian Williams, again,**
 5 **not very long before a lot of these events happened.**
 6 **There were substantial staffing changes in the**
 7 **borough between about 1989 and 1992.**
 8 Q. I am just going to stop you there, Dr Hodge, because
 9 I just want to check if your statement -- there may be
 10 an error in it. It says:
 11 "When Diana Cavanagh came, that changed."
 12 You are talking about your role:
 13 "I was appointed chief adviser and then, about nine
 14 months later, assistant director with responsibility for
 15 pupils."
 16 Does that help you with dates?
 17 **A. Yes, because I think when I saw Mr Garnham I got rather**
 18 **confused about some of the dates at that time and**
 19 **I looked at it again and it was actually slightly later**
 20 **than that, more than nine months.**
 21 Q. Thank you very much. You have suggested, then, that
 22 Knowl View became known to you after Mrs Simpson was
 23 appointed because she was bringing information to you
 24 about her concerns?
 25 **A. Yes, in that sense. I had not heard anything from my**

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1 **predecessor Cliff Bentley about the school, it was never**
 2 **discussed at adviser meetings, I didn't have any --**
 3 **I had the background and I had never got any information**
 4 **on Knowl View specifically from anybody in the**
 5 **authority.**
 6 **At the time, there wasn't a particularly good**
 7 **relationship between the advisory service and education**
 8 **office staff. That was partly because of tensions**
 9 **between the professional side and the administrative**
 10 **side. That was something I worked very hard on to try**
 11 **to get over that problem, which was certainly deflecting**
 12 **us from what we were trying to do.**
 13 Q. Did you come to form a view about Knowl View School in
 14 those early days of your appointment?
 15 **A. No, not really, apart from Marilyn Simpson's comments**
 16 **that there were tensions in the school, particularly**
 17 **between care staff and teaching staff, I remember that,**
 18 **and also there was a weakness in the senior management.**
 19 **I did talk to her about ways we might tackle that, and**
 20 **obviously, as an experienced head teacher, I said,**
 21 **"That's something you can work very hard on, to look at**
 22 **the issues, see what can come about from the advisory**
 23 **point of view".**
 24 Q. Dr Hodge, can you give us some idea, then, as to when
 25 you may have been having these discussions with

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1 Ms Simpson?

2 **A. That would have been certainly before the incident that**

3 **Liz Dobie and I had the -- I'm trying to think of**

4 **the word, the actual meeting with the staff. We had**

5 **that meeting.**

6 Q. Just to help you, that was 1992?

7 **A. It was before that, certainly.**

8 Q. Would it have been a couple of years before that?

9 **A. No, it wasn't as much as that. I would think probably**

10 **nine months, something of that order. It is so long ago**

11 **now, and I don't remember the detail of a lot of this.**

12 **As I say, it wasn't high on my agenda, not necessarily**

13 **because I didn't want it to be, but there were so many**

14 **other things which were going on in the authority at the**

15 **time that it was a matter of trying to throw all the**

16 **balls up in the air and trying to catch them again.**

17 Q. In your witness statement, you made reference to the

18 lack of clarity about the purpose of Knowl View School.

19 Can I ask you to explain that and what you meant by

20 that?

21 **A. Yes. When Knowl View School was opened -- and this is**

22 **my opinion as well as some fact -- it was set up**

23 **obviously by a number of local authorities in terms of**

24 **children who had severe behavioural difficulties and**

25 **possibly difficult home backgrounds. The authorities**

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1 **did this because within each authority there were very**

2 **few children who necessarily fell into these categories.**

3 **The authorities came together to create Knowl View**

4 **with a population up to about 40 children from I think**

5 **it was four authorities.**

6 **Now, when it was set up, I think in many ways it was**

7 **seen as a way of trying to give a group of children with**

8 **fairly severe behavioural difficulties and home**

9 **circumstances as well the opportunity to have a more**

10 **caring environment in which they could work and an**

11 **education which could fit into that caring environment.**

12 **I think that was the sort of intention.**

13 **I don't think at the time I spoke to Marilyn Simpson**

14 **about it that was actually coming to fruition.**

15 Q. Did you actually visit the school yourself at that stage

16 or --

17 **A. No, I didn't. The first time I visited the school was**

18 **substantially after that, probably around the time of**

19 **LMSS, in fact.**

20 Q. Is there a reason why you wouldn't have visited the

21 school to become more familiar with it?

22 **A. There were some schools I never visited simply because**

23 **my workload was so great in so many different areas that**

24 **I hadn't got the opportunities to visit them all and**

25 **I did have a team of advisers, who obviously kept me**

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1 **informed, and officers who worked on that.**

2 Q. So any view that you had about Knowl View School comes

3 from what was conveyed to you by Mrs Simpson --

4 **A. Absolutely.**

5 Q. -- in and around that time?

6 **A. And Mrs Dobie as well, in terms of the office side.**

7 Q. I am going to go on, really, to ask you about the report

8 that you wrote in 1992 about staffing at Knowl View

9 School?

10 **A. Yes.**

11 Q. Prior to that, what level of involvement had you had

12 leading up to writing that report?

13 **A. None, basically, I would say, because -- in the sense**

14 **that I was asked by the director to take over the report**

15 **of Knowl View with Mrs Dobie. I'm not quite clear why,**

16 **other than to say it is probably because I hadn't had**

17 **a lot of involvement, so I was going in as somebody who**

18 **was fairly neutral, without a lot of expectations.**

19 **I had also been very used to obviously working in that**

20 **evaluative sense in my career in the past and, going in,**

21 **it was merely a way of finding out what people's views**

22 **were without having any preconceptions.**

23 Q. I think -- I'm not going to take you to them -- we can

24 see that your name comes up as having been in attendance

25 at a few meetings that Mrs Cavanagh was at about

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1 Knowl View School. Would you have attended meetings in

2 order to provide her with advice or support?

3 **A. It would depend very much on the particular meeting. If**

4 **it was something to do with the administration of**

5 **budgets, or whatever, I might attend in terms of**

6 **the capacity I had relating to pupil services. But**

7 **generally it was to work on behalf of the advisory**

8 **service.**

9 **Normally, Marilyn Simpson would attend most of those**

10 **meetings rather than me.**

11 Q. So you weren't actually involved in any of the detail or

12 any of the nitty-gritty in dealing with the fallout from

13 the Roderick Hilton incident, then?

14 **A. None at all, no.**

15 Q. You have answered my next question, which was, why were

16 you selected, then, to write this report? I think you

17 have suggested that it was largely because you hadn't

18 been terribly involved previously?

19 **A. Yes, I think so, and obviously I was a member of**

20 **the senior management team and I worked closely,**

21 **therefore, with the other directors as well. I don't**

22 **think there was any other reason, other than that.**

23 **I wasn't going in as a Special Needs expert. I was**

24 **going in as an educational specialist. But not on**

25 **Special Needs. It wasn't my background.**

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1 Q. What did you understand the purpose of the report to be?
 2 **A. I think -- it wasn't totally clear, if I am quite**
 3 **honest. I know that Diana had had conversations with**
 4 **the chair of education about Knowl View and it was in**
 5 **the context I think primarily -- and my memory might be**
 6 **wrong here -- of the "sex in the tent" incident that we**
 7 **referred to it at the time, where a number of staff went**
 8 **to France with a group of children and there were**
 9 **various issues arose and the head had to send somebody**
 10 **across to bring the school back to Rochdale. Clearly,**
 11 **that got into the press.**
 12 **As a result, I think, quite clearly, elected members**
 13 **were very worried about the negative effects of all of**
 14 **that and wanted the director then to look into what was**
 15 **going on at Knowl View and to delve into what the staff**
 16 **felt.**
 17 **Really, my remit was to talk to the staff about some**
 18 **of their perceptions about the school, to talk about any**
 19 **issues that they themselves had, and really then to**
 20 **produce a report which came up with some of the key**
 21 **issues around why Knowl View seemed to have these**
 22 **constant issues.**
 23 **I think also the Smith Street toilets were again in**
 24 **the press or had been raised somewhere along the line at**
 25 **that time, so there were a number of things happening**

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1 **which made Knowl View quite high profile, and clearly**
 2 **there could be questions asked by elected members.**
 3 **Mary Moffat obviously, as chair of education, wanted to**
 4 **be able to respond to that, and she had asked**
 5 **Diana Cavanagh then to talk with her about the issues,**
 6 **and I think together they had concluded the time was**
 7 **there to have another enquiry. I didn't know about the**
 8 **outcomes of the Val Mellor enquiry either, which is an**
 9 **interesting thing in terms of the context. I knew of**
 10 **Val Mellor, but I didn't ever see her report. That was**
 11 **also an issue sometimes that some things weren't always**
 12 **passed on entirely.**
 13 Q. So it wasn't deliberate, then, that you hadn't been
 14 given the Mellor Report?
 15 **A. No, I don't think so. I think there were so many things**
 16 **passing around that time in so many different ways that**
 17 **they were simply passed by the director, in particular,**
 18 **to whomever she felt was the most appropriate person to**
 19 **receive them and it was a "need to see" basis.**
 20 Q. I just want to pick up on two things you said. You said
 21 that part of the impetus for this report came from
 22 elected members?
 23 **A. Mmm.**
 24 Q. Are you referring to members of the Education Committee
 25 or the leadership of the council?

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1 **A. I don't know about the leadership of the council. It**
 2 **was certainly Mary Moffat who was the chair of**
 3 **education, who I met with Diana Cavanagh about the**
 4 **process. So she was obviously involved. Whether she**
 5 **was also involving her other elected members and whether**
 6 **the chair of the council, the leader of the council, and**
 7 **the chief executive also were involved, I don't know.**
 8 Q. You also made reference to Smith Street toilets.
 9 I assume that that was something that you were aware of
 10 before you went to meet the staff?
 11 **A. Well, not before that time, actually, no. I'd not heard**
 12 **of any of the issues about Knowl View that came out**
 13 **later, and, again, I think that was a big failing on the**
 14 **part of the authority in terms of their induction**
 15 **programmes when I started, because I was given no**
 16 **information at all about anything. It was basically,**
 17 **"You're now an adviser. Go out and advise", and that**
 18 **was the style.**
 19 Q. Information about Smith Street toilets came out over the
 20 course of a number of years, including 1992. Does that
 21 mean that there wasn't, then, departmental discussion
 22 about these sorts of -- about this sort of information
 23 that was emerging --
 24 **A. Not necessarily, no, and certainly, if there had been --**
 25 **I don't know how many incidents there were at the**

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1 **Smith Street toilets. My understanding was it wasn't**
 2 **a one-off. I think there had been a number of cases of**
 3 **boys going into the centre of Rochdale. Whether they**
 4 **were then -- that information was passed on as**
 5 **appropriate, I think was quite doubtful. Information**
 6 **was passed as appropriate, or thought to be appropriate**
 7 **at the time it was passed on, to people who needed to**
 8 **know. I don't think there was a deliberate cutting off**
 9 **of people, but it was more a way of managing a process.**
 10 Q. Do you mean within the Education Department?
 11 **A. Within the Education Department.**
 12 Q. There was care taken as to who was made party to --
 13 **A. I don't know if it was as strongly as "care was taken".**
 14 **I think it was just a matter of people thinking, "Well,**
 15 **so and so needs to know about this, so and so needs to**
 16 **know about it" without necessarily thinking through in**
 17 **terms of a strategic approach to who needs to be**
 18 **involved in the particular process.**
 19 Q. Just returning to your report, did you understand that
 20 part of the impetus for the report was also that the
 21 staff felt quite disgruntled about the way things had
 22 been left after the Mellor Report?
 23 **A. No, that wasn't something that came out. I think -- not**
 24 **before I went in. That came out certainly when talking**
 25 **to staff. A number of them felt that they had not been**

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1 **treated particularly well and then, of course, I got to**
 2 **know more about the Val Mellor report and some of**
 3 **the things that had happened before. But that wasn't**
 4 **made clear to me before I set out to do the report with**
 5 **Elizabeth Dobie.**
 6 Q. I am just going to go to a document so that we can learn
 7 a bit more about your report. This is RHC001480 and it
 8 is page 1. This was a letter that was written to
 9 Mr Bradshaw, Dr Hodge, but nonetheless it tells us a bit
 10 about it?
 11 **A. Yes.**
 12 Q. It was to be an enquiry into the role played by staff
 13 which should be conducted by the education authority as
 14 part of its response to Mrs Mellor's report. Were you
 15 aware that your report was supposed to serve that
 16 function?
 17 **A. I have never seen that letter before.**
 18 Q. Then it goes on:
 19 "The purpose of the enquiry should be to clarify any
 20 residual areas of concern about the level of care or
 21 management exercised by teaching and nonteaching staff
 22 in the months leading to the incident in September 1990.
 23 There is the possibility that the enquiry may lead to
 24 disciplinary action and staff should be aware of this."
 25 **A. I knew about the first part of that paragraph, up to**

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1 **about teaching and nonteaching staff.**
 2 Q. But you didn't know that it was intended or that it was
 3 in mind that whatever you discovered might lead to --
 4 **A. No, not that I can recall. It was seen by me, and you**
 5 **need to talk to Elizabeth Dobie about this as well, and**
 6 **obviously Diana Cavanagh, basically that it was simply**
 7 **talking to the staff about the issues at the school and**
 8 **to clarify, as it says, any residual areas of concern**
 9 **about the level of care or management.**
 10 Q. You went on, didn't you, to interview staff over
 11 a period of about five days?
 12 **A. Yes.**
 13 Q. Did you interview about 32 staff?
 14 **A. Yes, something of that order. They were invited to meet**
 15 **us. They didn't have to. It wasn't compulsory. They**
 16 **were allowed to bring their union rep, and many did, to**
 17 **make sure that it was properly recorded. Yes,**
 18 **basically, that's the way it operated, over five days,**
 19 **to fit in, really, with the school's timetables,**
 20 **et cetera, et cetera.**
 21 Q. We have copies of the interviews that you conducted with
 22 the staff, which we won't go through, because they are
 23 quite lengthy, but it would appear that the focus of
 24 most of the interviews was indeed on the incident
 25 in September 1990 --

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1 **A. I think it came out that way.**
 2 Q. -- with Mr Hilton and the culture at the school?
 3 **A. Yes, I think it came out, certainly, about the culture**
 4 **and something around the Hilton issue and also about the**
 5 **"sex in the tent" issue. There were a number --**
 6 **different people had different perspectives on a whole**
 7 **host of different things in the school. Many of**
 8 **the staff were very new, only recently appointed, and**
 9 **they were talking very much about their perceptions of**
 10 **the school as it was compared to where they'd been**
 11 **before, perhaps, or what sort of issues they felt were**
 12 **in the school.**
 13 **There were some who were much more deeply engrained,**
 14 **clearly, into the whole way in which the school**
 15 **operated, particularly some of the care staff, and they**
 16 **were very clear about their concerns about the**
 17 **management and the way in which the school hadn't**
 18 **operated effectively for some time, particularly with**
 19 **the acting head, who was in post at that time.**
 20 Q. I am going to bring you to one page of the interviews,
 21 just because I want to ask you a question about that,
 22 and that's RHC001745. I'm sorry, that is an erroneous
 23 reference, can I you to take us to the next document,
 24 please, RHC001487. That would appear to be some notes
 25 that you have made, Dr Hodge --

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1 **A. No, these were notes taken by Diana Cavanagh.**
 2 Q. But it appears to be of a meeting that you were --
 3 I see. So this is a note made of a meeting that you had
 4 with Diana Cavanagh; is that right?
 5 **A. This was a discussion between Liz Dobie, myself and**
 6 **Diana Cavanagh, yes, that's right. Presumably --**
 7 **I don't remember the meeting, but Diana always took**
 8 **notes of the meetings she held with staff and kept them**
 9 **on file for her own purposes.**
 10 Q. If we look down that page, we will see an entry just
 11 below the third hole punch, and it says:
 12 "Ashworth (junior) block involved in Smith Street
 13 toilets -- 'Keep quiet!'"
 14 Do you recollect what that entry was about?
 15 **A. No, I don't. I don't.**
 16 Q. Do you think that that's likely to be a reflection of
 17 what you picked up from staff at that point?
 18 **A. I don't remember the meeting. Obviously it is not my**
 19 **writing, and it was something which was noted from the**
 20 **meeting that Mrs Dobie and I had with the director, so**
 21 **I don't remember what that was about. It obviously was**
 22 **an issue that some of the staff raised about the**
 23 **Smith Street toilets, but there wasn't any indication**
 24 **from them, as far as I can recall, to use the words**
 25 **"keep quiet" about it.**

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1 Q. What did staff tell you in general terms about
 2 Smith Street toilets?
 3 **A. Simply that boys were leaving the school to cottage in**
 4 **the centre of Rochdale and most of them were absolutely**
 5 **appalled by it, basically. A lot of the staff were very**
 6 **caring, they were trying to do their best for the**
 7 **children, they felt that some staff weren't necessarily**
 8 **always pulling their weight, and the leadership was**
 9 **poor.**
 10 Q. But no-one suggested to you that they had been asked to
 11 keep quiet or to keep a lid on what was happening at
 12 Smith Street toilets?
 13 **A. Not that I can recall.**
 14 Q. I'm going to go to your report, Dr Hodge, and this is at
 15 GMP000378, page 3. Do you recognise that, Dr Hodge?
 16 **A. No, I have not seen that before. I don't know whose**
 17 **writing that is. It is certainly not mine. It is not**
 18 **Mrs Dobie's writing or the director's writing.**
 19 Q. Can I just repeat the number again? It is
 20 GMP000373_003. Now do you recognise it, Dr Hodge?
 21 **A. That is better, yes.**
 22 Q. I just want to ask you a couple of things, first of all,
 23 about the markings on the top. This says "No 26", do
 24 you see that, and it has the name "Edmonds"?
 25 **A. DL Edmonds, that was Dave Edmonds, one of**

1 **the educational psychologists. I don't quite know --**
 2 **that is presumably -- I think that is my report typed**
 3 **up. I never saw any report coming out after that.**
 4 **I don't think there was a report -- I didn't see**
 5 **a report, for instance, that went to committee or went**
 6 **any further. I think this is my report and my**
 7 **assumption -- because I haven't seen the numbers at the**
 8 **top, but I can only guess a number of copies were**
 9 **produced by the director and circulated to certain**
 10 **staff.**
 11 Q. That's what I've assumed from this marking, but you
 12 weren't involved in --
 13 **A. No, I wasn't. In fact, once Mrs Dobie and I had**
 14 **finished the report, she wrote it up, we agreed it, it**
 15 **was typed, we handed it to the director, and that was**
 16 **the last then I heard of it.**
 17 Q. Is this the report that you agreed with Ms Dobie?
 18 **A. I think it looks very much like it, yes. It says "The**
 19 **report of the Director of Education".**
 20 Q. Exactly. It says it is "For distribution only as the
 21 Director of Education specifies"?
 22 **A. That's right.**
 23 Q. And it says "Report for the Director of Education by
 24 Selwyn Hodge"?
 25 **A. It is the report that Elizabeth Dobie and I produced.**

1 **As I say, I can only assume then that a number of copies**
 2 **were produced by the director for members of staff and**
 3 **others and this was for one of the educational**
 4 **psychologists.**
 5 Q. What it says in the next paragraph is:
 6 "Following the report by Val Mellor in March 1992,
 7 which gave rise to disquiet amongst some current staff
 8 members, it was decided by the Director of Education
 9 that an investigation take place as a final scrutiny of
 10 past sequences and a termination of speculation."
 11 **A. Yes.**
 12 Q. Again, just coming back to the Val Mellor report, given
 13 that it was that report and the disquiet afterwards that
 14 your report was supposed to address, wasn't it critical
 15 that you read the Val Mellor report and understood it?
 16 **A. Yes, I suppose it was, but I didn't see it. I don't**
 17 **know whether Mrs Dobie saw it, actually, because she was**
 18 **appointed, I think, after the time that Val Mellor was**
 19 **working with the authority. But I might be wrong on**
 20 **that.**
 21 Q. Is there any reason why you didn't seek a copy of
 22 the report out?
 23 **A. Again, as I was saying earlier, reports were circulated**
 24 **for whatever purpose at the time. I don't think it was**
 25 **necessarily deliberate. But if somebody wasn't directly**

1 **working on something, you wouldn't necessarily get sight**
 2 **of a report.**
 3 Q. Right.
 4 **A. For instance, again, coming back to the next stage of**
 5 **this, which I would have thought would have been**
 6 **a committee report, whether one was produced, I don't**
 7 **know. One might have, but I didn't see a copy. If it**
 8 **had been, presumably the thought was, I didn't need to**
 9 **see it.**
 10 Q. If we look, then, at what your report was to concentrate
 11 on, we see at 1, 2, 3:
 12 "The culture of the school.
 13 "The style of leadership and management within the
 14 school.
 15 "Relationships within the school."
 16 You were tasked to look at three critical periods in
 17 the school's recent history before 1989, and I think --
 18 was 1989 the date when the last headmaster had formally
 19 retired?
 20 **A. Yes, I think that was roughly around the time --**
 21 **Brett Andrews came about 1990, I think. I think there**
 22 **was an acting head, was there? I can't remember. Yes,**
 23 **I'm not quite sure on the chronology of that.**
 24 Q. "Events surrounding September 1990", so the
 25 Roderick Hilton incident?

1 **A. Yes.**
 2 Q. And then "Events from January 1991 until April 1991"?
 3 **A. Mmm.**
 4 Q. If we look at the first section of the report, that's to
 5 do with events before 1989 and the culture of the school
 6 before then?
 7 **A. Yes.**
 8 Q. What you have recorded at the top of page 2 was:
 9 "The culture of the school was one of insularity and
 10 isolation from external sources, but internally there
 11 was evidence of a considerable number of cohesive
 12 cliques competing for power and influence in a spurious
 13 spider's web of relationships."
 14 Two points about that. Did the isolation from
 15 external sources include the Education Department?
 16 **A. I don't think the Education Department would have seen**
 17 **it that way because there were officer links,**
 18 **Brian Williams was the Special Needs officer at the**
 19 **time, he linked with the school, there was an adviser,**
 20 **Heather Shaw, she linked with the school. But whether**
 21 **that was sufficient is a big question, and I doubt if it**
 22 **was, and the school might well have seen itself as being**
 23 **isolated, but I doubt if it was more isolated than some**
 24 **of the other schools were at the time, possibly.**
 25 Q. So it may have been part of a wider picture of schools

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1 not being particularly well governed by the Education
 2 Department?
 3 **A. Yes, and certainly in terms of advisory support.**
 4 **Advisory support was quite weak because it was a very**
 5 **small advisory team before I joined it. It was only**
 6 **around that time it was starting to get larger.**
 7 Q. Then in that -- the reference to relationships, the
 8 "spurious spider's web of relationships", was that
 9 a reference to sexual relationships amongst staff at the
 10 school or was it more general?
 11 **A. It was more general. There was reference to sexual**
 12 **relationships, certainly, but it was more, I think, the**
 13 **way staff felt that the care staff and the teaching**
 14 **staff were quite separate, and, in a way, it was**
 15 **a hierarchy, that the teaching staff were seen to be the**
 16 **professionals and the care staff were there to care. So**
 17 **seen at a very low level, which of course, in terms of**
 18 **a special school of that nature, was not the case,**
 19 **because the care staff were ideally the key people to**
 20 **actually put right a lot of the problems that some of**
 21 **these boys had in coming into the school. But it wasn't**
 22 **seen as that, and I think it was because, in many ways,**
 23 **schools in that era were seen in terms of their outputs**
 24 **educationally. So the teachers were important because**
 25 **they were trying to educate the children. The care**

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1 **staff were not helping because they weren't getting some**
 2 **of those children prepared sufficiently to be taught.**
 3 **So therefore it was the care staff's fault for any**
 4 **problems which were happening in classrooms, whereas**
 5 **clearly that wasn't the case. We all know that**
 6 **education is about links between teacher and pupil, and**
 7 **a lot of the problems were clearly some of the poor**
 8 **teaching in the school and not to say some of the care**
 9 **staff also weren't fully competent. But I think it was**
 10 **seen in that way, that the care staff did all the wrong**
 11 **things, the teaching staff didn't have the opportunity**
 12 **to do what they were good at. That's what I mean by**
 13 **some of the sharing of the schisms in the school.**
 14 Q. Looking at some of the comments made by staff, I think
 15 you give your analysis and then you set out what staff
 16 thought about things.
 17 **A. Yes, that's right.**
 18 Q. One of the things that you have said, and this was
 19 pre 1989:
 20 "The 'step sheet' was in place and although it was
 21 old-fashioned and regimented everyone knew where they
 22 stood."
 23 Yes?
 24 **A. Yes. I think that was basically because it was the**
 25 **control of the boys for the teachers. So basically,**

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1 **therefore, if there was a system which kept the boys**
 2 **controlled, then teachers could do something because**
 3 **there was a repercussion if they didn't behave. Once**
 4 **the school started to move to a slightly more open way**
 5 **of working, to encourage the boys to be more**
 6 **self-sufficient, to start working themselves, rather**
 7 **than simply being institutionalised into that very**
 8 **traditional almost Victorian way of teaching, then**
 9 **things started to go wrong. Of course, with the change**
 10 **of head that became even more apparent, when the**
 11 **leadership started to change, and possibly the sanctions**
 12 **also changed.**
 13 Q. But one of the comments that follows is:
 14 "Knowl View was left to run itself with its own
 15 rules."
 16 **A. Yes, an interesting --**
 17 Q. Sorry, did you understand that to mean that the school
 18 had developed over the years so that it was operating in
 19 an isolated way with its own framework of rules with
 20 very little outside intervention?
 21 **A. Yes. I think there's a number of things behind that.**
 22 **Clearly, there were, I think, four authorities involved**
 23 **in setting up the school, and it was almost felt by**
 24 **people in the school that the other authorities simply**
 25 **washed their hands of it anyway once their pupils**

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1 entered Knowl View, because it became Rochdale's
 2 prerogative to actually do the work with those pupils,
 3 and within the context then of Rochdale, I think it was
 4 felt there wasn't sufficient support given to the
 5 school, either by officers or by advisers, to actually
 6 help in a situation where a lot of the pupils were
 7 coming in at that time from other areas of
 8 Greater Manchester without necessarily the school
 9 knowing exactly what their backgrounds were, because I'm
 10 not sure how much support the educational psychologists
 11 in the other authorities were actually providing to
 12 pupils in Knowl View for pupils who were part of their
 13 authority, and that meant that the psychological support
 14 was given by Rochdale psychological service, which
 15 itself was very stretched, and clearly didn't
 16 necessarily have all the background on the pupils at the
 17 school. I think there were big questions -- this was
 18 very much before I joined the authority, but looking
 19 back on that, it must have been a very difficult
 20 situation where boys were sent to the school by
 21 whichever authority they came from and basically left
 22 there, because I have no experience of talking to any
 23 officers from other authorities involved with Knowl View
 24 or educational psychologists not at Rochdale about those
 25 pupils.

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1 So, in a sense, the authorities were giving Rochdale
 2 money for the pupils, sending the pupils along, and
 3 Rochdale then had the total responsibility for them.
 4 The difficulty with that is that there weren't those
 5 connections with the other support services.
 6 Q. Yes. I understand.
 7 A. I'm not sure how much support, for instance, Knowl View
 8 got from Rochdale Social Services, but I'm sure it got
 9 virtually no support from the Social Services
 10 Departments of the other authorities, and I think that
 11 was a big question mark in terms of the viability of
 12 having such an institution in the first place. It was
 13 convenient because we were able to put a number of
 14 pupils together, when numbers were fairly small, into
 15 one organisation, but in reality, it was almost passing
 16 the buck from the other authorities to Rochdale, and
 17 Rochdale didn't necessarily have the support systems to
 18 actually work across the complexity of that.
 19 Q. So notwithstanding that the four-council sponsorship of
 20 Knowl View School had ceased to exist for some time, do
 21 you think that that nonetheless was still having an
 22 impact on the school and how it was --
 23 A. Oh, very much so, yes. Very much so. I think that was
 24 the history of the school and, to some extent, I think
 25 it lent the -- the strengthening of the way in which

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1 officers, advisers, educational psychologists, all the
 2 people working with the school didn't necessarily
 3 interact very well. There was a lot of secrecy,
 4 certainly from the Educational Psychological Service,
 5 who were very, very reticent to give information about
 6 pupils, seeing it unprofessional. They saw themselves
 7 basically in the same category as a medic and couldn't
 8 divulge information about one of their patients and
 9 clearly that wasn't a helpful situation. Certainly it
 10 was very difficult to get good links between the service
 11 and the advisory service, and that wasn't itself
 12 helpful.
 13 Q. I'm just going to go and look at the staff comments at
 14 1.4.
 15 Again, we are looking at the period pre 1989. If we
 16 look at, I think about the sixth line:
 17 "The Smith Street toilet is a different scenario,
 18 teachers were informed of this at staff meetings via
 19 head teacher and head of care."
 20 I just wanted to clarify, was it your understanding,
 21 then, that the Smith Street toilets were a problem
 22 before 1989?
 23 A. I honestly don't remember that particular part, but
 24 I assume that there must have been an issue around the
 25 Smith Street toilets before the meeting we had with the

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1 staff, and what they are saying is that when that sort
 2 of thing happened, the staff were kept informed about
 3 the events. Whereas, afterwards, they were not told
 4 about things that were happening necessarily in the
 5 school, and this was the complaint really from them,
 6 that they didn't have the information they needed to be
 7 able to deal effectively with the pupils or with their
 8 own role in the school.
 9 Q. Dr Hodge, what I am really interested in is whether or
 10 not you understood that Smith Street toilets were
 11 a problem before 1989 because it appears in the pre-1989
 12 part of your report?
 13 A. It must have been there within the reports that
 14 I received from the members of staff. I honestly don't
 15 remember the detail of it, but I am sure if I went back
 16 through all the interview statements we had from the
 17 staff, there would be something to that effect. But my
 18 interpretation of that in relation to the actual wording
 19 is much more about the lack of support after the
 20 previous head had left the school and information such
 21 as that was not being passed on.
 22 Q. If we go over the page, please, I wanted to ask you
 23 about paragraph 1.5, which is about the relationships
 24 within the school, and, again, if we go -- it is below
 25 the midpoint of that paragraph:

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1 "Evidence of a known sex offender having been on the
 2 scene at Knowl View long before September 1990 was felt
 3 to be as a result of a strict regime which tended to
 4 force the problems within pupils underground rather than
 5 being addressed or attempting to be alleviated."
 6 Was that your analysis of the position or is that
 7 what staff were telling you?
 8 **A. It would have come from the discussions with the staff.**
 9 **It wasn't my interpretation of anything other than the**
 10 **interviews we'd conducted. Again, I think it is much**
 11 **more in the context of the way in which the school**
 12 **operated, rather than the events themselves.**
 13 **The strength of that is very much -- was felt to be**
 14 **a result of a strict regime which tended to force.**
 15 **In other words, although there was this knowledge by the**
 16 **staff of what was going to happen in the school before**
 17 **1990, it was also very strict in the way in which the**
 18 **boys were controlled. It was a very controlling**
 19 **environment. I wasn't there. I can't comment on**
 20 **whether that was true. But I guess they're saying that,**
 21 **because the boys felt cowed and weren't able to actually**
 22 **talk about things, they didn't, they kept it all bottled**
 23 **up. That's my interpretation of that, having not seen**
 24 **this, as you appreciate, for 25 years now.**
 25 Q. Then if we go on to look at 1.6, "Staff comments":

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1 "In the previous sections are further supported by:
 2 staff privately feared the amount of incidents. We had
 3 been reporting our concerns to line managers and were
 4 surprised that nothing had been done."
 5 Again, is that what staff were telling you, that
 6 they had been reporting things to managers?
 7 **A. Yes. Yes. Basically, as I say, it was the comments put**
 8 **in obviously in a sort of compacted form in terms of**
 9 **what -- of the staff and the teaching staff had said.**
 10 **So very much that would have been very much that line**
 11 **managers were not taking responsibility for issues that**
 12 **staff were reporting.**
 13 Q. If we again just read down the page in that section, it
 14 said:
 15 "There was no staff discussion about implications of
 16 the toilet incidents, merely a report of factual
 17 incidents."
 18 Again, was that staff suggesting that they had been
 19 raising the issue of children being exploited at the
 20 toilets but that nothing was being done about it?
 21 **A. Again, I don't remember that particular detail, but**
 22 **certainly that came through from most of the people that**
 23 **we spoke to who weren't senior staff, that they didn't**
 24 **feel fully involved in the work of the school. They**
 25 **weren't given information, they weren't included in any**

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1 **decision-making processes. That was part, really, of**
 2 **the way they were trying to explain it, saying, "We**
 3 **didn't know about something that really we should have**
 4 **been told about because we were working with those**
 5 **particular children and needed to know the background".**
 6 Q. Finally this in this section:
 7 "The kids were physically frightened and one had
 8 suggested he had been hit with a cricket bat across the
 9 legs."
 10 **A. Again, I think there had been a very strict regime in**
 11 **the school. The school was seen as a school for not**
 12 **children with problems, but delinquent boys, delinquent**
 13 **boys who needed to be basically forced back to live**
 14 **a proper life.**
 15 **There wasn't the same understanding of special**
 16 **needs, I think, back in the early '80s as there is now,**
 17 **and there was this attitude that a naughty boy is**
 18 **a naughty boy because they haven't been controlled**
 19 **sufficiently in their upbringing. Poor parenting for**
 20 **instance. That was the attitude which some of the staff**
 21 **were saying was the way in which the school operated**
 22 **through the senior management at that time.**
 23 Q. Thank you, Mr Hodge. If we go over the page again to
 24 2.1, this is the events surrounding September 1990, so
 25 surrounding the Hilton incident. Again, in that first

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1 paragraph, what you are reporting back is the fact that
 2 there were changes in personnel around that point, and
 3 in particular that there was an acting head, an acting
 4 deputy and changes in key care staff as well.
 5 **A. Yes.**
 6 Q. And that staff attributed quite a lot of significance to
 7 that as regards what happened.
 8 **A. Yes. Very much the school was suffering from staff**
 9 **turnover and an inability to recruit good staff to the**
 10 **positions that were vacant.**
 11 **It was never easy to get staff for schools such as**
 12 **Knowl View. Clearly, the children were challenging and**
 13 **needed a lot of experience from the staff. Those people**
 14 **were not available, certainly in the area of Rochdale,**
 15 **and so it was a matter of finding people who could cope,**
 16 **and that didn't work particularly well. That applied**
 17 **both to the care staff, who sometimes were too lax in**
 18 **terms of their relationships, wanting to be too**
 19 **friendly, not having enough parental control, and from**
 20 **the teaching staff who were not used to working with**
 21 **special needs youngsters of that sort.**
 22 **Not all of them had learning difficulties -- quite**
 23 **a few did -- some were quite bright children. Possibly**
 24 **these days they might have been seen as autistic or**
 25 **having Asperger's or whatever. In those days that**

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1 wasn't quite so prominent. The staff were not
 2 experienced enough to deal with a whole range of pupils
 3 with difficulties.
 4 Interestingly, the other school in Rochdale which
 5 dealt with EBD pupils, Brownhill, was different because
 6 it was a day school and it was able to recruit more
 7 easily. It was also for younger children. That didn't
 8 have the problems that Knowl View had, which was seen as
 9 a difficult school to work in for all sorts of reasons.
 10 Q. Thank you, Dr Hodge. It probably follows, then, if we
 11 go down to 2.3, in terms of leadership and management,
 12 that at this time the management team was formed on an
 13 ad hoc basis. I think that really goes to what you are
 14 saying because there was --
 15 A. Whoever was there longest got the promotion, yes.
 16 Q. Then if we go over the page, please, to paragraph 2.4,
 17 "Staff comments", we see there:
 18 "It was common for [people] to go off site ..."
 19 Was that whenever they were supposed to be on duty,
 20 is that the point?
 21 A. Yes. Yes, it wasn't obviously in their free time. It
 22 was that some staff -- from what I can remember --
 23 again, it is a long time remembering the exact
 24 interviews -- were saying that some staff -- and often
 25 senior staff -- were not there when they needed to be

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1 there.
 2 Q. Again, if we look down a few lines, just picking out
 3 some of the things that staff said:
 4 "We felt like lost sheep as social workers within
 5 education."
 6 A. Yes, that's an interesting one, isn't it? I mean,
 7 that's a direct quote. A lot of these are direct quotes
 8 from the staff. I think they saw themselves as
 9 teachers -- not as teachers, but as social workers and
 10 the care staff also said that in a bit of a disparaging
 11 way, I think, that they saw themselves wanting to be
 12 care staff in the best sense but they were being forced
 13 to be almost people analysing the children in order to
 14 find out what was wrong and then to put a label on them,
 15 and maybe that came from the way in which the children
 16 got to the school in the first place. They were
 17 children with Statements of Special Needs and very often
 18 it was because of the psychologist calling it a named
 19 cause, and therefore they became medicalised. I think
 20 the staff saw themselves doing work which they weren't
 21 necessarily qualified for or didn't necessarily
 22 understand how to cope. The amount of in-service
 23 training we were able to offer to them was very, very
 24 minimal. There is no doubt about that. As an
 25 authority, we didn't offer as much in-service training

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1 as we should have, largely because of resources.
 2 Q. Thank you, Dr Hodge. Again, I am just choosing from
 3 some of these quotations:
 4 "People would go off sick if they didn't want to do
 5 things.
 6 "Kids appeared to be incidental."
 7 Then finally, at the bottom of that section:
 8 "There was a lot of facilitating with wives and
 9 friends getting jobs."
 10 A. I think all of that is true. Coming back to the earlier
 11 point about the 1980s, although it was seen as a strict
 12 regime, it was an understood regime in the way it
 13 operated. It moved on to be a regime which people
 14 didn't understand or couldn't associate with. People
 15 didn't particularly like the strict regime in some
 16 respects because they didn't think it did the best for
 17 the boys, but it was seen by some as much better than
 18 what came later because it was too laissez-faire and
 19 ad hoc.
 20 Q. 2.5, "Relationships within school":
 21 "Set against all of this was evidence of
 22 relationships of a sexual nature between some staff in
 23 homo, hetero and bisexual liaisons which appeared to
 24 have had little regard for any moral tone that was being
 25 set within the school or for the model that was being

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1 given to pupils, some of whom were well aware of what
 2 was going on between staff."
 3 A. Mmm.
 4 Q. I think that speaks for itself, then, that you were told
 5 that teachers were involved in sexual relationships with
 6 each other?
 7 A. Yes.
 8 Q. That they were conducting on the premises?
 9 A. Within the school, as well as -- it is not just the "sex
 10 in the tent" incident. That was a different issue
 11 altogether, I think. There were accusations, and that's
 12 what they were, we didn't have the evidence, but staff
 13 said that there were various liaisons between staff,
 14 both of a homosexual and of a heterosexual nature.
 15 Q. If we look down that paragraph, you seem to have
 16 attached some significance to that as regards what
 17 eventually happened with the Hilton incident?
 18 A. Yes. It was, in a sense, because there was an element
 19 of that within the school, so the staff told us and we
 20 had to reason to dispute that. I don't think staff were
 21 being difficult or awkward. They actually were
 22 expressing their views. In some ways, just to go back
 23 slightly, many of the staff felt that the review
 24 Liz Dobie and I were taking with them was the first time
 25 the authority had taken them seriously, that we were

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1 actually going in and talking to them as senior officers
 2 of the authority and listening to what they had to say,
 3 not simply going to the head teacher. As a result of
 4 that, what I think is in this report is the truth in the
 5 sense that this is what people saw, it is not just being
 6 awkward or being catty or being difficult about
 7 colleagues. There was a genuineness behind what people
 8 were telling us and some of them were very upset. I was
 9 quite amazed at how much some of those staff were upset
 10 by having to say these things. I feel in a way what
 11 comes out from this is that nobody had done their best
 12 for Knowl View, either the authority or the staff or the
 13 other authorities sending their children there, because
 14 they had also had a case of in loco parentis for those
 15 children. Or the professionals who were working with
 16 them -- psychologists and social services -- because
 17 I didn't ever really have much contact with
 18 social services over this and I'm not sure there was
 19 much contact with the other authority's Social Services
 20 Departments either. Yet many of these children, if not
 21 all of them, would have been known to social services.

22 Q. Thank you, Dr Hodge. I am just going to go over the
 23 page to page 6 which was "Staff comments". I think when
 24 we see the dotted lines, that's where people's names
 25 have been taken out?

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1 **A. Indeed. They would have been staff names, yes.**
 2 Q. I'm just going to look down a bit. One of the comments
 3 says:
 4 "The kids knew that they could manipulate ..."
 5 And a name has been taken out:
 6 "... he was a very well meaning man."
 7 The next line says:
 8 "I asked one day what's going on in Norden? I was
 9 told someone was writing a 12-page document on this.
 10 I questioned why when I was a grade" -- I assume that's
 11 a grade of care worker -- "I knew nothing, I felt like
 12 I had been misused."
 13 There was a document that was prepared prior to this
 14 report and it would appear that it was the school keeper
 15 who was writing the 12-page document. Do you recollect
 16 that?
 17 **A. Yes, I do remember the caretaker. I'm not sure we**
 18 **interviewed him, but there were lots of comments about**
 19 **the caretaker, some of which were quite disparaging,**
 20 **that he saw himself as being in charge of the school, he**
 21 **was the one that people needed to report to if they were**
 22 **coming into the school, and I think there was a feeling**
 23 **about that. I'm not sure whether that was the 12-page**
 24 **document here, but certainly he was seen as a difficult**
 25 **character within the school.**

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1 Q. Just going down a few lines, the line that says
 2 "Listening to the boys when we were on the dormitories,
 3 they said 'He stands over by the games room and he
 4 whistles, we know to let him in'. You don't always know
 5 whether it's true."
 6 That seems to be a reference to Roderick Hilton,
 7 doesn't it?
 8 **A. Yes, I think that is what it is saying. Again, that did**
 9 **come up, about how easy it was for people like Hilton to**
 10 **gain access to the school, and in this case boys were**
 11 **facilitating that for him, for whatever reason.**

12 Q. Thank you, Dr Hodge. Then below that:
 13 "Nobody liked working on Norden, the boys seemed
 14 naughtier and cheekier. We'd been finding Durex under
 15 the bed. We did find a number before and after the
 16 incident."
 17 Again, the "incident" is presumably a reference to
 18 the Hilton incident?
 19 **A. Yes, I guess so, or it could have been homosexual**
 20 **relationships between boys, I don't know. What it does**
 21 **hint at again is that there isn't the reporting back to**
 22 **senior management and having a proper collegial view**
 23 **about how to deal with incidents. These, after all,**
 24 **were staff, care staff and teaching staff, who were in**
 25 **the school experiencing this. They were telling us and**

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1 **yet nothing was being done in the school about it, and**
 2 **that was the big worry, I think, which we had in writing**
 3 **this report.**

4 Q. You have then set out what had happened since
 5 January 1991 to April 1991.
 6 **A. Yes.**
 7 Q. I assume, Dr Hodge, that report went up to April 1991
 8 because by then the permanent head teacher was in place?
 9 **A. That's right. Yes. Stephen Bradshaw, yes.**

10 Q. If we go then to page 10 of this report?
 11 **A. Page 8?**
 12 Q. Page 10.
 13 **A. I have page 8 there.**

14 Q. What you have written at the top is:
 15 "There is a definite need to state that management
 16 was ultimately responsible for the origination of
 17 mistakes which led to events occurring. In stating
 18 this, the responsibility of the LEA has to be noted, in
 19 that inappropriate appointments were made at a difficult
 20 time in a complex set of circumstances."
 21 **A. Yes.**
 22 Q. Was that your firm view, having --
 23 **A. Yes. Yes. Because, basically, the LEA had control over**
 24 **staffing issues in those days, and I don't know how**
 25 **those appointments were made and who made them, but**

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1 clearly the appointments were not such that they allowed
 2 for work in the school to be properly conducted and
 3 problems rectified.
 4 Q. Then if we go down to paragraph 4.5, Dr Hodge:
 5 "The only staff who can be absolved of any onus
 6 concerning these events are those who have been
 7 appointed since the events."
 8 What you appear to be suggesting there is, having
 9 interviewed all of the staff, everybody who had been
 10 there at the time bore responsibility for what had taken
 11 place --
 12 A. Yes.
 13 Q. -- as regards September 1990?
 14 A. Yes. Because, however difficult it was to try to get
 15 change, there was too little effort made by some staff
 16 to facilitate that, and I think, as a result, they sat
 17 back and let things happen.
 18 I don't think you can absolve the authorities
 19 either, because the authorities should have been doing
 20 more. The problem was the schools weren't inspected in
 21 those days. I don't ever recollect talking to an HMI
 22 about Knowl View. I assume they visited occasionally,
 23 but there was never contact with HMI. The authority
 24 didn't inspect, there wasn't an inspection team.
 25 Q. We do know there was an inspection of Knowl View School

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1 in October 1991. Was that something that you were aware
 2 of?
 3 A. No. No. By HMI?
 4 Q. I'm sorry, I have just been corrected. It was 1990.
 5 A. I was still working with the authority. No, I didn't
 6 know there was an HMI -- certainly it is not something
 7 which is in my memory as an important issue, so unless
 8 it was simply a day visit by HMI -- whether there was
 9 a full inspection -- there is a difference, clearly,
 10 between a full inspection by HMI and a visit by HMI just
 11 to talk to the head teacher, for instance. That does
 12 happen.
 13 Q. I have just been told that I was right on the first date
 14 and that it was October 1991. Does that change anything
 15 in terms of your awareness of it?
 16 A. I should have known. I was chief adviser then, so it is
 17 quite interesting, if an HMI colleague had visited
 18 a school that there wasn't a connection between that
 19 HMI -- because the normal protocol at that time was for
 20 the HMI to at least contact the chief adviser or to at
 21 least, if not that, send a brief report afterwards about
 22 their visit.
 23 Q. There was a report, but, again, can we assume that was
 24 not something that was brought to your attention?
 25 A. No, I have not seen it.

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1 Q. I am going to move on, if I may, Dr Hodge. I just have
 2 an eye on the time.
 3 A. Yes, please.
 4 Q. I wanted to ask about political oversight of education
 5 in Rochdale, if I may. I don't want to go to it, but
 6 when you were interviewed by Mr Garnham, you expressed
 7 the view that you thought that some of the local
 8 politicians were too hands-on as regards education.
 9 I wondered if you could just explain what you meant by
 10 that?
 11 A. Yes. When I first joined the authority, it was an
 12 authority which was very keen on making changes to the
 13 way in which the borough worked. A lot of them were
 14 political -- that is their role, they are politicians --
 15 but they were political in the sense that they were keen
 16 to make those work rather than to pursue other areas
 17 which perhaps were more important for the way in which
 18 the authority operated.
 19 Now, that's a rather long-winded way of saying that
 20 there wasn't much consultation between elected members
 21 and officers of the authority about what was the best
 22 way forward. They tended to be political edicts about
 23 what was going to happen next.
 24 The difficulty with that, of course, was that they
 25 weren't always workable or manageable within the

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1 circumstances that the authority had from that level.
 2 A good example of that is, basically, we spent a lot
 3 of time on issues, say, like anti-racism and community
 4 education, we spent a lot of time on changing structures
 5 and so on and so forth, all of which tended to deflect
 6 from some of the work we were involved with.
 7 Now, that is obviously the prerogative of elected
 8 members to do things like that, but they didn't seem to
 9 seek advice on whether or not there were problems
 10 arising from them doing that, and to give you an example
 11 of how that worked in practice, the chair of education
 12 at the time had an office in the offices of
 13 the Education Department --
 14 Q. I'm just going to stop you there because there was
 15 a change of administration in 1992. Are you talking
 16 about before 1992?
 17 A. I'm talking about before that, when I first joined the
 18 authority.
 19 Q. Mary Moffat, then?
 20 A. Yes, had an office in the offices and would see members
 21 of staff, she would instruct members of staff to come
 22 and tell her exactly what they were doing and what they
 23 should do next. That wasn't done necessarily even with
 24 the chief officer knowing -- it was a different chief
 25 officer, it wasn't Diana Cavanagh at that time. That of

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1 course caused all sorts of problems for all sorts of
 2 people, because things were being decided in a very
 3 ad hoc way without them being communicated effectively.
 4 That changed over the next few years. It had to,
 5 because there were changes obviously with LMS coming in,
 6 and LMSS, and there were things that central government
 7 were introducing which local government had to follow --
 8 opting out of schools, et cetera, et cetera. But
 9 certainly, when I first joined the authority, it was an
 10 authority which was very much led by the politicians and
 11 politicians that didn't necessarily consult or sometimes
 12 even inform before they'd made the decision at a council
 13 or committee meeting.
 14 Q. Does that mean that local politicians would have been
 15 very well aware of the issues that were going on at
 16 Knowl View School between 1990 --
 17 A. I don't think they necessarily were aware of a lot of
 18 things. They were keen to follow an agenda, and, as
 19 I say, that is their right as politicians to do that,
 20 that's why they were elected, but I'm not sure how much
 21 information was being passed to them at that particular
 22 time.
 23 Q. If you had someone like Mary Moffat who kept an office
 24 in the Education Department, wouldn't she quite easily
 25 have become aware of large issues like Knowl View

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1 School?
 2 A. Only if people had told her. I'm not sure that was the
 3 case.
 4 Q. Do you think that that would have been a deliberate not
 5 passing on of information or something else?
 6 A. I don't think it's necessarily that. I don't think
 7 people would have necessarily operated in quite that
 8 way. I think the meetings were very much about being
 9 told what to do.
 10 Q. So it wasn't a two-way street?
 11 A. No.
 12 Q. It was simply officers being told of the --
 13 A. I will say, things changed a great deal once
 14 Diana Cavanagh had been appointed. She had a very
 15 different way of working. Before that, it had been
 16 a very big split between the officers of the authority
 17 and advisers and other professional staff. That
 18 obviously relates to the way in which the then chief
 19 officer operated within the authority.
 20 Q. When you say things changed then between that
 21 relationship, what is it that changed after she came to
 22 Rochdale?
 23 A. Far more collegial, far more willing to bring people in,
 24 but working against a very difficult background. There
 25 was still the political side, there was still the

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1 history of the authority, things still weren't working,
 2 still the same staff that were there before, and that
 3 took time to change; attitudes were still very much,
 4 "It's Rochdale, what can you expect?", they were all
 5 things -- "Well, it's not the brightest place in the
 6 world, is it, so if our children don't perform, what can
 7 you expect?" Attitudes as disgraceful as that.
 8 Q. Thank you, Dr Hodge. I am just going to ask you this to
 9 finish off, if I may: you were the vice chair of
 10 the Area Child Protection Committee, weren't you?
 11 A. Yes, I was.
 12 Q. What years did you hold that position?
 13 A. That would have been about -- I think it was after I had
 14 taken on the role of Assistant Director for Pupil
 15 Services. Certainly Jane Held was then the Deputy
 16 Director of Social Services and she chaired the ACPC
 17 with me as vice chair. That was a good relationship.
 18 I think certainly at that point I felt we were working
 19 much more closely with social services at the children's
 20 level, and we were actually starting to make some
 21 inroads. For instance, we created a working group
 22 between social services, police, the Probation Service
 23 and education, and other organisations, to actually look
 24 at children's services as a whole, and that made a lot
 25 of value.

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1 The ACPC was also multi-disciplinary, but very much
 2 of course in those days controlled by social services.
 3 Social services were expected by government to take
 4 charge of all issues around child protection.
 5 Jane worked very much with me and with others to do
 6 things, but nonetheless the buck stopped with
 7 social services. As a result of that, most of the cases
 8 that we came across were social services-derived cases
 9 or ones that they'd picked up from the health side where
 10 there had been a child death in hospital or something of
 11 that sort which they felt needed to be investigated.
 12 But it was a multi-disciplinary approach. It worked
 13 where it needed to work. But Knowl View was not
 14 necessarily -- or any other educational establishment
 15 was necessarily ever looked at.
 16 Q. That's what I wanted to ask you, whether or not Knowl
 17 View School was ever discussed --
 18 A. I don't remember it being discussed --
 19 Q. -- at that meeting?
 20 A. -- at any of those meetings. ACPC, when I was on it,
 21 was probably past the time that we are discussing now
 22 for Knowl View. It was after that. Knowl View was
 23 still in existence, but it was about 1994, I think,
 24 something like that.
 25 MS DOBBIN: Thank you, Dr Hodge. Chair, do you have any

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1 questions for Dr Hodge?
 2 THE CHAIR: No, I don't. No, thank you very much, Dr Hodge.
 3 **A. Okay, thank you very much.**
 4 **(The witness withdrew)**
 5 MS DOBBIN: It is 3.10 pm. I don't know whether that is an
 6 appropriate moment?
 7 THE CHAIR: Thank you. We will return at 3.25 pm.
 8 (3.10 pm)
 9 (A short break)
 10 (3.25 pm)
 11 MS DOBBIN: Chair, the next witness is Mr Paul Wheeler.
 12 MR PAUL JOHN ROWEN (sworn)
 13 Examination by MS DOBBIN
 14 MS DOBBIN: Can you give the panel your full name, please?
 15 **A. My name is Paul John Rowen.**
 16 Q. Were you a Liberal Party councillor for Brimrod and
 17 Deeplish Ward in Rochdale between 1983 and 2007?
 18 **A. Yes.**
 19 Q. Were you also the leader of the opposition in
 20 Rochdale Council -- that being the Liberal Party --
 21 between 1990 and 1992?
 22 **A. Yes.**
 23 Q. Were you also a member of the education subcommittee as
 24 well within the council?
 25 **A. I was a member of the Education Committee and the**

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1 **Further Education Subcommittee.**
 2 Q. What years were you a member of the Education Committee,
 3 please?
 4 **A. Probably most of the time that it actually existed.**
 5 Q. Do you mean from the time that you first started at the
 6 council until about 1992?
 7 **A. Yes.**
 8 Q. So 1983 to 1992.
 9 **A. Yes.**
 10 Q. Were you the leader of the council for a four-year term
 11 between 1992 and 1996?
 12 **A. Yes.**
 13 Q. Then you became a Member of Parliament for Rochdale
 14 between 2005 and 2010?
 15 **A. Yes.**
 16 Q. If you can just assist the panel as regards who was in
 17 power during that period, I think, in 1983, did the
 18 Liberals go into a coalition with the Conservative --
 19 **A. It was a coalition between the Conservatives and the**
 20 **Liberals. We were the smaller of the two parties.**
 21 Q. Did that last until 1986?
 22 **A. Until 1986, yes.**
 23 Q. Then there was the Labour administration within the
 24 Council?
 25 **A. From 1986 until 1992.**

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1 Q. Then after 1992, there was another coalition between the
 2 Liberal Democrats by this stage and the Conservative
 3 Party to control the council, and that's when you then
 4 became the leader of that coalition?
 5 **A. Yes, we were then the largest party.**
 6 Q. I just want to ask you, if I may, about some of the key
 7 individuals who were in place in 1992. Was your
 8 education spokesman Ray Colley?
 9 **A. Ray Colley. The chairman of the Education Committee was**
 10 **Ray Colley. He was a Liberal Democrat. What we did,**
 11 **was we had -- if there was a chairman who was**
 12 **Conservative, there would be a Liberal Democrat as**
 13 **a vice chairman, and vice versa.**
 14 Q. Was Norman Smith your social services spokesperson or
 15 chair?
 16 **A. He was the vice chair. The chair was a Conservative and**
 17 **that was Jane Hawton (sic).**
 18 Q. Is Norman Smith Cyril Smith's brother?
 19 **A. Yes.**
 20 Q. Rita Sargenson. Was she also on the
 21 Education Committee?
 22 **A. Yes, she was on the Social Services Committee, yes.**
 23 Q. And on the Education Committee as well?
 24 **A. She may have been, yes, as well.**
 25 Q. Was she also at one stage your education spokesperson as

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1 well?
 2 **A. I don't recall that, to be honest.**
 3 Q. We may look at some documentation, if it helps, with
 4 that.
 5 Your deputy, whenever you were leader of the council
 6 in 1992, was someone whose name we are familiar with,
 7 Pam Hawton?
 8 **A. Yes, Pamela Hawton. She was the leader of**
 9 **the Conservative group and she was also chair of**
 10 **the Rochdale Health Authority.**
 11 Q. Ashley Dearnley?
 12 **A. Ashley Dearnley was her deputy.**
 13 Q. Matt Ingoe as well?
 14 **A. He was the education spokesperson for the Conservatives**
 15 **and he would have been vice chairman of**
 16 **the Education Committee.**
 17 Q. I'm going to ask you a bit more about events after 1992
 18 in a moment, but I just want to ask you about your
 19 involvement with the Liberal Party.
 20 **A. Right.**
 21 Q. What age were you when you joined the Liberal Party?
 22 **A. 17.**
 23 Q. Was that in or around 1972?
 24 **A. I joined in February 1972.**
 25 Q. Did you get involved because at that point in time the

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1 1972 by-election was in sight or were you interested --

2 **A. I joined because a friend of mine in the sixth form was**

3 **a member of the Young Liberals, and there were about 12**

4 **of them, quite an active group, so she invited me to**

5 **join and that's how I got involved.**

6 Q. Did you become involved, then, in campaigning in the

7 1972 by-election?

8 **A. Yes. That was not until October, remember, because**

9 **Jack McCann, who was the MP, I think, died at the end**

10 **of June/beginning of July.**

11 Q. Did you know Cyril Smith before that point in time?

12 **A. I knew of him. I think everybody in Rochdale did. But**

13 **I didn't know him personally, no.**

14 Q. Did you get to know him then, as a 17-year-old?

15 **A. Through the involvement in the election. Obviously it**

16 **was quite an interesting, exciting time, a lot of media**

17 **interest, a lot of national politicians visiting. They**

18 **don't tend to have as much now, big rallies with loads**

19 **of people there. For somebody who was interested in**

20 **politics, it was quite an interesting time.**

21 Q. Was he very much immersed in the local campaign?

22 **A. Cyril?**

23 Q. Yes.

24 **A. Well, yes, he was the candidate.**

25 Q. Did you have much involvement with him then in the

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1 by-election?

2 **A. I was just a worker, so in the sense that I was**

3 **basically delivering leaflets and helped knocking on**

4 **doors, so whatever they wanted us to do.**

5 Q. Did you get to know him personally?

6 **A. Yeah, I got to know him quite well. That came later.**

7 Q. Who were the senior figures in the local Liberal Party

8 at that time?

9 **A. The leader of the Liberal -- there were only six**

10 **councillors. The leader of the Liberal group was**

11 **Bill Jenkins. His daughter and son were both members of**

12 **the Young Liberals. Tony Coppi was the president of**

13 **the party. Harry Halstead was another one. I didn't**

14 **really know lots of them very well. It's just a case**

15 **that you came along and you did what you did. You know,**

16 **I was mainly working with the young people -- other**

17 **people my age.**

18 Q. I understand. Were there any meetings at that time

19 about the selection of Cyril Smith?

20 **A. Yes. The party at the time had what was called**

21 **a general counsel and then above that there was an**

22 **executive. So I remember attending a meeting probably**

23 **the week after Jack McCann had died, when Cyril Smith**

24 **came in with his mother and announced that Jack McCann**

25 **had died and there would have to be a by-election. Then**

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1 **we were told that somebody would be coming up from**

2 **London who would be organising the campaign.**

3 Q. Was there any debate about who the candidate might be or

4 was it always going to be Cyril Smith?

5 **A. I think it was always -- because he'd stood in 1970 and**

6 **come second, I think that was a foregone conclusion.**

7 **There had to be a process that had to be gone through.**

8 Q. Was that simply the formal process of --

9 **A. Yes.**

10 Q. Was there a vote that he would be --

11 **A. There was a vote, but there was nobody else. It wasn't**

12 **advertised, in the way that perhaps we would now do**

13 **things.**

14 Q. Was there any discussion at any meeting that you were at

15 about the suitability of Cyril Smith to be the

16 candidate?

17 **A. No, that was never in question. I mean, as far as most**

18 **people were concerned, he was "Mr Rochdale".**

19 Q. How did he behave at that time towards you, as

20 a 17-year-old volunteering with his campaign?

21 **A. I never had any problem. You know, he was quite**

22 **friendly. He was always asking us how we were getting**

23 **on. He was very keen when he found out I was going to**

24 **university and wanted to know what I was doing. In**

25 **fact, he came to Nottingham and spoke for us in the**

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1 **Students' Union.**

2 Q. So was it really then over the course of years that you

3 discovered that he had a different side to his

4 personality?

5 **A. I knew nothing about the allegations that have been made**

6 **since. The first I knew was when the article appeared**

7 **in RAP in 19 --**

8 Q. I am just going to stop you because I wasn't asking

9 about the allegations, I was asking about the character

10 of the man.

11 **A. Yeah, I mean, as far as I was concerned, he was a Member**

12 **of Parliament, he was a larger-than-life character, but**

13 **he was doing, you know, he was doing a good job.**

14 Q. I think when you were interviewed by Neil Garnham you

15 said that he could be bombastic, intimidating and nasty?

16 **A. That, I came to know later, as I got more involved in**

17 **the Party. Obviously, when I became leader of**

18 **the group, for example, I took over at a period of time**

19 **when Robert Stott had stood down as leader of the group.**

20 **The group had selected Brenda Bridge over Norman Smith**

21 **and obviously the Smiths did everything they could to**

22 **undermine Brenda and she resigned, both as leader of**

23 **the group and as a councillor. So I took over a very**

24 **difficult situation where there were effectively two**

25 **factions and I had to try and bring them together.**

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1 Q. I am going to ask you a little bit more about that. But
 2 just focusing for the moment on your earlier involvement
 3 with the Liberal Party, did you hear any rumours about
 4 Cyril Smith at that stage?
 5 **A. No.**
 6 Q. Did anyone ever mention to you that there had been an
 7 investigation into him --
 8 **A. No.**
 9 Q. -- between 1969 and 1970?
 10 **A. No, I knew nothing about that until a few years ago.**
 11 Q. The investigation has heard evidence from two witnesses
 12 who have spoken about how well known rumours about
 13 Cyril Smith were about Rochdale. The suggestion is,
 14 more or less, that they were ubiquitous.
 15 **A. I mean, all I can tell you is my own understanding and**
 16 **the first I became aware of anything was when RAP -- the**
 17 **article appeared during the 1979 general election.**
 18 Q. So in 1979 was the first time that you had ever heard
 19 anything --
 20 **A. Yes.**
 21 Q. -- about Cyril Smith having what might be regarded as an
 22 unhealthy interest in young boys?
 23 **A. Yes.**
 24 Q. You were aware of that -- I think you had moved to
 25 Nottingham by that stage; is that right?

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1 **A. Yes, I was working in Nottingham then.**
 2 Q. You were obviously aware of it at the time. Were you
 3 still in touch with your colleagues in the Liberal Party
 4 in Rochdale?
 5 **A. Yes, and I still -- I knew John Walker, who was one of**
 6 **the editors of RAP, so -- but, you know, I wasn't in**
 7 **Rochdale during the 1979 general election. I was**
 8 **actually working in Nottingham. And as I say, it was**
 9 **only when I came home at Christmas that I found out**
 10 **a lot more about what had been alleged.**
 11 Q. What was your understanding of the reaction of the local
 12 Liberal Party to it?
 13 **A. Well, I was told -- remember, I'm not anybody important**
 14 **in the hierarchy or anything. I was told that he had**
 15 **denied it. He had always been very clear that he**
 16 **believed in what I would call the hanging/flogging**
 17 **brigade, you know, he believed in corporal punishment,**
 18 **he believed in capital punishment. These events had**
 19 **happened early in the 1960s. He claimed that it was**
 20 **just that he had to sort some boys out who needed**
 21 **sorting out.**
 22 Q. You saw the article, didn't you, in 1979?
 23 **A. Yes.**
 24 Q. What was your reaction to it?
 25 **A. Well, at the time, I tended to believe Cyril. You see,**

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1 **the problem with RAP at the time, it was a bit like**
 2 **Private Eye, anybody who was establishment, it didn't**
 3 **matter who it was, whether it was a -- whatever, they --**
 4 **these were -- you know, as far as I was concerned, both**
 5 **John Walker and David Bartlett were ex-Communists and**
 6 **they were running down everybody. So I took what they**
 7 **were putting in the paper, particularly as to what I'd**
 8 **been told Cyril had said, with a pinch of salt.**
 9 Q. I wonder if we could look at what you said in your
 10 interview about this. The reference is RHC00269 and it
 11 is page 6.
 12 If we look at the first paragraph in that section,
 13 Mr Rowen, what you said was:
 14 "Well, I read the RAP so I have a copy of the RAP
 15 paper at home, and I read it and re-read it again very
 16 carefully. It's been reprinted in the Rochdale Observer
 17 since and there is no explicit sexual harassment there
 18 and he never denied actual hitting people. In his case,
 19 that's what his mother used to do to him, you know. As
 20 I say, we are all creatures of our time and the time
 21 then was very different from what it is now."
 22 So when you were being interviewed with Mr Garnham,
 23 what you seemed to be suggesting was that you had
 24 studied the article quite carefully and that you didn't
 25 think that anything sexual was really alleged in it?

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1 **A. I mean, I read it very quickly and, yes, that was my**
 2 **understanding of how I felt, you know, what it was**
 3 **referring to. Obviously, events have, you know,**
 4 **become -- a lot more information has come out which**
 5 **I was not aware of at the time.**
 6 Q. Mr Rowen, you said in response to Mr Garnham that you
 7 read it and you re-read it carefully?
 8 **A. Yes.**
 9 Q. So you obviously had had time to form a considered
 10 response to it. Was it your view that what was set out
 11 in the article wasn't sexual in its nature, that the
 12 allegations weren't sexual in their nature?
 13 **A. I suppose what I was doing was laying credence to what**
 14 **I'd been told in the past. If I read it now, I would**
 15 **have to say, yes, there is explicit sexual harassment in**
 16 **there.**
 17 Q. Because what's set out quite clearly in the article is
 18 the allegation that Smith was making boys take their
 19 clothes off and was then spanking them and was also
 20 carrying out what the article described as "bizarre"
 21 medical examinations on them. So there isn't any doubt,
 22 is there, from the face of the article --
 23 **A. No.**
 24 Q. -- what was being alleged?
 25 **A. I accept that.**

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1 Q. So Cyril Smith denying or saying -- not denying it but
 2 saying that he believed in corporal punishment didn't
 3 really answer the allegations that were set out in the
 4 article?
 5 **A. No, but at the time, you have got to remember what was**
 6 **happening, during -- and, as I say, I wasn't there, so**
 7 **I was only told, but I was told that during the general**
 8 **election the Labour Party were going around showing**
 9 **people copies of this. He actually increased his**
 10 **majority at that election. I think he got over 10,000**
 11 **majority, which implies to me that people in Rochdale**
 12 **didn't believe it.**
 13 Q. What I am interested in is your response to it, as
 14 someone who was a member of the Liberal Party. Didn't
 15 it cause you any concern that those were the allegations
 16 that were being made?
 17 **A. Well, he had denied it. He had taken out -- he'd**
 18 **threatened to sue RAP, as I understand it. I didn't**
 19 **know that he'd subsequently withdrawn that. But that**
 20 **was what I was being told. So, you know, my view around**
 21 **the thing is, it's innocent until proven guilty.**
 22 Q. I wonder if we could look at what else you said in your
 23 interview -- sorry, can we go back to the same document,
 24 please. It is page 4 of it. If we look, you were asked
 25 the question by Neil Garnham:

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1 "What was printed in RAP in the 1970s?
 2 "That he had administered corporal punishment to
 3 a young man at Cambridge House and he never denied that.
 4 He always supported hanging and he always supported
 5 corporal punishment. You see, I remember when I started
 6 teaching, I went to a school where no corporal
 7 punishment was used ..."
 8 Again, what you appeared to be saying to
 9 Neil Garnham was that what Cyril Smith had never denied
 10 was that he had used corporal punishment on children?
 11 **A. Yes.**
 12 Q. He hadn't addressed, had he, the other part of
 13 the allegation?
 14 **A. No. No, that's true.**
 15 Q. So what steps did the Liberal Party take to find out
 16 about the truthfulness or otherwise of that part of
 17 the allegation?
 18 **A. My understanding -- and I have only found this out since**
 19 **when these allegations resurfaced again -- is that when**
 20 **that did happen, he was interviewed by David Steel.**
 21 **Again, this is only second-hand what I have been told.**
 22 **I haven't spoken to David Steel directly. But he had**
 23 **been told, well, the police had investigated it and are**
 24 **not taking any action.**
 25 Q. But that wasn't anything that you knew about at the

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1 time, was it?
 2 **A. No. No.**
 3 Q. So from your perspective, did the local Rochdale Liberal
 4 Party do anything to confront Cyril Smith about the
 5 sexual element of what was being alleged by RAP?
 6 **A. I don't know, to be honest, because, as I say, I wasn't**
 7 **living in Rochdale at the time and I wasn't directly**
 8 **involved in what was going on within the party.**
 9 Q. Did you ever take steps to find out, whenever you did
 10 then become far more involved in the party?
 11 **A. By then, the issue had gone away. Nobody had**
 12 **actually -- nobody was raising it. It was not an issue**
 13 **that was ever raised with me, for example, in all the**
 14 **time I was leader of the Liberal Democrat group or**
 15 **leader of the council, that was never an issue anybody**
 16 **raised.**
 17 Q. When you came to put Cyril Smith forward to be
 18 a governor at Knowl View School, did the RAP article
 19 come to mind then?
 20 **A. No. We were -- we had a discussion -- it was Pam Hawton**
 21 **and myself. Matt Ingoe was by then, I think, quite**
 22 **elderly and was struggling, and we felt the governance**
 23 **of the school needed to be strengthened. And Pam's**
 24 **suggestion was that we should have a -- one governor**
 25 **from each school. By then, Cyril Smith had ceased to be**

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1 **the Member of Parliament and to me it seemed something**
 2 **that he'd been very much involved in education in the**
 3 **1960s, Rochdale went comprehensive in 1963, largely due**
 4 **to the work that he'd done, and I thought he was**
 5 **appropriate. Pam Hawton came forward with Harry Wild.**
 6 **That's how the two of them were placed on the governors.**
 7 Q. Mr Rowen, just setting out what the position was then,
 8 insofar as you're aware, you don't know whether or not
 9 there was any Liberal Party investigation into
 10 Cyril Smith locally at the time of the RAP allegation?
 11 **A. I suspect there wasn't. I suspect there wasn't. But**
 12 **I can't -- I have no knowledge of that.**
 13 Q. The article didn't make you think that there ought to be
 14 some sort of investigation into what was being alleged
 15 by RAP?
 16 **A. I was 23 years of age. I was starting my career, living**
 17 **in Nottingham. You know, what was going on in Rochdale**
 18 **wasn't necessarily at the forefront of my mind.**
 19 Q. When you were a much older man and in a position of
 20 power and responsibility, what had been alleged in the
 21 RAP article had been forgotten about by you?
 22 **A. Yes. Yes. I can't say it was ever raised with me or**
 23 **made an issue of.**
 24 Q. And you never reflected upon Cyril Smith, the way he
 25 behaved towards people and whether or not there might be

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1 any truth in that allegation?
 2 **A. Well, I never saw anything, that was the key thing, that**
 3 **gave me cause for concern.**
 4 Q. Does that mean that you didn't ever hear any rumours in
 5 the years afterwards?
 6 **A. No, I didn't hear any rumours.**
 7 Q. About Cyril Smith?
 8 **A. No.**
 9 Q. They didn't reach your ears?
 10 **A. No.**
 11 Q. Mr Rowen, I am going to ask you then about Knowl View
 12 School and what you knew when as regards that. As
 13 I understand your evidence, you became aware that there
 14 had been an incident at the school with an intruder in
 15 1990?
 16 **A. I was only aware what was actually printed in the**
 17 **Rochdale Observer.**
 18 Q. So you got --
 19 **A. I don't recall anything being presented to the**
 20 **Education Committee, which I would have been a member**
 21 **of, to actually tell us about the particular incident.**
 22 Q. What I am interested in is the fact that that
 23 information came to your attention and you knew about it
 24 in 1990. You were a member of the educational
 25 committee. Did you bring it to the attention of anybody

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1 within the Education Department or seek to speak to
 2 anybody about it?
 3 **A. 1990, it was a very, very difficult situation if you**
 4 **were an opposition councillor. This was before the**
 5 **Freedom of Information Act. We were basically excluded.**
 6 **It was a very tight, very controlled group that was**
 7 **basically running everything and it was very difficult**
 8 **to get information about absolutely anything, and I had**
 9 **numerous rows with the Borough Solicitor at the time**
 10 **trying to get hold of information.**
 11 **So in that sense, it would have been -- it wouldn't**
 12 **have been top on my radar because there were far more**
 13 **pressing issues that were going on in terms of**
 14 **the finances of the borough that I was aware of. I'm**
 15 **saying I don't recall anything coming to education.**
 16 Q. I'm not interested in what you were told, I'm just
 17 interested at the moment about what you knew and whether
 18 or not you tried to do or to investigate or find out
 19 anything further about the incident in Knowl View School
 20 in 1990.
 21 **A. Well, when you asked things, you were told things were**
 22 **under control and were being sorted.**
 23 Q. Did you ask about Knowl View School in 1990?
 24 **A. Probably that was when Neville Naylor was still the**
 25 **Director of Education, and he was not the sort of person**

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1 **that you could have a direct, easy conversation with.**
 2 **He was a very formal, very old-fashioned -- a real**
 3 **gentleman, but very old-fashioned. I may have asked one**
 4 **of his other deputies what -- but I can't remember that,**
 5 **to be honest.**
 6 Q. Did you try and raise the issue within the
 7 Education Committee?
 8 **A. No.**
 9 Q. Is there a reason for that?
 10 **A. No. No. I mean, at the end of the day, you don't -- if**
 11 **you are an opposition councillor, you don't determine**
 12 **the agenda. The agenda is set by the chair of**
 13 **the committee and the papers went out and that's what's**
 14 **discussed.**
 15 Q. Are you suggesting that members of the opposition have
 16 no ability to raise issues within Education Committees
 17 if they want to?
 18 **A. No, at that period of time, no, as I say, it was an**
 19 **extremely difficult situation. We had to fight for**
 20 **every little bit of information about anything.**
 21 Q. So if there was a real issue of concern about the school
 22 in the Rochdale area, how would an opposition member go
 23 about raising concerns about it then?
 24 **A. You would probably go to the media. I mean, at the**
 25 **time, you have got to remember, we were reorganising and**

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1 **changing from a middle school system to an 11 to 16**
 2 **system with a tertiary college. The authority had**
 3 **purchased Hopwood Hall. I think it had been done at the**
 4 **stroke of midnight before the government had changed the**
 5 **rules to prevent local authorities from doing that. You**
 6 **know, the focus was very, very much on some of these big**
 7 **issues and where we, as an opposition, were being**
 8 **totally excluded from any proper decision-making**
 9 **process.**
 10 Q. What about the Policy Committee? You were a member of
 11 that, weren't you?
 12 **A. Yes.**
 13 Q. The Policy Committee was a meeting of senior or leaders
 14 of the political parties within Rochdale?
 15 **A. Yes.**
 16 Q. That was a meeting that was supposed to be a cross-party
 17 meeting to discuss issues of policy?
 18 **A. Yes.**
 19 Q. Is that right?
 20 **A. Again, the agenda for that was set by the leader of**
 21 **the council.**
 22 Q. Again, are you saying you couldn't have raised any issue
 23 of concern within the context of that meeting?
 24 **A. If there had been an item on the agenda, because if you**
 25 **tried to raise something that was not agendaed, it was**

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1 **ruled out of order.**
 2 Q. Did officers attend those meetings?
 3 **A. Yes.**
 4 Q. The committee meetings?
 5 **A. Yes, they usually attended to present their reports.**
 6 Q. So would Diana Cavanagh, when she took over the
 7 Education Committee, have come to those sorts of
 8 meetings?
 9 **A. Yes. If there was a report on education to the**
 10 **Policy Committee, she would have come to that.**
 11 Q. Who would have come to the Policy Committee?
 12 **A. It was usually the chief executive, the Borough**
 13 **Solicitor, the Borough Treasurer, they were the three**
 14 **main people there, and then chief officers would attend**
 15 **depending on whether there was an item on the agenda**
 16 **relating to their work.**
 17 Q. I want to ask you then about the Shepherd Report, the
 18 report that was written by Phil Shepherd in 1991. Was
 19 that something that you were aware of at the time it was
 20 written?
 21 **A. No.**
 22 Q. You have seen it since, haven't you?
 23 **A. Yes.**
 24 Q. Is that a report that you should have been made aware
 25 of?

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1 **A. Yes. I only found out later because Pam Hawton was**
 2 **chair of the health authority. I can't remember whether**
 3 **it is that report or the Val Mellor report, but she had**
 4 **been instrumental in actually helping to arrange one of**
 5 **those two reports. But that only came about much later,**
 6 **in a conversation with Pam. It was not something that**
 7 **had been to policy or had been -- you know, we'd seen.**
 8 **We certainly should have seen it.**
 9 Q. I think that the election was in May 1992?
 10 **A. Yes.**
 11 Q. Is that right? So the coalition would have taken over
 12 immediately thereafter?
 13 **A. Mmm-hmm.**
 14 Q. When you took over, did Bill Lawley, the solicitor to
 15 the council, telephone you to ask you if you would like
 16 to see some documentation about Knowl View School?
 17 **A. Yes, I think I recall probably some time, a week to**
 18 **ten days, after the election, I was working then in**
 19 **Bradford, so I wasn't a full-time leader, I had**
 20 **a full-time job, and I was asked if I wanted to see that**
 21 **report.**
 22 **At the time -- we are now talking about 1992 --**
 23 **I had been given the understanding, probably from**
 24 **Ray Colley, but I can't remember, that the school had**
 25 **stabilised and the issues had been sorted, so I said,**

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1 **no, I didn't want to see it because it was just going**
 2 **over old ground, that I was under the impression it was**
 3 **not relevant to where the school was now.**
 4 Q. The telephone conversation, that was ten days after
 5 the --
 6 **A. A week to ten days after the election.**
 7 Q. Was it specifically a telephone call about the Knowl
 8 View School papers?
 9 **A. I can't remember, to be honest. You've got to remember,**
 10 **at the time, most of the senior leadership of**
 11 **the Labour Party had lost their seats. We had then to**
 12 **put together a coalition. We were dealing with a huge**
 13 **number of problems. You know, financial, regulatory,**
 14 **the whole series of things. Bill may well have rung me**
 15 **about a number of issues. I know I had a very quick**
 16 **conversation when I was in the middle of work about**
 17 **something, and I made a decision -- perhaps, with**
 18 **hindsight, that was the wrong decision -- not to ask to**
 19 **see the report. But I prioritised on what I thought**
 20 **were the key issues facing the authority.**
 21 Q. It seems a bit odd that if the council officer
 22 telephones you and expressly asks you if you want to see
 23 the papers about something, that you would turn down the
 24 ability even to just look at them quickly to decide
 25 whether or not there's a serious issue that you need to

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1 look at?
 2 **A. Well, as I say, I was under the impression that**
 3 **everything was okay. I also had a very capable deputy**
 4 **in Ray Colley, and I also knew that Matt Ingoe on the**
 5 **committee -- because I was working full time -- as**
 6 **I say, I had to prioritise where I had to put my**
 7 **attention.**
 8 Q. Does that mean that Ray Colley within those first few
 9 days of the election was finding out about Knowl View
 10 School and --
 11 **A. I don't know. I mean, as I say, at the time, we had**
 12 **a huge number of issues to deal with. You know, in the**
 13 **grand scale of things, a school with less than 40 pupils**
 14 **was -- at the time, I thought it was quite low down on**
 15 **the priorities. I mean, events subsequently proved me**
 16 **different -- wrong, but that was the decision I made at**
 17 **the time.**
 18 Q. If an officer is trying to bring your attention to
 19 papers about a school with that number of children in
 20 it, that might suggest to you that there really is an
 21 issue that you need to look at?
 22 **A. Well, as I say, as I understand it, it was all historic**
 23 **accounts of what had happened and stuff that appeared in**
 24 **the papers which I had been assured had been sorted.**
 25 Q. Did you ask Ray Colley then about Knowl View School?

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1 **A. I can't remember, to be honest.**
 2 Q. Or did he come to you and have this -- was able to give
 3 you information about it?
 4 **A. The conversations about Knowl View came much later.**
 5 Q. That's what I'm trying to get to the bottom of, because
 6 this was a conversation that you had right at the
 7 beginning of your taking power in Rochdale?
 8 **A. Yes, in that week, I was asked to do a whole number of**
 9 **things, and I had to prioritise. The chair of education**
 10 **and the leader of the council, for example, were due to**
 11 **fly to Ukraine the week after the election to sign**
 12 **a twinning agreement with Lviv. One of the things**
 13 **I said was, "Well, I'm sorry, but we have a lot more**
 14 **important things to do". So there were an awful lot of**
 15 **decisions that we had to make very quickly and, as**
 16 **I say, it was a simple case that I had to prioritise**
 17 **what I thought was the most important.**
 18 Q. Let's move on, then, because obviously by May you're now
 19 in a leadership position and presumably you can see
 20 whatever you want to see. The Mellor Report. That
 21 wasn't a secret, was it?
 22 **A. I don't recall seeing it right away. What I established**
 23 **when we took over, I continued the system which the**
 24 **previous leadership had done where we had a meeting**
 25 **every Thursday afternoon of the chief senior officers**

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1 **and the senior councillors to discuss any pressing**
 2 **items, and basically there was always the chief**
 3 **executive there, there was always the Borough Treasurer,**
 4 **there was always the Borough Solicitor, myself,**
 5 **Pam Hawton and our two deputies, and then other chairs**
 6 **of committee attended, depending upon whether there was**
 7 **an item to do with the committee. Because what we were**
 8 **trying to do was have a forum whereby we could discuss**
 9 **important matters before they went to committee.**
 10 Q. But the point is, you were well aware of
 11 the Mellor Report within the Liberal Party, weren't you?
 12 **A. I don't recall knowing about it until much later.**
 13 Q. Because -- I mean, I can take you to it, but we know
 14 that Rita Sargenson was at a meeting at the end
 15 of March 1992 in which the report was introduced, a copy
 16 of it was provided, and there was a presentation by
 17 Dr Valerie Mellor about the content of that report?
 18 **A. Yes. I mean, Rita, as our spokesperson, would have**
 19 **attended that meeting and would have actually acted upon**
 20 **it. But, again, having re-read the Mellor Report and**
 21 **seeing that now, what she's basically saying in there**
 22 **was dealing with stuff that was of historic context and**
 23 **that the school had moved forward, there was a new head**
 24 **in place, there was a new deputy, and things were being**
 25 **improved.**

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1 Q. What the Mellor Report throws light on is that there
 2 were children within Rochdale who were being exploited
 3 sexually in public areas in Rochdale?
 4 **A. Yes.**
 5 Q. It is clear from that report that it wasn't confined to
 6 the school and that a number of the children had left?
 7 **A. Yes --**
 8 Q. So you couldn't be satisfied, could you, from the report
 9 that there weren't still very serious issues about child
 10 protection in Rochdale?
 11 **A. No, but as I understand it, and this was more from**
 12 **Pam Hawton's perspective, she had discussed with**
 13 **Ian Davey, you know, what was going to be done about it.**
 14 **As I say, what we were trying to do, the style of**
 15 **administration that I was trying to operate was much**
 16 **different from what had happened in the past, it was**
 17 **a collegiate one, and, as far as I was concerned,**
 18 **because Pam was chairman of the health authority as well**
 19 **as being the deputy leader, she was taking the lead on**
 20 **that particular issue. So I was under the impression**
 21 **that that was where that was being progressed.**
 22 Q. You say "under the impression". You were the leader of
 23 the council. Wasn't it your job to be clear about what
 24 was happening in response to a report that presented
 25 issues as serious as this one?

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1 **A. Well, I was -- from what Pam told me, and I can only say**
 2 **that, she felt that that -- that the Director of**
 3 **Social Services, Ian Davey, was taking forward some of**
 4 **the -- some of those issues and concerns that she had**
 5 **made. What you have got to understand is the difference**
 6 **between someone who is a chief officer and is employed**
 7 **full time, and this was -- I was very clear with what**
 8 **had happened with the previous administration. None of**
 9 **my members were going to have offices in the Education**
 10 **Department or in the social services. You employed**
 11 **officers to do the job. As I used to say to one chief**
 12 **officer, "I will give you the problems. I expect you to**
 13 **find the solutions", and as far as I was understanding,**
 14 **Pam had had that discussion and meeting with Ian Davey,**
 15 **and he was taking that forward.**
 16 Q. So what happened then when social services decided that
 17 they weren't going to get involved because this wasn't
 18 an issue that fell within child protection procedures or
 19 guidelines?
 20 **A. Well, I have only become aware of that since, and that**
 21 **appalls me, quite honestly.**
 22 Q. How did you, as leader of the council, not know?
 23 **A. I can only know something if that is reported to. Yes,**
 24 **you can ask questions, but if you believe that an**
 25 **officer, a senior officer, has agreed to undertake an**

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1 investigation and to carry out a sequence of work, and
 2 unless somebody says to you that has not been done --
 3 now, I did become aware later, when I met Martin Digan
 4 and I went to the school and he arranged for me to
 5 actually meet one of the pupils and parents and I met
 6 him and he'd got a black eye and that had been done by
 7 somebody who had hit him at the school, I did go back to
 8 the chief executive and I did say, "I'm not happy about
 9 what I have heard about what is going on at the school,
 10 and I think this should be reported to the police".
 11 Q. I just want to focus on 1992.
 12 A. Right.
 13 Q. The reason the Val Mellor report was written was because
 14 social services had decided not to get involved. That
 15 was the whole reason why the Education Department had
 16 had to go to someone else in order to write a report.
 17 You were aware of that, weren't you?
 18 A. I wasn't aware of the reason why that report -- it
 19 became clear later on from conversations I had with
 20 Diana Cavanagh that she had concerns about what was
 21 happening. You have to go back in history and look
 22 a little bit at what had happened in the Social Services
 23 Department just prior to Knowl View --
 24 Q. I'm just going to interrupt you --
 25 A. No, because it is important. We had had the satanic

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1 abuse stuff where children had been taken into care with
 2 the allegation that they had been watching these films,
 3 or whatever. They had got that drastically wrong.
 4 I can only surmise -- I don't know why; you would have
 5 to ask Ian Davey that -- that, rather than going one
 6 way, which they had done in the satanic abuse case, they
 7 had erred on the case of caution and not done what is
 8 quite clear they should have actually done.
 9 Q. That might explain why social services didn't get
 10 involved. I'm trying to ascertain your awareness of
 11 the fact that social services weren't involved --
 12 A. I wasn't aware of that discrepancy. As I say, all I was
 13 aware of was that Pam Hawton -- and to me she was
 14 eminently more qualified than me to have a conversation.
 15 I had had a meeting with Ian Davey and it had been
 16 agreed that, you know, that sort of going down the child
 17 protection route would happen.
 18 Q. Did you understand then that child protection procedures
 19 had been followed up?
 20 A. Yes. I assumed it had. Nobody had said, no, it hadn't.
 21 Pam never said anything to me after that to say that,
 22 "Oh, they haven't done this and I'm not" -- it only
 23 became clearer much later -- as I say, when I met
 24 Martin Digan -- that there were serious issues still
 25 outstanding.

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1 Q. So does that mean between 1992 and 1995 your interest in
 2 Knowl View or your awareness of Knowl View was based
 3 upon what other people had told you was going on?
 4 A. Well, I had a chairman of education who was doing the
 5 job.
 6 Q. Yes.
 7 A. And, as far as I was -- it was being reported to me, the
 8 school was improving. This was historical. They were
 9 over the issue and that, you know, the new head and the
 10 new deputy had moved the school forward. I think the
 11 meeting I had with Martin Digan was probably in 1994, it
 12 might have been late 1993, something like that.
 13 Q. Were you aware -- I'm just going to go back to one brief
 14 point. You did read the Val Mellor report, didn't you?
 15 A. Yes.
 16 Q. Because it does say in it that social services didn't
 17 investigate. In other words, the child protection
 18 procedures weren't used. Are we to assume then that
 19 that didn't prompt you to make any enquiry about that?
 20 A. No, I must have missed that because, as I say, I was
 21 basing my sort of understanding on the conversation I'd
 22 had with Pamela Hawton.
 23 Q. So then Knowl View School came back into your view in
 24 around 1994, do you think?
 25 A. Yeah, there were two issues. One was the chair of

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1 the school, who by then was Harry Wild, asked to see me,
 2 and I went to his house and he wanted to see me about
 3 a number of issues to do with the school. I think a lot
 4 of it was to do with the actual state of the building
 5 and to do with some of the staff. He had concerns about
 6 that.
 7 I think that prompted me to actually contact
 8 Diana Cavanagh and ask for a report on where the
 9 situation was with the school. I know that was referred
 10 to when I was interviewed the first time. Then, as
 11 I say, I actually was contacted by Martin Digan and
 12 I went up to the school and had a look around and that
 13 was the first time I'd been to the school, to be honest.
 14 He subsequently arranged for me to meet this boy and one
 15 of the parents.
 16 Q. Then it was after that that you decided that Cyril Smith
 17 would be the right person to become involved in the
 18 governance of the school?
 19 A. No, I think he -- both him and Harry Wild were appointed
 20 to the school about the same time. That would have been
 21 sometime in 1993, if I recall rightly.
 22 Q. I think it is 1994. Harry Wild was already on the
 23 governors before Cyril Smith was.
 24 A. Right. Well, it may have been, I'm sorry, I can't
 25 recall that.

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1 Q. Did you think that Cyril Smith was the right person then
 2 because, as you have said, he was a prominent person and
 3 he was the sort of person who might be able to sort the
 4 situation out, so to speak?
 5 **A. I had no reason to doubt his integrity or his honesty at
 6 that particular time. As I say, he was -- he had just
 7 retired as the Member of Parliament, and one thing I did
 8 learn with Cyril was it was important to keep him busy.
 9 So this was an important job that came up and I thought
 10 his experience, because he'd been chairman of education,
 11 would be valuable to the school.**
 12 Q. You didn't have second thoughts because of his being
 13 a bully, his being nasty, his being intimidating, that
 14 maybe he wasn't the right person to deal with this
 15 difficult situation?
 16 **A. No, because the other side of Cyril, which is what most
 17 people saw -- I'm talking about my experience of Cyril
 18 from the point of view of -- every political party has
 19 discussions and disagreements about policy and who does
 20 what. One of the things I learnt about Cyril was that,
 21 whereas, you know, when you retire, you retire, well,
 22 that was never the case with Cyril, at least it felt --
 23 and so a lot of my discussions and arguments with him
 24 were about what we were doing as a Liberal Democrat
 25 group on the council. I always took the view -- and**

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1 **I wrote him a letter once -- that I wasn't having any
 2 back seat drivers.**
 3 Q. So you say you had to find ways of keeping him busy?
 4 **A. Yes.**
 5 Q. Was that to keep him off your back?
 6 **A. I thought he would add value to the school because there
 7 was an issue about the governance at the school and to
 8 strengthen it. As I say, Matt Ingoe was getting quite
 9 elderly and I thought he could play a useful role.**
 10 Q. You have already confirmed that the allegations that had
 11 been made about him in the past just didn't come to
 12 mind --
 13 **A. No.**
 14 Q. -- whenever you were proposing?
 15 **A. No.**
 16 Q. Mr Rowen, I just want to ask you then about this: there
 17 have been allegations and rumours in Rochdale that there
 18 was some form of pact between the Liberal Party and the
 19 Labour Party; in essence, that the Labour Party wouldn't
 20 mention rumours about Smith if the Liberal Party didn't
 21 mention rumours about a different politician, whose name
 22 I won't use. Are you aware of this rumour?
 23 **A. I became aware of that a few years ago. It is total
 24 fantasy. Let's be very clear. Unfortunately,
 25 Jim Dobbin is not with us, but I'm sure if he was he**

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1 **would say exactly the same as me: we would have had to
 2 truck with any sort of -- I certainly, as leader of
 3 the group, would have had no truck with any of that sort
 4 of going on.**
 5 **The other issue, without naming the names, that
 6 person was no longer on the scene. He had lost his seat
 7 on the council and he was at the university. So there
 8 would have been no practical -- you know, it was not an
 9 issue. To me, as I say, it is total fantasy.**
 10 Q. If not a pact, may there have been just an understanding
 11 between the parties to, as it were, lay off on the
 12 rumour mongering because it was --
 13 **A. No. You have got to understand some of the politics in
 14 Rochdale. We were the opposition and the competition to
 15 the Labour Party. Traditionally, we had been the
 16 dominant party or the Labour Party had been the dominant
 17 party. Jim Dobbin took over as leader of the council
 18 from me in 1996. Whilst we got on very well personally,
 19 politically we were opposed and we would fight each
 20 other tooth and nail. So there is no way I would give
 21 any quarter on an issue like that. I did have some of
 22 my councillors at various stages wanting to form pacts
 23 of coalitions, usually with the Conservatives, not to
 24 fight a seat -- "We won't fight this seat in order for
 25 them to win" and I always said, no, we do not do that,**

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1 **we are a standalone on our own two feet and we fight our
 2 own battles.**
 3 MS DOBBIN: Mr Rowen, thank you. Chair, do you have any
 4 questions?
 5 Questions from THE PANEL
 6 THE CHAIR: Yes, just briefly, Mr Rowen. You would, of
 7 course, have had a Liberal Democrat group within the
 8 council?
 9 **A. Yes.**
 10 THE CHAIR: How frequently did you meet?
 11 **A. Usually before every council meeting.**
 12 THE CHAIR: So every six weeks or something like that?
 13 **A. Yes.**
 14 THE CHAIR: At any point, did you or anyone else raise
 15 issues about Knowl View School or child sexual
 16 exploitation during your time within the council?
 17 **A. When we were taking the decision to close the school,
 18 that was when we had the real serious discussion.**
 19 THE CHAIR: But not before that?
 20 **A. No.**
 21 THE CHAIR: Thank you.
 22 (The witness withdrew)
 23 MS DOBBIN: Thank you, chair.
 24 THE CHAIR: Thank you very much, Ms Dobbin. Have we
 25 concluded today?

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1 MS DOBBIN: We have.
2 THE CHAIR: Thank you very much. We will reconvene
3 tomorrow.
4 (4.15 pm)
5 (The hearing was adjourned to
6 Friday, 20 October 2017 at 10.30 am)
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