

1 Wednesday, 31 January 2018
2 (10.30 am)
3 Welcome and opening remarks by THE CHAIR
4 THE CHAIR: Good morning. I am Alexis Jay. I am the chair
5 of the Independent Inquiry into Child Sexual Abuse, and
6 sitting with me are the other panel members of
7 the inquiry: Professor Sir Malcolm Evans, Ivor Frank and
8 Drusilla Sharpling.
9 On behalf of the inquiry, I welcome you all to this,
10 the first preliminary hearing in the investigation into
11 allegations of child sexual abuse linked to Westminster.
12 This is one of 13 investigations being conducted by
13 this inquiry. Our task in each investigation is to
14 examine the extent to which public and private
15 institutions in England and Wales have failed to protect
16 children from sexual abuse in the past and to make
17 recommendations to keep children safe today and in the
18 future.
19 The Westminster investigation will consider evidence
20 relating to allegations of child sexual abuse committed
21 by persons of public prominence associated with
22 Westminster and how these came to light; the findings of
23 relevant investigations; whether there is evidence of
24 conspiracy, coverup, interference or tolerance in
25 relation to child sexual abuse committed by persons of

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1 public prominence associated with Westminster; whether
2 governmental, political and law enforcement institutions
3 were aware of such evidence and took appropriate steps;
4 and whether there are adequate safeguarding and child
5 protection policies in place within political parties,
6 government departments and agencies.
7 A substantive hearing in this investigation is
8 scheduled for March 2019.
9 The purpose of this first preliminary hearing is
10 fourfold: it is to provide an update on the
11 investigations; secondly, to hear renewed applications
12 for core participant status; third, to provide an update
13 on previous determinations; and, fourth, to make
14 directions for the future management of
15 the investigation. The structure of the hearing is set
16 out in the hearing agenda.
17 Before we hear from counsel, some points about the
18 arrangements for this morning. There will be
19 a 15-minute break at around 11.45 am. If this hearing
20 has not concluded before 1.00 pm, we will take a break
21 for lunch. Directions arising from this hearing will be
22 published on the inquiry's website in short order after
23 the hearing, as will the hearing transcript.
24 I now invite the lead counsel to the inquiry,
25 Brian Altman QC, and the lead counsel for this

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1 investigation, Andrew O'Connor QC, to provide us with
2 further background and an update on the investigation.
3 Please go ahead, Mr Altman?
4 Opening remarks by MR ALTMAN
5 MR ALTMAN: Thank you, chair. As is well known, I am
6 counsel to the inquiry. I am assisted by Mr O'Connor in
7 this investigation, as, chair, you have just said,
8 together with Ms Beattie and Ms O'Byrne.
9 First, may I describe the independent role of
10 counsel to the inquiry. Counsel to the inquiry adopts
11 an entirely neutral role in these proceedings. Our role
12 includes making submissions as to the manner in which
13 the inquiry's investigations should be conducted. For
14 example, the submissions that we will make today on the
15 scope of this investigation.
16 More generally, we will attempt to assist the
17 inquiry throughout this investigation by making
18 independent submissions on the law and on evidence, by
19 presenting the witness evidence at public hearings in
20 a neutral and nonpartisan manner, and by advising the
21 panel on the conclusions that are available on the
22 evidence.
23 Most of the parties who appear before you today have
24 applied for, and have been granted, core participant
25 status in this investigation. There are also a few

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1 parties whose applications for core participant status
2 has been refused and who wish to renew their
3 applications orally.
4 Dealing first with those who have been granted core
5 participant status, they are: the Crown Prosecution
6 Service, represented today by Mr Edward Brown QC; the
7 Labour Party, represented by Ms Eleanor Grey QC; the
8 Independent Office for Police Conduct, formerly known as
9 the IPCC, represented by Rachel Taylor; the
10 Metropolitan Police Service, represented by
11 Mr Jonathan Dixey; Wiltshire Police, represented by
12 Sue Dauncey; the Home Office, who have been granted core
13 participant status as a representative for Her Majesty's
14 Government, represented by Mr Tom Kark QC; a group of
15 seven complainants, whose ciphers are RO-A1, A4, A5, A6,
16 A7, A8 and A64, represented by Ms Laura Hoyano;
17 Ms Esther Baker, represented by Mr Peter Garsden; and
18 Mr Tim Hulbert, who is in person representing himself.
19 Turning, chair, to those who have not been granted
20 core participant status but who wish to renew their
21 applications before you today, they are WM-A1,
22 represented by Mr David Greenwood of Switalskis
23 Solicitors, WM-A4, represented by Mr Sam Stein QC, and
24 Mr Daniel Janner QC, who represents himself,
25 Marion Janner and Rabbi Laura Janner-Klausner, who are

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1 represented by Mr Rupert Butler, who is not in
 2 attendance today, and, as I understand the position --
 3 he is in attendance, so he will be representing both
 4 Marion Janner and Rabbi Laura Janner-Klausner.
 5 Mr Janner is pointing to himself. Well, we will find
 6 out in due course who represents whom.
 7 Chair, I will shortly invite Mr O'Connor to address
 8 you on the detail of this investigation; in particular,
 9 the progress that has been made so far and our proposals
 10 as to the scope of the investigation.
 11 Before doing so, may I make one further introductory
 12 point? In making submissions at the hearing today, and
 13 in line with the practice that has been adopted in the
 14 inquiry's other investigations, we will refer generally
 15 to those who have made allegations of sexual abuse as
 16 "complainants", except where there has been a criminal
 17 trial which has resulted in a conviction or where the
 18 fact of abuse has otherwise been formerly established,
 19 in which case we will use the term "victim" and/or
 20 "survivor".
 21 With that introduction, may I invite Mr O'Connor to
 22 address you?
 23 Opening statement by MR O'CONNOR
 24 MR O'CONNOR: Chair, this inquiry was established as
 25 a public inquiry under the 2005 Inquiries Act

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1 in March 2015. The inquiry had, of course, had
 2 a previous existence as a non-statutory inquiry for some
 3 months prior to that.
 4 The language of section 1 of the 2005 Act speaks of
 5 the purpose of a public inquiry as being to address
 6 public concern.
 7 The nature of the public concern that triggered the
 8 setting up of this inquiry and which this inquiry must
 9 address is well known. It is a public concern about the
 10 way in which institutions have responded, and are
 11 responding, to issues of child sexual abuse and
 12 exploitation. The first paragraph of the inquiry's
 13 terms of reference requires the inquiry to, and I quote:
 14 "Consider the extent to which state and non-state
 15 institutions have failed in their duty of care to
 16 protect children from sexual abuse and exploitation; to
 17 consider the extent to which those failings have since
 18 been addressed; to identify further action needed to
 19 address any failings identified; [and] to consider the
 20 steps which it is necessary for state and non-state
 21 institutions to take in order to protect children from
 22 such abuse in future."
 23 One strand of this public concern that was
 24 particularly prominent at the time that the inquiry was
 25 set up arose from news reports suggesting that people of

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1 public prominence associated with Westminster had been
 2 involved in the sexual abuse of children and that
 3 members of the Westminster establishment -- MPs,
 4 ministers, party whips, civil servants, the prosecuting
 5 authorities, and so on -- may have been aware of this
 6 conduct and had either failed to take adequate steps to
 7 prevent it or had even conspired in covering it up.
 8 Those are the matters that this particular element
 9 of the inquiry -- the Westminster investigation -- is
 10 intended to address. The inquiry has published
 11 a definition of scope for this investigation, and there
 12 is also an update about the investigation that was
 13 published in August last year. Those documents are
 14 available on the inquiry website. In summary, both
 15 documents emphasise that the focus of this investigation
 16 will be on how Westminster institutions -- be it
 17 political parties, government departments and agencies,
 18 or law enforcement agencies -- responded to allegations
 19 of child sexual abuse and exploitation. To use the
 20 language of the inquiry's overarching terms of
 21 reference: did these institutions fail in their duty to
 22 protect children?
 23 It is important to recognise from the outset,
 24 however, that the nature and degree of public concern
 25 relating to these issues has not remained static since

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1 2015. In 2015, the allegations of a so-called
 2 Westminster paedophile ring whose activities were
 3 centred on Dolphin Square in London were a cause of very
 4 serious public concern. Since then, those allegations
 5 have been investigated by the Metropolitan Police under
 6 Operation Midland. As is well known, that investigation
 7 has now concluded with no charges being brought, and the
 8 police investigation itself has been the subject of
 9 a formal review by Sir Richard Henriques, who has
 10 published his conclusions. Given these developments, we
 11 submit that the public concern relating to those
 12 particular allegations has diminished considerably.
 13 However, those allegations were only one element of
 14 the public concern relating to Westminster institutions.
 15 Many other areas of concern remain. For example, did
 16 political parties turn a blind eye to allegations of
 17 child sexual abuse or attempt to cover them up, or, in
 18 the case of the Whips' Office, did they in fact try to
 19 turn such allegations to their advantage? Did members
 20 of the Westminster establishment seek to influence
 21 policing or prosecution decisions in cases of child
 22 sexual abuse? These matters are, of course, especially
 23 concerning because they relate directly to the conduct
 24 of elected representatives; they affect public
 25 confidence in the individuals and institutions

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<p>1 responsible for running the country. 2 It is upon these and other similar matters that, in 3 our submission, this investigation should focus. 4 I propose to return to the scope of the investigation 5 and to say a little more about it in due course. 6 Chair, as you have already observed, the Westminster 7 investigation is one of 13 investigations that the 8 inquiry is conducting. There is a degree of overlap 9 between this and other investigations. At a high level 10 of generality, this investigation shares with many 11 others a concern that individuals at the highest levels 12 of national institutions may have been complacent 13 towards and indeed may have covered up allegations of 14 child sexual abuse and exploitation. These issues 15 arise, for example, in the inquiry's investigation into 16 the child migrants programme and also the investigations 17 into the Catholic and Anglican Churches. 18 There is a more direct link with the Rochdale 19 investigation. Hearings in that investigation took 20 place at the end of last year. The evidence that you 21 heard then was deliberately limited to matters that took 22 place in Rochdale. Within that context, you heard 23 evidence relating to the late Cyril Smith, and in 24 particular about decisions that were taken not to bring 25 charges against him in respect of allegations that he</p> <p style="text-align: center;">Page 9</p>	<p>1 investigation, preparatory work is in fact already well 2 under way. 3 The window for applications for core participant 4 status was open for two months towards the end of last 5 year. In total, 40 applications were received from 6 a wide range of individuals and institutions. 7 In those cases where you did not grant the 8 application for core participant status, you indicated 9 that you were minded to refuse the application and gave 10 the applicant the opportunity to make oral submissions 11 to you in support of the application today. There are 12 several individuals here today who wish to make such 13 submissions. We will come to that later. 14 Before I leave the subject of core participant 15 applications, may I emphasise that, in granting any 16 individual or institution core participant status, you 17 are simply, to summarise, recognising that that 18 individual or institution has a significant interest in 19 the matters to be investigated. There is no more to it 20 than that. Nor is there any meaning in the phrases 21 "special witness status" or "special victim status" 22 which have been referred to in the press. The only 23 status of this sort recognised in the Inquiry Rules is 24 that of core participant. 25 One of those to whom you have granted core</p> <p style="text-align: center;">Page 11</p>
<p>1 had committed offences of child sexual abuse. 2 Consequential issues relating to Westminster 3 institutions -- most obviously, perhaps, what the 4 Liberal Party national leadership knew about these 5 allegations, and what, if any, action they took as 6 a result of them -- were plainly not within the scope of 7 the Rochdale investigation, and you gave a ruling to 8 that effect. 9 Such issues plainly are, however, within the scope 10 of this investigation, and our submission, which I will 11 come to in due course, is that you should now 12 investigate these matters. 13 Finally on the question of overlap, chair, there is 14 an issue as to any potential overlap between this 15 investigation and the inquiry's separate investigation 16 into institutional responses to allegations of child 17 sexual abuse involving the late Lord Janner of 18 Braunstone QC. I will return to that, if I may, in due 19 course. 20 Turning to procedural matters, as you have stated, 21 chair, it is intended that the inquiry will hold public 22 hearings in this investigation in just over a year's 23 time, in March 2019. Those hearings will last for three 24 weeks. Our task is now to prepare for those hearings. 25 Although this is the first hearing in this</p> <p style="text-align: center;">Page 10</p>	<p>1 participant status in this investigation is 2 Ms Esther Baker. You have done so given her status as 3 a complainant of relevant sexual abuse and also in her 4 capacity as someone who has campaigned publicly on 5 related issues in her own name. Since there has been 6 some public comment about this matter, I should 7 emphasise that granting Ms Baker core participant status 8 does not mean that she will be called to give oral 9 evidence at the hearings. You have not yet made any 10 decisions as to which witnesses to call. Nor does it 11 mean that the particular allegations that Ms Baker has 12 made will be investigated. Indeed, our submission, to 13 which I shall return in due course, is that in general 14 terms it will not be appropriate for the inquiry, in 15 conducting this investigation, to seek to make findings 16 as to whether any individual allegations of child sexual 17 abuse are true or false. 18 Returning to procedural matters, a critical element 19 of this investigation will be the disclosure process. 20 I am glad to say that that exercise is already well 21 under way. In a public inquiry, there are three 22 distinct stages to the disclosure process. First, the 23 inquiry makes requests to individuals and to 24 organisations for relevant documents. At this first 25 stage, the inquiry obtains relevant documents or, and</p> <p style="text-align: center;">Page 12</p>

<p>1 this can be just as important, establishes through 2 a search process that certain individuals or 3 organisations do not hold relevant documents. Secondly, 4 relevant documents are disclosed by the inquiry to core 5 participants. Third, many, but usually not all, 6 relevant documents are put into evidence before the 7 inquiry and made available to the public, nowadays by 8 publication on the internet. This is the process that 9 all of this inquiry's other investigations have 10 followed.</p> <p>11 We have been working on the first stage of this 12 process, ie, making disclosure requests to and obtaining 13 relevant documents from individuals and organisations, 14 for many months now, and it is well under way. We have 15 engaged with a number of organisations that hold 16 potentially relevant material and we have received over 17 35,000 pages of documentation.</p> <p>18 To be more specific, we have made disclosure 19 requests to MI5, MI6 and GCHQ. All three agencies have 20 completed their initial searches and we are engaging 21 with them as to the outcome of those searches.</p> <p>22 We have made similar disclosure requests to the 23 police. To be more specific, requests have gone to the 24 Metropolitan Police, to the Metropolitan Police Special 25 Branch, and to all regional forces via</p> <p style="text-align: center;">Page 13</p>	<p>1 keep under review the possibility of conducting 2 searches -- probably targeted searches -- in these 3 archives.</p> <p>4 We have corresponded with the London School of 5 Economics, which holds archives from the Liberal and 6 Liberal Democratic parties, and we will be commencing 7 a disclosure exercise in relation to that material in 8 the near future.</p> <p>9 We have met with the Secretary of the Defence and 10 Security Media Advisory Committee, the body that 11 administers what is still commonly known as the D-Notice 12 system. At our request, searches of relevant records 13 have taken place and a witness statement from the 14 secretary of the committee has been provided.</p> <p>15 We have made disclosure requests directly to 16 political parties and have received a considerable 17 volume of material in response.</p> <p>18 Finally, we have received a large number of 19 documents that have been sent to us by individuals with 20 an interest in these matters. All documents received 21 have been uploaded onto our computer systems and the 22 process of reviewing these documents for relevance is 23 under way.</p> <p>24 The disclosure process will of course continue. Now 25 that we have core participants, we expect them to be</p> <p style="text-align: center;">Page 15</p>
<p>1 Operation Hydrant. The search process is well under way 2 and we are working with the police to ensure that these 3 searches are comprehensive and proportionate.</p> <p>4 We have been working closely with the Independent 5 Office for Police Conduct, formerly known as the 6 Independent Police Complaints Commission, the IPCC. 7 That organisation has conducted a number of 8 investigations that are relevant to this investigation, 9 and some of those investigations are still under way. 10 They have disclosed some material already to us, and we 11 anticipate further material being disclosed in due 12 course.</p> <p>13 An extensive disclosure exercise has been set in 14 train at the Cabinet Office. That process is still 15 under way, but some documents are already available for 16 review and the inquiry legal team will commence that 17 process very shortly.</p> <p>18 We have liaised with both the Bodleian Library in 19 Oxford and Churchill College, Cambridge, which hold 20 a number of sets of archives, including prime 21 ministerial archives, that are of potential relevance to 22 the investigation. No searches have yet been conducted 23 in these archives, and we are of course mindful of 24 the need to ensure that the disclosure process is 25 undertaken in a way that is proportionate. We intend to</p> <p style="text-align: center;">Page 14</p>	<p>1 involved in the process. Some core participants may 2 wish to make suggestions as to further places that we 3 should look for documents. Some core participants hold 4 documents and are already assisting us in this regard. 5 All core participants will, provided they sign the 6 standard confidentiality undertaking that is in use 7 across all the inquiry's investigations, receive 8 disclosure of documents from the inquiry when we reach 9 the second stage of the process that I described a few 10 moments ago.</p> <p>11 Finally on the question of process, chair, may 12 I record that we intend to hold one or more further 13 preliminary hearings between now and March 2019. These 14 will be held as necessary to enable the preparation for 15 the substantive hearings to be conducted in an efficient 16 and publicly transparent manner.</p> <p>17 I said earlier that I would return to and say 18 a little more about the likely scope of 19 the investigation, and I turn to that now.</p> <p>20 There are three short preliminary points that 21 I would make.</p> <p>22 First, I have already referred to the inquiry's 23 overarching terms of reference and to the definition of 24 scope and the update document that the inquiry has 25 published in relation to this particular investigation.</p> <p style="text-align: center;">Page 16</p>

<p>1 Those documents are all available on the inquiry 2 website. I know that you, chair, and the panel are very 3 familiar with those documents and I do not propose to 4 read them out today. But they are essential reading for 5 anyone with an interest in this investigation, since 6 they set the basic parameters within which it will 7 operate. 8 Second, it will be apparent to anyone with knowledge 9 of this area that the investigation will have to be 10 selective in the topics that it chooses to examine. 11 I referred earlier to the public concern relating to 12 Westminster child sexual abuse allegations. That 13 concern covers a huge number of factual matters which 14 relate to events taking place all over the country and 15 spanning decades. Even if it were appropriate to do so, 16 it would not be possible for this investigation to 17 examine all of these matters. We must not forget that 18 this is only one of the inquiry's 13 investigations. 19 Resources, in particular in terms of hearing time, are 20 limited. 21 You, chair, and the panel will therefore need to 22 make decisions as to which matters to pursue. You will 23 need to be selective. Your decisions will no doubt be 24 informed by a range of factors. For example, you will 25 of course have regard to the inquiry's overarching terms</p> <p style="text-align: center;">Page 17</p>	<p>1 following this hearing. In due course, we expect that 2 it will be helpful to draw up a list of issues. 3 We have identified six broad issues that we submit 4 should be explored by this investigation. Each amounts 5 to a strand of public concern relating to the way in 6 which Westminster institutions have historically 7 addressed or responded to issues of child sexual abuse. 8 I will give a brief summary of each. As will be 9 apparent, there is a degree of overlap between several 10 of these categories. 11 The first strand relates to concern that police 12 investigations into cases of possible child sexual abuse 13 linked with Westminster may have been the subject of 14 inappropriate interference. 15 A central theme of many cases in this category is 16 the suggestion that the police may have been prevented 17 from investigating the conduct of senior politicians and 18 other establishment figures. A number of retired police 19 officers have claimed that they were indeed warned off 20 investigating possible cases of child sexual abuse 21 committed by senior politicians in the 1960s, '70s and 22 '80s. Several of these cases are linked to the 23 Elm Guest House affair, which was itself the subject of 24 investigation by the Metropolitan Police in its 25 Operations Fairbank and Fernbridge. The claims that</p> <p style="text-align: center;">Page 19</p>
<p>1 of reference and to the emphasis there on issues of 2 institutional responsibility. As stated in the August 3 update note to which I have referred, you will also take 4 account of proportionality. For example, you will not 5 wish, without very good reason, to cover ground that has 6 already been covered by another investigation or 7 inquiry. You may well wish to focus on issues that you 8 consider to be of particular public concern. In 9 summary, you will wish to make the best use of 10 the resources available to this investigation to address 11 as fully as possible the public concern relating to 12 issues of Westminster child sexual abuse. 13 This leads to the third point, which is to emphasise 14 that the scope of this investigation has not yet been 15 determined, but we submit that scope will need to be 16 determined by you within a fairly short period of time. 17 That will allow a focused process of searching for and 18 disclosing relevant documents and obtaining witness 19 evidence to take place. We will make submissions today 20 on the issues that we submit this investigation ought to 21 address. You will no doubt wish to provide core 22 participants with an opportunity to make submissions in 23 response. We will come to directions later, chair, but 24 our suggestion is that it will be most convenient to all 25 concerned for such submissions to be made in writing</p> <p style="text-align: center;">Page 18</p>	<p>1 have been made are claims of conspiracy and coverup and 2 we submit that they go to the heart of the inquiry's 3 work in this investigation. I have mentioned the 4 Metropolitan Police's investigations. In addition, some 5 of the cases in this category have been investigated by 6 the IPCC and/or its successor body, the Independent 7 Office for Police Conduct. We are liaising with both 8 the IOPC and the Met Police in this regard. 9 Another case that raises questions as to 10 inappropriate political influence over police conduct 11 arises from the well-publicised account that the 12 journalist Don Hale has given of his office being raided 13 by Special Branch officers who served, or at least 14 purported to serve, a D-Notice on him and seized 15 a dossier from him containing names of MPs said to be 16 sympathetic to the Paedophile Information Exchange, 17 a dossier that had apparently been given to Mr Hale by 18 Barbara Castle MP. This case has also been the subject 19 of an investigation by the IPCC. We will consider the 20 report and any other documents relating to these events 21 that we obtain. We submit that this may well be an 22 appropriate case to investigate further. Written 23 evidence relating to D-Notices and the work of 24 the D-Notice Committee was adduced in the Rochdale 25 investigation, and it may well be that you will wish to</p> <p style="text-align: center;">Page 20</p>

<p>1 hear oral evidence on that subject during the course of 2 the hearings in this investigation. 3 The second strand is related to the first. Have 4 there been cases in which prosecutorial decisions in 5 child sexual abuse cases have been the subject of 6 improper influence from within the Westminster 7 establishment? Questions of this nature relating to 8 Cyril Smith were raised in the Rochdale investigation. 9 We propose that you should pursue those questions in 10 this investigation. Similar issues also arise in 11 relation to prosecution decisions taken in at least two 12 other cases -- those of Peter Hayman and Victor Montagu. 13 We submit that those cases also should be investigated, 14 and it is possible that the disclosure exercise that we 15 are currently undertaking will raise similar questions 16 in relation to other cases. 17 The third strand that we propose should be 18 investigated relates to the way in which political 19 parties, and in particular the leadership of those 20 parties, have reacted to allegations of child sexual 21 abuse made about individuals within their own parties. 22 What, for example, did the leadership of the Liberal 23 Party know about the allegations against Cyril Smith? 24 Did they take those allegations seriously? Did they 25 react appropriately? Similar questions have been raised</p> <p style="text-align: center;">Page 21</p>	<p>1 be protected. And if a few things had gone wrong here 2 and there, that it was more important to protect the 3 system than to delve too far into them". Chair, 4 Lord Tebbit's words beg a number of questions that, we 5 submit, can and should be explored within the scope of 6 this investigation. 7 The fourth strand concerns the activities of 8 the Whips' Offices of the various parties in parliament. 9 Is it possible that on occasions in the past the Whips 10 may have received allegations of child sexual abuse made 11 against politicians in their own party and then failed 12 to report those allegations or to take any other 13 appropriate steps? Is it possible, indeed, that the 14 Whips may have taken active steps to conceal such 15 allegations, in part to avoid embarrassing publicity and 16 in part to gain a hold over the politician in question? 17 In a notorious BBC interview in 1995, Tim Fortescue, who 18 is now dead but who in the early 1970s was 19 a Conservative MP and government Whip, suggested that 20 this was so. In describing the work of the Whips' 21 Office, he made the following comments: 22 "For anyone with any sense, who was in trouble, 23 would come to the Whips and tell them the truth, and say 24 'Now, I'm in a jam, can you help?' It might be debt, it 25 might be ... a scandal involving small boys, or any kind</p> <p style="text-align: center;">Page 23</p>
<p>1 about the way in which allegations relating to 2 Peter Morrison were dealt with within the Conservative 3 Party. And how did the Westminster establishment 4 generally react to efforts made to shine a light on 5 child sexual abuse and associated institutional 6 failings? I have already mentioned the well-known 7 allegations relating to the Elm Guest House. They 8 clearly touch on these issues. We also anticipate that 9 the investigation will hear evidence in this regard 10 about the so-called Dickens dossier, and possibly also 11 about the allegations that have been made by 12 Anthony Gilberthorpe. 13 In this context, it may also be helpful for the 14 investigation to explore more general questions as to 15 how the Westminster establishment operated 30 years ago 16 and how open it was to pursuing allegations of even very 17 serious wrongdoing made against those who were members 18 of that establishment. In a BBC interview with 19 Andrew Marr in 2014, Norman Tebbit said that he thought 20 that "there may well have been" what he described as 21 a "big political coverup" relating to child sexual abuse 22 in the 1980s. He added that "things looked different in 23 those days". He described an atmosphere within 24 Westminster where, as he put it, "most people would have 25 thought that the establishment -- the system -- was to</p> <p style="text-align: center;">Page 22</p>	<p>1 of scandal in which, er, a member seemed likely to be 2 mixed up in. They'd come and ask if we could help and, 3 if we could, we did. And we would do everything we can 4 because we would store up Brownie points ... and if 5 I mean, that sounds a pretty, pretty nasty reason, but 6 it's one of the reasons, because if we could get a chap 7 out of trouble, then he will do as we ask for evermore." 8 Did the Whips' Offices in fact assist in covering up 9 "scandals involving small boys" to gain what 10 Mr Fortescue described as "Brownie points"? We submit 11 that that is an issue that this inquiry should 12 investigate. 13 The fifth issue relates to the honours system, 14 a system operated on behalf of the Crown by senior 15 politicians and civil servants within the Westminster 16 establishment. Concerns have been expressed publicly 17 about honours granted to individuals who had been 18 accused of child sexual abuse or where allegations of 19 this nature were made after the honour had been granted. 20 Prominent amongst the cases that have raised concerns 21 are the knighthoods that were awarded to Cyril Smith and 22 to Jimmy Savile. We submit that the inquiry should 23 examine these matters. We propose to investigate what 24 policies have been, and are, followed in cases where 25 candidates for honours have been the subject of</p> <p style="text-align: center;">Page 24</p>

1 allegations of this nature. We will look at all
 2 relevant records, including those relating to Smith and
 3 Savile. Some documents relating to those two cases have
 4 already been put into the public domain. We submit that
 5 the inquiry should seek to publish any further documents
 6 it finds that are relevant to these and any other
 7 similar cases. Document searches are already under way
 8 in the Honours and Appointments Secretariat within the
 9 Cabinet Office.

10 The sixth issue that we propose should be
 11 investigated relates to the Paedophile Information
 12 Exchange, commonly known as PIE. The key issues of
 13 public concern in relation to PIE are its membership,
 14 which appears to have included senior members of
 15 the Westminster establishment, and the suggestion that
 16 the organisation may have been funded by the government.
 17 These matters have already been the subject of a review
 18 commissioned by the Home Office and by a further
 19 independent review of that work by Peter Wanless and
 20 Richard Whittam QC. The original review found no
 21 evidence that PIE was funded by the Home Office's
 22 Voluntary Service Unit, VSU, and Wanless and Whittam
 23 subsequently found nothing in registered files or in
 24 testimony offered by contemporaries in and around the
 25 VSU that funding of PIE might have taken place with the

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1 knowledge of the police or security services as part of
 2 an effort to infiltrate PIE. But Wanless and Whittam
 3 were not able to dismiss the latter suggestion entirely
 4 and we submit that this investigation should explore
 5 public concern about the alleged position and influence
 6 of PIE members within Westminster whilst mindful of
 7 the reviews which have already taken place into these
 8 matters.

9 Chair, those are the six themes relating to
 10 historical institutional failings that we suggest should
 11 be the subject of investigation. As I have said, you
 12 will no doubt wish to receive submissions on scope from
 13 core participants. Ultimately, of course, it will be
 14 for you and the members of the panel to decide what
 15 matters should be selected for investigation, given the
 16 time and resources available, and the judgments you make
 17 about the value to be obtained from any particular line
 18 of enquiry in assisting you to fulfil the inquiry's
 19 terms of reference.

20 You will have noted, chair, that the proposed issues
 21 that I have listed all relate to historical issues --
 22 many of them to events in the 1980s or earlier. We
 23 submit that that is quite appropriate, since the current
 24 public concern relating to Westminster is indeed founded
 25 to a large extent upon events, or at least on

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1 allegations and speculation about events, from that
 2 period.

3 That said, it is also important that this
 4 investigation focuses upon the present. Paragraph 2.3
 5 of the definition of scope for this investigation tasks
 6 us to address "the adequacy of existing safeguarding and
 7 child protection policies in place within political
 8 parties, in government departments and agencies, and in
 9 the intelligence and security agencies". This is
 10 a matter that we have in hand. We have written to
 11 political parties and also to central government asking
 12 for disclosure of their safeguarding policies. We have
 13 received a considerable volume of material in response
 14 and expect to receive more in the coming weeks. You
 15 will be aware that a similar exercise of considering the
 16 adequacy of safeguarding policies currently in force is
 17 being undertaken in a number of other investigations
 18 within this inquiry -- for example, the investigations
 19 into the Catholic and Anglican Churches, the
 20 investigation into custodial institutions and the
 21 investigation into residential schools.

22 Before I leave the question of scope, I hope that it
 23 may also be useful if I say a few words about the types
 24 of issue that should not, in our submission, be pursued
 25 as a part of this investigation.

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1 First, we submit that it will be neither necessary
 2 nor proportionate for this investigation to involve
 3 itself in attempting to investigate, far less in
 4 attempting to make findings, as to whether individual
 5 allegations of child sexual abuse are true or false. In
 6 general terms, at least, those are matters for the
 7 police and for the courts. Moreover, the focus of this
 8 investigation, and indeed of the inquiry more generally,
 9 is on the conduct of institutions, not that of
 10 individuals. And we submit that questions as to
 11 possible institutional failings in this field can,
 12 generally speaking, be perfectly properly investigated
 13 without undertaking the time-consuming and
 14 resource-intensive process of making findings on the
 15 underlying allegations. To be clear, therefore, we do
 16 not anticipate that this investigation will be making
 17 any findings as to whether, for example, high-profile
 18 politicians such as Edward Heath or Cyril Smith did or
 19 did not commit acts of child sexual abuse of which they
 20 have been accused. Our focus, rather, will be on the
 21 way in which Westminster institutions dealt with and
 22 responded to allegations of this nature.

23 Second, we do not propose that this investigation
 24 should conduct any detailed review of the merits or
 25 otherwise of recent high-profile police investigations

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<p>1 into historic allegations of child sexual abuse 2 connected with Westminster. There has, of course, been 3 much public debate about investigations such as 4 Operation Midland and Operation Conifer. There are 5 three reasons why, in our submission, reviewing these 6 recent police investigations is not a role for this 7 investigation. 8 First, given the scale of the investigations, any 9 such review would be extremely resource intensive and 10 would inevitably distract this investigation from other, 11 and we submit more significant, issues. 12 Second, there is an issue as to duplication of work. 13 A review of the Midland investigation has already been 14 conducted by Sir Richard Henriques. We understand that 15 the IPCC either has been or may be asked to investigate 16 Operation Conifer. 17 Finally, we submit that possible failings in these 18 police investigations are remote from the central 19 purpose of this inquiry, which is to investigate 20 possible failings by institutions in their duty to 21 protect children from sexual abuse and exploitation. 22 I have already referred to cases where the police may 23 have been prevented from investigating possible 24 instances of child sexual abuse as a result of political 25 influence, and you have heard our submission that those</p> <p style="text-align: center;">Page 29</p>	<p>1 least some of them, are relevant to this inquiry, and 2 I know that you and the panel are considering how best 3 to address them. These issues are also generic, they 4 are not specific to Westminster cases. For present 5 purposes, our simple submission is that it would not be 6 appropriate to attempt to address these issues within 7 the Westminster investigation. 8 I have already referred, chair, to the inquiry's 9 separate investigation into institutional responses to 10 allegations of child sexual abuse involving the late 11 Lord Janner of Braunstone QC. The substantive hearings 12 in that investigation will take place after the hearings 13 in the Westminster investigation. Lord Janner was, of 14 course, an MP for many years, and latterly a member of 15 the House of Lords. Questions as to the relationship 16 between the two investigations have been the subject of 17 debate within the inquiry, and you gave a ruling last 18 year, which is on the inquiry website, rejecting 19 a suggestion that the two investigations should be 20 merged. It is not necessary for me to go into the 21 detail of all this today, chair. The short point that 22 is relevant for our purposes is that you have decided 23 that the best way to manage these two investigations is 24 to ensure that all issues relating to the late 25 Lord Janner, including those that may have some form of</p> <p style="text-align: center;">Page 31</p>
<p>1 cases should be investigated. But no allegations of 2 this character have been made about Operations Midland 3 or Conifer. 4 I would add, chair, that the debate around these 5 police investigations has given rise to a number of 6 issues of public concern as to the way in which the 7 criminal justice system deals with historic allegations 8 of child sexual abuse. There are issues relating to the 9 treatment of complainants, in particular, the so-called 10 duty to believe, the implementation of which was 11 criticised by Sir Richard Henriques in his report on 12 Operation Midland. There are issues relating to the 13 treatment of the subjects of such investigations, which 14 have, for example, been addressed publicly by 15 Paul Gambaccini and Harvey Proctor. Most obviously, 16 there is a question as to whether the subjects of such 17 investigations should be entitled to pre-charge 18 anonymity. And there are general issues relating to the 19 investigation of cases where the alleged perpetrator is 20 dead -- should such cases be investigated by the police 21 at all? How should such investigations be calibrated 22 when the subject of the investigation cannot give his or 23 her account and there is no question of any prosecution? 24 How should the police present the outcome of their 25 investigation to the public? Chair, these issues, or at</p> <p style="text-align: center;">Page 30</p>	<p>1 Westminster connection, will be addressed by the inquiry 2 as part of the investigation into institutional 3 responses to allegations of child sexual abuse involving 4 the late Lord Janner, and not as part of the Westminster 5 investigation. If and to the extent that any such 6 issues arise during this investigation, they will be 7 deferred to the other investigation. It is on this 8 basis, chair, that you have indicated your intention to 9 refuse applications for core participant status in this 10 investigation that have been made by individuals whose 11 interest in this investigation relates only to 12 allegations concerning the late Lord Janner. A number 13 of such applications have been made, both by 14 complainants and by Lord Janner's children. As I have 15 said, you have indicated your intention to refuse all 16 such applications. Some of these applicants intend to 17 renew their applications before you today. 18 There is one further point that I would like to make 19 regarding the boundary between what is in and what is 20 out of scope, in our submission, for the purposes of 21 this investigation. This is an inquiry into child 22 sexual abuse. It is not concerned with sexual conduct 23 where both individuals involved were 18 or older. 24 However, between 1967, when sexual intercourse between 25 males was legalised in this country, and 1994, when the</p> <p style="text-align: center;">Page 32</p>

1 age of consent for such activity was reduced from 21 to
 2 18, sexual activity between what this inquiry would
 3 regard as consenting adults was unlawful if one of them
 4 was below the age of 21. That period, ie, the period
 5 between 1967 and 1994, is likely to be the focus of much
 6 of the work of this investigation. In searching for
 7 evidence as to whether institutions may, for example,
 8 have sought to cover up instances or allegations of
 9 child sexual abuse during this period, we think it is
 10 very likely that we will also come across evidence that
 11 sexual activity between adults that was then unlawful
 12 but which became lawful in 1994 was also covered up. We
 13 will need to remain alert to the fact that the latter is
 14 not within the scope of this inquiry.

15 Finally, chair, I would like to say a few words
 16 about the means by which we anticipate this
 17 investigation will address the issues before it.

18 I have mentioned the disclosure of documents. We
 19 consider this process to be of particular importance in
 20 this investigation. We suspect that much of the public
 21 concern relating to Westminster child abuse issues may
 22 have been created, or at least exacerbated, by a lack of
 23 knowledge. Some documents have been put into the public
 24 domain, but even then they have been heavily redacted,
 25 a process which may in itself give rise to fresh

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1 concern. We therefore consider it to be a critical part
 2 of our function in this investigation to identify
 3 relevant documents and to put them into the public
 4 domain with as few redactions as possible. We submit
 5 that that step in itself will contribute to the
 6 inquiry's core function of addressing public concern.

7 We will also attempt to bring together as many of
 8 the basic facts related to these issues as possible.

9 Much of the press reporting has, quite understandably,
 10 been fragmentary in nature. We consider that public
 11 understanding of these matters will be assisted if we
 12 create a single narrative bringing together, for
 13 example, the detail of the allegations that have been
 14 made over the years and a record of the police and other
 15 investigations into those allegations. There have, of
 16 course, been numerous such previous investigations and
 17 inquiries. Apart from the police and IPCC
 18 investigations, there have been statutory and
 19 non-statutory inquiries, such as the Wanless/Whittam
 20 inquiry into issues around the Paedophile Information
 21 Exchange, the review conducted by Lady Justice Macur
 22 into the work of the Waterhouse Inquiry, which had
 23 itself focused on the abuse of children in care in
 24 North Wales, and the recent Hart Inquiry into
 25 allegations relating to the Kincora Children's Home in

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1 Northern Ireland. We submit that, as a matter of
 2 general principle, this investigation should aim to
 3 bring together the findings of these various inquiries.
 4 That exercise of aggregation is a valuable task in
 5 itself, and it will also provide a foundation for the
 6 further work of this investigation. We are aware, of
 7 course, that criticism has been made of some of
 8 the findings of some of these inquiries, and of related
 9 suggestions that such findings should be re-opened and
 10 re-examined by this investigation. Whilst it would be
 11 wrong to rule that out, certainly at this early stage,
 12 we do submit that you would need to think most carefully
 13 about issues of proportionality before taking that step.

14 Finally, chair, you and the panel will of course
 15 hear live witness evidence at the substantive hearings
 16 next year. We will call witnesses who are best placed
 17 to assist you in exploring the issues that you have
 18 selected for investigation. We anticipate that such
 19 witnesses are likely to include senior politicians and
 20 civil servants.

21 Chair, that concludes the submissions that we wished
 22 to make by way of introduction to this investigation.

23 Discussion re renewed applications for core participant
 24 status

25 MR O'CONNOR: The next item on the agenda, to which we have

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1 already referred, are the renewed applications for core
 2 participant status.

3 Chair, there are, in effect, three applications.
 4 First, an application on behalf of WM-A4, in respect of
 5 which you will hear submissions from Mr Stein QC;
 6 second, an application on behalf of WM-A1, we expect
 7 that Mr Greenwood will make submissions to you on that
 8 application; and thirdly, there is, as we understand it,
 9 a combined application on behalf of Daniel Janner QC and
 10 his sisters, Marion Janner and Rabbi Laura
 11 Janner-Klausner. We understand that Mr Janner will make
 12 submissions to you, as I say, on all of those
 13 applications in a combined way.

14 THE CHAIR: Thank you, Mr O'Connor. We will hear the
 15 applications in the order that you propose. I would be
 16 grateful if each of the submissions could be limited to
 17 ten minutes in length. We have other matters on the
 18 agenda for this hearing, and a hearing in a different
 19 investigation this afternoon.

20 Can I make it clear now that I will not be giving my
 21 decision on these applications today. I will reflect on
 22 the submissions made and give my decision in writing in
 23 due course.

24 Mr O'Connor, may I ask you to say a few words of
 25 introduction for each of the applications?

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1 Introductory remarks by MR O'CONNOR
 2 MR O'CONNOR: Yes, thank you, chair. The first application,
 3 then, is the application made on behalf of WM-A4.
 4 Chair, WM-A4 alleges that, as a boy, he was raped at
 5 Dolphin Square by a man he believed was Greville Janner.
 6 He also alleges he was abused at a care home in Haringey
 7 and that Hackney Social Services were aware of this
 8 abuse.
 9 You have indicated that you are minded to refuse
 10 WM-A4's application for core participant status. The
 11 principal ground on which you took this view was that
 12 issues relating to allegations made against the late
 13 Lord Janner, and in particular the institutional
 14 responses to such allegations, should be considered
 15 solely as part of this inquiry's separate investigation
 16 into institutional responses to allegations made against
 17 Lord Janner. Chair, I have addressed you on that
 18 a moment ago.
 19 In your provisional decision, you observed that it
 20 would be an unnecessary duplication of the inquiry's
 21 work and that it would be an inefficient use of
 22 the inquiry's resources for issues of this nature to be
 23 considered additionally as part of the Westminster
 24 investigation.
 25 THE CHAIR: Thank you, Mr O'Connor. Mr Stein?

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1 Submissions by MR STEIN
 2 MR STEIN: Good morning. May I focus on the points that
 3 have been raised by counsel to the inquiry. In the way
 4 that matters have been set out, counsel to the inquiry
 5 is inviting this investigation to consider the police
 6 investigation, whether there has been interference
 7 within police investigations, whether there has been
 8 improper influence within the prosecution decisions that
 9 were made at the time. Underpinning the submissions
 10 made by counsel to the inquiry and the building block or
 11 foundation for this investigation are, really, three
 12 questions.
 13 Was there tolerance of abuse within Westminster?
 14 Was there acceptance of that abuse within Westminster?
 15 And, finally, was there complicity within abuse taking
 16 place at Westminster? Very much A4's application fits
 17 within those three goals. The reason why is not
 18 concerned with who he believes was his abuser, and he
 19 believes that that was Greville Janner, but what
 20 happened when he was with his abuser.
 21 You know through the renewed application and through
 22 the application papers submitted that he was
 23 systematically taken to where he was abused by someone
 24 who had clearly identified him as a vulnerable youth.
 25 He was vulnerable not only because he was in care, but

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1 also because he had already been abused, and that abuse
 2 was known about within the Hackney Social Services, as
 3 his abuser was married to a senior manager within
 4 Hackney Social Services.
 5 So we have a vulnerable youth, identified by
 6 a person who is clearly an organised facilitator for
 7 Westminster, as he was then taken there. His abuser met
 8 him at a flat where he had been provided with clothes,
 9 with food and then off to the Apollo nightclub. With
 10 his abuser was a man dressed as a woman. He, himself,
 11 was clearly a vulnerable youngster. At the Apollo
 12 nightclub, a police officer entered and took his
 13 details. It is obvious, he says, A4, that he looked
 14 young. It would be clear that he was in an
 15 inappropriate situation. Nevertheless, the police
 16 officer -- so hitting, if I can put it that way, the
 17 first of the targets that's been set out by counsel to
 18 the inquiry -- was and would have been aware of his
 19 position. Tolerated it, allowed it, was complicit in
 20 allowing him to stay there with nothing being said about
 21 it. He was then abused that night. He was raped.
 22 Photographs of that abuse were taken, and he was
 23 told by the person who was, in his mind, the
 24 facilitator, that those photographs, being in
 25 a pamphlet, they were being shown at Westminster, the

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1 House of Lords and the House of Commons. So we have, as
 2 we suggest, not only the fact of his abuse, but the fact
 3 that he was being made aware, presumably as part and
 4 parcel of a control of him, that this is what is going
 5 to happen, that you are someone who is being shown to
 6 potential further abusers in the future.
 7 Now, that very much goes to the counsel to the
 8 inquiry targets as they set out within this
 9 investigation. What was known about was known about
 10 commonly. What was known about was tolerated, and was
 11 tolerated at a high level within Westminster. So when
 12 we suggest, on his behalf -- and you have seen through
 13 the papers that he has a significant interest in this
 14 investigation, he certainly does, because A4 has both
 15 been abused and has been subject to a system being
 16 employed within Westminster, within the House of Commons
 17 and the House of Lords, we suggest, on what he has put
 18 forward.
 19 You have made, madam, a determination that
 20 allegations that concern the late Lord Janner be dealt
 21 with within that investigation, and the temptation that
 22 you may have would be to suggest -- as the name "Grev",
 23 who A4 believes was Greville Janner, is being identified
 24 in this application, the temptation is to say, well, it
 25 should go potentially to that investigation. Our

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1 respectful suggestion and invitation is to focus on the
 2 fact that A4 sets out significant factors of a system,
 3 money being used in order to traffic him, essentially,
 4 into the hands of abusers, and the fact that this
 5 individual, A4, was someone who was being controlled by
 6 those individuals, and he knows that because he was
 7 shown a pamphlet identifying his abuse that he was told
 8 was going to be proliferated across Westminster estate.
 9 So those facts are the facts to concentrate on. The
 10 question of whether he should be involved in the
 11 investigation into the late Lord Janner is another
 12 matter for another time. Just because there is an
 13 aspect of crossover should not stop A4 having his
 14 rightful place through his significant interest in this
 15 investigation.
 16 The reason that we suggest that you should focus on,
 17 madam, is this: it is the building blocks. It is the
 18 building blocks for this investigation where you're
 19 considering the points that are being set forth by
 20 counsel to this inquiry, those points being that they,
 21 counsel to the inquiry, suggest that the situation is we
 22 are looking at questions of improper influence and
 23 improper, if you like, engagement with authorities. A4,
 24 what happened to him, underlies all of that, and it
 25 should, therefore, his concerns, his part, should be

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1 allowed to be played by having core participant status
 2 within this investigation.
 3 I am very much aware of the time limits and how many
 4 other matters you have to deal with today. Can I help
 5 any further?
 6 THE CHAIR: No. Thank you, Mr Stein. Mr O'Connor?
 7 MR O'CONNOR: Chair, the second of the applications is made
 8 on behalf of the applicant WM-A1 and submissions will be
 9 made by Mr Greenwood. Chair, WM-A1 alleges that he was
 10 raped as a child by Edward Heath. His allegation was
 11 one of those investigated by the Wiltshire Police under
 12 Operation Conifer. You made a number of points in
 13 indicating your intention to refuse WM-A1's application
 14 for core participant status, some of which I have
 15 touched on in my submissions. You stated, chair, that
 16 the inquiry does not presently intend to conduct
 17 a critical review of Operation Conifer or to re-open the
 18 factual issues that were the subject of that
 19 investigation. You emphasised the institutional focus
 20 of the Westminster investigation and observed that WM-A1
 21 had not suggested that there were any institutional
 22 failings in the way in which his allegations had been
 23 dealt with. Finally, you said that, although the
 24 disclosure exercise was still under way, you did not
 25 currently anticipate that institutional issues relating

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1 to Edward Heath would be a particular focus of
 2 the investigation. You stated that you would keep this
 3 application under review and that if the scope of
 4 the investigation changed -- if, for example,
 5 institutional issues relating to Edward Heath took on
 6 a greater prominence -- you would reconsider the
 7 application at that stage.
 8 THE CHAIR: Thank you, Mr O'Connor. Mr Greenwood?
 9 Submissions by MR GREENWOOD
 10 MR GREENWOOD: Madam chair, panel, it is probably my fault
 11 that I am stood here now renewing this application. My
 12 initial application on behalf of WM-A1 was brief, and so
 13 I have sent in some more submissions to you with more
 14 detail giving probably what you need to know in terms of
 15 more dealings of WM-A1 with politicians. So I will try
 16 to explain.
 17 A1 alleged that he had been picked up and raped by
 18 Edward Heath. His initial core participant status
 19 application was deliberately brief, as much of
 20 the background of the actual offending against him has
 21 been examined by Wiltshire Police. They have liaised
 22 with IICSA, and I had assumed that his allegations had
 23 been supported by others within Operation Conifer and
 24 that there had been some corroboration, so I didn't
 25 expand on those.

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1 I now provide you with more detail to explain why
 2 I believe that A1 and A1 believes that he is an
 3 important person and has an important place in this
 4 inquiry and has, therefore, a significant interest.
 5 Given the prominence of Mr Heath and the level of
 6 detail to which Wiltshire Police worked in
 7 Operation Conifer, it is a reasonable assumption that
 8 a case study of allegations into Mr Heath and the way
 9 that they were handled would be a priority of IICSA.
 10 I know that my friend hasn't ruled out any kind of case
 11 study, but I would suggest that a case study on Mr Heath
 12 and the way in which allegations against him were
 13 handled at the time by various institutions should be
 14 identified as one of the topics.
 15 There have been a number of serious allegations,
 16 obviously, involving Westminster politicians.
 17 Allegations against Mr Heath, due to his public
 18 prominence, are likely to have been examined on all
 19 levels by a number of organisations. Neither A1 nor
 20 I have access to all similar allegations against other
 21 politicians, so I can't, we can't, join up the links to
 22 establish the ways in which the system either operated
 23 to expose or to protect perpetrators at Westminster.
 24 These have to be examined by yourselves.
 25 A1's case does, however, demonstrate engagement by

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<p>1 numerous politicians in sex with children in London in 2 the 1960s, principally through A1's work as a rent boy 3 and at particular restaurants.</p> <p>4 A1 recounts, to give you more detail, that he left 5 home at the age of 11, and after the Heath encounter 6 worked variously as a rent boy and at the Studio 7 Restaurant and at the Cellar Bar or Pub in Kings Road, 8 London, in the 1960s. His 12th birthday was celebrated 9 with him having to wear a thong and carry a bucket into 10 which money was dropped whilst he walked through rows of 11 men who were allowed to touch him. The evening 12 developed sexually beyond this.</p> <p>13 He describes a number of individuals, who I will not 14 name, four of them being politicians, two of them being 15 fixers, a police officer and other professionals, being 16 present at the time. Questions arise as to why these 17 other persons present and connected with Westminster, 18 who he does not name, didn't report this type of 19 behaviour and why this type of culture was permitted, 20 encouraged, tolerated and not reported or, if it was 21 reported to the police and security agencies, what 22 action was taken.</p> <p>23 Did security agencies ignore child protection issues 24 in favour of national security?</p> <p>25 A1 also worked at The Thieves' Kitchen, another</p> <p style="text-align: center;">Page 45</p>	<p>1 He reported those to the police but they were 2 unsatisfactorily dealt with, in his view.</p> <p>3 He very much went off the rails.</p> <p>4 For all these reasons, both A1 and I believe that it 5 is appropriate to designate him as a core participant. 6 He has a significant interest in the issues being 7 discussed and investigated at this inquiry. The 8 responses at all levels, through school, 9 social services, police, and those monitoring 10 high-profile individuals will have been -- well, will be 11 touched upon if his case is looked at in some detail.</p> <p>12 A1 is not "Nick" of Operation Midland, but he has 13 been let down on all levels. He describes being close 14 to a group of politicians that were using rent boys in 15 the 1960s, and he was neither investigated himself -- he 16 was not prosecuted -- nor was he protected. This all 17 raises the issue of blackmail and scrutiny by security 18 services of politicians, or powerful figures, at least, 19 at the time, and A1's evidence needs to be looked at for 20 evidence of this scrutiny where it may lead the inquiry 21 into significant findings.</p> <p>22 Operation Conifer looked only at evidence which is 23 admissible in the criminal courts. We don't know to 24 what extent other evidence which could be available was 25 scrutinised in relation to Mr Heath, and it's probably</p> <p style="text-align: center;">Page 47</p>
<p>1 restaurant in Earls Court. He describes being told that 2 Admiralty junior ministers attended there during 3 refurbishment of the Westminster Palace at the time in 4 the early to mid '60s, and attended that restaurant. A1 5 was invited to a party in Pimlico, which was organised 6 by one of these fixers that I have mentioned. But he 7 refused to attend further parties due to the behaviour 8 he was expected to indulge in.</p> <p>9 A1 describes working openly as a rent boy in the 10 Soho Square area with the knowledge of the police. A1 11 is not aware of the contemporaneous involvement of 12 the police in his case in relation to Mr Heath, but he 13 does complain that he told a social worker at Kent 14 County Council who, to his knowledge, failed to alert 15 the police. He complains also that he told his 16 headmaster at school, but rather than being listened to, 17 he was caned and punished.</p> <p>18 A1 has obviously become aware of subsequent reports 19 in relation to Mr Heath, and my friend Mr O'Connor 20 mentioned Barbara Castle handing over documents. That's 21 troubling in itself and is a potential link to A1.</p> <p>22 On a personal level, A1 has fallen into this -- can 23 I describe it as a delinquent culture, I suppose, back 24 then, after having been subject to rapes on him prior to 25 this episode with Mr Heath, and those happened in 1959.</p> <p style="text-align: center;">Page 46</p>	<p>1 IICSA's job to do so. Without IICSA considering this in 2 public, there will still be the suspicion that there is 3 some kind of protection going on for this former 4 Prime Minister.</p> <p>5 The August 2007 CTI statement suggested that a paper 6 review leading to focus on issues would be carried out. 7 Operation Conifer has looked at the evidence insofar as 8 it would support a prosecution, but no inquiry that I am 9 aware of has delved deeper into the intelligence 10 available on Mr Heath's activities or the lack of this 11 intelligence.</p> <p>12 The existence of A1 and what he describes offers an 13 opportunity for this focus to be on Mr Heath and whether 14 the scrutiny on him existed and, if so, what did he tell 15 decision makers and what procedures were in place for 16 investigators at the time to protect children.</p> <p>17 A1 certainly feels it is unfair that, given that he 18 has these types of allegations, that other core 19 participants have been granted core participant status. 20 For all these reasons, both A1 and I believe that he is 21 a person who has a significant interest in the subject 22 matter of the inquiry, madam. Thank you.</p> <p>23 THE CHAIR: Thank you, Mr Greenwood. Mr O'Connor? 24 MR O'CONNOR: Just, chair, for the record, my friend 25 Mr Greenwood referred to an August 2007 CTI note.</p> <p style="text-align: center;">Page 48</p>

1 I think he must have been referring to the August 2017
2 note. But just leaving aside the typos, it may be more
3 important just to make the fact that that was of course
4 a note that was published by the inquiry and not by
5 counsel to the inquiry.
6 Chair, I see the time. I know you had intended to
7 take a break at about this time. May I suggest that we
8 deal with Mr Janner's application first and then take
9 a break after that?
10 THE CHAIR: Yes, we will do that.
11 MR O'CONNOR: I'm grateful. Chair, the applications for
12 core participant status by Daniel Janner QC,
13 Marion Janner and Rabbi Laura Janner-Klausner were made
14 on the basis of their interest in an investigation
15 dealing with allegations and/or responses to allegations
16 made about their late father. You have, of course,
17 already recognised that they have such an interest in
18 granting their applications for core participant status
19 in the inquiry's other investigation into institutional
20 responses to allegations of child sexual abuse made
21 against the late Lord Janner.
22 The reason why you have indicated that you are
23 minded to refuse the applications for core participant
24 status that the Janner family have made in this
25 investigation is the point on which I addressed you

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1 earlier and which arose in A4's case; in short, issues
2 relating to allegations made against the late
3 Lord Janner and in particular the institutional
4 responses to such allegations will be considered solely
5 as part of this inquiry's separate investigation set up
6 for that purpose, and that work will not be duplicated
7 in the Westminster investigation.
8 THE CHAIR: Thank you, Mr O'Connor. Mr Janner?
9 Submissions by MR JANNER
10 MR JANNER: In my respectful submission, your decision to
11 refuse me and my sisters core participation status in
12 the Westminster strand breaches rule 5 of the 2006
13 rules. If my late father was alive, it would have been
14 astonishing to have refused him core participation
15 status in this strand. Since he is dead, it falls to me
16 to fight for his reputation, and I am very proud to do
17 so.
18 Plainly, my late father would have had a significant
19 interest in the Westminster strand. He served in
20 Westminster from 1970 for over 40 years, first as an MP
21 and then as a member of the House of Lords. He was very
22 much part of the Westminster scene throughout that time,
23 and he is specifically referred to by name in the
24 strand's explanatory update document of August 2017.
25 Madam chairman, my late father was a man of great

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1 integrity and principle who fought all his life for
2 truth and justice. However, ever since 1991, he has
3 been the victim of false allegations swirling around
4 Westminster, along with others, like Ted Heath,
5 Leon Brittan, Lord McAlpine and others now unfortunately
6 named today, no doubt a surprise to their families,
7 colleagues and friends.
8 In 1991, during the prosecution of Frank Beck, who
9 was indeed an evil paedophile, Beck made false
10 allegations of sexual abuse against my father in
11 a desperate and futile effort to disrupt the trial
12 process and save himself.
13 As a consequence, Beck's outburst became an open
14 invitation for fantasists, liars and fraudulent
15 compensation seekers to make bogus compensation claims.
16 When my late father was weak and vulnerable and dying
17 with dementia, too ill to be interviewed by the police
18 in 2014, in flooded the civil claims. 32 letters before
19 action, nine issued claims in the High Court. All these
20 claims were either struck out or abandoned by May last
21 year.
22 Madam chairman, my beloved, wonderful father died an
23 innocent man. Like other distinguished Westminster
24 politicians, his reputation is now very much at risk in
25 this strand, as we have just heard. The strand does

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1 risk turning into a witch-hunt of dead politicians,
2 a circus, where fantasists will have free rein to live
3 out their fantasies in evidence. There were no
4 paedophile rings in Westminster, save in warped
5 imaginations. But the evidence and findings of
6 the Westminster strand will have an influence and
7 bearing on the strand which follows in my late father's
8 name, because, madam chairman, the two strands -- again,
9 as we have witnessed today -- are inevitably and
10 inexorably intertwined.
11 You, yourself, madam chairman, acknowledged this on
12 16 December 2016 with reference to my late father's
13 strand. This is what you wrote, madam chairman, and
14 I quote:
15 "The work on this investigation is likely to be
16 closely associated with that of the Westminster
17 investigation."
18 So to shut me and my family out of an already
19 Kafkaesque process would, in my respectful submission,
20 be Wednesbury unreasonable. It suggests it is actually
21 more of a question of wanting to have a critical family
22 off your back than fairness.
23 It goes further than that. Because you have given
24 CP status to proven fantasists, and here is the thing:
25 they risk coming out with more lies against my father,

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1 just as we have heard about Dolphin Square. I had never
 2 heard of an allegation against my father in relation to
 3 Dolphin Square until this morning, and I won't be here
 4 to stop this, to prevent the risk. How can that be
 5 fair?
 6 Madam chairman, it goes further than that. This
 7 whole inquiry and strand was set up, actually this whole
 8 inquiry was set up, in the wake of "Nick's" allegations
 9 in what became known as Operation Midland. It would be
 10 open to criticism if Operation Midland did not feature
 11 in this strand, although Mr O'Connor eloquently submits
 12 that the risk of so doing so has diminished. But
 13 nevertheless it is still a risk.
 14 Madam chairman, "Nick" falsely alleged that my
 15 father was part of a group in London who seriously
 16 sexually abused him at the Carlton Club. May I remind
 17 you, he was a Labour MP. So, as a family, we are now
 18 faced with a whole strand in our late father's name,
 19 a person who was never convicted of any offence, and the
 20 strand proceeds on an assumption of guilt and therefore
 21 is a reversal of the presumption of innocence. He
 22 cannot answer back from the grave. I have been refused
 23 the right to cross-examine, whereas those who pulled out
 24 of the civil actions will now have free rein to make any
 25 outrageous allegations they want under the cloak of

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1 anonymity.
 2 Here is the thing: that brings discredit to the
 3 important work of this inquiry and the legitimate claims
 4 of genuine victims. Now we are shut out from this
 5 strand. Is it any wonder that we, as a family, conclude
 6 this is a stain on British justice? Thank you.
 7 THE CHAIR: Thank you, Mr Janner. We will now take a break
 8 and return at 12.05 pm.
 9 (11.52 am)
 10 (A short break)
 11 (12.10 pm)
 12 MR STEIN: Madam, before Mr Altman proceeds, A4 is in fact
 13 in the inquiry hearing room and was present when he was
 14 accused of being a fantasist. We would respectfully
 15 ask, no matter what feelings are being expressed, that
 16 great care is given to making such accusations about
 17 individuals.
 18 The tendency, otherwise, is it will put people off
 19 making applications to be present or indeed to
 20 participate. Thank you, madam.
 21 THE CHAIR: Thank you, Mr Stein. Mr Altman?
 22 MR ALTMAN: Chair, all I was going to raise -- in fact,
 23 I didn't know that Mr Stein was going to be saying
 24 that -- was that you will see that Mr Janner and indeed
 25 Mr Butler are not here. Mr Janner had told us before we

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1 resumed -- in fact, before we started -- that he wished
 2 not to be here for this afternoon, purely for personal
 3 reasons, not by way of protest or anything else, but
 4 purely for personal reasons, he had another personal
 5 engagement. So he apologises to you, chair, and the
 6 panel for not being here this afternoon. He knows,
 7 equally, that there may be certain other submissions
 8 that we make and others make which, if you were to grant
 9 him core participant status, would be of relevance to
 10 him. If that were to happen, then he is very content to
 11 make written submissions later.
 12 THE CHAIR: Thank you, Mr Altman. Mr O'Connor?
 13 MR O'CONNOR: Chair, the next topic on the agenda is
 14 directions. There are three procedural directions that
 15 we invite you to make today. I will outline each of
 16 the proposed directions, and you may then wish to invite
 17 submissions on them from each of the parties.
 18 The first direction is referred to at item 4 of
 19 the agenda. In April 2016, the previous chair of this
 20 inquiry made a ruling relating to the broadcasting of
 21 inquiry proceedings. That ruling is available on the
 22 inquiry website. Putting the matter very shortly
 23 indeed, the previous chair ruled that, in principle,
 24 inquiry proceedings should be broadcast by being live
 25 streamed on the internet, albeit that the live streaming

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1 should be subject to a five-minute delay.
 2 The question for today is whether that ruling should
 3 be adopted for the purposes of the substantive hearings
 4 in this investigation. Our submission is that the
 5 ruling should be adopted, and that substantive hearings
 6 should be broadcast. We submit that the arguments of
 7 transparency and open justice addressed by the former
 8 chair in her April 2016 ruling apply with full force to
 9 this investigation.
 10 There is one qualification that we had, namely, that
 11 the five-minute delay be changed to a three-minute delay
 12 which experience has shown to be a more practical
 13 measure.
 14 I suggest, chair, you invite submissions from the
 15 core participants on this point together with the other
 16 two proposed directions which I will outline now.
 17 The second direction concerns applications that core
 18 participants may wish to make to the inquiry for funding
 19 under section 40 of the 2005 Act. We invite you to make
 20 a direction that any such applications must be made in
 21 accordance with the inquiry's costs protocol and, in the
 22 case of those already designated as core participants,
 23 that such applications must be made within 14 days of
 24 today, ie, by 14 February, and in the case of any party
 25 designated following the hearing, that any application

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1 must be made within 14 days of receiving notice of
 2 designation.
 3 The final direction that we propose relates to core
 4 participants' submissions on scope. I have already
 5 mentioned this in my submissions before the break. We
 6 invite you to direct that core participants file any
 7 written submissions on scope within six weeks of today,
 8 ie, by 14 March.
 9 Lastly, chair, may I simply refer to item 5 of
 10 the agenda, which is timetable for future hearings. We
 11 submit that it may or may not be necessary to hold
 12 a hearing in the spring to hear oral submissions on
 13 scope. That depends very much on what views are
 14 expressed in the written submissions that you are to
 15 receive.
 16 Our suggestion is, therefore, that you do not set
 17 a date today for a further hearing, but, rather, keep
 18 the matter under review and list a hearing in due course
 19 if necessary.
 20 May I, therefore, suggest that you invite oral
 21 submissions from each of the parties on the three
 22 proposed directions: broadcasting, costs applications
 23 and written submissions on scope.
 24 Chair, since the position of the parties who have
 25 renewed their applications today has not yet been

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1 determined, we submit that you should hear from them on
 2 those issues as well as from those who have already been
 3 designated as core participants.
 4 THE CHAIR: Yes. I will do that, Mr O'Connor. We will
 5 start with Mr Brown?
 6 MR BROWN: No, chair.
 7 THE CHAIR: Mr Kark?
 8 MR KARK: No, chair.
 9 THE CHAIR: Ms Taylor?
 10 MS TAYLOR: No submissions.
 11 THE CHAIR: Mr Dixey?
 12 MR DIXEY: No submissions.
 13 THE CHAIR: Ms Dauncey?
 14 MS DAUNCEY: No submissions.
 15 THE CHAIR: Mr Janner isn't present. Ms Grey?
 16 MS GREY: No submissions, madam chair.
 17 THE CHAIR: Mr Hulbert?
 18 MR HULBERT: No submissions.
 19 THE CHAIR: Mr Stein?
 20 Discussion re broadcasting, costs applications and written
 21 submissions on scope
 22 Submissions by MR STEIN
 23 MR STEIN: I don't want to be the odd one out, but we make
 24 just two very brief submissions. One concerning
 25 disclosure. There have been some difficulties with

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1 disclosure in relation to other investigations. For
 2 that reason, we would suggest that there is in fact
 3 going to be a purpose behind having a further
 4 preliminary hearing, to ensure that disclosure has been
 5 targeted, has been received, is capable of being dealt
 6 with by the time of any public hearing.
 7 Secondly, given the position of our application on
 8 behalf of A4, we would respectfully invite the
 9 investigation, or you, madam, and your colleagues, to
 10 consider it may be appropriate to have an oral hearing
 11 on scope at a later stage, because we will undoubtedly
 12 be making representations on scope. If they are
 13 accepted, we can then write into the inquiry saying that
 14 is no longer an issue. If they are not accepted, there
 15 may need to be some further oral discussion. For those
 16 two reasons, we would submit there is in fact a purpose
 17 behind having a further prelim hearing.
 18 THE CHAIR: Mr Garsden?
 19 MR GARSDEN: I don't think I have any submissions on scope,
 20 ma'am.
 21 THE CHAIR: Mr Greenwood?
 22 Submissions by MR GREENWOOD
 23 MR GREENWOOD: Madam, in terms of the broadcasting, the
 24 three-minute delay is certainly agreeable. It certainly
 25 would work better than a five-minute delay.

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1 On the scope, it is really difficult for complainant
 2 core participants to work out what is reasonable to
 3 state in terms of amendments to scope or suggestions on
 4 scope without knowing what evidence is available. It is
 5 a cart before the horse issue.
 6 We have to trust that the CTI and the team are doing
 7 their work and that their suggestions on scope are
 8 sensible and in accordance with the evidence that they
 9 have seen so far.
 10 Within the bounds of that representation, I would
 11 invite CTI to make written suggestions on scope. We can
 12 respond and, if there is a great divergence, perhaps an
 13 oral hearing on scope might be necessary.
 14 THE CHAIR: Thank you, Mr Greenwood. Ms Hoyano?
 15 MS HOYANO: Chair, we are content.
 16 THE CHAIR: Thank you, Ms Hoyano. Mr O'Connor?
 17 Submissions by MR O'CONNOR
 18 MR O'CONNOR: Chair, I think two points arising. First of
 19 all, scope. We submit that -- we have made our
 20 submissions on scope. That is what I attempted to set
 21 out before the break. Of course, these things can
 22 always be more or less detailed, but we submit that we
 23 have provided a sufficient basis of our suggestions as
 24 to the scope of this investigation at this early stage
 25 for core participants to respond.

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<p>1 We entirely take the point that the scope of any 2 investigation like this needs to develop as preparations 3 are made for the hearing, and in particular as 4 disclosure becomes available, but to go back to the cart 5 and horse analogy, until one has at least some sort of 6 outline scope, then it is difficult to make the right 7 disclosure searches. So, in our submission, we have 8 done our bit now. It is appropriate that you should 9 make the direction that core participants should respond 10 in writing to our submissions on scope, and of course 11 there will be an opportunity for further submissions, 12 further narrowing and identifying the issues, as the 13 investigation progresses and as disclosure becomes 14 available. That was the first point.</p> <p>15 On the question of a hearing, chair, we maintain the 16 submission that it is not appropriate for you to list 17 a hearing today. The inquiry has a very busy schedule 18 in the coming months. It would not be appropriate, we 19 submit, simply to put a date in the diary in case it was 20 necessary. We submit that you ought to wait, see the 21 submissions on scope, see how disclosure is going and 22 then decide in due course whether or not to list 23 a hearing.</p> <p>24 Chair, our submission is that you should make the 25 three directions that we have identified.</p> <p style="text-align: center;">Page 61</p>	<p>1 various individuals who are the persons this inquiry is 2 interested in. She was taken to various houses in the 3 Birmingham area and to a wood where she and other girls 4 were abused by various individuals, one of whom has been 5 publicly named, another of whom hasn't, who are either 6 MPs or former MPs, and that's why she is relevant to 7 this inquiry.</p> <p>8 She was very reluctant to make disclosures. She 9 mentioned it to a number of authorities. She didn't 10 want to go to the police, but eventually did. Her 11 allegations are being investigated now by Staffordshire 12 Police.</p> <p>13 One of those inquiries has not resulted in 14 a prosecution, and that refusal to charge has been 15 turned into a criticism of her, which I will come on to 16 later.</p> <p>17 She only approached a lawyer two weeks ago, and 18 I have only been instructed in this matter for two 19 weeks. She has been ably assisted by other individuals 20 who suggested that she make public disclosure of her 21 allegations, which she did in 2015, principally as 22 a method of protecting her from what she deemed to be 23 a threat of violence or worse than that. She thought 24 that if she disclosed her identity there was more chance 25 of her staying alive because she was making allegations</p> <p style="text-align: center;">Page 63</p>
<p>1 THE CHAIR: Yes, I will make the directions. 2 MR O'CONNOR: I'm grateful, chair, and those will be 3 published on the website, as you said at the outset. 4 Chair, the final matter on the agenda is the 5 suggestion that there may be other applications or 6 submissions from core participants. I simply don't know 7 whether there are any matters that any core participants 8 wish to raise at this point. If there are, this would 9 be a good moment for anyone to stand up and do it.</p> <p>10 THE CHAIR: Thank you. 11 MR GARSDEN: I would like to make an application. 12 THE CHAIR: Mr Garsden? 13 Application by MR GARSDEN 14 MR GARSDEN: I act on behalf of Esther Baker, who is sitting 15 to my left and is one of the individuals who has been 16 heavily criticised in the media and been called 17 a fantasist. I think she was the person who was being 18 referred to. I think she told me in the break that the 19 word "fantasist" had been used seven times already 20 today. She takes great offence to that, denies it and 21 it upsets her greatly.</p> <p>22 Esther Baker is a very fragile individual. She has 23 been serially and consistently abused from the age of 6 24 to 19, firstly by her father, who abused her on 25 a regular basis, and then her father introduced her to</p> <p style="text-align: center;">Page 62</p>	<p>1 against celebrities, or, should I say, well-known 2 individuals who were known to the public. 3 Since then, there has been an orchestrated campaign 4 made against her to vilify her and call her a liar. 5 This has been done in other modules, as you well know. 6 There is a curious sense of logic creeping in. I have 7 been dealing with -- specialising in child abuse cases 8 for the last 24 years, and I have seen the media 9 pendulum swing between claimant and falsely accused 10 allegations at least three times, and we are now 11 unfortunately in the alleged falsely accused section, 12 and what the media are interested in now is anybody who 13 says that they have been falsely accused. My client 14 takes great exception to that.</p> <p>15 The effect upon her -- I asked her to draw up 16 a table of the effects of these allegations that she's 17 not telling the truth, because the one thing that really 18 hurts victims of abuse is their credibility being 19 questioned, because abuse is about imbalance of power, 20 it is the powerful over the powerless, and the victims 21 are the powerless. When they are accused of telling 22 untruths and they say they are telling the truth, it is 23 deeply hurtful, and it replicates the imbalance of power 24 when the abuse took place, and that is what is happening 25 at the moment, and it has to stop and it has to stop</p> <p style="text-align: center;">Page 64</p>

<p>1 now.</p> <p>2 I have asked her to say what the effects of these</p> <p>3 newspaper articles and publicity are upon her. I have</p> <p>4 worked out that, since 2015, when she went public with</p> <p>5 her allegations and waived her anonymity, most bravely,</p> <p>6 she has taken 12 overdoses, 12 attempts to commit</p> <p>7 suicide, by the excessive ingestion of tablets,</p> <p>8 prescription drugs, because it is not surprising that</p> <p>9 she, like many other victims of abuse, are on a quite</p> <p>10 high dose of medication to help with depression and</p> <p>11 beta-blockers and some antipsychotic tablets.</p> <p>12 12 attempts at suicide between 2015 and now, the</p> <p>13 most recent of which was 25 January 2018, because of</p> <p>14 the publication of this article in the Sunday Times by</p> <p>15 James Gillespie on 21 January, the headline for which is</p> <p>16 "Child rape fantasist Esther Baker given key role in</p> <p>17 abuse inquiry". She's being criticised for being given</p> <p>18 core participant status and called a fantasist. The</p> <p>19 source of the briefing is her alleged abuser, the former</p> <p>20 MP John Hemming.</p> <p>21 I just noticed one of the comments which goes:</p> <p>22 "My concern is whether it is morally right for the</p> <p>23 Times to blame somebody, who is a potential victim, as</p> <p>24 a fantasist. It does not seem very balanced and in my</p> <p>25 view could discourage people who have been abused from</p> <p style="text-align: center;">Page 65</p>	<p>1 inquiries called the Witnesses (Public Inquiries)</p> <p>2 Protection Act 1892. Under section 2, every person who</p> <p>3 "threatens or in any way punishes, damnifies [I think</p> <p>4 that's the word] or injures or attempts to punish,</p> <p>5 damnify or injure, any person for having giving evidence</p> <p>6 upon any inquiry, or an account of the evidence which he</p> <p>7 has given upon any such inquiry, shall, unless evidence</p> <p>8 has been given in bad faith, be guilty of a misdemeanour</p> <p>9 and be liable on conviction to a maximum penalty of £100</p> <p>10 and maximum imprisonment of three months."</p> <p>11 So it would be open to this inquiry to institute</p> <p>12 through the police an investigation into what has been</p> <p>13 done to Esther Baker which has brought her to take</p> <p>14 overdoses and suffer psychologically and</p> <p>15 psychiatrically.</p> <p>16 I think that's the only way this is going to stop,</p> <p>17 because the curious logic is, a victim makes an</p> <p>18 allegation, the abuser finds out, the abuser briefs the</p> <p>19 media that the victim is a fantasist on the basis of</p> <p>20 the denials, and the victim is psychologically injured,</p> <p>21 as in this case.</p> <p>22 Why people who make allegations of abuse are called</p> <p>23 fantasists, I really don't know. It is a word that has</p> <p>24 crept into the media, and it should stop, and it should</p> <p>25 stop now. It is all very well to say under the right of</p> <p style="text-align: center;">Page 67</p>
<p>1 coming forward."</p> <p>2 He's summarised it very well. She's very bravely</p> <p>3 maintained her presence here, but that particular</p> <p>4 article, another one in the Daily Mail, resulted in her</p> <p>5 taking an overdose and being admitted to hospital in</p> <p>6 Liverpool for 12 hours.</p> <p>7 I have worked out that, of the 12 attempts at</p> <p>8 suicide and the overdoses that she's taken, they have</p> <p>9 resulted in 17 and a half days in hospital at</p> <p>10 Liverpool Royal, which is a tragedy. So I want to send</p> <p>11 out a message to those who write these articles and</p> <p>12 particularly Mr Janner, who mentioned the word</p> <p>13 "fantasist" seven times in his address this morning,</p> <p>14 what the effect is on victims of abuse who read this</p> <p>15 type of thing.</p> <p>16 My client deserves the protection of this inquiry</p> <p>17 and I call upon this inquiry to protect her. She has</p> <p>18 reported Mr Hemming and his, if I can call them,</p> <p>19 trolls -- they are other survivors who engage in</p> <p>20 scurrilous and insulting comments in social media,</p> <p>21 which, unfortunately, she reads -- to the Staffordshire</p> <p>22 Police under I think it is the Criminal Justice and</p> <p>23 Public Order Act 1994 which prohibits witness</p> <p>24 intimidation and it is a criminal offence, but there is</p> <p>25 another Act of Parliament specifically related to public</p> <p style="text-align: center;">Page 66</p>	<p>1 free speech that somebody denies allegations, but to</p> <p>2 turn that into a criticism of a victim is wrong and</p> <p>3 pernicious and I have advised my client to seek advice</p> <p>4 from defamation lawyers and to make a complaint to the</p> <p>5 Press Complaints Commission, because it is clearly</p> <p>6 serious if somebody suffers the way she has.</p> <p>7 Unfortunately, victims of abuse have very low</p> <p>8 self-esteem. They are abused in childhood, and in my</p> <p>9 client's case over many years. They consider themselves</p> <p>10 worthless, and my client's motivation in joining this</p> <p>11 inquiry is to help others, not herself. She regards</p> <p>12 herself very poorly and doesn't consider herself worthy</p> <p>13 of anything. That's why she injures herself and</p> <p>14 attempts to commit suicide.</p> <p>15 So I am putting out a plea that this fantasist</p> <p>16 nonsense should stop. It has happened in other</p> <p>17 inquiries. It has happened to all my clients in the</p> <p>18 Janner module. They have also been called fantasists.</p> <p>19 They are also -- we have got to deal with the</p> <p>20 after-effects of that, as legal representatives. Not</p> <p>21 only have they been called by names, but myself,</p> <p>22 Mr Scorer and Mr Greenwood have also been criticised in</p> <p>23 social media by the trolls that I was referring to. We</p> <p>24 are big enough, we can stand up for ourselves, but</p> <p>25 victims can't, and they don't.</p> <p style="text-align: center;">Page 68</p>

1 I have no doubt that, as has been mentioned, all the
 2 members of this module will be asked to sign
 3 confidentiality agreements, which means that she can't
 4 speak out against her abusers. I have been approached
 5 by the media leading up to this inquiry to see what my
 6 client says. I have refused any attempts to backlash in
 7 a tit-for-tat manner and will remain in a dignified
 8 silence. However, I don't think there's much further
 9 that I can add, save to say that one of the reasons my
 10 client has been criticised is because the other
 11 individuals who were abused in Cannock Wood have not
 12 come forward. I think one of them has. I haven't
 13 spoken to the police officer yet, but the remainder
 14 haven't. My client tells me there were at least
 15 15 girls who were raped in those woods. I would like to
 16 put out a public plea for them to come forward.
 17 The aggressive and threatening manner in which those
 18 accused behave towards her is no doubt why the others
 19 have not come forward, but they should, and I urge them
 20 to do so. That is all I wish to say.
 21 Submissions by MR HULBERT
 22 MR HULBERT: Madam chair, I will be very brief.
 23 I understand very well the inquiry's desire to maintain
 24 proportionality and not to cover the same ground as has
 25 already been covered elsewhere, as counsel so eloquently

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1 argued for earlier on. However, I do believe there is
 2 a danger in conflating a number of previous reports or
 3 investigations into part of the evidence and that there
 4 is a danger that by so doing, because those inquiries
 5 may well have had totally different terms of reference,
 6 being done by people who have less authority than this
 7 inquiry has, that there is a danger that in conflating
 8 those reports you may actually dilute the evidence, and
 9 I am a little concerned that in establishing a common
 10 narrative, we may lose some of the subtleties in the
 11 distinctions between inquiries and their purposes.
 12 Indeed, some of the previous inquiries stand referred to
 13 IICSA for the very reason that they were inconsistent in
 14 the way in which they reported on the same facts.
 15 All I wish to do, madam chair, is to plead that the
 16 inquiry is very mindful of that danger as we proceed and
 17 that in drawing the scope tightly to enable you to
 18 examine the evidence, you don't miss some of
 19 the subtleties as a result of that process. Thank you.
 20 THE CHAIR: Thank you, Mr Hulbert. Ms Hoyano?
 21 Submissions by MS HOYANO
 22 MS HOYANO: I will be very brief, chair. I just want to
 23 emphasise, for the purposes of those watching, because
 24 I know that the panel is already well aware of this,
 25 that Mr Scorer and I represent only the seven

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1 complainants against Cyril Smith in the Westminster
 2 investigation. We have had a lot of momentum from the
 3 Rochdale investigation. Our clients have testified
 4 already. The questions are now quite well defined, and
 5 I would submit that the contours of the investigation
 6 remaining to be done in relation to Cyril Smith are
 7 largely known. I thank counsel to the inquiry for their
 8 openness to our suggestions about dangling threads from
 9 the Rochdale hearings to be followed through, and also
 10 our suggestions about structure in terms of the upcoming
 11 hearings in relation to the investigation and to
 12 responses to the issues about Cyril Smith.
 13 My concern is simply this: it appears that the road
 14 to March 2019 will be strewn with boulders and quite
 15 a few potholes. Our clients, as you know, because you
 16 have heard from me on a number of occasions about this,
 17 are very frail in health. So I would just plead that
 18 there be no slippage in the schedule in relation to
 19 Cyril Smith. I am sure that the chair will do
 20 everything possible to ensure that does not happen, as
 21 well as counsel to the inquiry. I would just thank them
 22 again for their cooperation. Thank you.
 23 THE CHAIR: Thank you, Ms Hoyano. Mr Altman?
 24
 25

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1 Submissions by MR ALTMAN
 2 MR ALTMAN: Chair, before you rise, two things. First of
 3 all, we have heard what both Mr Stein and Mr Garsden
 4 have said on behalf of their respective clients, and we
 5 simply submit, whatever other individuals' views and
 6 opinions may be, that people choose their words with
 7 care for future reference, given the obvious
 8 sensitivities and difficulties, and often divergent
 9 interests amongst participants. That's the first thing.
 10 The second thing is this: we have listened with care
 11 to Mr Garsden, in particular his submissions on the 1892
 12 Act, and he has made an application which you will want
 13 to consider and may wish to make a determination in
 14 writing about in due course. Our submission is, I'm
 15 afraid, however, that, on our reading of the Act, the
 16 Act doesn't apply to Ms Baker because section 2 is
 17 premised on the basis that she has given evidence to the
 18 inquiry or given an account of her evidence to the
 19 inquiry, which of course she hasn't, and, as Mr O'Connor
 20 made clear earlier, no decision has yet been made by you
 21 whether she in fact will.
 22 Therefore, that is our present position on the
 23 application of the Act, but I am sure everybody has very
 24 well in mind what Mr Garsden said very powerfully some
 25 moments ago. Thank you very much.

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1	THE CHAIR: Thank you, Mr Altman.	1	
2	MR GARSDEN: Can I just respond to that, ma'am?	2	Submissions by MS HOYANO70
3	THE CHAIR: Briefly, if you could.	3	
4	Reply submissions by MR GARSDEN	4	Submissions by MR ALTMAN72
5	MR GARSDEN: Very, very quickly. I am aware of that legal	5	
6	argument. What I would say is, because she's made an	6	Reply submissions by MR GARSDEN73
7	application to the inquiry and disclosed her evidence,	7	
8	that is evidence on which the inquiry is relying and	8	
9	I would say that that qualifies. That is my submission.	9	
10	THE CHAIR: Thank you, Mr Garsden.	10	
11	MR ALTMAN: Thank you.	11	
12	THE CHAIR: That concludes today's hearing. Thanks to	12	
13	everyone here for your helpful submissions. Thank you.	13	
14	(12.39 pm)	14	
15	(The hearing concluded)	15	
16		16	
17		17	
18	I N D E X	18	
19		19	
20	Welcome and opening remarks by THE1	20	
21	CHAIR	21	
22		22	
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