

<p>1 Tuesday, 8 May 2018 2 (10.30 am) 3 Welcome and opening remarks by THE CHAIR 4 THE CHAIR: Good morning, everyone. I am Alexis Jay and I'm 5 the chair of the Independent Inquiry into Child Sexual 6 Abuse. Sitting with me are members of the inquiry, 7 Ivor Frank and Drusilla Sharpling. Professor Sir 8 Malcolm Evans is abroad on business. 9 As you will all know, the decisions of procedural 10 hearings are for me to make, but we always try to sit as 11 a full panel whenever we can, and of course the full 12 panel will sit for the public hearings later this year. 13 On behalf of the inquiry, I welcome you all to this, 14 the third preliminary hearing in the accountability and 15 reparations investigation. This investigation is 16 examining the extent to which existing support services, 17 compensation frameworks and the civil justice system are 18 fit to deliver reparations to victims and survivors of 19 child sexual abuse. 20 From 26 November of this year, we will hold 21 a three-week public hearing in the case studies. 22 Today's preliminary hearing is an opportunity to provide 23 an update on the work that the inquiry has been doing 24 and discuss the necessary preparations for 25 the November/December hearing. We will also have</p> <p style="text-align: center;">Page 1</p>	<p>1 proposed will be considered through the case studies and 2 the approach which we, as counsel, consider ought to be 3 taken at the public hearing. 4 Madam, to be clear, we are having a further 5 preliminary hearing on 25 September in order to ensure 6 that we are ready for the public hearing starting 7 in November, and no doubt further issues will be 8 addressed in detail as to what the hearing will then 9 comprise. 10 Before I set out my preliminary submissions, may 11 I just introduce the advocates who are present in the 12 room today. On my left is Lois Williams, junior counsel 13 to this investigation. Stephen Simblett is representing 14 victims and survivors. Alan Collins is representing 15 victims and survivors. Mr Imran Khan likewise. 16 Peter Robson, a victim/survivor, is present in the room 17 but is not intending to address you today and is now 18 sitting within the public gallery. Sam Stein QC 19 representing victims and survivors. Mr Peter Garsden, 20 who is sat behind me, representing victim and survivor. 21 Nigel Fleming QC for Zurich Insurance. 22 Chris Webb-Jenkins for MMI. Jonathan Hough QC for Royal 23 Sun Alliance. Steven Ford QC for Middlesbrough County 24 Council. Paul Greatorex for Devon County Council. 25 Alan Payne for the Chief Constable of Durham</p> <p style="text-align: center;">Page 3</p>
<p>1 a further and final preliminary hearing on 25 September 2 this year. 3 Before we hear from counsel, some points on the 4 arrangements this morning. We will take a 10-minute 5 break at around 11.45 am, and then a break for lunch, if 6 this hearing hasn't concluded before then, at 1.00 pm. 7 The transcript of today's proceedings will be 8 published on the inquiry's website, and we will let all 9 core participants know when this has been done. My 10 determination on the scope of the five case studies will 11 be circulated to all core participants in due course 12 after the hearing. 13 I will now invite the lead counsel to the inquiry in 14 relation to this investigation, Peter Skelton QC, to 15 provide us with an update on the accountability and 16 reparations investigation. Please go ahead, Mr Skelton. 17 Submissions by MR SKELTON 18 MR SKELTON: Thank you, chair, members of the panel. The 19 purpose of today's hearing is to provide an update on 20 this investigation and in particular the work that has 21 been undertaken in respect of the five case studies. 22 I will also address you on the additional work that 23 needs to be undertaken in preparation for the hearing 24 that's due to take place on 26 November this year, and 25 I will make some submissions on the issues that it is</p> <p style="text-align: center;">Page 2</p>	<p>1 Constabulary. Anne Studd QC for the Chief Constable of 2 Devon and Cornwall Police and the Commissioner of 3 the Metropolitan Police, and Neil Sheldon for the 4 Secretary of State for Justice. 5 May I also mention that Merseyside Police and 6 North Wales Police have notified that they are not 7 attending today and have made no written submissions for 8 the purpose of this hearing. 9 Turning then to the scope of the investigation, the 10 investigation's scope is published on the inquiry's 11 website and it provides guidance on the matters to be 12 investigated. The principal issues for investigation 13 are captured in the very first sentence of that 14 document, which states: 15 "The inquiry will investigate the extent to which 16 existing support services, compensation frameworks and 17 the civil justice systems are fit to deliver reparations 18 to victims and survivors of child sexual abuse." 19 Madam, as we have already stated, the breadth of 20 the investigation is wide. So, too, is our methodology. 21 We are gathering information not solely through case 22 studies but also seminars, which took place in 2016 and 23 2017, and through research. 24 So far as this investigation goes, we have provided 25 an update on the seminars and the research work at the</p> <p style="text-align: center;">Page 4</p>

<p>1 last preliminary hearing, and I won't repeat what we                  2 said then. More recently, however, on 26 March 2018 the                  3 inquiry published on its website an updated report on                  4 the civil justice seminar, and we have recently                  5 published an update report on the criminal compensation                  6 seminar. Those seminars provided a useful starting                  7 point for the investigation's work and also helped to                  8 inform our proposals as to the issues which we now                  9 consider should be investigated in the five case                  10 studies.</p> <p>11 At the time of the last preliminary hearing, on                  12 28 March last year, the inquiry had no core participant                  13 victims and survivors in the St Aidan's case study, and                  14 you will recall I addressed you on that. Fortunately,                  15 that position has now changed and there are four such                  16 persons from St Aidan's, in addition to one previously                  17 designated in respect of St Vincent's. Core participant                  18 status has also been given to two additional                  19 victims/survivors, one from Forde Park and one from                  20 Stanhope Castle. We now have a total of 41 core                  21 participant victims and survivors at the institutions                  22 with which these case studies are concerned. 26                  23 finalised statements have now been received and their                  24 production has been an iterative process with initial                  25 drafts being finalised following detailed requests by</p> <p style="text-align: center;">Page 5</p>	<p>1 description of scope for the individual case studies is                  2 published on the inquiry's website and it explains that                  3 we will be seeking evidence on the following issues, the                  4 following three issues, in relation to the five studies.                  5 First, the process of making a civil claim for damages;                  6 second, criminal compensation schemes, that is, criminal                  7 compensation orders and awards made by the Criminal                  8 Injuries Compensation Authority, or CICA; and, third,                  9 support services for victims and survivors who have                  10 disclosed child sexual abuse, whether or not they were                  11 involved in criminal or civil proceedings.</p> <p>12 It is important to note that, as the description of                  13 scope for the case studies makes clear at paragraph 5,                  14 this investigation will not examine or resolve disputed                  15 factual issues relating to the underlying allegations of                  16 child sexual abuse.</p> <p>17 It is beyond the scope of this investigation to                  18 conduct a root-and-branch enquiry into each of                  19 the institutions at which the victims and survivors were                  20 abused and to determine which persons and organisations                  21 are responsible for that abuse. That is not the purpose                  22 of this investigation.</p> <p>23 So far as the proposed topics for the case studies                  24 are concerned, the overriding purpose is to further the                  25 understanding of the extent to which existing support</p> <p style="text-align: center;">Page 7</p>
<p>1 the inquiry for clarification and expansion of                  2 particular areas of evidence. It is hoped that the                  3 remaining statements will be completed shortly.</p> <p>4 In the first instance, so far as disclosure is                  5 concerned, the inquiry requested schedules of                  6 information from organisations and institutions,                  7 including core participants, to enable more targeted                  8 requests for relevant material. We have also made                  9 requests for all material held by institutional core                  10 participants in relation to each core participant                  11 victim/survivor. The exercise of gathering this                  12 material has taken many months and it is still ongoing.                  13 Several institutions have requested extensions of time                  14 to complete their disclosure. However, over 9,300 pages                  15 of documentation have now been received, which the                  16 investigation legal team is presently reviewing.                  17 Consideration will also be given to requests for further                  18 documentary material and witness statements, which is                  19 something I will come on to in my final -- the final                  20 phase of these submissions.</p> <p>21 As we indicated at the last hearing, we have also                  22 obtained other material that may be relevant to the case                  23 studies, including publicly available documents such as                  24 court judgments and previous inquiry reports.</p> <p>25 So far as the case studies are concerned, the</p> <p style="text-align: center;">Page 6</p>	<p>1 services and compensation frameworks and civil justice                  2 system are fit to deliver reparations, as I have said.                  3 To achieve that objective, it is not necessary, or                  4 indeed practical, for the inquiry to conduct an                  5 exhaustive investigation of each of the three broad                  6 issues identified above in the scoping document in                  7 respect of each case study. Instead, as we presaged at                  8 the last hearing, what is required is a targeted and                  9 proportionate approach, focusing on one or more key                  10 issues in each case study.</p> <p>11 In our view, that is, as counsel to this                  12 investigation, the primary focus on the case studies                  13 should be as follows. First of all, what the concepts                  14 of accountability and reparation mean to victims and                  15 survivors. That's a generic issue which features                  16 throughout all of the case studies and which you will                  17 recall featured heavily during the course of                  18 the seminars.</p> <p>19 Secondly, knowledge of and access to civil                  20 litigation and criminal compensation, including issues                  21 of funding.</p> <p>22 Third, insurance, ie, the nature of insurance cover                  23 and how this affects access to and the outcome of civil                  24 litigation.</p> <p>25 Fourth, the management of child sexual abuse civil</p> <p style="text-align: center;">Page 8</p>

<p>1 litigation, including the administration of group 2 litigation. Several group actions were heard within the 3 case studies. 4 Fifthly, the process of civil litigation, in 5 particular, limitation, and that is the imposition of 6 statutory time limits on the process of claiming damages 7 in the civil courts; the assessment of damages, ie, the 8 process by which claimants are required to prove their 9 injuries and the quantification of damages for the abuse 10 and its consequential effects; and the settlement of 11 cases by agreement. 12 Sixthly, the processes of criminal compensation, 13 that includes the CICA awards and criminal compensation 14 orders. 15 And, lastly, access to support services. 16 In our written submissions, we set out below the 17 proposals for which of these should be investigated in 18 each individual case study. Before doing so, I would 19 like to make five general points. First of all, the 20 list of issues that are identified in the written 21 submissions and which I will advert to today is intended 22 to be the focus of the inquiry's work, but it is not 23 exclusive. Some flexibility is of course required. 24 Other issues may become apparent or gain greater 25 prominence during the individual case studies. If this</p> <p style="text-align: center;">Page 9</p>	<p>1 litigation, such as limitation, will be investigated in 2 multiple case studies. The purpose of this is to obtain 3 a broad range of evidence, practice and opinions on 4 those issues -- indeed, as broad as possible. 5 I should emphasise at this point that, in line with 6 the published scope of the investigation, which I have 7 already quoted, we do anticipate obtaining evidence 8 about the existing systems of civil justice and criminal 9 compensation. As has rightly been pointed out in 10 written submissions, for example, by RSA and by 11 Mr Collins, many of the practices exemplified in the 12 case studies are now historical, due to changes, for 13 example, in the law and indeed in the overall approach 14 of litigation parties to the process of civil 15 litigation. It is going to be essential for the inquiry 16 to understand what present practices are so that in due 17 course its recommendations can be directed towards their 18 future improvement. 19 Fifth, the operation of the criminal justice system 20 is not included as an issue in this investigation. That 21 is an important point which I do need to emphasise. As 22 we stated at the last hearing, we anticipate that 23 criticisms may be made, and are being made, of 24 the actions of individuals and organisations working 25 within that system, including police officers and police</p> <p style="text-align: center;">Page 11</p>
<p>1 occurs, the inquiry may wish to include them within the 2 scope of its investigation. In that regard, we are 3 grateful to the core participants for emphasising in 4 their written submissions particular issues or subissues 5 which they consider should be included. We will of 6 course bear these in mind as the investigation 7 progresses. 8 Second, the first of the issues identified above, 9 that is, what are the concepts of accountability and 10 reparation and what they mean to victims and survivors, 11 will inevitably arise and be considered in all of 12 the case studies. It is at the heart of the work of 13 this investigation and obtaining a broad range of views 14 is of obvious benefit to this inquiry. 15 Third, two of the issues -- support services and the 16 processes of criminal compensation -- have not been 17 allocated to particular case studies. This is 18 deliberate. It is because the investigation of those 19 issues will require the inquiry to consider the 20 experiences of individuals rather than groups of victims 21 and survivors. Therefore, the issue will arise to the 22 extent that individual witnesses in each of the case 23 studies provides significant evidence on that subject. 24 Fourth, some specific issues, such as the management 25 of civil litigation and legal issues within civil</p> <p style="text-align: center;">Page 10</p>	<p>1 forces. In the interests of fairness, those individuals 2 and organisations may need to be given the opportunity 3 to respond to those criticisms, but it doesn't follow 4 that the panel -- you, madam, and your panel -- will 5 need to address such matters in your report or express 6 views upon them. 7 Pausing here, may I now, having sketched out the 8 overall scope of the investigation, invite you to hear 9 from representatives of the core participants? At this 10 stage, I would ask that their submissions are limited to 11 general observations on the matters which I have 12 outlined to you, rather than on the individual case 13 studies, which I will go on to address you on after 14 generic submissions. Madam, it may assist, given that 15 we have so many people, if I outline who they are. 16 I know you have a list, I hope, of the appropriate 17 people. 18 THE CHAIR: I do, Mr Skelton, thank you. Mr Simblett? 19 Submissions by MR SIMBLETT 20 MR SIMBLETT: Thank you, madam. Madam, I hope you have had 21 an opportunity to read our written submissions, which 22 I won't read out and repeat as part of this exercise. 23 As you will have seen, madam, there are some 24 particular examples of good practice that we have 25 highlighted, for instance, at paragraphs 8 to 10 of our</p> <p style="text-align: center;">Page 12</p>

<p>1 submissions, the actions of the London Borough of                  2 Lambeth in establishing its redress scheme, which                  3 deliberately and overtly does not take limitation as an                  4 issue, and it has the concept that placing a child in                  5 harm's way is a compensatable wrong.                  6 Our submissions are informed by wishing to help you                  7 see examples of good practice available now and to                  8 contrast that with the experience that the core                  9 participants that we represent, victims of sex abuse in                  10 a number of different places, have had a real struggle                  11 to get the redress to which they're entitled. In fact,                  12 when we come on to look at the North Wales stuff, that                  13 goes back over 25 years.                  14 Secondly, madam, if I can highlight this as                  15 a general point: although this is an accountability and                  16 reparations phase of the investigation, of course the                  17 matters that you are investigating in your other phases                  18 will feed into, we hope, the conclusions and                  19 recommendations that you make. So, for instance, the                  20 Nottinghamshire phase in which I am instructed by                  21 Uppal Taylor, the Beechwood cases, which is a case study                  22 that has been chosen there, are likely to shed very                  23 considerable light on the sorts of things you are                  24 looking at in this phase. So we would remind you,                  25 madam, that the inquiry will need to take an overall</p> <p style="text-align: center;">Page 13</p>	<p>1 engaged by that body, to the stance they take in the                  2 litigation. In other words, these are not things that                  3 inexorably caused a problem, they are things that became                  4 a problem because of a particular tactical position                  5 taken. That this is still an ongoing problem can be                  6 shown by the Nottinghamshire cases that you are going to                  7 look at later. As recently as this year, the                  8 Supreme Court was concerned with an issue of vicarious                  9 liability. So the idea that somehow this was all in the                  10 past and systems are very different now is not one that                  11 we submit should be the thought that the inquiry panel                  12 takes with it from the start. It is something that                  13 actually needs to be treated with a degree of scepticism                  14 and of scrutiny.                  15 Developing slightly that point, one consequence, of                  16 course, of that is that that approach can and has led to                  17 significant delays to people, and it is part of                  18 the tribunal's job, we say, to allow a space for as many                  19 of those affected who have got something useful to                  20 contribute to give an account of their journey to                  21 obtaining redress and that you shouldn't, for example,                  22 be deflected from that course too significantly by                  23 allowing too much evidence from the insurance companies,                  24 and Mr Hough's submissions at paragraph 7 invite you, as                  25 it were, to hear evidence from people who were not</p> <p style="text-align: center;">Page 15</p>
<p>1 view.                  2 In relation to some of the points that have arisen                  3 in the written submissions from other parties, and                  4 there's reference already been made to the Royal &amp; Sun                  5 Alliance submissions, which, if I can extract a point                  6 from, recognise at paragraph 10 that the children's                  7 homes in North Wales, for example, revealed abuse on                  8 a terrible scale. So one would have hoped that if abuse                  9 had been revealed on a terrible scale, it would have                  10 been a relatively straightforward and easy path to                  11 justice, but unfortunately, it hasn't. Although it is                  12 very nicely put by Mr Hough QC in his submissions, in                  13 particular paragraphs 3 and 9(b), where he says that                  14 there were particular complications around issues of                  15 vicarious liability or issues of limitation and so on,                  16 in a sense, those may have been legitimate legal points                  17 for somebody who wanted to defend their position in                  18 a case. But that's different from saying that, as it                  19 were, they had no choice about it.                  20 One of the matters that we say is important for the                  21 tribunal going forward is to look at essentially -- and                  22 this is something that we have set out in our own                  23 submissions at paragraph 6 -- things like the attitude                  24 of defendants, whether they are local authorities or                  25 other defendants, the attitude of the insurers that are</p> <p style="text-align: center;">Page 14</p>	<p>1 involved in the litigation at the time, but appear to --                  2 because some of those will have moved on, to give                  3 evidence about how procedures may have changed, and                  4 while, of course, it's appropriate to have an                  5 understanding of how the insurance business works, or                  6 how claims such as these may need to be dealt with, what                  7 needs to be avoided is any suggestion of ex post facto                  8 window dressing and essentially the attempt to portray                  9 as a sunnily different situation from that which has                  10 been faced by the victims, all of whom, when you                  11 consider the evidence, and you have heard the timetable                  12 for the evidence being marshalled and so on, will be, in                  13 my submission, portraying a tale of considerable delay,                  14 difficulty, obstruction and obfuscation in achieving                  15 redress for what has been obviously very significant                  16 injury caused to them.                  17 So we say it is important not to allow this to                  18 become sort of too lawyerised or too focused on matters                  19 that get in the way of providing the opportunity for                  20 those affected to outline the devastating effect it's                  21 had on them.                  22 In relation to the CICA points, we have made some                  23 observations in our written submissions that one of                  24 the problems that is faced by people who have been                  25 sexually abused is that they can be cut out of their</p> <p style="text-align: center;">Page 16</p>

<p>1 compensation if, in fact, they have an involvement in                  2 the criminal justice system, and of course one of                  3 the consequences of being a victim of sexual abuse is it                  4 can cause behavioural/emotional conduct problems that                  5 sometimes will lead somebody into the criminal justice                  6 system when they might not have been otherwise and that                  7 is then used as reason not to provide them with                  8 compensation. It is in that sense that the inquiry, in                  9 our submission, will need to take account of the role of                  10 CICA, but also the role, for instance, of the various                  11 police forces, and there is before you an application                  12 from one police force to be relieved of core participant                  13 status. I don't know if that is anything that anybody                  14 is going to touch on today. But we would be reluctant                  15 for the tribunal to prejudge an issue of there being no                  16 criticism possible of a particular police force or                  17 a particular public body at this stage. But I won't say                  18 any more about that at this point.</p> <p>19 In terms of going forward, as we have tailed our                  20 submissions, we want to focus on the concrete                  21 improvements that can be made, removing problems such as                  22 taking limitation defences and looking particularly at                  23 the resources that are necessary in an adversarial                  24 process. We have highlighted in our written submissions                  25 problems around the use of experts and things like that,</p> <p style="text-align: center;">Page 17</p>	<p style="text-align: center;">Submissions by MR COLLINS</p> <p>1 MR COLLINS: Thank you, ma'am. A couple of observations.                  2 I think it is absolutely essential that you form an                  3 opinion as to what's happening in 2018, both from                  4 understanding the mechanics in the civil litigation                  5 process, but also what dovetails in with that are wider                  6 policy considerations. Picking up on what's been said                  7 already, I would say you are going to need some case                  8 studies of some sort in order to understand what is                  9 happening, for better or for worse, now, in 2018, rather                  10 than simply rely on opinion, anecdote, whatever.</p> <p>11 Now, limitation has been touched upon a great deal                  12 already this morning, and, as you know, in Australia                  13 there's been serious limitation reform in very recent                  14 times, and cases have been before the courts, for                  15 example, in the State of Victoria, under the new                  16 legislation, and you may, for example, want to see how                  17 the courts are addressing sexual abuse cases under that                  18 new regime and compare and contrast, because there is an                  19 appetite for reform here, but in order to make any kind                  20 of recommendation, you, the inquiry, need to understand                  21 whatever recommendations you may come up with, if any,                  22 how that would work in practice.</p> <p>23 So I would say you need some case studies, whether                  24 from here or from elsewhere, in order to understand the                  25</p> <p style="text-align: center;">Page 19</p>
<p>1 all of which can add significantly to the costs of                  2 seeking redress because, effectively, everybody involved                  3 wants to be able to have their say and to be backed up                  4 by the best support, and that can, of course, divert                  5 resources away from providing compensation to those who                  6 ought to have it and whom it is recognised ultimately                  7 will be entitled to it. One of the things that we say                  8 is an important focus in this is to keep an eye on the                  9 time that it has taken for people who were victims of                  10 this abuse from the point at which they were victims to                  11 the point at which they get redress. Most, if not all,                  12 of those delays are avoidable in some way and most, if                  13 not all, of those delays can be shortened by various                  14 public bodies changing their attitude and their                  15 approach, and when we come on to the detailed hearings,                  16 those are the sorts of submissions we will be saying.</p> <p>17 In terms of any procedural additional matters, we                  18 are only concerned at this stage in the North Wales                  19 case, and I will confine anything I have got to say to                  20 that phase, but it will be very brief.</p> <p>21 THE CHAIR: Thank you, Mr Simblett.                  22 MR SIMBLETT: Thank you, madam.                  23 THE CHAIR: Mr Collins?                  24                  25</p> <p style="text-align: center;">Page 18</p>	<p>1 mechanics.</p> <p>2 As I said, feeding into that are the wider policy                  3 considerations, whether it be limitation or other                  4 matters. For example, insurance. And I have touched                  5 upon in my written submission that insurance is a very,                  6 very live issue. In the vast majority of cases that                  7 I see, very often there is no insurance available, for                  8 whatever reason, to indemnify the abuser or the                  9 institution responsible for the abuser, and that is                  10 a fundamental problem for many survivors trying to seek                  11 justice: they are precluded from justice because of                  12 the lack of means to satisfy any judgment that they may                  13 obtain.</p> <p>14 In complete contrast to the road traffic situation:                  15 there is a default position if there is no insurance                  16 cover. It seems to me that abuse survivors are very                  17 much the Cinderella of the civil justice system, and                  18 that is, I would say, a real issue that you need to                  19 consider when considering policy.</p> <p>20 In my written submission, I have outlined what                  21 I would say, on behalf of the survivors that                  22 I represent, are the key issues, and I don't propose to                  23 repeat what I have written.</p> <p>24 So, yes, I think you do need to see what's happening                  25 in 2018, because that is going to shape the future.</p> <p style="text-align: center;">Page 20</p>

<p>1 Unless I can assist you further?                  2 THE CHAIR: Thank you, Mr Collins. Mr Khan?                  3 Submissions by MR KHAN                  4 MR KHAN: Madam, can I apologise firstly, you have not seen                  5 any written submissions in advance, so apologies for                  6 that. This is a short submission made in response to                  7 paragraph 14 of Mr Skelton's submissions in relation to                  8 the criminal justice system not being included, and that                  9 concerned me, and going back to what our submissions                  10 were last year, we wrote then, in relation to the                  11 preliminary hearing, that the priority for our clients                  12 is that those who subject them to abuse face                  13 a successful criminal prosecution. Our clients also                  14 want the institutions or bodies who failed in their                  15 obligations to protect them or other children to face                  16 investigation or prosecution where appropriate.                  17 We consider that the failures of the authorities,                  18 the institutions and the police informs the rest of the                  19 process and should be included in this particular                  20 investigation.                  21 Madam, I recall saying at the last hearing, on                  22 28 March 2017, referring to Howe &amp; Co's submissions:                  23 "We were [that is, the victims] never given our day                  24 in court. That is true for most survivors. We want                  25 those responsible, ie, the Home Office, local</p> <p style="text-align: center;">Page 21</p>	<p>1 we say failed, and that police officers, senior police                  2 officers, are asked to come and give evidence in                  3 relation to that.                  4 We invite the inquiry to reconsider its approach to                  5 this critical question. It is fundamental to the issue                  6 of reparation and accountability, particularly                  7 accountability. We support those submissions set out at                  8 paragraph 28 on pages 13 and 14 of Howe &amp; Co's                  9 submissions.                  10 I'm afraid anything less than that will, we submit,                  11 not fulfil the terms of reference of the inquiry and the                  12 scope. Thank you.                  13 THE CHAIR: Thank you, Mr Khan. Mr Stein?                  14 Submissions by MR STEIN                  15 MR STEIN: Madam, with Mr Enright from Howe &amp; Co Solicitors,                  16 we represent 25 core participants across the five                  17 institutions which are going to be part of this                  18 investigation, accountability and reparations. We                  19 appear, therefore, on behalf of F16 to F24, F36 and F51,                  20 from Forde Park Survivors Group; F43 is from the                  21 Bryn Alyn community; F26, F27, F30 to 34 and F50 from                  22 Stanhope Castle Survivors; F35 and 27 from St Leonard's;                  23 F41, F42 and F47 from St Aidan's and St Vincent's and                  24 individually on behalf of Nigel O'Mara, who has been                  25 given a core participant status, which essentially is</p> <p style="text-align: center;">Page 23</p>
<p>1 authorities, police, social services, insurance                  2 companies and legal representatives, to be held                  3 accountable for their mistakes.                  4 "We share those concerns and we share those demands,                  5 recognising, of course, the limitations of the scope of                  6 this inquiry. We don't know how it is that the inquiry                  7 will deal with those issues and they are real issues,                  8 central issues, to the work of the inquiry."                  9 So it was surprising to read that the criminal                  10 justice system would not be included, and it concerns me                  11 that that does not then meet the terms of reference and                  12 the scope of the inquiry. Madam, I remind you that the                  13 purpose of the inquiry is to consider the extent to                  14 which state and non-state institutions have failed in                  15 their duty of care to protect children, and that of                  16 course, in terms of scope, state and non-state                  17 institutions are government departments, the                  18 Cabinet Office, parliament ministers, the police and                  19 prosecuting authorities. Our submission would be that                  20 this investigation needs to look at the police and other                  21 institutions and that informs the rest of the process.                  22 We feel and support the submissions made -- you will                  23 hear from Mr Stein in due course -- in relation to the                  24 proposals there that there are position statements from                  25 the various authorities and institutions that failed, or</p> <p style="text-align: center;">Page 22</p>	<p>1 a watching brief because of background experience across                  2 this investigation.                  3 More does not necessarily mean greater all of                  4 the time. When we represent so many people, though,                  5 what it does is that we suggest it allows us a better                  6 opportunity, as you have, sitting looking at all of                  7 these investigations in all of these modules, to access                  8 what are the themes across these survivors that they                  9 have encountered so many times, and we hope, therefore,                  10 that we can provide that educated knowledge through our                  11 submissions to this inquiry.                  12 In representing a number of people, we are                  13 occasionally, Mr Enright and I, brought back to square                  14 one by our clients and our core participants we                  15 represent. A recent email emphasised to us the very                  16 nature of what it is that we are doing. One of our core                  17 participants sent to myself and Mr Enright the following                  18 note. This was after I had had a conversation with this                  19 particular individual on the telephone. He said this:                  20 "I'm a very personal person and don't give much away                  21 because of the hurt inside. At Stanhope, I was there                  22 for six years, and every day I was there I woke up in                  23 fear of how to get through the day without a beating and                  24 how to get through the night, how to avoid getting                  25 abused. I'm so sorry for saying this to you."</p> <p style="text-align: center;">Page 24</p>

<p>1 Now, we emphasise those words because the effect of                  2 child sexual abuse, as you well know through all of                  3 the work you have done, both before your work as the                  4 panel for this inquiry and of course the work that you                  5 are doing as the inquiry proceeds, you know that the                  6 effect of child sexual abuse continues remorselessly                  7 throughout a survivor's life. Very few survivors say                  8 anything different from the survivor I quoted just                  9 a minute ago. The hurt is inside and the hurt is felt                  10 every day.</p> <p>11 So we ask on behalf of all of the survivors we have                  12 the privilege to represent that the ongoing, devastating                  13 and debilitating effect of abuse is at the foremost of                  14 the panel's mind when considering accountability and                  15 reparation.</p> <p>16 Now, this investigation within this inquiry has                  17 perhaps the widest focus of ail of the modules, and we                  18 appreciate, as it's already been said, that the inquiry                  19 will be using the public hearings and the case studies                  20 into Forde Park, St Aidan's, St Vincent's,                  21 Stanhope Castle and North Wales children's home as only                  22 one part of its investigation into accountability and                  23 reparations.</p> <p>24 The difficulty that you have is to balance,                  25 therefore, the requirements and the submissions by</p> <p style="text-align: center;">Page 25</p>	<p>1 that counsel has set forward that the bullet points set                  2 out at page 5, the following issues, as they put it,                  3 should form the primary focus of the case studies. The                  4 difficulty is that we suggest this is the bare minimum                  5 rather than what should be looked at. Page 5 of counsel                  6 to the inquiry's submissions, paragraph 13. It is                  7 a document I think dated 2017. I think we can take it                  8 that was an error, it was dated this year. I'm very                  9 grateful. It is to those particular points that we                  10 address our submissions and we are going to take our                  11 submissions generally.</p> <p>12 You know, madam, as does counsel to the inquiry, we                  13 have made -- if I say they are short submissions in                  14 writing on behalf of the core participants we represent,                  15 they in fact go on for some time, I think they are                  16 68 pages or so, but inevitably, we are obviously                  17 representing the points on behalf of so many individuals                  18 and they have to be made, and we hope made well, so that                  19 this inquiry can see the force of their submissions.</p> <p>20 We are hoping -- and we are hoping we will obviously                  21 discuss this with my learned friend Mr Skelton QC --                  22 that after this particular hearing, if we can, if there                  23 is time, not today but another time, have a meeting with                  24 counsel to the inquiry to be able to cover some of those                  25 points in detail, and that may assist as we go forward.</p> <p style="text-align: center;">Page 27</p>
<p>1 survivors that we represent who need to have their                  2 institutions looked at with care and who need to have                  3 answers against what is going to be the goal of this                  4 inquiry, which is to make submissions and make                  5 recommendations as to change in the future.</p> <p>6 Of course, counsel to the inquiry has got the same                  7 difficulty. He and Ms Williams, representing from the                  8 inquiry purposes or perspective the counsel team that is                  9 seeking to put forward the material that would be of                  10 the greatest benefit to the inquiry, they have to bear                  11 in mind the question of resources and time that is                  12 available. The danger, though, is losing too much on                  13 behalf of survivors.</p> <p>14 So we make our submissions looking at the agenda at                  15 the proposed scope of the five case studies with care,                  16 and looking at the submissions from counsel to the                  17 inquiry, from Mr Skelton QC and his junior Ms Williams.</p> <p>18 It would assist, madam, if you and your colleagues                  19 have a copy of counsel to the inquiry's submissions in                  20 front of you. I don't know whether you do. I have                  21 a spare copy here, if needs be. I'm very grateful. It                  22 would assist, therefore, if we can look at page 5, so                  23 I won't need to read through each one of the bullet                  24 points.</p> <p>25 Obviously we agree as being the basic starting point</p> <p style="text-align: center;">Page 26</p>	<p>1 Obviously, as we say, we agree with the points that                  2 have been set out by counsel to the inquiry but suggest                  3 that it is, as we have already said, a bare minimum.</p> <p>4 The needs, therefore, we suggest, on behalf of                  5 the core participants and survivors we represent, there                  6 is a need to hear evidence of the abuse suffered by the                  7 core participants of what were, frankly, institutional                  8 hellholes. Now, that will assist in the first of                  9 the bullet points that's been set out, at page 5,                  10 paragraph 13, the first bullet point. Counsel to the                  11 inquiry puts it this way:</p> <p>12 "What the concepts of accountability and reparation                  13 mean to victims and survivors."</p> <p>14 Counsel also then sets out other aspects of the way                  15 that the process is then considered in terms of civil                  16 litigation. We won't get anywhere without understanding                  17 what has happened to these individuals. The concept of                  18 accountability and reparation, taking it from --                  19 correctly, as counsel to the inquiry points out -- the                  20 survivor's perspective, needs to be understood against                  21 what has happened to them and against the ongoing sense                  22 of injustice which each one of the core participants and                  23 survivors we represent feels.</p> <p>24 The sense of injustice is the failure by the state                  25 to adequately deal with their accounts and what has</p> <p style="text-align: center;">Page 28</p>

<p>1 happened to them. So whilst we completely agree with                  2 counsel to the inquiry Mr Skelton and Ms Williams'                  3 suggestion that you need to understand the concepts of                  4 accountability and reparation and what that means to the                  5 victims, as they put it, and survivors, it has to be                  6 against what has actually happened and not just what has                  7 happened in the past, not just the abuse. It is                  8 ridiculous almost somewhat to say "not just the abuse",                  9 but the abuse is the starting point. What happened                  10 thereafter is the failures through civil litigation, the                  11 failures through the police, on occasions, and far too                  12 often, in failing to understand what has happened to                  13 these individuals.</p> <p>14 So whilst we agree with my learned friend's                  15 submissions, we suggest it needs to be dealt with from                  16 what has happened at their institutions.</p> <p>17 Obviously, the question of limitation period, which                  18 has been addressed already before the inquiry today, is                  19 also set out within the bullet points and by counsel to                  20 the inquiry. There is a need, we suggest, to take,                  21 again, this a little further. The question of                  22 the limitation period within civil proceedings --                  23 obviously we all know that this governs as a statutory                  24 time limit the process of making a civil claim in the                  25 civil courts, subject to the discretion of a judge to</p> <p style="text-align: center;">Page 29</p>	<p>1 measured needs to be understood against the points                  2 raised by the survivors that we represent. So many of                  3 our survivors have made various submissions, and we have                  4 set them out at different times in our written                  5 submissions, so we will only quote some. We were of                  6 the belief that the inquiry -- this is a quote from                  7 survivors we represent:</p> <p>8 "We were of the belief that the inquiry will help us                  9 to finally get the answers as to why and whom was                  10 ultimately responsible for our treatment as children at                  11 Forde Park."</p> <p>12 And each one of the survivors we represent would say                  13 the same about their respective institution. The wish                  14 is that they would have a determination of who is                  15 ultimately responsible for their time at these                  16 institutions and, "the consequential treatment of us by                  17 the legal teams we employed to help us and who were                  18 pulling their strings".</p> <p>19 So survivors say this, that:</p> <p>20 "With that being said, the main objectives and                  21 issues that we want [survivors want] the inquiry to deal                  22 with at the public hearings are as follows: to be able                  23 to put questions to organisations involved, that                  24 includes the Home Office, the police, the respective                  25 councils, including Devon County Council, Durham and</p> <p style="text-align: center;">Page 31</p>
<p>1 extend that period. We understand from speaking to                  2 civil solicitors and claimant solicitors, not only                  3 before this inquiry but more generally, that it is                  4 raised all too often. Comments that we have heard is                  5 it's raised routinely.</p> <p>6 Now, that is quite different from some of the points                  7 that have been raised in seminars whereby insurance                  8 companies are seeking to essentially say, "Well, we use                  9 this infrequently. We use it with discretion".</p> <p>10 So there is a conflict at the moment between what is                  11 being put forward, it seems, in relation to the                  12 limitation period versus what we understand is the                  13 general position within the civil courts. So our                  14 respectful suggestion is that there should be evidence                  15 from solicitors with experience in this area so that the                  16 inquiry can actually understand the frequency of                  17 the raising of this particular issue.</p> <p>18 Counsel to the inquiry has also put forward the                  19 question of quantification of damages for the abuse and                  20 its consequential effects and has set that out at                  21 I think the fifth bullet point in the middle then of, if                  22 you like, the sub-bullet points.</p> <p>23 This is, of course, an important area. It needs to                  24 be understood -- the question of the context of                  25 the abuse and how the concept of accountability can be</p> <p style="text-align: center;">Page 30</p>	<p>1 other councils, and the police forces in these areas;                  2 the insurance companies; the lawyers who acted for us                  3 previously in the various cases."</p> <p>4 Survivors say in relation to their individual                  5 points:</p> <p>6 "We want to see all documentation between Devon                  7 County Council, the Home Office, the insurance                  8 companies, the police and our former legal                  9 representatives. We want to understand if there was                  10 collusion between these various groups to limit our                  11 damages in civil cases, to limit the exposure of how                  12 badly we were let down by these organisations when we                  13 were children in care. We want to know" -- taking on                  14 board counsel to the inquiry's point about the extent of                  15 quantification of damages, "We want to know why so                  16 little value was put on the harm we suffered and why we                  17 were not allowed any effective role in the civil and                  18 criminal cases against our abusers. We were never given                  19 our day in court", and that is true for most survivors:</p> <p>20 "This inquiry is the last chance that we and most                  21 survivors will have our day in court. As regards the                  22 Home Office, we want to know why these institutions" --                  23 taking any example of the institutions that form part of                  24 this aspect of the inquiry, "We want to know why these                  25 institutions were allowed to operate as they did, why</p> <p style="text-align: center;">Page 32</p>



<p>1 staff were not checked, and why were clearly unqualified 2 staff employed to look after children." 3 Each one of the survivors we represent wants the 4 panel, as they say, at the end of the day, to give and 5 publish views and opinions on mistakes that were made. 6 If this is not done, what is the point of this inquiry? 7 Let me pause there. In representing a goodly number 8 of people before this inquiry, some 25 core 9 participants, across the board our core participant 10 clients state -- and this inquiry may well agree -- that 11 in order to actually attack the issues that counsel to 12 the inquiry are setting out, you need to have an 13 understanding of what has happened to them. So the 14 points that counsel to the inquiry are setting out, the 15 concepts of accountability and reparation, what does 16 that mean to victims and survivors; the quantification 17 of damages for abuse and its consequential effect, none 18 of that can be understood unless you have a raw 19 understanding of what has happened to them, because it 20 is ongoing from the abuse at the beginning through to 21 the way they have been dealt with through their claims. 22 We suggest that these themes that we have set out 23 and the complaints made by core participants will 24 resonate with this inquiry. It's sometimes difficult to 25 hear yourself being quoted back to you, and so I make</p> <p style="text-align: center;">Page 33</p>	<p>1 the past, and you know, therefore, that where the 2 complainant survivors that we represent are saying that 3 they were ignored, that their complaints and accounts 4 were sidelined, that it is not just a coincidence that 5 you made similar findings in relation to Rotherham, that 6 this is in fact what has happened throughout. 7 This inquiry, therefore, needs to hear from the 8 survivors and, we suggest, to come to a conclusion about 9 the way these institutions, these hellholes, were 10 organised, if that is even possibly a word to describe 11 them, and run and managed by the Home Office and other 12 institutions. 13 Let me then deal in a little bit more detail with 14 some of the points that are going to be raised and dealt 15 with within this part of the accountability and 16 reparations inquiry. The inquiry would be better 17 informed about the limitation period point if solicitors 18 that deal with these particular cases are heard from. 19 We have made that point already. 20 We know that the Royal &amp; Sun Alliance Insurance 21 Company are proposing that this inquiry hears evidence 22 from solicitors or from people who work for the 23 insurance companies, and we suggest it would be 24 interesting to hear, if anybody from insurance company 25 is called, as to what they would say about the</p> <p style="text-align: center;">Page 35</p>
<p>1 this quote to remind you of your findings, madam, in the 2 Independent Inquiry into Child Sexual Exploitation in 3 Rotherham which you chaired. In your recommendations 4 and in your conclusions, you stated this as regards what 5 happened at Rotherham: 6 "Over the first 12 years covered by this inquiry, 7 the collective failures of political and officer 8 leadership was blatant. From the beginning, there was 9 growing evidence that child sexual exploitation was 10 a serious problem in Rotherham. This came from those 11 working in residential care and from youth workers who 12 knew the people, knew the young people, well. Within 13 social care, the scale and seriousness of the problem 14 was underplayed by senior managers. At an operational 15 level, the police gave no priority to child sexual 16 exploitation, regarding many child victims with contempt 17 and failing to act on their abuse as a crime. Further 18 stark evidence came in 2002, 2003 and 2006, with three 19 reports going to the police and the council which could 20 not have been clearer in their description of 21 the situation in Rotherham. The first of these reports 22 was effectively suppressed because some senior officers 23 disbelieved the data it contained." 24 Madam, you know all too well what has happened, 25 through our own investigations and your own report, in</p> <p style="text-align: center;">Page 34</p>	<p>1 limitation period. 2 The criminal courts have now for some time, in 3 dealing with both the case law before the criminal 4 courts at the Court of Appeal level and in dealing with 5 the handbook, which is one of the guides that judges use 6 that is online for dealing with criminal cases when 7 coming to the point of directing a jury, that criminal 8 courts have long recognised that when considering the 9 question of a delay in making an accusation, whether 10 it's indeed presenting a claim within the civil sphere 11 or the criminal sphere that a delay should not be used 12 as any type of bar to proceedings. In other words, the 13 criminal courts have come to a sensible understanding 14 that the question of a delay is simply an evidential 15 point that needs to be considered and that there should 16 be no limitation on making a claim. That has been set 17 out in various cases. We quote one, which is Miller, 18 decided in 2013, and it says this at the Court of 19 Appeal: 20 "In recent years, the courts have increasingly been 21 prepared to acknowledge the need for a direction to 22 a jury that deals with what might be described as 23 stereotypical assumptions about issues such as delay in 24 reporting allegations of sexual crime and distress." 25 We suggest that the limitation period and the</p> <p style="text-align: center;">Page 36</p>

<p>1 support for a limitation period that is being put                  2 forward by the insurance companies is doing no more than                  3 reflecting a stereotypical view of the reasons why                  4 somebody who has been badly abused may not be able, may                  5 not feel able, to present their claim until a later                  6 stage.                  7 Further, in relation to the question of insurance                  8 companies, the inquiry, when looking at the particular                  9 points raised by counsel to the inquiry, should look                  10 with care at what we suggest is a conflict between                  11 insurance companies and either institutions or often                  12 local authorities. You would expect that an institution                  13 dealing with a claim that relates to the way that they                  14 have run a particular place that abuse is suggested to                  15 have occurred would wish to hear that evidence, and, if                  16 possible, learn lessons for the future. That would be                  17 what we would expect.                  18 You would expect that a local authority, whose duty                  19 to a child is that the welfare of the child is paramount                  20 within the statutory legislation that deals with this,                  21 we would expect that a local authority with that duty                  22 should be looking at a potential civil claim to consider                  23 not only learning lessons, but making sure that those                  24 lessons are understood across their work in supporting                  25 and looking after children.</p> <p style="text-align: center;">Page 37</p>	<p>1 the child, or is it the insurance company who is                  2 understandably, from its perspective, looking at its                  3 balance sheet. So within the question of a civil claim,                  4 this tension -- we say it is much more than that, this                  5 conflict between an insurance company and a local                  6 authority and, indeed, other institutions needs to be                  7 looked at with care.                  8 We move on to the question of damages or                  9 compensation for child sexual abuse and whether they                  10 have been adequately or fairly assessed in the past.                  11 This leads us to consider the question of how this                  12 inquiry overall, through what we would suggest is the                  13 appropriate investigation, which is the accountability                  14 and reparations investigation, whether this inquiry                  15 should recommend and follow the clear lead of                  16 the Australian Royal Commission, which has set up                  17 a redress scheme.                  18 Now, counsel to the inquiry, a point we have already                  19 addressed, have suggested that this investigation                  20 includes consideration of how claimants are required to                  21 prove their injuries, the quantification of damages, and                  22 its consequent effects. The core participants we                  23 represent agree with that. May I just quote:                  24 "The damage from child sexual abuse cannot be lumped                  25 in with suffering a broken leg. The damage caused by</p> <p style="text-align: center;">Page 39</p>
<p>1 Turn the case over, though, through civil litigation                  2 to the insurance company that is representing the local                  3 authority, and we have a conflict, we suggest, that                  4 needs to be understood. An insurance company has                  5 responsibility to its shareholders, has responsibility                  6 to its economic bottom line. It needs to consider with                  7 care how its resources are going to be dealt with and                  8 expended during a particular claim and how best for that                  9 claim to be dealt with against their financial forecasts                  10 and their accounts.                  11 So, immediately, you can see that you have                  12 a conflict. Not just a tension, but a true conflict,                  13 between a local authority looking after and considering                  14 the welfare of a child versus the way a claim is dealt                  15 with by an insurance company. So one of the points that                  16 we suggest that this inquiry should grasp when looking                  17 at the civil litigation route through a claim is quite                  18 how the local authority balances that issue. Is the                  19 local authority putting forward the fact that, if it                  20 instructs solicitors as far as it can in a civil claim                  21 to settle, provide damages to a certain amount, is it in                  22 fact then threatening the premium that it will be paying                  23 on its insurance in the future? How is that dealt with?                  24 Who is in fact making the decision? Is it the local                  25 authority, who should be looking after the interests of</p> <p style="text-align: center;">Page 38</p>	<p>1 abuse suffered as a child is lifelong, life-changing and                  2 does not heal, like a broken leg."                  3 Equally, we suggest the question of the lifelong                  4 failure to recognise the extent of the abuse across all                  5 of the institutions that are being considered by this                  6 inquiry has a lifelong effect. So many of the people                  7 that Mr Enright and I represent suffered abuse within an                  8 institution and were then failed by the police, the                  9 local authorities, the Home Office and then the civil                  10 justice system, so that their abuse has been compounded                  11 and compounded so many times by what has been                  12 a widespread and decades-long failure to recognise both                  13 the prevalence of child sexual abuse and a downgrade of                  14 its overall and lifelong effect.                  15 This inquiry, even this inquiry, in doing the                  16 necessary work that needs to be done and making the                  17 recommendations you have done already in the interim                  18 report and further recommendations in the future, even                  19 this, as you know, has an effect upon the survivors. It                  20 makes people relive what has happened, and so often we                  21 are speaking to core participant survivors and they are                  22 saying, "Not just what happened to me, the abuse,                  23 actually going back through what happened to me through                  24 civil litigation itself, the horrors of trying to deal                  25 with that, were so difficult to deal with".</p> <p style="text-align: center;">Page 40</p>

<p>1 So we suggest that this inquiry either recommends 2 that for survivors of abuse there should be a head of 3 damage that would be retrospective, payable to survivors 4 whether or not they have received some compensation. 5 I remind you -- you don't need to be reminded -- of 6 the way you dealt with the child migration aspect of 7 matters in the interim report as has been set out there. 8 Or recommend that a redress scheme is established. The 9 establishment of the Australian national redress scheme 10 was a key recommendation of the Royal Commission into 11 Institutional Responses to Child Sexual Abuse. It's 12 been described as a critical part of the process of 13 healing in Australia. The Australian redress scheme is 14 a new government programme. It will provide support to 15 people who were sexually abused as children while in the 16 care of institutions, and you are probably aware that 17 that scheme will start from 1 July this year and run for 18 10 years. 19 Now, in putting forward that scheme, the Australian 20 Government has not only taken responsibility for the 21 failures of the government in the different states and 22 in seeking the buy-in from the different territories to 23 the scheme, they have ensured that the cost is spread, 24 but they have also called for other institutions, so the 25 churches, the charities, to take part in that redress</p> <p style="text-align: center;">Page 41</p>	<p>1 called. He is a survivor of child sexual abuse himself 2 and has long-term and deep knowledge of how child sexual 3 abuse complaints have been handled over the decades. He 4 is a trained counsellor. His work also includes 5 providing training to various police forces, and he also 6 works with Police and Crime Commissioners as well as 7 providing training to general practitioners on child 8 sexual abuse matters. 9 We suggest that his evidence, as will be the 10 evidence of other workers within support services, will 11 be vital in understanding this. He carries with him an 12 individual perspective in relation to the survivors of 13 boys, young men, who have been raped. For this reason, 14 he, himself, has founded in the past a hostel to support 15 young men and boys who were raped or abused and he knows 16 all too well the difficulties in finding financial 17 support for such hostels and institutions and support 18 networks, and so his experience should be used, we 19 suggest, by this inquiry, as should other witnesses from 20 this particular area. 21 Other witnesses that would be of assistance, we 22 respectfully suggest, we have already mentioned the 23 question in relation to civil litigation and the 24 possibilities of using experienced solicitors dealing 25 with civil litigation.</p> <p style="text-align: center;">Page 43</p>
<p>1 scheme, so that the actual and, frankly, financial cost 2 of it can be spread. 3 This does recognise, we suggest, a sensible and 4 reasonable proportionate way forward in allowing those 5 people that have suffered for so long to have their 6 claims recognised as a result of this inquiry. 7 Now, may I move on then to the individual position 8 of Mr O'Mara? Counsel to the inquiry has recognised at 9 the final bullet point at page 5 that there is a need to 10 consider the question of access to support services. 11 Now, I don't criticise at all the counsel to the 12 inquiry. At present, I don't believe we have a witness 13 list of proposed witnesses, and that may be a matter 14 that we can discuss. We need, therefore, to consider 15 how this question of access to support services is going 16 to be dealt with by this investigation. 17 We suggest that experienced counsellors from women's 18 refuges and support organisations be called before this 19 inquiry to speak not only about their experiences in 20 handling and dealing with accounts from survivors of 21 abuse, but also to inform this inquiry about what 22 appears to be and is so well known to support services, 23 the dwindling supply of finance for their support for 24 survivors. 25 Whilst doing so, we suggest that Mr O'Mara is</p> <p style="text-align: center;">Page 42</p>	<p>1 The witnesses that can be drawn from the litigation 2 in respect to the institutions will include, therefore, 3 solicitors and counsel who dealt with the litigation in 4 the past across these various institutions. You may 5 wish to consider, as we have set out in our written 6 submissions, that the Forde Park litigation would 7 provide an opportunity to hear from the people and the 8 lawyers who related individuals, and that would be 9 Penelope Ayles, the solicitor who conducted the 10 litigation; the experienced counsel, Elizabeth-Anne 11 Gumbel QC; and potentially the judge who dealt with the 12 litigation as well. 13 Now, we recognise that the calling of evidence from 14 legal teams and potentially the judge involved in the 15 process is unusual, but this is an unusual process. 16 Clearly, issues that relate to privilege, the 17 confidential communications between individuals and 18 their solicitors, would have to be looked at with care 19 and lines drawn, but in essence, there is no good reason 20 not to have evidence from those people who are best able 21 to provide it so that they can set out what happened, 22 not only what happened, but lessons learnt from that and 23 suggestions as to change. 24 May I then move on, please, to deal with the 25 question of police involvement within this</p> <p style="text-align: center;">Page 44</p>

<p>1 investigation. Counsel to the inquiry has set out at                  2 the fifth paragraph, at page 6, the question of                  3 the criminal justice system. Mr Skelton QC says this:                  4 "The operation of the criminal justice system is not                  5 included as an issue."                  6 As we stated at the last preliminary hearing, "We                  7 anticipate that criticisms may be made of the actions of                  8 individuals and organisations where they are working                  9 within that system."                  10 First of all, and a matter that we may be able to                  11 resolve through discussion, it's somewhat unclear                  12 exactly what that means. In the interests of fairness,                  13 counsel to the inquiry is saying those individuals or                  14 organisations may need to be given the opportunity to                  15 respond to criticisms. Does that mean that there should                  16 be police witnesses called to account for the way that                  17 they either failed or indeed did deal with accounts that                  18 were provided and complaints made of child sexual abuse?                  19 And we do need some clarity about that. So many of                  20 the individuals we represent had the same problems,                  21 which is a lack of belief, a lack of investigation, so                  22 many times repeated across these different institutions.                  23 We suggest that this inquiry can have a proper and                  24 useful learning process through hearing survivors'                  25 accounts and looking at the alternative explanation that</p> <p style="text-align: center;">Page 45</p>	<p>1 to F30 and this directly denied him any prospect of                  2 accountability via the criminal justice system or                  3 otherwise.                  4 So we would suggest that where the individual                  5 survivors can set out their complaints as they have done                  6 within the various statements, and we can put forward                  7 a synthesis or summary of their points that relate to                  8 the various police forces, that the police forces be                  9 asked to and provide an account that potentially could                  10 be associated by witness evidence in relation to their                  11 role.                  12 Before I leave the question of the police, and                  13 indeed finish submissions, can we just remind ourselves                  14 of why it is so important that the police conduct their                  15 investigations properly from the start? Because the                  16 danger is that when counsel to the inquiry says the                  17 operation of the criminal justice system is not included                  18 as an issue, that it is just wiped out and we forget,                  19 therefore, about the involvement of the police in                  20 relation to an investigation.                  21 The starting point for many, if not most, civil                  22 claims will be a complaint made by a survivor of abuse                  23 to the authorities, often, and most often, to the                  24 police. That is the starting point. The police then,                  25 if they are carrying out their duties responsibly, will</p> <p style="text-align: center;">Page 47</p>
<p>1 may be capable of being provided by the various police                  2 forces.                  3 The criminal proceedings in relation to North Wales                  4 children's homes and the police culture during those                  5 investigations are of paramount importance to victims                  6 and survivors such as F43. We suggest that these police                  7 areas and forces should be asked for a position                  8 statement, essentially, a statement setting out what                  9 they suggest was the response made by their police force                  10 to the complaints made to them on their actions in                  11 relation to allegations and prosecutions, for example,                  12 in relation to the Bryn Alyn community, the North Wales                  13 children's homes. This would apply across the board to                  14 each one of these institutions.                  15 Another survivor, and inevitably I have to pick and                  16 find individuals rather than quoting everybody, but                  17 another survivor, F43 I have already mentioned, F30                  18 provides again further insight into the way that the                  19 police failed to deal with his individual claim. F30,                  20 who was at Stanhope Castle, was profoundly failed over                  21 two decades in relation to the way that the                  22 Durham Police failed to conduct their investigation                  23 adequately or, we would say, at all. There were                  24 findings made by the IPCC and admissions that the                  25 Durham Police had not fulfilled their duties in relation</p> <p style="text-align: center;">Page 46</p>	<p>1 conduct their investigation into that individual claim.                  2 They will take a statement, they will interview as                  3 necessary, they will conduct using a -- if we are                  4 looking at a young person or, these days, anybody who is                  5 making a complaint of sexual abuse, using a supported                  6 system of interviewing.                  7 They then should carry out an investigation. This                  8 means that taking that point, that complaint, on board                  9 they then carry out an investigation into what has                  10 happened, who was responsible and where the appropriate                  11 steps are capable -- in other words, where there are                  12 people that still can be identified that have not died                  13 or are not otherwise unavailable, then they consider                  14 arrest and interview through that process.                  15 This, we understand, is the starting point for                  16 a case that may be considered through the criminal                  17 justice system. What is the purpose, what is the use,                  18 that that is put towards taking a civil claim? We know,                  19 but let's analyse it so that we understand its                  20 importance within the civil justice system, that where                  21 there has been an investigation and where there has been                  22 a prosecution, the prosecution through the criminal                  23 courts is to the standard, the highest standard, which                  24 is beyond reasonable doubt.                  25 So, claim properly assessed, investigation properly</p> <p style="text-align: center;">Page 48</p>

<p>1 conducted by the police, properly prosecuted by the CPS,                  2 taken to court, a trial either before magistrates or                  3 a jury and a conviction.                  4 Taking an individual through that process, which has                  5 the vital starting point of the initial complaint being                  6 made to the police at the heart of it, means, when                  7 turning to the civil justice system, that there has been                  8 a finding made, often in these cases to that high                  9 standard. So what does that do to the civil claim?                  10 What it does to the civil claim is that most of                  11 the time, and generally, it avoids the need for there to                  12 be any litigation or considering any litigation to                  13 relates to, has this happened, was there abuse? All of                  14 that is then swept away.                  15 Now, you may be left with other aspects of a claim                  16 to be dealt with. It may well be, and it is possible,                  17 that because the limitation period is then still in                  18 question that an insurance company or solicitors acting                  19 on behalf of an institution may say, "Well, look, you're                  20 time barred on that". Well, you know our submissions on                  21 that point. It is ridiculous to have a limitation in                  22 relation to child sexual abuse claims. So put that                  23 aside.                  24 If the case has been handled thoroughly and                  25 properly, investigated properly, from the beginning</p> <p style="text-align: center;">Page 49</p>	<p>1 where they feel able to make a complaint through the                  2 criminal justice system and that is often -- that is the                  3 starting point for a case in the civil courts.                  4 I started by accepting that this inquiry needs to                  5 handle the way that it deals with its inquiry period, be                  6 able to deal with matters in a timely fashion, we accept                  7 that. But be careful, please, not to overly limit this                  8 investigation because by doing so, in fact, you will be                  9 throwing out a starting point for civil litigation if                  10 you don't look at the involvement of the police forces.                  11 So what we suggest is a practical way forward is an                  12 understanding of the issues that relate to the police                  13 forces and their handling of cases through the use of                  14 the statements made by the survivors that we represent                  15 and, indeed, other survivors represented by other                  16 parties before this inquiry; that the police forces                  17 provide then a response through a position statement                  18 setting out what they have done and what they would                  19 suggest has happened, either accepting problems or not,                  20 and then this inquiry can make its determination as to                  21 how far evidence should be heard. This also clearly                  22 reflects upon the question of the involvement of                  23 the Home Office which has general control over this                  24 area.                  25 The Home Office can't be avoided. It has control</p> <p style="text-align: center;">Page 51</p>
<p>1 through the criminal justice system and if it is then                  2 prosecuted, it forms the basis then of the claim in the                  3 civil jurisdiction.                  4 What if it isn't handled that way? What if the                  5 police failed to conduct their investigation properly?                  6 What if the very findings, madam, that you made in                  7 Rotherham that police forces were failing to deal with                  8 claims properly is a situation of so many people that we                  9 represent? In that situation, then the civil justice                  10 system has a weak and sometimes impossible to overcome                  11 starting point. In that situation, where the limitation                  12 period is applying, then the limitation period is                  13 something that will be prayed in aid before the civil                  14 justice system because it will be said, "Hang on, you                  15 should have complained ages ago. The police haven't put                  16 anything forward. There's been no prosecution".                  17 So where counsel to the inquiry, and we understand                  18 the reasons why, is seeking to try and cut down what is                  19 required to handle this particular investigation in the                  20 period of time set aside for it, it is in fact -- my                  21 learned friends are in fact, we respectfully say, wrong                  22 in seeking to avoid the criminal justice system and its                  23 implications on the civil justice system, because they                  24 are linked. There is no going away from this. Someone                  25 that's been abused may find themselves in a situation</p> <p style="text-align: center;">Page 50</p>	<p>1 over the police and it has control over these many                  2 institutions and there needs to be an answer that deals                  3 with its position across the board through the civil                  4 justice system claims and through the claims made by so                  5 many of the survivors we represent about what happened                  6 to them, in other words, the Home Office failures and                  7 mismanagement of these institutions.                  8 So in making these submissions, I won't apologise                  9 for the length, we represent a lot of people. We hope                  10 it has been helpful in putting forward the perspective                  11 of the core participants we represent across this                  12 particular investigation as it is then going to be gone                  13 through this year, and obviously some of these themes we                  14 won't be able to develop fully until we get to the three                  15 weeks of the investigation and then we consider what is                  16 going to be the next stage for accountability and                  17 reparations in the future.                  18 THE CHAIR: Thank you, Mr Stein. We will now take a break                  19 and resume at 12.05 pm.                  20 (11.52 pm)                  21 (A short break)                  22 (12.07 pm)                  23 THE CHAIR: Mr Garsden?                  24                  25</p> <p style="text-align: center;">Page 52</p>

<p>1 Submissions by MR GARDEN                  2 MR GARDEN: Good morning, ma'am. Could I first of all                  3 start by apologising for keeping the tribunal waiting                  4 this morning. It was a combination of being the first                  5 day after the bank holiday, one train being cancelled at                  6 7.15 am and the second train being eight minutes late.                  7 So apologies.                  8 THE CHAIR: Fine.                  9 MR GARDEN: I think the submissions that we are being                  10 invited to make now simply relate to generic issues and                  11 I will try to limit my submissions to those, but of                  12 course the individual case studies and generic issues do                  13 overlap.                  14 I act on behalf of B19, who is a victim of                  15 St Aidan's. I also arguably wear two other hats. One                  16 is the lead solicitor in charge of the St Aidan's and                  17 St Vincent's group litigation. I just pause there to                  18 say that I did apply for core participant status at an                  19 early stage in this module but that application was                  20 declined, I think, by your predecessor, Lowell Goddard,                  21 as indeed did Mr Uppal, who was the lead solicitor in                  22 charge of the North Wales litigation.                  23 The other hat I wear is President of the Association                  24 of Child Sexual Abuse Lawyers, but of course I did                  25 attend, together with Mr Collins and others, a seminar,</p> <p style="text-align: center;">Page 53</p>	<p>1 There was an application made in that litigation for                  2 group litigation status, but that was refused,                  3 a decision that may be worth examining, because of                  4 the particular rules appertaining to group litigation in                  5 the Civil Procedure Rules.                  6 Obviously, that's something that I can develop with                  7 Mr Skelton if the need arises.                  8 The other point was made by Mr Stein. He was                  9 saying, as was indeed Mr Khan, that there should be an                  10 investigation of the criminal justice system because of                  11 the way in which litigants or victims or survivors, or                  12 however you term it, are dealt with by the police.                  13 A very relevant point to civil litigation is the                  14 conflict between the criminal process and the civil                  15 justice process. If I can just explain?                  16 What the police want when they're doing their                  17 investigation is raw evidence. They do not want                  18 a complainant who has first of all instructed civil                  19 lawyers because it opens the door to the accused                  20 cross-examining the victim on the basis that he's only                  21 interested in money, whether or not he is -- and I think                  22 I have already said in the civil justice seminar that                  23 a lot of our clients are interested in justice, very,                  24 very few of them are interested primarily in                  25 compensation. Obviously they believe they deserve some</p> <p style="text-align: center;">Page 55</p>
<p>1 a very useful two-day seminar, on civil justice.                  2 What I don't quite understand is what the linkage                  3 between that seminar and this evidence is. Because, of                  4 course, a lot of very good points were made and there                  5 has been a paper on that point, but whether or not we                  6 will have reliance on that paper when considering                  7 evidence in this module later in the year, I don't know,                  8 and that's perhaps something that can be clarified.                  9 Because, of course, there may be points that are                  10 developed as a result of these submissions, the evidence                  11 for which can be accessed in those papers, as indeed is                  12 true of the criminal injuries seminar.                  13 I'd like to pick up on points made earlier today,                  14 because I've made submissions and there are lots of                  15 other very useful submissions. Firstly, Mr Collins                  16 helpfully said that we ought to look at the way group                  17 litigation is considered today. It may interest you to                  18 know that over the last 25 years I have been the lead                  19 solicitor in nearly 25 different examples of group                  20 litigation, and my firm, Simpson Millar, is currently                  21 conducting an 850-claimant piece of group litigation                  22 against Manchester City Council. That litigation is                  23 nearing its end, but it isn't finished yet. We are also                  24 running another small piece of group litigation which                  25 may be available for comment.</p> <p style="text-align: center;">Page 54</p>	<p>1 compensation for what happened to them, but the way in                  2 which the criminal justice system and the civil justice                  3 system overlap is quite interesting, because if we sit                  4 on our hands and do nothing, as we should do to allow                  5 the criminal process to reach its conclusion, and that                  6 criminal process takes two years, then by the time the                  7 civil system hears the evidence, there will be criticism                  8 from the defendants' lawyers that we have sat on our                  9 hands and done nothing and not been expeditious. So                  10 that is a problem that may be interesting to examine.                  11 The other point Mr Stein made was whether or not                  12 there should be evidence given by civil lawyers who have                  13 taken part of the group litigation process. Personally,                  14 I would have no objection to assisting the inquiry in my                  15 views on the 14-year group litigation process that was                  16 St Vincent's and St Aidan's and what I think about it                  17 and I would commend that submission that the same should                  18 be done of the defendants. But that is more connected                  19 with the submissions I would like to make in connection                  20 with the modules. So I won't say any more about that at                  21 the moment.                  22 THE CHAIR: Thank you, Mr Garsden. Mr Pleming?                  23 Submissions by MR PLEMING                  24 MR PLEMING: Madam, I represent Zurich Insurance plc. You                  25 should have a letter written by solicitors for Zurich</p> <p style="text-align: center;">Page 56</p>

<p>1 dated 1 May 2018 setting out its brief submissions. As                  2 we say in that letter, Zurich is keen to continue to                  3 assist the inquiry on the various issues which it has                  4 identified for investigation and look forward to                  5 receiving further details in due course.                  6 In the letter, two main points are made. One is to                  7 reserve the position in relation to the submissions that                  8 may be made by core participants, and we have now read                  9 and considered the written submissions and listened with                  10 care to the submissions made orally this morning.                  11 We accept, of course, that there are serious issues                  12 for the inquiry to investigate and to resolve and Zurich                  13 understands the difficulties faced by claimants involved                  14 in the compensation side of their claims when legal                  15 issues and lawyers and insurers become involved.                  16 The second point we made is that we didn't have any                  17 comments in relation to the written submissions made by                  18 Mr Skelton as counsel to the inquiry. We have heard                  19 those written submissions expanded this morning, and it                  20 seems to us that paragraph 13 does cover the ground in                  21 terms of the list of issues set out at page 5 of those                  22 written submissions, bearing in mind, as explained over                  23 the page, that the list of issues is not to be seen as                  24 exclusive and there is to be some flexibility. That                  25 seems to us to cover the various points made in the</p> <p style="text-align: center;">Page 57</p>	<p>1 over 25 years now and in terms of employees it's now                  2 a very small organisation, and all the people who dealt                  3 with the claims at the time that they were being handled                  4 have now left MMI and the people who are currently with                  5 MMI were not there at the time.                  6 The fourth point I would make is that, even though                  7 this investigation has been running for some time now,                  8 MMI is still somewhat in the dark about what will be                  9 required of it in preparation for the public hearings                  10 in November and December. We have provided the                  11 disclosure that's been requested of us to date. We                  12 don't know if further disclosure is going to be required                  13 of us. We don't know if we will need to provide                  14 a statement and, if we will be providing a statement,                  15 importantly, what issues that will cover. And we don't                  16 know whether we will be asked to attend to give live                  17 evidence at the hearings. Those issues, for a small                  18 organisation which needs to marshal its limited                  19 resources with efficiency, are matters of some concern.                  20 Thank you.                  21 THE CHAIR: Thank you, Mr Webb-Jenkins. Mr Hough?                  22 Submissions by MR HOUGH                  23 MR HOUGH: Chair, members of the panel, first of all, thank                  24 you for allowing me to make these submissions from                  25 a seated position because of injury.</p> <p style="text-align: center;">Page 59</p>
<p>1 course of submissions this morning. So apart from                  2 repeating the content of that letter, madam, I have                  3 nothing to add on behalf of Zurich.                  4 THE CHAIR: Thank you, Mr Fleming. Mr Webb-Jenkins?                  5 Submissions by MR WEBB-JENKINS                  6 MR WEBB-JENKINS: Good afternoon, chair. I am here on                  7 behalf of Municipal Mutual Insurance. We have lodged                  8 short submissions which hopefully are self-explanatory,                  9 so I don't propose to go through those again.                  10 Following those short submissions, I just want to                  11 make four short points. The first is that MMI's                  12 approach to this investigation can be pithily summarised                  13 as follows: it intends to comply with all its legal                  14 responsibilities; it intends to demonstrate openness,                  15 honesty and integrity in the way that it interacts with                  16 the inquiry; and it intends only to incur those costs                  17 which are necessary for the performance of its statutory                  18 duties and for the protection of the interests of its                  19 scheme creditors.                  20 Secondly, MMI asserts in relation to civil                  21 litigation that insurers should be allowed to                  22 investigate claims properly so that they can be dealt                  23 with within the bounds of its insurance contracts.                  24 Thirdly, I would make the point that MMI is in                  25 runoff. It has not been an active insurance company for</p> <p style="text-align: center;">Page 58</p>	<p>1 As you know, I represent Royal &amp; Sun Alliance which                  2 is an insurance company that's provided liability                  3 insurance for a range of institutions responsible for                  4 children. That kind of insurance supplies the funds                  5 from which compensation payments are made in civil                  6 claims. That is the extent of our interest and                  7 involvement.                  8 RSA is a core participant for two reasons. First,                  9 because it was the insurer of some institutions                  10 featuring in two of the case studies; and, secondly, as                  11 an insurer of homes, schools, and so on, it can provide                  12 information and views as to how the civil justice system                  13 functions.                  14 We are grateful for the elaboration by Mr Skelton of                  15 the purpose of the investigation and also his                  16 reiteration of the fact that this purpose is to be                  17 achieved through a number of means, including the issues                  18 paper process, the seminar process, the research project                  19 and these case studies.                  20 Against that background, we'd like shortly to                  21 develop the submissions in our document, but in broad                  22 terms, we support the approach of counsel to the inquiry                  23 subject to a few points I shall make which may                  24 themselves now be common ground.                  25 We don't address subjects obviously which have no</p> <p style="text-align: center;">Page 60</p>

<p>1 relevance to RSA.                  2 As regards the progress of the investigation, we                  3 would simply like to put on record that RSA has                  4 dedicated significant time and money to assisting the                  5 inquiry and we intend to continue to do so.                  6 Specifically, in the seminar process, RSA provided                  7 a detailed response to the issues paper on civil justice                  8 and sent a senior complex claims and strategy director                  9 to participate in that seminar. In the seminar, we made                  10 positive proposals for reform.                  11 Secondly, as to disclosure, RSA has provided                  12 schedules of information as requested and has agreed                  13 with the inquiry a process for disclosure. The exercise                  14 will be large and it will be costly for RSA, but we                  15 recognise its importance.                  16 We have supplied summaries of the Bryn Alyn and                  17 Nugent Care group actions and we have offered                  18 proactively to make available an appropriate person from                  19 RSA to give evidence about the handling of abuse claims                  20 as of today.                  21 As to scope, we generally support the comprehensive                  22 list of issues at paragraph 13 of Mr Skelton and                  23 Ms Williams' submissions, and we accept the five general                  24 considerations they identify at paragraph 14. We only                  25 wish to make three further general points which are</p> <p style="text-align: center;">Page 61</p>	<p>1 representative of how the system functions today. They                  2 involved large pieces of group litigation which took                  3 years to resolve, very largely because the appellate                  4 courts made fundamental changes to the law during the                  5 litigation which required all parties to reformulate                  6 their cases. Those changes seriously prolonged the                  7 cases and, as I say, the case summaries we have                  8 submitted illustrate how that happened.                  9 We, of course, accept the value of the inquiry                  10 hearing the experiences of victims and survivors who                  11 were involved in these high-profile cases. We also                  12 understand that it's been necessary to choose cases from                  13 the past because present cases raise their own                  14 difficulties about hearing evidence concerning ongoing                  15 civil claims. But we make two respectful submissions.                  16 First of all, there should be at least some evidence                  17 of how the system now functions after the law was                  18 clarified in those cases, because it is exceptionally                  19 rare nowadays for a victim to have to go through a very                  20 long piece of litigation, and most cases settle long                  21 before a trial. It will be valuable to hear how that                  22 happens today.                  23 Secondly, the evidence about victims' experiences of                  24 the group actions should be heard in the context of some                  25 evidence explaining why the actions took years to</p> <p style="text-align: center;">Page 63</p>
<p>1 sketched in our document.                  2 First of all, as submissions from the victims and                  3 survivors have stressed, accountability and reparations                  4 is a much wider concept than monetary compensation.                  5 Accountability can be established through the criminal                  6 justice system and reparation may include support                  7 services and appropriate apologies. Furthermore, civil                  8 claims are just one means of compensation. Criminal                  9 compensation is important, not least because some                  10 abusers and homes have no insurance and no other means                  11 of meeting civil claims. So although it is right that                  12 the public hearing will scrutinise the civil claims                  13 process, we submit that evidence should also be called                  14 to cover the other two important subjects of                  15 the investigation: criminal compensation and access to                  16 support services.                  17 Our second general point, and one we apprehend has                  18 been accepted, is that the primary purpose in addressing                  19 the civil justice system is to consider how well the                  20 existing system functions in the context of abuse                  21 claims. As our document makes clear, and as our                  22 summaries of the case studies in which we were involved                  23 elaborate, the case studies of which we have                  24 knowledge -- North Wales and St Aidan's and                  25 St Vincent's -- are, in our submission, not</p> <p style="text-align: center;">Page 62</p>	<p>1 resolve. Their experiences are important, but the                  2 context is also, we submit, valuable.                  3 The third general point we would make concerns the                  4 targeted and proportionate approach which counsel to the                  5 inquiry rightly says should be taken. We agree with                  6 them that this investigation can't resolve disputed                  7 factual issues about the abuse which took place at the                  8 institutions in the case studies. Although, of course,                  9 in many cases abuse has already been proven in criminal                  10 or civil cases.                  11 We also respectfully question whether this                  12 investigation can realistically carry out a full inquiry                  13 into how each of the group actions was conducted on both                  14 sides. Of course, if that is the investigation, so be                  15 it; RSA would be content to explain and justify its own                  16 conduct, as no doubt would the solicitors who acted for                  17 the victims. But we doubt that a hearing lasting a few                  18 weeks can minutely examine all the stages of all the                  19 proceedings in all the case studies or enable findings                  20 fairly to be made about how those pieces of litigation                  21 were conducted on each side.                  22 The better approach, we suggest, with a view to                  23 learning lessons, is to receive, first of all, the                  24 evidence of the victims and survivors about their                  25 experiences; secondly, some evidence about the</p> <p style="text-align: center;">Page 64</p>



<p>1 chronology and the course of each piece of litigation;                  2 and, thirdly, some evidence about how claims are now                  3 handled. Such an approach, coupled with the other                  4 strands of this investigation, would enable the inquiry                  5 to see what lessons can be learned and what                  6 recommendations made.                  7 Finally, chair, members of the panel, a few short                  8 points about recommendations. In its interim report,                  9 the inquiry has made some recommendations which are                  10 straightforward and sensible, encouraging the ABI to                  11 consider the practicality of a register of public                  12 liability insurers, and, secondly, supporting additional                  13 protections for victims giving evidence in civil cases.                  14 Other possible reforms have been mooted in some of                  15 the submissions for today's hearing, and we respectfully                  16 suggest they can only properly be addressed after full                  17 consideration of the submissions and evidence in the                  18 public hearing and that some may also require additional                  19 research.                  20 Take 3, for example. First, some have encouraged                  21 the inquiry to recommend a redress scheme, but as you                  22 will recall from the seminar process, there have been                  23 many different kinds of scheme tried around the world                  24 and each of them has had its own limitations. Whether                  25 to recommend any kind of redress scheme and what kind</p> <p style="text-align: center;">Page 65</p>	<p>1 THE CHAIR: Thank you, Mr Hough. Mr Ford?                  2 MR FORD: Thank you. Thank you very much.                  3 THE CHAIR: Thank you. Mr Greatorex?                  4 Submissions by MR GREATOREX                  5 MR GREATOREX: Madam, members of the panel, I represent                  6 Devon County Council. The issues and approach proposed                  7 in the written submissions by counsel to the inquiry, so                  8 far as they are relevant to us, to Devon County Council,                  9 and its limited involvement in this investigation appear                  10 to be sensible, particularly given the need for                  11 a targeted and proportionate approach to the stated                  12 scope of this investigation.                  13 I simply place on record that if and when the                  14 inquiry proposes to consider different issues or take                  15 a different approach, we trust that fair notice of this                  16 will be given.                  17 Madam, I don't propose to respond to or make                  18 submissions about the submissions made by other core                  19 participants unless we are invited to do so by the                  20 inquiry.                  21 THE CHAIR: Mr Payne?                  22 MR PAYNE: No submissions.                  23 THE CHAIR: Thank you. Ms Studd?                  24                  25</p> <p style="text-align: center;">Page 67</p>
<p>1 requires very careful thought.                  2 Secondly, a submission has been made about making it                  3 compulsory for institutions to obtain insurance on                  4 minimum terms. However, while such a rule might expand                  5 the market for insurers, and you might think that                  6 insurers would favour it, we recognise that it could                  7 increase the cost of premiums and make some small                  8 businesses nonviable.                  9 Thirdly, submissions have been made about the                  10 statutory limitation period and it's been attacked as                  11 too rigid. However, the existing law does allow the                  12 limitation period to be extended indefinitely under                  13 section 33 of the Limitation Act where that's in the                  14 interests of justice, and any reform of this complex                  15 area of law which has been considered on many occasions                  16 by the courts would require very careful consideration                  17 of the evidence about how the law works today in                  18 practice and what the ramifications of any specific                  19 changes might be. Even the Scottish changes, to which                  20 reference has been made, do not represent a simple                  21 abolition of the limitation period, but a more                  22 structured set of reforms.                  23 So those are the general submissions that we have.                  24 Our submissions on the individual case studies will be                  25 very short.</p> <p style="text-align: center;">Page 66</p>	<p>1 Submissions by MS STUDD                  2 MS STUDD: Madam, I make submissions on behalf of Devon and                  3 Cornwall Police this morning. Really, just three short                  4 points. Obviously, police forces have to allocate                  5 resources appropriately, particularly where those                  6 resources are precious. Police forces have, I know,                  7 assisted you greatly in other strands of your                  8 investigations and, if required to do so, be under no                  9 illusion, they will assist you here too. But we want to                  10 reassure the inquiry that Devon and Cornwall Police will                  11 assist this inquiry in whatever way they can with the                  12 provision of evidence and documents whether they                  13 continue as core participants or not.                  14 The issues which are of concern to the core                  15 participants and have been raised before you today have                  16 been dealt with in other strands of your inquiry.                  17 Although not involving these particular core                  18 participants, the issues that they raise have been the                  19 subject of other investigations.                  20 We are concerned about the uncertainty expressed by                  21 your counsel in paragraph 14(1) of their submission that                  22 "where, in the course of this inquiry, other issues may                  23 become apparent or gain greater prominence during the                  24 individual case studies, if this occurs, the inquiry may                  25 wish to include them within the scope of</p> <p style="text-align: center;">Page 68</p>

<p>1 the investigation", because we would say it is really                  2 important for all core participants that they know the                  3 nature and scope of the inquiry before it commences, and                  4 it would be wrong to use that paragraph of your                  5 counsel's submission to somehow include the criminal                  6 investigation and the criminal process within this                  7 investigation partway through the oral hearings                  8 in November.</p> <p>9 Having seen what has been put by Mr Beer QC in the                  10 written submission about wishing to have the core                  11 participant status removed from Devon and Cornwall, that                  12 perhaps has to stay on one side for the moment, because                  13 what is really important to Devon and Cornwall is that                  14 the scope of the investigation, insofar as it involves                  15 the police, is made very clear so that those core                  16 participants who represent police forces can make                  17 a careful analysis of whether resources should be spent                  18 attending those oral hearings or not.</p> <p>19 THE CHAIR: Thank you, Ms Studd. Mr Sheldon?                  20 MR SHELTON: Thank you, chair. I have no submissions to                  21 make.                  22 THE CHAIR: Mr Skelton?                  23 Submissions by MR SKELTON                  24 MR SKELTON: Thank you, madam. I won't respond to every                  25 point that's been made. I don't think I need to today.</p> <p style="text-align: center;">Page 69</p>	<p>1 potential redress schemes, changes to the law of                  2 limitation. Those are issues which no doubt will be                  3 raised during the course of the public hearings during                  4 the case studies, but they are really issues for                  5 development after the case studies have concluded, by                  6 whichever means you see fit. We will start to address                  7 that issue as and when the case studies have concluded.</p> <p>8 Mr Stein makes a valuable point about the relevance                  9 of police actions to the processes of civil justice and                  10 criminal compensation. That is not a point that is lost                  11 on us and is no doubt not lost on you. It was raised at                  12 the seminars which occurred previously, which I have                  13 adverted to, and it does justify some examination of how                  14 victims and survivors came into contact with the police                  15 during the course of the hearing so that you can                  16 understand better the process of civil justice, but, as                  17 I say, it is not intended to conduct a root-and-branch                  18 investigation of the criminal justice system.</p> <p>19 Madam, the point made by Mr Collins about a further                  20 case study, at this late stage, I would not be advising                  21 in favour of adding another case study. I think the                  22 point he makes is really you ought to be receiving                  23 evidence about present practices. That is one which we                  24 endorse and indeed I think everyone endorses, and that                  25 should come out through the existing case studies,</p> <p style="text-align: center;">Page 71</p>
<p>1 May I just make these few observations, though.                  2 First of all, we will look at the issues of                  3 witnesses and disclosure as and when the scope has been                  4 set, and several of the issues which have arisen during                  5 submissions will be determined in light of your decision                  6 on scope.</p> <p>7 For example, the issue of the police application, if                  8 that is going to be made, for de-designation as a core                  9 participant. The appropriate time to revisit that will                  10 of course be later in the investigation.</p> <p>11 A point Mr Stein made about evidence of the facts of                  12 the abuse, you will, madam, receive a large number of                  13 statements from victims and survivors which will set out                  14 their accounts, their stories, of what happened to them                  15 in the various institutions with which they are                  16 concerned, and in which they set out in as much detail                  17 as they wish the facts of their abuse and the                  18 allegations that they make. That evidence will be                  19 before you and some of it will be elicited at the public                  20 hearings, but, as I have indicated, what will not be                  21 made in due course is findings of fact in relation to                  22 that abuse. I hope that message is understood.</p> <p>23 So far as the issue of recommendations goes, we are                  24 not of course at that stage yet. Mr Stein and other                  25 core participants have rightly raised the issue of</p> <p style="text-align: center;">Page 70</p>	<p>1 I hope, because evidence will be heard from lawyers,                  2 insurers and the like about such practices.</p> <p>3 So far as the points made by Mr Hough are concerned,                  4 in general, there seems to be a large measure of                  5 agreement. We agree in particular with the need for                  6 careful thought about future recommendations. We agree                  7 in principle that the evidence you receive must be put                  8 in context so that historical practices aren't viewed                  9 artificially as being present practices. And we agree                  10 about the issue of proportionality and it is a matter                  11 for you, in your discretion, to determine which factual                  12 issues require resolution for the purpose of this                  13 investigation and which don't and whether those issues                  14 can be fairly resolved. We are concerned, as always, to                  15 act fairly, and so, where criticisms are made of                  16 organisations, those organisations will ordinarily be                  17 given an opportunity to respond to those criticisms even                  18 if they are not going to form the basis of any findings.</p> <p>19 Mr Garsden queried the role of the seminars in                  20 informing the inquiry's work. The seminars and indeed                  21 the issues papers which preceded them will be a valuable                  22 point of reference for you in developing the issues for                  23 the case studies and there will be further                  24 work/research, as Mr Hough points out, after the case                  25 studies, which will continue to gather information on</p> <p style="text-align: center;">Page 72</p>

<p>1 those issues.</p> <p>2 So far as Mr Webb-Jenkins is concerned, he made the</p> <p>3 point about the need for clarity of what evidence is</p> <p>4 going to be required of his clients, and indeed that</p> <p>5 must be something which applies across the board to</p> <p>6 those institutions and individuals. Of course, the</p> <p>7 right way of going about this is to set the scope and</p> <p>8 then make the requests for the finalisation of witness</p> <p>9 evidence and disclosure and that is the phase that we</p> <p>10 will enter immediately when you have made your decisions</p> <p>11 on the scope of this investigation.</p> <p>12 I hope I have picked up most of the points about</p> <p>13 the -- that were made by the core participants. I won't</p> <p>14 repeat the submissions I made earlier, which of course</p> <p>15 stand as far as the general scope of the investigation</p> <p>16 goes.</p> <p>17 Discussion re case studies</p> <p>18 Submissions by MR SKELTON</p> <p>19 MR SKELTON: Madam, may I now turn to the individual case</p> <p>20 studies? I will deal with them each in turn, but</p> <p>21 I don't anticipate that there will be a great deal more</p> <p>22 to be said other than the general submissions that</p> <p>23 I have already made.</p> <p>24 I will deal with North Wales first, if I may. To</p> <p>25 recap, North Wales is notable for the widespread</p> <p style="text-align: center;">Page 73</p>	<p>1 that litigation. There may be some statistical evidence</p> <p>2 that can be provided about things like costs and damages</p> <p>3 and so on, as well as more general information about the</p> <p>4 consequences of adversarial litigation. You have seen</p> <p>5 what we have said in 6(5) of our submissions.</p> <p>6 In terms of the progress towards identifying</p> <p>7 evidence and so on, six of the nine -- well, there are</p> <p>8 ten people who are potentially core participants, nine</p> <p>9 of whom already are, and most of the statements have</p> <p>10 been provided. The only reason there are statements</p> <p>11 outstanding is because of recent funding permissions and</p> <p>12 so on. So we expect to be able to assist with the</p> <p>13 evidence, because you are working towards -- you are</p> <p>14 defining the scope of it, in the near future.</p> <p>15 I don't think there is anything else that needs to</p> <p>16 be added at this stage. I will sit down. Thank you.</p> <p>17 MR SKELTON: Mr Collins?</p> <p>18 MR COLLINS: Ma'am, I don't think there is anything I can</p> <p>19 usefully add. I think I have expressed the observation,</p> <p>20 in my submission, about what is actually happening on</p> <p>21 the ground as we speak.</p> <p>22 MR SKELTON: Mr Khan?</p> <p>23 MR KHAN: Nothing to add, thank you.</p> <p>24 MR SKELTON: Mr Stein?</p> <p>25</p> <p style="text-align: center;">Page 75</p>
<p>1 child abuse that took place in a large number of local</p> <p>2 authority and private institutions over a period of</p> <p>3 decades, and this abuse led to criminal proceedings and</p> <p>4 was investigated by both the Jillings and Waterhouse</p> <p>5 Inquiries.</p> <p>6 In North Wales, scandal was also the subject of</p> <p>7 complex civil litigation, including several judgments by</p> <p>8 the High Court and the Court of Appeal and the issues of</p> <p>9 insurance cover, statutory time limits and the</p> <p>10 assessment of damages were critical within that</p> <p>11 litigation. We propose that the case study is focused</p> <p>12 on each of those issues and how they impacted on the</p> <p>13 experiences of victims and survivors. So the litigation</p> <p>14 in those cases is the primary issue for investigation in</p> <p>15 that case study as we propose it. You may now hear from</p> <p>16 those core participants who wish to say something about</p> <p>17 that particular case study, starting with Mr Simblett.</p> <p>18 THE CHAIR: Mr Simblett?</p> <p>19 Submissions by MR SIMBLETT</p> <p>20 MR SIMBLETT: Madam, sorry not to have stood up earlier. It</p> <p>21 was unintentional.</p> <p>22 In terms of the North Wales aspect of it,</p> <p>23 Uppal Taylor had 60-plus clients in litigation</p> <p>24 surrounding that, and would hope to be able to assist</p> <p>25 you in significant ways about the twists and turns in</p> <p style="text-align: center;">Page 74</p>	<p>1 Submissions by MR STEIN</p> <p>2 MR STEIN: Only very briefly. The inquiry will be aware</p> <p>3 that F43's abuse was the subject of a police</p> <p>4 investigation. We emphasise that this is one of</p> <p>5 the reasons why there is a need to ensure that there is</p> <p>6 an answer from the police as regards the litigation that</p> <p>7 was then conducted and in the way that it was then dealt</p> <p>8 with so that F43's statement as to the way that his</p> <p>9 complaints were dealt with can be looked at in the</p> <p>10 round.</p> <p>11 It is perhaps -- it is one of the examples that</p> <p>12 should be looked at with some care. Essentially, what</p> <p>13 happened, as the inquiry knows from page 42, as F43 sets</p> <p>14 out, the social services and the police were, we</p> <p>15 suggest, aware of the abuse that he was suffering, but,</p> <p>16 sadly, the position is that he was still essentially</p> <p>17 left in the hands of the abuser. So it is an important</p> <p>18 aspect of F43's account to realise and understand what</p> <p>19 has actually happened to him and the way that he was</p> <p>20 dealt with.</p> <p>21 THE CHAIR: Thank you, Mr Stein.</p> <p>22 MR SKELTON: Mr Fleming?</p> <p>23 MR PLEMING: Madam, nothing to add.</p> <p>24 MR SKELTON: Mr Webb-Jenkins?</p> <p>25 MR WEBB-JENKINS: Nothing to add, chair.</p> <p style="text-align: center;">Page 76</p>

<p>1 MR SKELTON: Finally, Mr Hough?                  2 MR HOUGH: We just direct the panel to paragraphs 10 and 11                  3 of our submissions and have nothing to add.                  4 MR SKELTON: Sorry, I said "finally", but Mr Garsden, behind                  5 me, quite rightly reminds me.                  6 Submissions by MR GARSDEN                  7 MR GARSDEN: Thank you, Mr Skelton. I intentionally didn't                  8 make submissions about the individual case studies in my                  9 earlier address, and I will be brief.                  10 One or two points. It was interesting to read in                  11 RSA's submissions that the principal reason for the                  12 delay in the St Aidan's and the St Vincent's litigation                  13 was the developing changes in the law. In my                  14 submission, there are many other considerations that                  15 ought to be investigated, and I have listed them (a) to                  16 (i).                  17 When deciding how to conduct litigation of this                  18 nature, one has to consider the issues of insurance and                  19 the impact of the litigation upon insurance premiums, as                  20 has been outlined.                  21 (b) the advice of lawyers from those acting to the                  22 insurers and also to the clients, the local authority.                  23 (c) the legal uncertainty, as has been outlined.                  24 (d) most importantly, perhaps, the sensitivity of                  25 the litigation and the issues and needs and feelings of</p> <p style="text-align: center;">Page 77</p>	<p>1 into. I'm sure that hasn't escaped Mr Skelton's                  2 attention, knowing him as I do.                  3 In the north-west child abuse cases that are                  4 asserted to in the submissions, there were not only the                  5 defendants St Vincent's and St Aidan's, but also the                  6 defendants Liverpool City Council and National                  7 Children's Homes who were representing three defendants,                  8 one being Danesford in Congleton and the other two being                  9 Greystone Heath in Warrington and Dyson Hall in                  10 Liverpool.                  11 In my submissions I have said it might be                  12 instructive to look at why it was that those two                  13 defendants, one of whom I don't think was insured, the                  14 other of whom was, settled all their claims very early                  15 in the litigation, after one or two or three years, yet                  16 it was only the St Aidan's and St Vincent's defendants                  17 that determinedly pursued their claims all the way to                  18 the Court of Appeal and beyond.                  19 My final submission relates to submissions of                  20 Mr Stein's clients, because obviously I was the lead                  21 solicitor in that litigation, and now he is represented                  22 by Mr Stein. There is a comment made in the                  23 submissions -- I'm not sure how important they are, but                  24 they relate to my firm. Obviously, I don't know who F42                  25 is, and I appreciate that there are anonymity</p> <p style="text-align: center;">Page 79</p>
<p>1 the claimants and how that may impact -- the delay may                  2 impact upon their psychology.                  3 (e) the instructions of insurers, and I think                  4 Mr Stein has very helpfully pointed out that sometimes                  5 there can be a conflict between the position of                  6 insurance companies and the position of local                  7 authorities who, in my experience, when there is no                  8 insurance, are far more willing to do things like                  9 provide apologies and act in the interests of                  10 the welfare of the child rather than the interests of                  11 insurer clients, and in the Manchester litigation there                  12 is a good example of that, because part of the case was                  13 insured and part wasn't.                  14 (f) the mental health of the claimants and how                  15 prolonging the litigation may make their mental health                  16 worse and the impact upon the various public services                  17 that is thereby caused.                  18 (g) the wishes and feelings of the claimants, in any                  19 event.                  20 (h) the cost of the litigation: whether or not to                  21 settle because of the cost of litigating it all the way                  22 to trial as opposed to settling early.                  23 (i) the wishes, perhaps on a political level, of                  24 the local authority or the charity.                  25 So there are many, many aspects that need looking</p> <p style="text-align: center;">Page 78</p>	<p>1 restrictions relating to disclosure of his identity, but                  2 it may be helpful if you confirm that Mr Stein is able                  3 to tell me who F42 is, because then I can more                  4 meaningfully respond and deal with those                  5 representations.                  6 It wouldn't normally be a problem, because obviously                  7 he has instructed us as lead solicitors, and I'm sure                  8 I know who he is. It is merely a technical point. If                  9 you feel you need to make a decision on that, then                  10 I would urge you to do so.                  11 THE CHAIR: Thank you, Mr Garsden.                  12 Submissions by MR SKELTON                  13 MR SKELTON: Madam, I'm not going to, again, address you on                  14 the general matters raised by the other core                  15 participants. May I just raise two issues, though, one                  16 in response to the point made by Mr Garsden. He raises                  17 an important issue. If it is not possible for someone                  18 to respond to a request for evidence without knowing the                  19 particular identity, then the inquiry will have to                  20 consider whether it is necessary to provide that                  21 identity on a case-by-case basis and Mr Garsden gives                  22 a good example of where it might be appropriate in the                  23 circumstances.                  24 Secondly, my mistake, I should have clarified we are                  25 just dealing with the individual case studies and</p> <p style="text-align: center;">Page 80</p>

<p>1 I think Mr Garsden stood up really to talk to you about 2 St Aidan's and St Vincent's. We are coming to that in 3 due course. At the moment, I was just dealing with the 4 North Wales homes.</p> <p>5 May I now, having said that, turn on to Forde Park. 6 Again, I will invite just the core participants that are 7 involved with that particular case study to speak, if 8 I may. Forde Park Approved School was managed by the 9 Home Office and subsequently by Devon County Council. 10 Allegations of abuse were the subject of a police 11 investigation that led to criminal convictions. Civil 12 claims were also brought, but ultimately concluded by 13 agreement before trial.</p> <p>14 We, your counsel, propose that the case study is 15 focused on the overall management of the Forde Park 16 civil litigation and the litigation process itself, in 17 particular how the claims were settled and how that 18 settlement was perceived by the victims and survivors. 19 You may now wish to hear from core participant 20 representatives, and may I start in this regard with 21 Mr Stein?</p> <p>22 Submissions by MR STEIN 23 MR STEIN: I'm very grateful. The position that's been 24 outlined by Mr Garsden I will just deal with very 25 discretely for a moment. It relates to the Bryn Alyn</p> <p style="text-align: center;">Page 81</p>	<p>1 Just to give a little -- and I mean only a little -- 2 bit more light into this, it seems that what has 3 happened is that documentation relevant to their claims, 4 civil claims, relevant to this inquiry, has gone 5 missing. So as an example, F16 and F21 and others have 6 looked into whether this documentation is available, and 7 they have established, and we have seen and looked at 8 with Mr Smith, solicitor to the inquiry, dockets that 9 seem to suggest that files should be available but the 10 files are not actually containing any material.</p> <p>11 Now, it is possible, and indeed perhaps likely, that 12 Devon and Cornwall County Council and its solicitors 13 withdrew documentation that relates to these particular 14 claims, and it is therefore possible that these 15 documents have never been returned to the relevant 16 archives or, indeed, to the National Records Office, and 17 they should be there and they should be available.</p> <p>18 The core participants that we represent have 19 attempted to try to track down this material. This is 20 an ongoing issue that the inquiry team is well aware of, 21 but it is also an issue that is relevant to this 22 inquiry's investigation under accountability and 23 reparations. You don't get very far unless records are 24 kept, unless the material is available. So the keeping 25 of and the potential use of material, records that</p> <p style="text-align: center;">Page 83</p>
<p>1 community and F43, not 42. Clearly, what we need to do 2 is have instructions as to whether F43 is prepared to 3 waive anonymity. That may assist the inquiry in making 4 the determination. But otherwise, Mr Garsden is 5 perfectly correct, identifying needs to be done. We 6 will undertake to do that within a period of time. 7 I look to Mr Enright -- within a week. Within seven 8 days.</p> <p>9 May I then turn to the matter in relation to 10 Forde Park. You have heard our overall submissions and 11 you have heard our points that relate to the way that 12 each one of these investigations is important and what 13 we suggest should be included. Without repeating those 14 submissions, may we emphasise one point that relates to 15 Forde Park?</p> <p>16 One of the difficulties in dealing with the 17 Forde Park aspect of this investigation has been the 18 access to and unavailability of documentation. Core 19 participants have been seeking to identify, seeking to 20 find, and establish where the documents that should be 21 held by the local authority, by the councils, is held, 22 where the original documentation has gone. This is 23 a matter that we have addressed the inquiry before. 24 This is a matter to which Martin Smith, solicitor to the 25 inquiry, is very much aware is an ongoing problem.</p> <p style="text-align: center;">Page 82</p>	<p>1 relate to what happened at these institutions, relating 2 to education and the like, you do not get very far with 3 a civil claim unless the records are kept.</p> <p>4 So whilst it is, to say the least -- if I use the 5 word "galling", it is a vast understatement of the way 6 people feel from Forde Park as to what's happened to 7 their material. It is frustrating and it is for them 8 impossible and, we suggest, understandably impossible to 9 understand what has happened to the records. So we hope 10 that the inquiry will continue in its efforts to 11 identify where that material has gone.</p> <p>12 But it is also vital to understand accountability 13 and reparations, without access to records, without 14 record keeping, various claims that should be made can't 15 be made. So we recommend this issue as an issue within 16 the Forde Park investigation that should be identified 17 for analysis within this investigation.</p> <p>18 MR SKELTON: Mr Fleming? 19 MR PLEMING: Nothing to add, ma'am. 20 MR SKELTON: Mr Webb-Jenkins? 21 MR WEBB-JENKINS: No comments, chair. 22 MR SKELTON: Mr Greatorex? 23 MR GREATOREX: Madam, nothing except this: in terms of what 24 has just been said about documentation, Devon County 25 Council, we have complied with all disclosure requests</p> <p style="text-align: center;">Page 84</p>

<p>1 made of us by the inquiry. We are not aware of any                  2 outstanding requests. We will continue to cooperate, so                  3 if any further requests are forthcoming, of course we                  4 will cooperate as we have done to date. I can't assist                  5 any further with the matters raised specifically just                  6 now, and I'm not sure this is the forum anyway, but                  7 I simply want to reiterate our cooperation with the                  8 inquiry and any requests that are made by it in due                  9 course.                  10 MR SKELTON: Ms Studd?                  11 MS STUDD: No submissions.                  12 Submissions by MR SKELTON                  13 MR SKELTON: Madam, may I move on to the third case study,                  14 and that is St Leonard's. St Leonard's was a children's                  15 home in Essex owned by the London Borough of                  16 Tower Hamlets. A police investigation into allegations                  17 of abuse at the home again led to criminal convictions.                  18 Civil claims were also brought against the local                  19 authority and, as with Forde Park, the claims were                  20 ultimately concluded by agreement before trial, although                  21 it appears earlier on in the litigation process. We                  22 therefore propose that this case study is also focused                  23 on the overall management of the civil litigation and                  24 the litigation process itself; in particular, how it was                  25 settled and how that settlement was perceived by victims</p> <p style="text-align: center;">Page 85</p>	<p>1 carefully.                  2 MR SKELTON: Again, Mr Fleming?                  3 MR PLEMING: Again, I have nothing to say.                  4 MR SKELTON: Mr Webb-Jenkins?                  5 MR WEBB-JENKINS: No comments, chair.                  6 MR SKELTON: Lastly, again, Ms Studd?                  7 MS STUDD: No, thank you.                  8 MR SKELTON: Madam, I don't have anything to add in response                  9 beyond repeating my generic submissions from earlier.                  10 Submissions by MR SKELTON                  11 MR SKELTON: The fourth case study is St Aidan's and                  12 St Vincent's which were children's homes managed by                  13 Nugent Care Society and previously they had been                  14 approved schools. As with the previous case studies,                  15 allegations of abuse led to criminal convictions and                  16 civil claims.                  17 They were two of five homes at the centre of                  18 the litigation that became known as the "North-west                  19 child abuse cases". The litigation in respect of these                  20 two homes spanned a number of years and included several                  21 judgments by both the High Court and the Court of                  22 Appeal. The issue of statutory time limits, that is,                  23 limitation, was critical within the litigation and it                  24 took place at a time when there was a significant change                  25 in the law. We therefore propose that the case studies</p> <p style="text-align: center;">Page 87</p>
<p>1 and survivors.                  2 Again, may I invite other core participants to                  3 address you if they see fit, starting again with                  4 Mr Stein?                  5 Submissions by MR STEIN                  6 MR STEIN: We have set out our submissions in relation to                  7 the St Leonard's. The St Leonard's Children's Home has                  8 been the subject of books, "Against All Odds", and the                  9 feature film "Six from Eight". This was a notorious                  10 children's home whereby the damage was long term and                  11 deep.                  12 One of the main issues that we suggest that should                  13 be looked at in relation to St Leonard's -- again, it                  14 relates to the police, but it relates also to the                  15 questions that arise in relation to how this was allowed                  16 to happen. A number of individuals were identified by                  17 those people that had been abused as responsible for                  18 that abuse and there were failures to prosecute. So                  19 this is perhaps the other side of the relevance of                  20 the police investigation, which is that there needs to                  21 be an investigation. Otherwise, what happens is that                  22 first of all there is very little chance of claims being                  23 presented within the civil field but also there will be                  24 no chance of other children being protected from abuses                  25 if the police don't act swiftly, responsibly and</p> <p style="text-align: center;">Page 86</p>	<p>1 focus on the process of civil litigation, in particular                  2 limitation, and how this impacted on the experiences of                  3 victims and survivors. Again, may I invite, on your                  4 behalf, any addresses from the core participants,                  5 starting this time with Mr Collins?                  6 MR COLLINS: I have nothing to add. Thank you.                  7 MR SKELTON: And Mr Stein?                  8 Submissions by MR STEIN                  9 MR STEIN: Well, I said about Mr Garsden he had made                  10 a mistake. In fact, I made the mistake. It was in                  11 relation to this aspect of it. I apologise to him,                  12 St Aidan's and St Vincent's. He was right in                  13 identifying F42. The same point applies. We will of                  14 course consult with F42.                  15 We would suggest, as you can see from our                  16 submissions, that both F42 and F47 should be -- are                  17 capable of providing cogent and realistic evidence in                  18 relation to what happened at those institutions. In                  19 particular, F47 is able to address one of the points                  20 that is going to be considered within this                  21 investigation, and that is the difficulties in providing                  22 and bringing forward a civil claim within a time period                  23 that will be encompassed by the Civil Litigation Rules.                  24 That is because of the effect of the abuse and how long                  25 it took for him to come to terms with his experience of</p> <p style="text-align: center;">Page 88</p>

<p>1 child sexual abuse. So we commend his evidence to this                  2 inquiry in relation to that regard.                  3 THE CHAIR: Thank you, Mr Stein.                  4 MR SKELTON: For the second and last time, Mr Garsden?                  5 MR GARDSEN: You will be very relieved to hear, ma'am,                  6 I have absolutely nothing to add, having gone out of                  7 order.                  8 THE CHAIR: Thank you.                  9 MR SKELTON: Mr Hough?                  10 MR HOUGH: Only to direct you to paragraphs 12 and 13 of our                  11 document.                  12 MR SKELTON: Madam, again, I don't feel the need to address                  13 you further on points raised.                  14 Submissions by MR SKELTON                  15 MR SKELTON: Stanhope Castle.                  16 Stanhope Castle was originally an approved school                  17 managed by the Home Office before responsibility for                  18 approved schools generally was transferred to local                  19 authorities. Unlike the other case studies in this                  20 investigation, it is understood that allegations of                  21 abuse have not resulted in any criminal convictions.                  22 Middlesbrough Borough Council has assumed                  23 liabilities arising from the operation of                  24 Stanhope Castle Approved School from its predecessor                  25 local authorities. At the last preliminary hearing, the</p> <p style="text-align: center;">Page 89</p>	<p>1 questions such as compensation should be considered.                  2 The second aspect of this that we suggest is                  3 potentially helpful -- excuse me one moment.                  4 When we turn to the submissions we made at pages 57                  5 and 58, the question has arisen as to how Middlesbrough                  6 Borough Council is dealing with some current and live                  7 claims. I have spoken to counsel for Middlesbrough                  8 today, and there is no objection, it seems, and we agree                  9 that there should be not, for the evidence that can be                  10 provided in relation to those individuals that are                  11 subject to those claims being provided before this                  12 particular inquiry and, indeed, answers provided from                  13 Middlesbrough. There is no objection from any side to                  14 that evidence being provided as this inquiry needs to                  15 get to the heart of what's happened.                  16 As an example, we are not dealing with a case                  17 whereby there may be a criminal case, where there may be                  18 a jury that could be affected. These are civil claims                  19 and subject to rather different rules in relation to any                  20 possible prejudice. So that doesn't appear to be an                  21 issue that need concern the inquiry. It can be managed                  22 by solicitor and counsel to the inquiry in dealing with                  23 these aspects of things.                  24 MR SKELTON: Mr Ford?                  25 MR FORD: Chair, we anticipate that we will be asked for</p> <p style="text-align: center;">Page 91</p>
<p>1 council informed the inquiry that in addition to the                  2 cases already settled, at least ten claims had been                  3 intimated to them and the inquiry would need to be                  4 careful that its deliberations and its evidence do not                  5 prejudice any civil claims. We agree with that                  6 submission, as I outlined earlier.                  7 We propose that this case study is focused on                  8 knowledge of and access to civil litigation by victims                  9 and survivors and to criminal compensation from the                  10 CICA.                  11 Again, may I now invite on your behalf                  12 representations from core participants? Mr Stein?                  13 Submissions by MR STEIN                  14 MR STEIN: Two points to raise in relation to                  15 Stanhope Castle. As Mr Skelton has just set out, this                  16 was an approved school run by the Home Office. This we                  17 identify as being a perfect example of where the                  18 Home Office could form part and parcel of                  19 the accountability and reparations investigation.                  20 There needs to be understood how the failures, we                  21 suggest, of the Home Office in managing and running this                  22 particular institution affects those individuals that                  23 have been abused within it, because that itself needs to                  24 be understood when determining questions of how they                  25 feel, how they understand accountability and indeed</p> <p style="text-align: center;">Page 90</p>	<p>1 details of the civil claims in the relevant rule 9                  2 letter and we will of course provide the details.                  3 MR SKELTON: Mr Fleming?                  4 MR PLEMING: Thank you, madam. Again, nothing to add.                  5 MR SKELTON: Mr Webb-Jenkins?                  6 MR WEBB-JENKINS: No comments, chair.                  7 MR SKELTON: Mr Payne?                  8 MR PAYNE: No.                  9 MR SKELTON: I don't have anything to add in that regard                  10 either. That concludes the discussion of the individual                  11 case studies.                  12 You will appreciate, madam, we have now just gone                  13 after 1.00 pm. I now need to turn just to the generic                  14 issues about evidence in the public hearings. I can                  15 deal with that relatively shortly. I don't anticipate,                  16 although I may be proved optimistic, that there will be                  17 much to say on behalf of the core participants because                  18 they have already aired their views in detail. May                  19 I suggest that we sit slightly later in an endeavour to                  20 conclude?                  21 THE CHAIR: Yes, we will do that.                  22 Discussion re public hearings                  23 Submissions by MR SKELTON                  24 MR SKELTON: Thank you. The public hearings. First of all,                  25 evidence. Madam and panel, it is vitally important that</p> <p style="text-align: center;">Page 92</p>

<p>1 the oral hearings are conducted in a way that is                  2 proportionate. As we made clear at the last preliminary                  3 hearing, all of the witness statements in the case                  4 studies will be read by the inquiry panel and the                  5 inquiry will hear oral evidence from core participant                  6 victims and survivors in each case. However, it will                  7 not be necessary or possible to hear oral evidence from                  8 every witness. Nor will it be possible to adduce                  9 evidence in respect of all issues, including disputed                  10 facts, that do not require resolution by the panel.                  11 In due course, the panel will be invited to make                  12 findings on the basis of all relevant and disclosed                  13 evidence and any evidence relied upon as part of                  14 the case studies investigation, but not referred to at                  15 the hearing, will be made publicly available.                  16 In order to make best use of the hearing time,                  17 madam, it is important that witnesses are carefully                  18 selected and their evidence focused on issues that                  19 require exploration in oral evidence. As soon as is                  20 practicable, the inquiry will circulate a provisional                  21 list of witnesses who may be able to provide evidence                  22 that is relevant to the topics under consideration in                  23 each case study. Before that list is finalised, the                  24 views of core participants will be sought as to whether                  25 other persons should be added to it and which witnesses</p> <p style="text-align: center;">Page 93</p>	<p>1 sensitive and irrelevant information. Further guidance                  2 on matters relating to redactions and ciphers and the                  3 like can be found in the relevant protocol and guidance                  4 documents on the inquiry's website.                  5 Turning then finally to hearing dates, the hearing                  6 will commence with opening submissions by counsel to the                  7 investigation, that is me, and by core participants on                  8 Monday, 26 November and it will conclude by Friday,                  9 14 December. It is intended that the Thursday of                  10 the final week will be a non-sitting day which will                  11 enable core participants to make closing submissions on                  12 the Friday.                  13 Madam, that completes my submissions for today.                  14 I won't stand up unless I need to after you have heard                  15 from others.                  16 Madam, will you invite them in the order they gave                  17 submissions this morning? Alternatively, I'm happy to                  18 do so.                  19 THE CHAIR: Please go ahead, Mr Skelton.                  20 MR SKELTON: May I start with Mr Simblett?                  21 Submissions by MR SIMBLETT                  22 MR SIMBLETT: Thank you, madam. Two short points. In                  23 relation to disclosure, obviously everybody wants it as                  24 soon as it can possibly be provided but, again, it is                  25 the confidentiality issue. There will be a lot of</p> <p style="text-align: center;">Page 95</p>
<p>1 should be called to give oral evidence.                  2 We anticipate that, in addition to victims and                  3 survivors, other categories of witness will include, at                  4 the very least, lawyers and insurers involved in                  5 individual case studies, for obvious reasons, because                  6 they include an examination, in most cases, of                  7 litigation processes.                  8 So far as the issue of disclosure is concerned, the                  9 inquiry intends to disclose material to core                  10 participants on a rolling basis prior to the hearings.                  11 Until the totality of that evidence has been received,                  12 it is not possible to provide an exact timetable for                  13 disclosure. However, we will ensure that it is                  14 completed in good time for the purposes of preparing for                  15 the public hearings commencing on 26 November.                  16 As has occurred in other investigations, disclosure                  17 will be circulated to core participants via the                  18 Relativity database system and the inquiry's document                  19 management system. Prior to disclosure, we will send                  20 around an email about Relativity training to those who                  21 require it so that anyone who is unfamiliar with the                  22 system can familiarise themselves in time for the start                  23 of the disclosure process.                  24 Documents that fall to be disclosed may have                  25 provisional redactions applied to them to remove</p> <p style="text-align: center;">Page 94</p>	<p>1 redaction and ciphering necessary in the disclosure                  2 process, and we hope that that -- there is a means of                  3 balancing the need for speed against the ability to                  4 comply with the ciphering and redaction process with                  5 great care, because this is exactly where things could                  6 start to go wrong.                  7 Secondly, in respect of evidence, it would be                  8 helpful if the panel could make its decision on those                  9 persons -- those survivor core participants from whom                  10 they wish to hear oral evidence as soon as possible, for                  11 two reasons. First, there may be some people who will                  12 be disappointed not to be selected to give evidence, and                  13 they would -- and part of our job as their                  14 representatives is to handle their responses and handle                  15 their feelings and so on, so that your job is made                  16 easier. And secondly, there will be people who, while                  17 they are perfectly prepared to give evidence and want to                  18 and wish to give it, will still need a degree of careful                  19 preparation so that they are able to manage emotionally                  20 the process and also able to give you the best evidence                  21 that they can. So on that aspect of it, it would be                  22 helpful, as soon as the decision is taken as to who                  23 those survivor witnesses are to be, that their                  24 representatives are informed so they can help you                  25 prepare them.</p> <p style="text-align: center;">Page 96</p>



1 THE CHAIR: Thank you, Mr Simblett.  
 2 MR SKELTON: Madam, may I ask Mr Collins if he has anything  
 3 to address you?  
 4 MR COLLINS: I have nothing to add save to follow on from  
 5 what has just been said: it would be of great help if it  
 6 is made clear to those witnesses who are being called to  
 7 give evidence what the focus of their evidence is going  
 8 to be. Thank you.  
 9 MR SKELTON: Mr Khan?  
 10 MR KHAN: Nothing to add.  
 11 MR SKELTON: Mr Stein?  
 12 Submissions by MR STEIN  
 13 MR STEIN: Only very briefly. It may well be that we can  
 14 deal with this in a meeting that we hope to have with  
 15 Mr Skelton. We have encountered in other  
 16 investigations, other modules, difficulties with  
 17 disclosure coming too late. I know that you are aware  
 18 of the issues, but as we are bound by Inquiry Rules to  
 19 signal in advance questions that we may wish to present  
 20 or, indeed, in this particular investigation, have  
 21 Mr Skelton consider presenting on behalf of core  
 22 participants, the rules mean that we are always the  
 23 last, often, to get disclosed material because it has to  
 24 go through all of the requisite filters, but we need to  
 25 actually be the people that have it first, and that

Page 97

1 creates a real tug of war with the way disclosure is  
 2 dealt with.  
 3 I hope that we can deal with this with Mr Skelton  
 4 and Ms Williams when we have a meeting and work  
 5 backwards from the inquiry date so that we have  
 6 a timetable for disclosure.  
 7 MR SKELTON: Mr Garsden?  
 8 Submissions by MR GARSDEN  
 9 MR GARSDEN: Just finally, I don't know what the rules are  
 10 with regard to videoconferencing at these types of  
 11 hearings. I only say that because I have learned that  
 12 B19 has some medical issues, and whether or not it would  
 13 be possible for him to travel, as opposed to giving  
 14 evidence from a different location, I don't know. If,  
 15 indeed, he is asked to give evidence.  
 16 THE CHAIR: Thank you.  
 17 MR SKELTON: Mr Fleming?  
 18 MR PLEMING: Nothing to add, thank you.  
 19 MR SKELTON: Mr Webb-Jenkins?  
 20 MR WEBB-JENKINS: No, thank you, chair.  
 21 MR SKELTON: Mr Hough?  
 22 MR HOUGH: Nothing to add to our document.  
 23 MR SKELTON: Mr Ford?  
 24 MR FORD: No, thanks.  
 25 MR SKELTON: No Greatorex?

Page 98

1 MR GREATOREX: No.  
 2 MR SKELTON: Mr Payne?  
 3 MR PAYNE: Nothing to add.  
 4 MR SKELTON: Ms Studd?  
 5 MS STUDD: No, thank you.  
 6 MR SKELTON: And last but not least, Mr Sheldon?  
 7 MR SHELDON: No, thank you, madam.  
 8 MR SKELTON: Madam, that concludes the hearing. I think,  
 9 for the avoidance of doubt, Mr Stein has raised the  
 10 possibility of meetings with counsel and the legal team.  
 11 Of course we are always amenable to having such meetings  
 12 with any core participant that needs to speak with us  
 13 and indeed they can contact me directly if they need to.  
 14 Madam, that concludes the submissions for today.  
 15 THE CHAIR: Thank you, Mr Skelton, and thanks to everyone  
 16 here for attending today and for your very helpful and  
 17 detailed submissions. We have covered a wide range of  
 18 issues and my determination on the scope of the five  
 19 case studies will be circulated in due course. We will  
 20 consider any outstanding matters further at the next  
 21 preliminary hearing on 25 September before we continue  
 22 our investigation at the hearing in November  
 23 and December. That concludes this preliminary hearing.  
 24 Thanks to all.  
 25 (1.10 pm)

Page 99

1 (The hearing concluded)  
 2  
 3 I N D E X  
 4  
 5 Welcome and opening remarks by THE .....1  
 6 CHAIR  
 7  
 8 Submissions by MR SKELTON .....2  
 9  
 10 Submissions by MR SIMBLETT .....12  
 11  
 12 Submissions by MR COLLINS .....19  
 13  
 14 Submissions by MR KHAN .....21  
 15  
 16 Submissions by MR STEIN .....23  
 17  
 18 Submissions by MR GARSDEN .....53  
 19  
 20 Submissions by MR PLEMING .....56  
 21  
 22 Submissions by MR WEBB-JENKINS .....58  
 23  
 24 Submissions by MR HOUGH .....59  
 25

Page 100

1	Submissions by MR GREATOREX .....67	
2		
3	Submissions by MS STUDD .....68	
4		
5	Submissions by MR SKELTON .....69	
6		
7	Discussion re case studies .....73	
8		
9	Submissions by MR SKELTON .....73	
10		
11	Submissions by MR SIMBLETT .....74	
12		
13	Submissions by MR STEIN .....76	
14		
15	Submissions by MR GARDEN .....77	
16		
17	Submissions by MR SKELTON .....80	
18		
19	Submissions by MR STEIN .....81	
20		
21	Submissions by MR SKELTON .....85	
22		
23	Submissions by MR STEIN .....86	
24		
25	Submissions by MR SKELTON .....87	
Page 101		

1		
2	Submissions by MR STEIN .....88	
3		
4	Submissions by MR SKELTON .....89	
5		
6	Submissions by MR STEIN .....90	
7		
8	Discussion re public hearings .....92	
9		
10	Submissions by MR SKELTON .....92	
11		
12	Submissions by MR SIMBLETT .....95	
13		
14	Submissions by MR STEIN .....97	
15		
16	Submissions by MR GARDEN .....98	
17		
18		
19		
20		
21		
22		
23		
24		
25		
Page 102		

A				
<b>ABI</b> 65:10	<b>accepting</b> 51:4,19	<b>addition</b> 5:16 90:1	77:12 79:5,16	<b>apologise</b> 21:4 52:8
<b>ability</b> 96:3	<b>access</b> 8:19,23 9:15	94:2	81:2 87:11 88:12	88:11
<b>able</b> 18:3 27:24	24:7 42:10,15	<b>additional</b> 2:22	<b>ail</b> 25:17	<b>apologising</b> 53:3
31:22 37:4,5	62:15 82:18 84:13	5:18 18:17 65:12	<b>aired</b> 92:18	<b>apparent</b> 9:24
44:20 45:10 51:1	90:8	65:18	<b>Alan</b> 3:14,25	68:23
51:6 52:14 74:24	<b>accessed</b> 54:11	<b>address</b> 2:22 3:17	<b>Alexis</b> 1:4	<b>Appeal</b> 36:4,19
75:12 80:2 88:19	<b>account</b> 15:20 17:9	12:5,13 27:10	<b>allegations</b> 7:15	74:8 79:18 87:22
93:21 96:19,20	45:16 47:9 76:18	60:25 71:6 77:9	36:24 46:11 70:18	<b>appear</b> 16:1 23:19
<b>abolition</b> 66:21	<b>accountability</b> 1:14	80:13 86:3 88:19	81:10 85:16 87:15	67:9 91:20
<b>abroad</b> 1:8	2:15 8:14 10:9	89:12 97:3	89:20	<b>appears</b> 42:22
<b>absolutely</b> 19:3	13:15 23:6,7,18	<b>addressed</b> 3:8 5:14	<b>Alliance</b> 3:23 14:5	85:21
89:6	25:14,22 28:12,18	29:18 39:19 65:16	35:20 60:1	<b>appellate</b> 63:3
<b>abuse</b> 1:6,19 4:18	29:4 30:25 33:15	82:23	<b>allocate</b> 68:4	<b>appertaining</b> 55:4
7:10,16,21 8:25	35:15 39:13 47:2	<b>addresses</b> 88:4	<b>allocated</b> 10:17	<b>appetite</b> 19:20
9:9 13:9 14:7,8	52:16 62:3,5	<b>addressing</b> 19:18	<b>allow</b> 15:18 16:17	<b>application</b> 17:11
17:3 18:10 19:18	83:22 84:12 90:19	62:18	56:4 66:11	53:19 55:1 70:7
20:16 21:12 25:2	90:25	<b>adduce</b> 93:8	<b>allowed</b> 32:17,25	<b>applied</b> 94:25
25:6,13 28:6 29:7	<b>accountable</b> 22:3	<b>adequately</b> 28:25	58:21 86:15	<b>applies</b> 73:5 88:13
29:8,9 30:19,25	<b>accounts</b> 28:25	39:10 46:23	<b>allowing</b> 15:23	<b>apply</b> 46:13 53:18
33:17,20 34:17	35:3 38:10 42:20	<b>administration</b> 9:1	42:4 59:24	<b>applying</b> 50:12
37:14 39:9,24	45:17,25 70:14	<b>admissions</b> 46:24	<b>allows</b> 24:5	<b>appreciate</b> 25:18
40:1,4,7,10,13,22	<b>accusation</b> 36:9	<b>advance</b> 21:5 97:19	<b>alternative</b> 45:25	79:25 92:12
41:2,11 42:21	<b>accused</b> 55:19	<b>adversarial</b> 17:23	<b>Alternatively</b> 95:17	<b>apprehend</b> 62:17
43:1,3,8 45:18	<b>achieve</b> 8:3	75:4	<b>Alyn</b> 23:21 46:12	<b>approach</b> 3:2 8:9
47:22 48:5 49:13	<b>achieved</b> 60:17	<b>advert</b> 9:21	61:16 81:25	11:13 15:16 18:15
49:22 53:24 61:19	<b>achieving</b> 16:14	<b>adverted</b> 71:13	<b>amenable</b> 99:11	23:4 58:12 60:22
62:20 64:7,9	<b>acknowledge</b> 36:21	<b>advice</b> 77:21	<b>amount</b> 38:21	64:4,22 65:3 67:6
70:12,17,22 74:1	<b>act</b> 34:17 53:14	<b>advising</b> 71:20	<b>analyse</b> 48:19	67:11,15
74:3 76:3,15 79:3	66:13 72:15 78:9	<b>advocates</b> 3:11	<b>analysis</b> 69:17	<b>appropriate</b> 12:16
81:10 85:17 86:18	86:25	<b>afraid</b> 23:10	84:17	16:4 21:16 39:13
87:15,19 88:24	<b>acted</b> 32:2 64:16	<b>afternoon</b> 58:6	<b>anecdote</b> 19:11	48:10 61:18 62:7
89:1,21	<b>acting</b> 49:18 77:21	<b>agenda</b> 26:14	<b>Anne</b> 4:1	70:9 80:22
<b>abused</b> 7:20 16:25	<b>actions</b> 9:2 11:24	<b>ages</b> 50:15	<b>anonymity</b> 79:25	<b>appropriately</b> 68:5
24:25 37:4 41:15	13:1 45:7 46:10	<b>ago</b> 25:9 50:15	82:3	<b>approved</b> 81:8
43:15 50:25 86:17	61:17 63:24,25	<b>agree</b> 26:25 28:1	<b>answer</b> 52:2 76:6	87:14 89:16,18,24
90:23	64:13 71:9	29:1,14 33:10	<b>answers</b> 26:3 31:9	90:16
<b>abuser</b> 20:8,9	<b>active</b> 58:25	39:23 64:5 72:5,6	91:12	<b>archives</b> 83:16
76:17	<b>actual</b> 42:1	72:9 90:5 91:8	<b>anticipate</b> 11:7,22	<b>area</b> 30:15,23
<b>abusers</b> 32:18	<b>add</b> 18:1 58:3	<b>agreed</b> 61:12	45:7 73:21 91:25	43:20 51:24 66:15
62:10	75:19,23 76:23,25	<b>agreement</b> 9:11	92:15 94:2	<b>areas</b> 6:2 32:1 46:7
<b>abuses</b> 86:24	77:3 84:19 87:8	72:5 81:13 85:20	<b>anybody</b> 17:13	<b>arguably</b> 53:15
<b>accept</b> 51:6 57:11	88:6 89:6 92:4,9	<b>ahead</b> 2:16 95:19	35:24 48:4	<b>arisen</b> 14:2 70:4
61:23 63:9	97:4,10 98:18,22	<b>aid</b> 50:13	<b>anyway</b> 85:6	91:5
<b>accepted</b> 62:18	99:3	<b>Aidan's</b> 5:13,16	<b>apart</b> 58:1	<b>arises</b> 55:7
	<b>added</b> 75:16 93:25	23:23 25:20 53:15	<b>apologies</b> 21:5 53:7	<b>arising</b> 89:23
	<b>adding</b> 71:21	53:16 56:16 62:24	62:7 78:9	<b>arrangements</b> 2:4

<b>arrest</b> 48:14	78:7 89:19,25	<b>Beer</b> 69:9	<b>Bryn</b> 23:21 46:12	63:7 64:8,19
<b>artificially</b> 72:9	<b>authority</b> 7:8 37:18	<b>beginning</b> 33:20	61:16 81:25	66:24 68:24 71:4
<b>aside</b> 49:23 50:20	37:21 38:3,13,18	34:8 49:25	<b>bullet</b> 26:23 27:1	71:5,7,20,21,25
<b>asked</b> 23:2 46:7	38:19,25 39:6	<b>behalf</b> 1:13 20:21	28:9,10 29:19	72:23,24 73:17,19
47:9 59:16 91:25	74:2 77:22 78:24	23:19,24 25:11	30:21 42:9	74:11,15,17 77:8
98:15	82:21 85:19	26:13 27:14,17	<b>business</b> 1:8 16:5	78:12 80:25 81:7
<b>aspect</b> 32:24 41:6	<b>available</b> 6:23 13:7	28:4 49:19 53:14	<b>businesses</b> 66:8	81:14 85:13,22
74:22 76:18 82:17	20:7 26:12 54:25	58:3,7 68:2 88:4	<b>buy-in</b> 41:22	87:11,14,25 89:19
88:11 91:2 96:21	61:18 83:6,9,17	90:11 92:17 97:21		90:7 91:16,17
<b>aspects</b> 28:14 49:15	83:24 93:15	<b>behavioural/emo...</b>	<b>C</b>	92:11 93:3,6,14
78:25 91:23	<b>avoid</b> 24:24 50:22	17:4	<b>c</b> 77:23	93:23 94:5 99:19
<b>asserted</b> 79:4	<b>avoidable</b> 18:12	<b>belief</b> 31:6,8 45:21	<b>Cabinet</b> 22:18	101:7
<b>asserts</b> 58:20	<b>avoidance</b> 99:9	<b>believe</b> 42:12 55:25	<b>called</b> 35:25 41:24	<b>case-by-case</b> 80:21
<b>assessed</b> 39:10	<b>avoided</b> 16:7 51:25	<b>benefit</b> 10:14 26:10	42:18 43:1 45:16	<b>cases</b> 9:11 13:21
48:25	<b>avoids</b> 49:11	<b>best</b> 18:4 38:8	62:13 94:1 97:6	15:6 19:15,18
<b>assessment</b> 9:7	<b>awards</b> 7:7 9:13	44:20 93:16 96:20	<b>calling</b> 44:13	20:6 32:3,11,18
74:10	<b>aware</b> 41:16 76:2	<b>better</b> 19:10 24:5	<b>cancelled</b> 53:5	35:18 36:6,17
<b>assist</b> 12:14 21:1	76:15 82:25 83:20	35:16 64:22 71:16	<b>capable</b> 46:1 48:11	49:8 51:13 63:6,7
26:18,22 27:25	85:1 97:17	<b>beyond</b> 7:17 48:24	88:17	63:11,12,13,18,20
28:8 57:3 68:9,11	<b>Ayles</b> 44:9	79:18 87:9	<b>captured</b> 4:13	64:9,10 65:13
74:24 75:12 82:3		<b>bit</b> 35:13 83:2	<b>care</b> 22:15 26:2,15	74:14 79:3 87:19
85:4	<b>B</b>	<b>blatant</b> 34:8	32:13 34:11,13	90:2 94:6
<b>assistance</b> 43:21	<b>b</b> 77:21	<b>board</b> 32:14 33:9	37:10 38:7 39:7	<b>Castle</b> 5:20 23:22
<b>assisted</b> 68:7	<b>B19</b> 53:14 98:12	46:13 48:8 52:3	41:16 44:18 57:10	25:21 46:20 89:15
<b>assisting</b> 56:14 61:4	<b>back</b> 13:13 21:9	73:5	61:17 76:12 87:13	89:16,24 90:15
<b>associated</b> 47:10	24:13 33:25 40:23	<b>bodies</b> 18:14 21:14	96:5	<b>categories</b> 94:3
<b>Association</b> 53:23	<b>backed</b> 18:3	<b>body</b> 15:1 17:17	<b>careful</b> 51:7 66:1	<b>cause</b> 17:4
<b>assumed</b> 89:22	<b>background</b> 24:1	<b>books</b> 86:8	66:16 69:17 72:6	<b>caused</b> 15:3 16:16
<b>assumptions</b> 36:23	60:20	<b>Borough</b> 13:1	90:4 96:18	39:25 78:17
<b>attack</b> 33:11	<b>backwards</b> 98:5	85:15 89:22 91:6	<b>carefully</b> 87:1	<b>central</b> 22:8
<b>attacked</b> 66:10	<b>badly</b> 32:12 37:4	<b>bottom</b> 38:6	93:17	<b>centre</b> 87:17
<b>attempt</b> 16:8	<b>balance</b> 25:24 39:3	<b>bound</b> 97:18	<b>carries</b> 43:11	<b>certain</b> 38:21
<b>attempted</b> 83:19	<b>balances</b> 38:18	<b>bounds</b> 58:23	<b>carry</b> 48:7,9 64:12	<b>chair</b> 1:3,4,5 2:18
<b>attend</b> 53:25 59:16	<b>balancing</b> 96:3	<b>boys</b> 43:13,15	<b>carrying</b> 47:25	12:18 18:21,23
<b>attending</b> 4:7 69:18	<b>bank</b> 53:5	<b>breadth</b> 4:19	<b>case</b> 1:21 2:10,21	21:2 23:13 52:18
99:16	<b>bar</b> 36:12	<b>break</b> 2:5,5 52:18	3:1 4:21 5:9,13,22	52:23 53:8 56:22
<b>attention</b> 79:2	<b>bare</b> 27:4 28:3	52:21	6:22,25 7:1,13,23	58:4,6 59:21,23
<b>attitude</b> 14:23,25	<b>barred</b> 49:20	<b>brief</b> 18:20 24:1	8:7,10,12,16 9:3	65:7 67:1,3,21,23
18:14	<b>basic</b> 26:25	57:1 77:9	9:18,25 10:12,17	69:19,20,22 74:18
<b>Australia</b> 19:13	<b>basis</b> 50:2 55:20	<b>briefly</b> 76:2 97:13	10:22 11:2,12	76:21,25 80:11
41:13	72:18 80:21 93:12	<b>bringing</b> 88:22	12:12 13:21 14:18	84:21 87:5 89:3,8
<b>Australian</b> 39:16	94:10	<b>broad</b> 8:5 10:13	18:19 19:8,24	91:25 92:6,21
41:9,13,19	<b>bear</b> 10:6 26:10	11:3,4 60:21	25:19 26:15 27:3	95:19 97:1 98:16
<b>authorities</b> 14:24	<b>bearing</b> 57:22	<b>broken</b> 39:25 40:2	36:3 38:1 48:16	98:20 99:15 100:6
21:17 22:1,19,25	<b>beating</b> 24:23	<b>brought</b> 24:13	49:24 51:3 53:12	<b>chaired</b> 34:3
37:12 40:9 47:23	<b>Beechwood</b> 13:21	81:12 85:18	60:10,19 62:22,23	<b>chance</b> 32:20 86:22

<p>86:24  <b>change</b> 26:5 44:23  87:24  <b>changed</b> 5:15 16:3  <b>changes</b> 11:12 63:4  63:6 66:19,19  71:1 77:13  <b>changing</b> 18:14  <b>charge</b> 53:16,22  <b>charities</b> 41:25  <b>charity</b> 78:24  <b>checked</b> 33:1  <b>Chief</b> 3:25 4:1  <b>child</b> 1:5,19 4:18  7:10,16 8:25 13:4  25:2,6 34:2,9,15  34:16 37:19,19  38:14 39:1,9,24  40:1,13 41:6,11  43:1,2,7 45:18  49:22 53:24 74:1  78:10 79:3 87:19  89:1  <b>children</b> 21:15  22:15 31:10 32:13  33:2 37:25 41:15  60:4 86:24  <b>children's</b> 14:6  25:21 46:4,13  79:7 85:14 86:7  86:10 87:12  <b>choice</b> 14:19  <b>choose</b> 63:12  <b>chosen</b> 13:22  <b>Chris</b> 3:22  <b>chronology</b> 65:1  <b>churches</b> 41:25  <b>CICA</b> 7:8 9:13  16:22 17:10 90:10  <b>Cinderella</b> 20:17  <b>ciphering</b> 96:1,4  <b>ciphers</b> 95:2  <b>circulate</b> 93:20  <b>circulated</b> 2:11  94:17 99:19  <b>circumstances</b></p>	<p>80:23  <b>City</b> 54:22 79:6  <b>civil</b> 1:17 4:17 5:4  7:5,11 8:1,19,23  8:25 9:4,7 10:25  10:25 11:8,14  19:5 20:17 28:15  29:10,22,24,25  30:2,13 32:11,17  36:10 37:22 38:1  38:17,20 39:3  40:9,24 43:23,25  47:21 48:18,20  49:7,9,10 50:3,9  50:13,23 51:3,9  52:3 54:1 55:5,13  55:14,18,22 56:2  56:7,12 58:20  60:5,12 61:7 62:7  62:11,12,19 63:15  64:10 65:13 71:9  71:16 74:7 81:11  81:16 83:4 84:3  85:18,23 86:23  87:16 88:1,22,23  90:5,8 91:18 92:1  <b>claim</b> 7:5 29:24  36:10,16 37:5,13  37:22 38:8,9,14  38:17,20 39:3  46:19 48:1,18,25  49:9,10,15 50:2  84:3 88:22  <b>claimant</b> 30:2  <b>claimants</b> 9:8 39:20  57:13 78:1,14,18  <b>claiming</b> 9:6  <b>claims</b> 16:6 33:21  42:6 47:22 49:22  50:8 52:4,4 57:14  58:22 59:3 60:6  61:8,19 62:8,11  62:12,21 63:15  65:2 79:14,17  81:12,17 83:3,4  83:14 84:14 85:18</p>	<p>85:19 86:22 87:16  90:2,5 91:7,11,18  92:1  <b>clarification</b> 6:1  <b>clarified</b> 54:8 63:18  80:24  <b>clarity</b> 45:19 73:3  <b>clear</b> 3:4 7:13  39:15 62:21 69:15  93:2 97:6  <b>clearer</b> 34:20  <b>clearly</b> 33:1 44:16  51:21 82:1  <b>clients</b> 21:11,13  24:14 33:10 55:23  73:4 74:23 77:22  78:11 79:20  <b>closing</b> 95:11  <b>Co's</b> 21:22 23:8  <b>cogent</b> 88:17  <b>coincidence</b> 35:4  <b>colleagues</b> 26:18  <b>collective</b> 34:7  <b>Collins</b> 3:14 11:11  18:23 19:1,2 21:2  53:25 54:15 71:19  75:17,18 88:5,6  97:2,4 100:12  <b>collusion</b> 32:10  <b>combination</b> 53:4  <b>come</b> 6:19 13:12  18:15 19:22 23:2  35:8 36:13 71:25  88:25  <b>coming</b> 36:7 81:2  97:17  <b>commence</b> 95:6  <b>commences</b> 69:3  <b>commencing</b> 94:15  <b>commend</b> 56:17  89:1  <b>comment</b> 54:25  79:22  <b>comments</b> 30:4  57:17 84:21 87:5  92:6</p>	<p><b>Commission</b> 39:16  41:10  <b>Commissioner</b> 4:2  <b>Commissioners</b>  43:6  <b>common</b> 60:24  <b>communications</b>  44:17  <b>community</b> 23:21  46:12 82:1  <b>companies</b> 15:23  22:2 30:8 32:2,8  35:23 37:2,8,11  78:6  <b>company</b> 35:21,24  38:2,4,15 39:1,5  49:18 58:25 60:2  <b>compare</b> 19:19  <b>compensatable</b>  13:5  <b>compensation</b> 1:17  4:16 5:5 7:6,7,8  8:1,20 9:12,13  10:16 11:9 17:1,8  18:5 39:9 41:4  55:25 56:1 57:14  60:5 62:4,8,9,15  71:10 90:9 91:1  <b>complainant</b> 35:2  55:18  <b>complained</b> 50:15  <b>complaint</b> 47:22  48:5,8 49:5 51:1  <b>complaints</b> 33:23  35:3 43:3 45:18  46:10 47:5 76:9  <b>complete</b> 6:14  20:14  <b>completed</b> 6:3  94:14  <b>completely</b> 29:1  <b>completes</b> 95:13  <b>complex</b> 61:8 66:14  74:7  <b>complications</b>  14:14</p>	<p><b>complied</b> 84:25  <b>comply</b> 58:13 96:4  <b>compounded</b> 40:10  40:11  <b>comprehensive</b>  61:21  <b>comprise</b> 3:9  <b>compulsory</b> 66:3  <b>concept</b> 13:4 28:17  30:25 62:4  <b>concepts</b> 8:13 10:9  28:12 29:3 33:15  <b>concern</b> 59:19  68:14 91:21  <b>concerned</b> 5:22 6:5  6:25 7:24 15:8  18:18 21:9 68:20  70:16 72:3,14  73:2 94:8  <b>concerning</b> 63:14  <b>concerns</b> 22:4,10  64:3  <b>conclude</b> 92:20  95:8  <b>concluded</b> 2:6 71:5  71:7 81:12 85:20  100:1  <b>concludes</b> 92:10  99:8,14,23  <b>conclusion</b> 35:8  56:5  <b>conclusions</b> 13:18  34:4  <b>concrete</b> 17:20  <b>conduct</b> 7:18 8:4  17:4 46:22 47:14  48:1,3 50:5 64:16  71:17 77:17  <b>conducted</b> 44:9  49:1 64:13,21  76:7 93:1  <b>conducting</b> 54:21  <b>confidential</b> 44:17  <b>confidentiality</b>  95:25  <b>confine</b> 18:19</p>
--	---	--	---	---

<b>confirm</b> 80:2	63:24 64:2 72:8	31:25 32:7 34:19	<b>courts</b> 9:7 19:15,18	<b>d</b> 77:24 100:3
<b>conflict</b> 30:10	<b>continue</b> 57:2 61:5	54:22 67:6,8 79:6	29:25 30:13 36:2	<b>damage</b> 39:24,25
37:10 38:3,12,12	68:13 72:25 84:10	81:9 83:12 84:25	36:4,8,13,20	41:3 86:10
39:5 55:14 78:5	85:2 99:21	89:22 90:1 91:6	48:23 51:3 63:4	<b>damages</b> 7:5 9:6,7
<b>Congleton</b> 79:8	<b>continues</b> 25:6	<b>councils</b> 31:25 32:1	66:16	9:9 30:19 32:11
<b>connected</b> 56:18	<b>contracts</b> 58:23	82:21	<b>cover</b> 8:22 20:16	32:15 33:17 38:21
<b>connection</b> 56:19	<b>contrast</b> 13:8 19:19	<b>counsel</b> 2:3,13 3:2	27:24 57:20,25	39:8,21 74:10
<b>consequence</b> 15:15	20:14	3:12 8:11 26:6,8	59:15 62:14 74:9	75:2
<b>consequences</b> 17:3	<b>contribute</b> 15:20	26:16,19 27:1,5	<b>covered</b> 34:6 99:17	<b>Danesford</b> 79:8
75:4	<b>control</b> 51:23,25	27:12,24 28:2,10	<b>CPS</b> 49:1	<b>danger</b> 26:12 47:16
<b>consequent</b> 39:22	52:1	28:14,19 29:2,19	<b>creates</b> 98:1	<b>dark</b> 59:8
<b>consequential</b> 9:10	<b>conversation</b> 24:18	30:18 32:14 33:11	<b>creditors</b> 58:19	<b>data</b> 34:23
30:20 31:16 33:17	<b>conviction</b> 49:3	33:14 37:9 39:18	<b>crime</b> 34:17 36:24	<b>database</b> 94:18
<b>consider</b> 3:2 5:9	<b>convictions</b> 81:11	42:8,11 44:3,10	43:6	<b>date</b> 59:11 85:4
10:5,19 16:11	85:17 87:15 89:21	45:1,13 47:16	<b>criminal</b> 5:5 7:6,6,7	98:5
20:19 21:17 22:13	<b>cooperate</b> 85:2,4	50:17 57:18 60:22	7:11 8:20 9:12,13	<b>dated</b> 27:7,8 57:1
37:22 38:6 39:11	<b>cooperation</b> 85:7	64:4 67:7 68:21	10:16 11:8,19	<b>dates</b> 95:5
42:10,14 44:5	<b>copy</b> 26:19,21	81:14 91:7,22	17:2,5 21:8,13	<b>day</b> 21:23 24:22,23
48:13 52:15 62:19	<b>core</b> 2:9,11 5:12,17	95:6 99:10	22:9 32:18 36:2,3	25:10 32:19,21
65:11 67:14 77:18	5:20 6:7,9,10 10:3	<b>counsel's</b> 69:5	36:6,7,11,13 45:3	33:4 53:5 95:10
80:20 97:21 99:20	12:9 13:8 17:12	<b>counsellor</b> 43:4	45:4 46:3 47:2,17	<b>days</b> 48:4 82:8
<b>considerable</b> 13:23	23:16,25 24:14,16	<b>counsellors</b> 42:17	48:16,22 50:1,22	<b>de-designation</b>
16:13	27:14 28:5,7,22	<b>County</b> 3:23,24	51:2 54:12 55:10	70:8
<b>consideration</b> 6:17	33:8,9,23 39:22	31:25 32:7 67:6,8	55:14 56:2,5,6	<b>deal</b> 19:12 22:7
39:20 65:17 66:16	40:21 52:11 53:18	81:9 83:12 84:24	62:5,8,15 64:9	28:25 31:21 35:13
93:22	57:8 60:8 67:18	<b>couple</b> 19:2	69:5,6 71:10,18	35:18 40:24,25
<b>considerations</b>	68:13,14,17 69:2	<b>coupled</b> 65:3	74:3 81:11 85:17	44:24 45:17 46:19
19:7 20:3 61:24	69:10,15 70:8,25	<b>course</b> 1:11 2:11	87:15 89:21 90:9	50:7 51:6 73:20
77:14	73:13 74:16 75:8	8:17 9:23 10:6	91:17	73:21,24 80:4
<b>considered</b> 3:1	80:14 81:6,19	11:17 13:16 15:16	<b>critical</b> 23:5 41:12	81:24 92:15 97:14
10:11 28:15 36:15	82:18 83:18 86:2	15:22 16:4 17:2	74:10 87:23	98:3
40:5 48:16 54:17	88:4 90:12 92:17	18:4 22:5,16,23	<b>criticise</b> 42:11	<b>dealing</b> 36:3,4,6
57:9 66:15 88:20	93:5,24 94:9,17	25:4 26:6 30:23	<b>criticism</b> 17:16	37:13 42:20 43:24
91:1	95:7,11 96:9	53:12,24 54:4,9	56:7	80:25 81:3 82:16
<b>considering</b> 20:19	97:21 99:12	57:5,11 58:1 63:9	<b>criticisms</b> 11:23	91:6,16,22
25:14 36:8 38:13	<b>Cornwall</b> 4:2 68:3	64:8,14 65:1	12:3 45:7,15	<b>deals</b> 36:22 37:20
49:12 54:6	68:10 69:11,13	68:22 70:10,21,24	72:15,17	51:5 52:2
<b>Constable</b> 3:25 4:1	83:12	71:3,15 73:6,14	<b>cross-examining</b>	<b>dealt</b> 16:6 29:15
<b>Constabulary</b> 4:1	<b>correct</b> 82:5	81:3 85:3,9 88:14	55:20	33:21 35:14 38:7
<b>consult</b> 88:14	<b>correctly</b> 28:19	92:2 93:11 99:11	<b>culture</b> 46:4	38:9,14,23 41:6
<b>contact</b> 71:14 99:13	<b>cost</b> 41:23 42:1	99:19	<b>current</b> 91:6	42:16 44:3,11
<b>contained</b> 34:23	66:7 78:20,21	<b>court</b> 6:24 15:8	<b>currently</b> 54:20	49:16 55:12 58:22
<b>containing</b> 83:10	<b>costly</b> 61:14	21:24 32:19,21	59:4	59:2 68:16 76:7,9
<b>contempt</b> 34:16	<b>costs</b> 18:1 58:16	36:4,18 49:2 74:8	<b>cut</b> 16:25 50:18	76:20 98:2
<b>content</b> 58:2 64:15	75:2	74:8 79:18 87:21		<b>debilitating</b> 25:13
<b>context</b> 30:24 62:20	<b>council</b> 3:24,24	87:21	<b>D</b>	<b>decades</b> 43:3 46:21

74:3 <b>decades-long</b> 40:12 <b>December</b> 59:10 95:9 99:23 <b>decided</b> 36:18 <b>deciding</b> 77:17 <b>decision</b> 38:24 55:3 70:5 80:9 96:8,22 <b>decisions</b> 1:9 73:10 <b>declined</b> 53:20 <b>dedicated</b> 61:4 <b>deep</b> 43:2 86:11 <b>default</b> 20:15 <b>defences</b> 17:22 <b>defend</b> 14:17 <b>defendants</b> 14:24 14:25 56:18 79:5 79:6,7,13,16 <b>defendants'</b> 56:8 <b>defining</b> 75:14 <b>deflected</b> 15:22 <b>degree</b> 15:13 96:18 <b>delay</b> 16:13 36:9,11 36:14,23 77:12 78:1 <b>delays</b> 15:17 18:12 18:13 <b>deliberate</b> 10:18 <b>deliberately</b> 13:3 <b>deliberations</b> 90:4 <b>deliver</b> 1:18 4:17 8:2 <b>demands</b> 22:4 <b>demonstrate</b> 58:14 <b>denied</b> 47:1 <b>departments</b> 22:17 <b>describe</b> 35:10 <b>described</b> 36:22 41:12 <b>description</b> 7:1,12 34:20 <b>deserve</b> 55:25 <b>designated</b> 5:17 <b>detail</b> 3:8 27:25 35:13 70:16 92:18 <b>detailed</b> 5:25 18:15	61:7 99:17 <b>details</b> 57:5 92:1,2 <b>determination</b> 2:10 31:14 51:20 82:4 99:18 <b>determine</b> 7:20 72:11 <b>determined</b> 70:5 <b>determinedly</b> 79:17 <b>determining</b> 90:24 <b>devastating</b> 16:20 25:12 <b>develop</b> 52:14 55:6 60:21 <b>developed</b> 54:10 <b>developing</b> 15:15 72:22 77:13 <b>development</b> 71:5 <b>Devon</b> 3:24 4:2 31:25 32:6 67:6,8 68:2,10 69:11,13 81:9 83:12 84:24 <b>died</b> 48:12 <b>different</b> 13:10 14:18 15:10 16:9 25:8 30:6 31:4 41:21,22 45:22 54:19 65:23 67:14 67:15 91:19 98:14 <b>difficult</b> 33:24 40:25 <b>difficulties</b> 43:16 57:13 63:14 82:16 88:21 97:16 <b>difficulty</b> 16:14 25:24 26:7 27:4 <b>direct</b> 77:2 89:10 <b>directed</b> 11:17 <b>directing</b> 36:7 <b>direction</b> 36:21 <b>directly</b> 47:1 99:13 <b>director</b> 61:8 <b>disappointed</b> 96:12 <b>disbelieved</b> 34:23 <b>disclose</b> 94:9 <b>disclosed</b> 7:10	93:12 94:24 97:23 <b>disclosure</b> 6:4,14 59:11,12 61:11,13 70:3 73:9 80:1 84:25 94:8,13,16 94:19,23 95:23 96:1 97:17 98:1,6 <b>discretely</b> 81:25 <b>discretion</b> 29:25 30:9 72:11 <b>discuss</b> 1:24 27:21 42:14 <b>discussion</b> 45:11 73:17 92:10,22 101:7 102:8 <b>disputed</b> 7:14 64:6 93:9 <b>distress</b> 36:24 <b>divert</b> 18:4 <b>dockets</b> 83:8 <b>document</b> 4:14 8:6 27:7 60:21 62:1 62:21 89:11 94:18 98:22 <b>documentary</b> 6:18 <b>documentation</b> 6:15 32:6 82:18 82:22 83:3,6,13 84:24 <b>documents</b> 6:23 68:12 82:20 83:15 94:24 95:4 <b>doing</b> 1:23 9:18 24:16 25:5 37:2 40:15 42:25 51:8 55:16 <b>door</b> 55:19 <b>doubt</b> 3:7 48:24 64:16,17 71:2,11 99:9 <b>dovetails</b> 19:6 <b>downgrade</b> 40:13 <b>drafts</b> 5:25 <b>drawn</b> 44:1,19 <b>dressing</b> 16:8 <b>Drusilla</b> 1:7	<b>due</b> 2:11,24 11:12 11:16 22:23 57:5 70:21 81:3 85:8 93:11 99:19 <b>Durham</b> 3:25 31:25 46:22,25 <b>duties</b> 46:25 47:25 58:18 <b>duty</b> 22:15 37:18 37:21 <b>dwindling</b> 42:23 <b>Dyson</b> 79:9 <hr/> <b>E</b> <hr/> <b>e</b> 78:3 100:3 <b>earlier</b> 54:13 73:14 74:20 77:9 85:21 87:9 90:6 <b>early</b> 53:19 78:22 79:14 <b>easier</b> 96:16 <b>easy</b> 14:10 <b>economic</b> 38:6 <b>educated</b> 24:10 <b>education</b> 84:2 <b>effect</b> 16:20 25:1,6 25:13 33:17 40:6 40:14,19 88:24 <b>effective</b> 32:17 <b>effectively</b> 18:2 34:22 <b>effects</b> 9:10 30:20 39:22 <b>efficiency</b> 59:19 <b>efforts</b> 84:10 <b>eight</b> 53:6 86:9 <b>either</b> 37:11 41:1 45:17 49:2 51:19 92:10 <b>elaborate</b> 62:23 <b>elaboration</b> 60:14 <b>elicited</b> 70:19 <b>Elizabeth-Anne</b> 44:10 <b>email</b> 24:15 94:20 <b>emotionally</b> 96:19	<b>emphasise</b> 11:5,21 25:1 76:4 82:14 <b>emphasised</b> 24:15 <b>emphasising</b> 10:3 <b>employed</b> 31:17 33:2 <b>employees</b> 59:1 <b>enable</b> 6:7 64:19 65:4 95:11 <b>encompassed</b> 88:23 <b>encountered</b> 24:9 97:15 <b>encouraged</b> 65:20 <b>encouraging</b> 65:10 <b>endeavour</b> 92:19 <b>endorse</b> 71:24 <b>endorses</b> 71:24 <b>engaged</b> 15:1 <b>enquiry</b> 7:18 <b>Enright</b> 23:15 24:13,17 40:7 82:7 <b>ensure</b> 3:5 76:5 94:13 <b>ensured</b> 41:23 <b>enter</b> 73:10 <b>entitled</b> 13:11 18:7 <b>Equally</b> 40:3 <b>error</b> 27:8 <b>escaped</b> 79:1 <b>essence</b> 44:19 <b>essential</b> 11:15 19:3 <b>essentially</b> 14:21 16:8 23:25 30:8 46:8 76:12,16 <b>Essex</b> 85:15 <b>establish</b> 82:20 <b>established</b> 41:8 62:5 83:7 <b>establishing</b> 13:2 <b>establishment</b> 41:9 <b>Evans</b> 1:8 <b>event</b> 78:19 <b>everybody</b> 18:2 46:16 95:23 <b>evidence</b> 6:2 7:3
--	--	--	--	--

10:23 11:3,7 15:23,25 16:3,11 16:12 23:2 28:6 30:14 34:9,18 35:21 37:15 43:9 43:10 44:13,20 47:10 51:21 54:3 54:7,10 55:17 56:7,12 59:17 61:19 62:13 63:14 63:16,23,25 64:24 64:25 65:2,13,17 66:17 68:12 70:11 70:18 71:23 72:1 72:7 73:3,9 75:1,7 75:13 80:18 88:17 89:1 90:4 91:9,14 92:14,25 93:5,7,9 93:13,13,18,19,21 94:1,11 96:7,10 96:12,17,20 97:7 97:7 98:14,15 <b>evidential</b> 36:14 <b>ex</b> 16:7 <b>exact</b> 94:12 <b>exactly</b> 45:12 96:5 <b>examination</b> 71:13 94:6 <b>examine</b> 7:14 56:10 64:18 <b>examining</b> 1:16 55:3 <b>example</b> 11:10,13 14:7 15:21 19:16 19:17 20:4 32:23 46:11 65:20 70:7 78:12 80:22 83:5 90:17 91:16 <b>examples</b> 12:24 13:7 54:19 76:11 <b>exceptionally</b> 63:18 <b>exclusive</b> 9:23 57:24 <b>excuse</b> 91:3 <b>exemplified</b> 11:11 <b>exercise</b> 6:11 12:22	61:13 <b>exhaustive</b> 8:5 <b>existing</b> 1:16 4:16 7:25 11:8 62:20 66:11 71:25 <b>expand</b> 66:4 <b>expanded</b> 57:19 <b>expansion</b> 6:1 <b>expect</b> 37:12,17,18 37:21 75:12 <b>expeditious</b> 56:9 <b>expended</b> 38:8 <b>experience</b> 13:8 24:1 30:15 43:18 78:7 88:25 <b>experienced</b> 42:17 43:24 44:10 <b>experiences</b> 10:20 42:19 63:10,23 64:1,25 74:13 88:2 <b>experts</b> 17:25 <b>explain</b> 55:15 64:15 <b>explained</b> 57:22 <b>explaining</b> 63:25 <b>explains</b> 7:2 <b>explanation</b> 45:25 <b>exploitation</b> 34:2,9 34:16 <b>exploration</b> 93:19 <b>exposure</b> 32:11 <b>express</b> 12:5 <b>expressed</b> 68:20 75:19 <b>extend</b> 30:1 <b>extended</b> 66:12 <b>extensions</b> 6:13 <b>extent</b> 1:16 4:15 7:25 10:22 22:13 32:14 40:4 60:6 <b>extract</b> 14:5 <b>eye</b> 18:8 <hr/> <b>F</b> <hr/> <b>f</b> 78:14 <b>F16</b> 23:19 83:5	<b>F21</b> 83:5 <b>F24</b> 23:19 <b>F26</b> 23:21 <b>F27</b> 23:21 <b>F30</b> 23:21 46:17,19 47:1 <b>F35</b> 23:22 <b>F36</b> 23:19 <b>F41</b> 23:23 <b>F42</b> 23:23 79:24 80:3 88:13,14,16 <b>F43</b> 23:20 46:6,17 76:13 82:1,2 <b>F43's</b> 76:3,8,18 <b>F47</b> 23:23 88:16,19 <b>F50</b> 23:21 <b>F51</b> 23:19 <b>face</b> 21:12,15 <b>faced</b> 16:10,24 57:13 <b>fact</b> 13:11 17:1 27:15 35:6 38:19 38:22,24 50:20,21 51:8 60:16 70:21 88:10 <b>facto</b> 16:7 <b>facts</b> 70:11,17 93:10 <b>factual</b> 7:15 64:7 72:11 <b>failed</b> 21:14 22:14 22:25 23:1 40:8 45:17 46:19,20,22 50:5 <b>failing</b> 29:12 34:17 50:7 <b>failure</b> 28:24 40:4 40:12 <b>failures</b> 21:17 29:10,11 34:7 41:21 52:6 86:18 90:20 <b>fair</b> 67:15 <b>fairly</b> 39:10 64:20 72:14,15 <b>fairness</b> 12:1 45:12	<b>fall</b> 94:24 <b>familiarise</b> 94:22 <b>far</b> 4:24 6:4,25 7:23 29:11 38:20 51:21 67:8 70:23 72:3 73:2,15 78:8 83:23 84:2 94:8 <b>fashion</b> 51:6 <b>favour</b> 66:6 71:21 <b>fear</b> 24:23 <b>feature</b> 86:9 <b>featured</b> 8:17 <b>features</b> 8:15 <b>featuring</b> 60:10 <b>feed</b> 13:18 <b>feeding</b> 20:2 <b>feel</b> 22:22 37:5 51:1 80:9 84:6 89:12 90:25 <b>feelings</b> 77:25 78:18 96:15 <b>feels</b> 28:23 <b>felt</b> 25:9 <b>field</b> 86:23 <b>fifth</b> 11:19 30:21 45:2 <b>Fifthly</b> 9:4 <b>files</b> 83:9,10 <b>film</b> 86:9 <b>filters</b> 97:24 <b>final</b> 2:1 6:19,19 42:9 79:19 95:10 <b>finalisation</b> 73:8 <b>finalised</b> 5:23,25 93:23 <b>finally</b> 31:9 65:7 77:1,4 95:5 98:9 <b>finance</b> 42:23 <b>financial</b> 38:9 42:1 43:16 <b>find</b> 46:16 50:25 82:20 <b>finding</b> 43:16 49:8 <b>findings</b> 34:1 35:5 46:24 50:6 64:19 70:21 72:18 93:12	<b>Fine</b> 53:8 <b>finish</b> 47:13 <b>finished</b> 54:23 <b>firm</b> 54:20 79:24 <b>first</b> 4:13 6:4 7:5 8:13 9:19 10:8 28:8,10 34:6,21 45:10 53:2,4 55:18 58:11 59:23 60:8 62:2 63:16 64:23 65:20 70:2 73:24 86:22 92:24 96:11 97:25 <b>firstly</b> 21:4 54:15 <b>fit</b> 1:18 4:17 8:2 71:6 86:3 <b>five</b> 2:10,21 5:9 7:4 9:19 23:16 26:15 61:23 87:17 99:18 <b>flexibility</b> 9:23 57:24 <b>focus</b> 8:12 9:22 17:20 18:8 25:17 27:3 88:1 97:7 <b>focused</b> 16:18 74:11 81:15 85:22 90:7 93:18 <b>focusing</b> 8:9 <b>follow</b> 12:3 39:15 97:4 <b>following</b> 5:25 7:3 7:4 24:17 27:2 58:10 <b>follows</b> 8:13 31:22 58:13 <b>force</b> 17:12,16 27:19 46:9 <b>forces</b> 12:1 17:11 32:1 43:5 46:2,7 47:8,8 50:7 51:10 51:13,16 68:4,6 69:16 <b>Ford</b> 3:23 67:1,2 91:24,25 98:23,24 <b>Forde</b> 5:19 23:20 25:20 31:11 44:6
---	--	---	--	--



81:5,8,15 82:10 82:15,17 84:6,16 85:19 <b>forecasts</b> 38:9 <b>foremost</b> 25:13 <b>forget</b> 47:18 <b>form</b> 19:3 27:3 32:23 72:18 90:18 <b>former</b> 32:8 <b>forms</b> 50:2 <b>forthcoming</b> 85:3 <b>Fortunately</b> 5:14 <b>forum</b> 85:6 <b>forward</b> 14:21 17:19 26:9 27:1 27:25 30:11,18 37:2 38:19 41:19 42:4 47:6 50:16 51:11 52:10 57:4 88:22 <b>found</b> 95:3 <b>founded</b> 43:14 <b>four</b> 5:15 58:11 <b>fourth</b> 8:25 10:24 59:6 87:11 <b>frameworks</b> 1:17 4:16 8:1 <b>Frank</b> 1:7 <b>frankly</b> 28:7 42:1 <b>frequency</b> 30:16 <b>Friday</b> 95:8,12 <b>friend</b> 27:21 <b>friend's</b> 29:14 <b>friends</b> 50:21 <b>front</b> 26:20 <b>frustrating</b> 84:7 <b>fulfil</b> 23:11 <b>fulfilled</b> 46:25 <b>full</b> 1:11,11 64:12 65:16 <b>fully</b> 52:14 <b>functions</b> 60:13 62:20 63:1,17 <b>fundamental</b> 20:10 23:5 63:4 <b>funding</b> 8:21 75:11	<b>funds</b> 60:4 <b>further</b> 2:1 3:4,7 6:17 7:24 21:1 29:21 34:17 37:7 40:18 46:18 57:5 59:12 61:25 71:19 72:23 85:3,5 89:13 95:1 99:20 <b>Furthermore</b> 62:7 <b>future</b> 11:18 20:25 26:5 37:16 38:23 40:18 52:17 72:6 75:14	96:20 97:7 98:15 <b>given</b> 5:18 6:17 12:2,14 21:23 23:25 32:18 45:14 56:12 67:10,16 72:17 <b>gives</b> 80:21 <b>giving</b> 65:13 98:13 <b>go</b> 2:16 12:13 27:15 27:25 58:9 63:19 95:19 96:6 97:24 <b>goal</b> 26:3 <b>Goddard</b> 53:20 <b>goes</b> 4:24 13:13 70:23 73:16 <b>going</b> 11:15 14:21 15:6 17:14,19 19:8 20:25 21:9 23:17 26:3 27:10 34:19 35:14 38:7 40:23 42:15 50:24 52:12,16 59:12 70:8 72:18 73:4,7 80:13 88:20 97:7 <b>good</b> 1:4 12:24 13:7 44:19 53:2 54:4 58:6 78:12 80:22 94:14 <b>goodly</b> 33:7 <b>government</b> 22:17 41:14,20,21 <b>governs</b> 29:23 <b>grasp</b> 38:16 <b>grateful</b> 10:3 26:21 27:9 60:14 81:23 <b>great</b> 19:12 73:21 96:5 97:5 <b>greater</b> 9:24 24:3 68:23 <b>greatest</b> 26:10 <b>greatly</b> 68:7 <b>Greatorex</b> 3:24 67:3,4,5 84:22,23 98:25 99:1 101:1 <b>Greystone</b> 79:9 <b>ground</b> 57:20 60:24	75:21 <b>group</b> 9:1,2 23:20 53:17 54:16,19,21 54:24 55:2,4 56:13,15 61:17 63:2,24 64:13 <b>groups</b> 10:20 32:10 <b>growing</b> 34:9 <b>guidance</b> 4:11 95:1 95:3 <b>guides</b> 36:5 <b>Gumbel</b> 44:11	<b>head</b> 41:2 <b>heal</b> 40:2 <b>healing</b> 41:13 <b>health</b> 78:14,15 <b>hear</b> 2:3 12:8 15:25 22:23 28:6 33:25 35:7,24 37:15 44:7 63:21 74:15 81:19 89:5 93:5,7 96:10 <b>heard</b> 9:2 16:11 30:4 35:18 51:21 57:18 63:24 72:1 82:10,11 95:14 <b>hearing</b> 1:14,21,22 1:25 2:1,6,12,19 2:23 3:3,5,6,8 4:8 5:1,11 6:21 8:8 11:22 21:11,21 27:22 45:6,24 62:12 63:10,14 64:17 65:15,18 71:15 89:25 93:3 93:15,16 95:5,5 99:8,21,22,23 100:1 <b>hearings</b> 1:10,12 18:15 25:19 31:22 59:9,17 69:7,18 70:20 71:3 92:14 92:22,24 93:1 94:10,15 98:11 102:8 <b>hears</b> 35:21 56:7 <b>heart</b> 10:12 49:6 91:15 <b>Heath</b> 79:9 <b>heavily</b> 8:17 <b>held</b> 6:9 22:2 82:21 82:21 <b>hellholes</b> 28:8 35:9 <b>help</b> 13:6 31:8,17 96:24 97:5 <b>helped</b> 5:7 <b>helpful</b> 52:10 80:2 91:3 96:8,22
	<b>G</b>		<b>H</b>	

99:16 <b>helpfully</b> 54:16 78:4 <b>high</b> 49:8 74:8 87:21 <b>high-profile</b> 63:11 <b>highest</b> 48:23 <b>highlight</b> 13:14 <b>highlighted</b> 12:25 17:24 <b>historical</b> 11:12 72:8 <b>hold</b> 1:20 <b>holiday</b> 53:5 <b>home</b> 21:25 25:21 31:24 32:7,22 35:11 40:9 51:23 51:25 52:6 81:9 85:15,17 86:7,10 89:17 90:16,18,21 <b>homes</b> 14:7 46:4,13 60:11 62:10 79:7 81:4 87:12,17,20 <b>honesty</b> 58:15 <b>hope</b> 12:16,20 13:18 24:9 27:18 52:9 70:22 72:1 73:12 74:24 84:9 96:2 97:14 98:3 <b>hoped</b> 6:2 14:8 <b>hopefully</b> 58:8 <b>hoping</b> 27:20,20 <b>horrors</b> 40:24 <b>hostel</b> 43:14 <b>hostels</b> 43:17 <b>Hough</b> 3:22 14:12 59:21,22,23 67:1 72:3,24 77:1,2 89:9,10 98:21,22 100:24 <b>Hough's</b> 15:24 <b>Howe</b> 21:22 23:8 23:15 <b>hurt</b> 24:21 25:9,9	<b>idea</b> 15:9 <b>identified</b> 8:6 9:20 10:8 48:12 57:4 84:16 86:16 <b>identify</b> 61:24 82:19 84:11 90:17 <b>identifying</b> 75:6 82:5 88:13 <b>identity</b> 80:1,19,21 <b>ignored</b> 35:3 <b>illusion</b> 68:9 <b>illustrate</b> 63:8 <b>immediately</b> 38:11 73:10 <b>impact</b> 77:19 78:1 78:2,16 <b>impacted</b> 74:12 88:2 <b>implications</b> 50:23 <b>importance</b> 46:5 48:20 61:15 <b>important</b> 7:12 11:21 14:20 16:17 18:8 30:23 47:14 62:9,14 64:1 69:2 69:13 76:17 79:23 80:17 82:12 92:25 93:17 <b>importantly</b> 59:15 77:24 <b>imposition</b> 9:5 <b>impossible</b> 50:10 84:8,8 <b>improvement</b> 11:18 <b>improvements</b> 17:21 <b>Imran</b> 3:15 <b>include</b> 10:1 44:2 62:6 68:25 69:5 94:3,6 <b>included</b> 10:5 11:20 21:8,19 22:10 45:5 47:17 82:13 87:20 <b>includes</b> 9:13 31:24	39:20 43:4 <b>including</b> 6:7,23 8:20 9:1 11:25 31:25 60:17 74:7 93:9 <b>increase</b> 66:7 <b>increasingly</b> 36:20 <b>incur</b> 58:16 <b>indefinitely</b> 66:12 <b>indemnify</b> 20:8 <b>Independent</b> 1:5 34:2 <b>indicated</b> 6:21 70:20 <b>individual</b> 7:1 9:18 9:25 10:22 12:12 24:19 32:4 42:7 43:12 46:19 47:4 48:1 49:4 53:12 66:24 68:24 73:19 77:8 80:25 92:10 94:5 <b>individually</b> 23:24 <b>individuals</b> 10:20 11:24 12:1 27:17 28:17 29:13 44:8 44:17 45:8,13,20 46:16 73:6 86:16 90:22 91:10 <b>inevitably</b> 10:11 27:16 46:15 <b>inexorably</b> 15:3 <b>inform</b> 5:8 42:21 <b>information</b> 4:21 6:6 60:12 61:12 72:25 75:3 95:1 <b>informed</b> 13:6 35:17 90:1 96:24 <b>informing</b> 72:20 <b>informs</b> 21:18 22:21 <b>infrequently</b> 30:9 <b>initial</b> 5:24 49:5 <b>injuries</b> 7:8 9:9 39:21 54:12 <b>injury</b> 16:16 59:25	<b>injustice</b> 28:22,24 <b>Inquiries</b> 74:5 <b>inquiry</b> 1:5,6,13,23 2:13 4:15 5:3,12 6:1,5,24 8:4 10:1 10:14,19 11:15 13:25 15:11 17:8 19:21 22:6,6,8,12 22:13 23:4,11 24:11 25:4,5,16 25:18 26:4,6,8,10 26:17 27:12,19,24 28:2,11,19 29:2 29:18,20 30:3,16 30:18 31:6,8,21 32:20,24 33:6,8 33:10,12,14,24 34:2,6 35:7,16,16 35:21 37:8,9 38:16 39:12,14,18 40:6,15,15 41:1 42:6,8,12,19,21 43:19 45:1,13,23 47:16 50:17 51:4 51:5,16,20 56:14 57:3,12,18 58:16 60:22 61:5,13 63:9 64:5,12 65:4 65:9,21 67:7,14 67:20 68:10,11,16 68:22,24 69:3 76:2,13 80:19 82:3,23,25 83:4,8 83:20 84:10 85:1 85:8 89:2 90:1,3 91:12,14,21,22 93:4,5,20 94:9 97:18 98:5 <b>inquiry's</b> 2:8 4:10 7:2 9:22 26:19 27:6 32:14 72:20 83:22 94:18 95:4 <b>inside</b> 24:21 25:9 <b>insight</b> 46:18 <b>insofar</b> 69:14 <b>instance</b> 6:4 12:25	13:19 17:10 <b>institution</b> 20:9 31:13 37:12 40:8 49:19 90:22 <b>institutional</b> 6:9 28:7 41:11 <b>institutions</b> 5:21 6:6,13 7:19 21:14 21:18 22:14,17,21 22:25 23:17 26:2 29:16 31:16 32:22 32:23,25 35:9,12 37:11 39:6 40:5 41:16,24 43:17 44:2,4 45:22 46:14 52:2,7 60:3 60:9 64:8 66:3 70:15 73:6 74:2 84:1 88:18 <b>instructed</b> 13:20 55:18 80:7 <b>instructions</b> 78:3 82:2 <b>instructive</b> 79:12 <b>instructs</b> 38:20 <b>insurance</b> 3:21 8:22,22 15:23 16:5 20:4,5,7,15 22:1 30:7 32:2,7 35:20,23,24 37:2 37:7,11 38:2,4,15 38:23 39:1,5 49:18 56:24 58:7 58:23,25 60:2,3,4 62:10 66:3 74:9 77:18,19 78:6,8 <b>insured</b> 78:13 79:13 <b>insurer</b> 60:9,11 78:11 <b>insurers</b> 14:25 57:15 58:21 65:12 66:5,6 72:2 77:22 78:3 94:4 <b>integrity</b> 58:15 <b>intend</b> 61:5
<b>I</b>				

<b>intended</b> 9:21 71:17 95:9	69:14 70:10 71:18 72:13 73:11,15	14:15 20:22 22:7 22:7,8 27:2 31:21	62:6,19 66:14 71:9,16,18	<b>late</b> 53:6 71:20 97:17
<b>intending</b> 3:17	74:14 76:4 81:11	33:11 36:23 44:16	<b>justify</b> 64:15 71:13	<b>law</b> 11:13 36:3 63:4
<b>intends</b> 58:13,14,16 94:9	82:17 83:22 84:16 84:17 85:16 86:20	51:12 53:10,12 57:3,11,15,21,23	<hr/> <b>K</b> <hr/>	63:17 66:11,15,17 71:1 77:13 87:25
<b>intentionally</b> 77:7	86:21 88:21 89:20	59:15,17 60:17	<b>keen</b> 57:2	<b>lawyerised</b> 16:18
<b>interacts</b> 58:15	90:19 93:14 95:7	61:7,22 64:7 67:6	<b>keep</b> 18:8	<b>lawyers</b> 32:2 44:8
<b>interest</b> 54:17 60:6	97:20 99:22	67:14 68:14,18,22	<b>keeping</b> 53:3 83:24	53:24 55:19 56:8
<b>interested</b> 55:21,23 55:24	<b>investigation's</b> 4:10 5:7	70:2,4 71:2,4	84:14	56:12 57:15 72:1 77:21 94:4
<b>interesting</b> 35:24	<b>investigations</b> 24:7	72:12,13,21,22	<b>kept</b> 83:24 84:3	<b>lead</b> 2:13 17:5
56:3,10 77:10	34:25 46:5 47:15	73:1 74:8,12	<b>key</b> 8:9 20:22 41:10	39:15 53:16,21
<b>interests</b> 12:1 38:25	68:8,19 82:12	77:18,25 80:15	<b>Khan</b> 3:15 21:2,3,4	54:18 79:20 80:7
45:12 58:18 66:14	94:16 97:16	86:12 92:14 93:9	23:13 55:9 75:22	<b>leadership</b> 34:8
78:9,10	<b>invite</b> 2:13 12:8	93:18 97:18 98:12	75:23 97:9,10	<b>leads</b> 39:11
<b>interim</b> 40:17 41:7 65:8	15:24 23:4 81:6	99:18	100:14	<b>learn</b> 37:16
<b>interview</b> 48:2,14	86:2 88:3 90:11	<b>iterative</b> 5:24	<b>kind</b> 19:20 60:4	<b>learned</b> 27:21
<b>interviewing</b> 48:6	95:16	<b>Ivor</b> 1:7	65:25,25	29:14 50:21 65:5 98:11
<b>intimated</b> 90:3	<b>invited</b> 53:10 67:19 93:11	<hr/> <b>J</b> <hr/>	<b>kinds</b> 65:23	<b>learning</b> 37:23
<b>introduce</b> 3:11	<b>involved</b> 7:11 16:1	<b>Jay</b> 1:4	<b>knew</b> 34:12,12	45:24 64:23
<b>investigate</b> 4:15	18:2 31:23 44:14	<b>Jillings</b> 74:4	<b>know</b> 1:9 2:9 12:16	<b>learnt</b> 44:22
57:12 58:22	57:13,15 62:22	<b>job</b> 15:18 96:13,15	17:13 19:13 22:6	<b>leave</b> 47:12
<b>investigated</b> 4:12	63:2,11 81:7 94:4	<b>Jonathan</b> 3:22	25:2,5 26:20	<b>led</b> 15:16 74:3
5:9 9:17 11:1	<b>involvement</b> 17:1	<b>journey</b> 15:20	27:12 29:23 32:13	81:11 85:17 87:15
49:25 74:4 77:15	44:25 47:19 51:10	<b>judge</b> 29:25 44:11	32:15,22,24 34:24	<b>left</b> 3:12 49:15 59:4 76:17
<b>investigating</b> 13:17	51:22 60:7 67:9	44:14	35:1,20 40:19	<b>leg</b> 39:25 40:2
<b>investigation</b> 1:15	<b>involves</b> 69:14	<b>judges</b> 36:5	48:18 49:20 54:7	<b>legal</b> 6:16 10:25
1:15 2:14,16,20	<b>involving</b> 68:17	<b>judgment</b> 20:12	54:18 59:12,13,16	14:16 22:2 31:17
3:13 4:9,12,20,24	<b>IPCC</b> 46:24	<b>judgments</b> 6:24	60:1 68:6 69:2	32:8 44:14 57:14
6:16 7:14,17,22	<b>irrelevant</b> 95:1	74:7 87:21	79:24 80:8 97:17	58:13 77:23 99:10
8:5,12 10:2,6,13	<b>issue</b> 8:15 10:21	<b>July</b> 41:17	98:9,14	<b>legislation</b> 19:17 37:20
10:18 11:6,20	11:20 13:4 15:8	<b>junior</b> 3:12 26:17	<b>knowing</b> 79:2	<b>legitimate</b> 14:16
12:8 13:16 21:16	17:15 20:6,18	<b>jurisdiction</b> 50:3	80:18	<b>length</b> 52:9
21:20 22:20 23:18	23:5 30:17 38:18	<b>jury</b> 36:7,22 49:3	24:10 43:2 62:24	<b>Leonard's</b> 23:22
24:2 25:16,22	45:5 47:18 70:7	91:18	90:8	85:14,14 86:7,7 86:13
39:13,14,19 42:16	70:23,25 71:7	<b>justice</b> 1:17 4:4,17	<b>known</b> 42:22 87:18	<b>lessons</b> 37:16,23,24
45:1,21 46:22	72:10 74:14 80:17	5:4 8:1 11:8,19	<b>knows</b> 43:15 76:13	44:22 64:23 65:5
47:20 48:1,7,9,21	83:20,21 84:15,15	14:11 17:2,5	<hr/> <b>L</b> <hr/>	<b>let's</b> 48:19
48:25 50:5,19	87:22 91:21 94:8	20:11,11,17 21:8	<b>lack</b> 20:12 45:21,21	<b>letter</b> 56:25 57:2,6
51:8 52:12,15	95:25	22:10 40:10 45:3	<b>Lambeth</b> 13:2	58:2 92:2
55:10,17 57:4	<b>issues</b> 2:25 3:7 4:12	45:4 47:2,17	<b>large</b> 61:14 63:2	<b>level</b> 34:15 36:4 78:23
58:12 59:7 60:15	5:8 7:3,4,15 8:6	48:17,20 49:7	70:12 72:4 74:1	
61:2 62:15 64:6	8:10,20 9:20,24	50:1,9,14,22,23	<b>largely</b> 63:3	
64:12,14 65:4	10:4,8,15,19,24	51:2 52:4 54:1	<b>lasting</b> 64:17	
67:9,12 69:1,6,7	10:25 11:4 14:14	55:10,15,22,23	<b>lastly</b> 9:15 87:6	
		56:2,2 60:12 61:7		

<b>liabilities</b> 89:23	54:21,22,24 55:1	<b>losing</b> 26:12	<b>March</b> 5:2,12	<b>methodology</b> 4:20
<b>liability</b> 14:15 15:9	55:2,4,13 56:13	<b>lost</b> 71:10,11	21:22	<b>Metropolitan</b> 4:3
60:2 65:12	56:15 58:21 63:2	<b>lot</b> 52:9 54:4 55:23	<b>market</b> 66:5	<b>middle</b> 30:21
<b>life</b> 25:7	63:5,20 64:20	95:25	<b>marshal</b> 59:18	<b>Middlesbrough</b>
<b>life-changing</b> 40:1	65:1 74:7,11,13	<b>lots</b> 54:14	<b>marshalled</b> 16:12	3:23 89:22 91:5,7
<b>lifelong</b> 40:1,3,6,14	74:23 75:1,4 76:6	<b>Lowell</b> 53:20	<b>Martin</b> 82:24	91:13
<b>light</b> 13:23 70:5	77:12,17,19,25	<b>lumped</b> 39:24	<b>material</b> 6:8,9,12	<b>migration</b> 41:6
83:2	78:11,15,20 79:15	<b>lunch</b> 2:5	6:18,22 26:9	<b>Millar</b> 54:20
<b>likewise</b> 3:15	79:21 81:16,16		83:10,19,24,25	<b>Miller</b> 36:17
<b>limit</b> 29:24 32:10	85:21,23,24 87:18	<b>M</b>	84:7,11 94:9	<b>mind</b> 10:6 25:14
32:11 51:7 53:11	87:19,23 88:1,23	<b>ma'am</b> 19:2 53:2	97:23	26:11 57:22
<b>limitation</b> 9:5 11:1	90:8 94:7	75:18 84:19 89:5	<b>matter</b> 42:13 45:10	<b>minimum</b> 27:4
13:3 14:15 17:22	<b>little</b> 29:21 32:16	<b>madam</b> 3:4 4:19	72:10 82:9,23,24	28:3 66:4
19:12,14 20:3	35:13 83:1,1	12:4,14,20,20,23	<b>matters</b> 4:11 12:5	<b>ministers</b> 22:18
29:17,22 30:12	86:22	13:14,25 18:22	12:11 13:17 14:20	<b>minute</b> 25:9
35:17 36:1,16,25	<b>live</b> 20:6 59:16 91:6	21:4,21 22:12	16:18 18:17 20:4	<b>minutely</b> 64:18
37:1 49:17,21	<b>Liverpool</b> 79:6,10	23:15 26:18 27:12	41:7 43:8 51:6	<b>minutes</b> 53:6
50:11,12 66:10,12	<b>local</b> 14:24 21:25	34:1,24 50:6	59:19 80:14 85:5	<b>mismanagement</b>
66:13,21 71:2	37:12,18,21 38:2	56:24 58:2 67:5	95:2 99:20	52:7
87:23 88:2	38:13,18,19,24	67:17 68:2 69:24	<b>mean</b> 8:14 10:10	<b>missing</b> 83:5
<b>limitations</b> 22:5	39:5 40:9 74:1	70:12 71:19 73:19	24:3 28:13 33:16	<b>mistake</b> 80:24
65:24	77:22 78:6,24	74:20 76:23 80:13	45:15 83:1 97:22	88:10,10
<b>limited</b> 12:10 59:18	82:21 85:18 89:18	84:23 85:13 87:8	<b>meaningfully</b> 80:4	<b>mistakes</b> 22:3 33:5
67:9	89:25	89:12 92:4,12,25	<b>means</b> 20:12 29:4	<b>MMI</b> 3:22 58:20,24
<b>limits</b> 9:6 74:9	<b>location</b> 98:14	93:17 95:13,16,22	45:12 48:8 49:6	59:4,5,8
87:22	<b>lodged</b> 58:7	97:2 99:7,8,14	60:17 62:8,10	<b>MMI's</b> 58:11
<b>line</b> 11:5 38:6	<b>Lois</b> 3:12	<b>magistrates</b> 49:2	71:6 96:2	<b>module</b> 53:19 54:7
<b>lines</b> 44:19	<b>London</b> 13:1 85:15	<b>main</b> 31:20 57:6	<b>measure</b> 72:4	<b>modules</b> 24:7 25:17
<b>linkage</b> 54:2	<b>long</b> 36:8 42:5	86:12	<b>measured</b> 31:1	56:20 97:16
<b>linked</b> 50:24	63:20,20 86:10	<b>majority</b> 20:6	<b>mechanics</b> 19:5	<b>moment</b> 30:10
<b>list</b> 9:20 12:16	88:24	<b>making</b> 7:5 29:24	20:1	56:21 69:12 81:3
42:13 57:21,23	<b>long-term</b> 43:2	36:9,16 37:23	<b>medical</b> 98:12	81:25 91:3
61:22 93:21,23	<b>look</b> 13:12 14:21	38:24 40:16 48:5	<b>meet</b> 22:11	<b>Monday</b> 95:8
<b>listed</b> 77:15	15:7 22:20 26:22	52:8 66:2 82:3	<b>meeting</b> 27:23	<b>monetary</b> 62:4
<b>listened</b> 57:9	33:2 37:9 49:19	<b>Malcolm</b> 1:8	62:11 97:14 98:4	<b>money</b> 55:21 61:4
<b>litigants</b> 55:11	51:10 54:16 57:4	<b>manage</b> 96:19	<b>meetings</b> 99:10,11	<b>months</b> 6:12
<b>litigating</b> 78:21	70:2 79:12 82:7	<b>managed</b> 35:11	<b>members</b> 1:6 2:18	<b>mooted</b> 65:14
<b>litigation</b> 8:20,24	<b>looked</b> 26:2 27:5	81:8 87:12 89:17	59:23 65:7 67:5	<b>morning</b> 1:4 2:4
9:1,2,4 10:25 11:1	39:7 44:18 76:9	91:21	<b>men</b> 43:13,15	19:13 53:2,4
11:14,15 15:2	76:12 83:6,7	<b>management</b> 8:25	<b>mental</b> 78:14,15	57:10,19 58:1
16:1 19:5 28:16	86:13	10:24 81:15 85:23	<b>mention</b> 4:5	68:3 95:17
29:10 38:1,17	<b>looking</b> 13:24	94:19	<b>mentioned</b> 43:22	<b>move</b> 39:8 42:7
40:24 43:23,25	17:22 24:6 26:14	<b>managers</b> 34:14	46:17	44:24 85:13
44:1,3,6,10,12	26:16 37:8,22,25	<b>managing</b> 90:21	<b>merely</b> 80:8	<b>moved</b> 16:2
49:12,12 51:9	38:13,16,25 39:2	<b>Manchester</b> 54:22	<b>Merseyside</b> 4:5	<b>multiple</b> 11:2
53:17,22 54:17,20	45:25 48:4 78:25	78:11	<b>message</b> 70:22	<b>Municipal</b> 58:7

<b>Mutual</b> 58:7	<b>night</b> 24:24	<b>obtain</b> 11:2 20:13	72:17	27:16 91:4
<hr/>	<b>nine</b> 75:7,8	66:3	<b>opposed</b> 78:22	<b>panel</b> 1:11,12 2:18
<b>N</b>	<b>non-sitting</b> 95:10	<b>obtained</b> 6:22	98:13	12:4,4 15:11 25:4
<b>N</b> 100:3	<b>non-state</b> 22:14,16	<b>obtaining</b> 10:13	<b>optimistic</b> 92:16	33:4 59:23 65:7
<b>national</b> 41:9 79:6	<b>nonviable</b> 66:8	11:7 15:21	<b>oral</b> 69:7,18 93:1,5	67:5 77:2 92:25
83:16	<b>normally</b> 80:6	<b>obvious</b> 10:14 94:5	93:7,19 94:1	93:4,10,11 96:8
<b>nature</b> 8:22 24:16	<b>North</b> 4:6 13:12	<b>obviously</b> 16:15	96:10	<b>panel's</b> 25:14
69:3 77:18	14:7 18:18 25:21	26:25 27:16,20	<b>orally</b> 57:10	<b>paper</b> 54:5,6 60:18
<b>near</b> 75:14	46:3,12 53:22	28:1 29:17,23	<b>order</b> 3:5 19:9,20	61:7
<b>nearing</b> 54:23	62:24 73:24,25	52:13 55:6,25	19:25 33:11 89:7	<b>papers</b> 54:11 72:21
<b>nearly</b> 54:19	74:6,22 81:4	60:25 68:4 79:20	93:16 95:16	<b>paragraph</b> 7:13
<b>necessarily</b> 24:3	<b>north-west</b> 79:3	79:24 80:6 95:23	<b>orders</b> 7:7 9:14	14:6,23 15:24
<b>necessary</b> 1:24 8:3	87:18	<b>occasionally</b> 24:13	<b>ordinarily</b> 72:16	21:7 23:8 27:6
17:23 40:16 48:3	<b>notable</b> 73:25	<b>occasions</b> 29:11	<b>organisation</b> 59:2	28:10 45:2 57:20
58:17 63:12 80:20	<b>note</b> 7:12 24:18	66:15	59:18	61:22,24 68:21
93:7 96:1	<b>notice</b> 67:15	<b>occurred</b> 37:15	<b>organisations</b> 6:6	69:4
<b>need</b> 11:21 12:2,5	<b>notified</b> 4:6	71:12 94:16	7:20 11:24 12:2	<b>paragraphs</b> 12:25
13:25 16:6 17:9	<b>notorious</b> 86:9	<b>occurs</b> 10:1 68:24	31:23 32:12 42:18	14:13 77:2 89:10
19:8,21,24 20:18	<b>Nottinghamshire</b>	<b>Odds</b> 86:8	45:8,14 72:16,16	<b>paramount</b> 37:19
20:24 26:1,2,23	13:20 15:6	<b>offered</b> 61:17	<b>organised</b> 35:10	46:5
28:6 29:3,20	<b>November</b> 1:20	<b>Office</b> 21:25 22:18	<b>original</b> 82:22	<b>parcel</b> 90:18
33:12 36:21 41:5	2:24 3:7 59:10	31:24 32:7,22	<b>originally</b> 89:16	<b>Park</b> 5:19 23:20
42:9,14 45:14,19	69:8 94:15 95:8	35:11 40:9 51:23	<b>ought</b> 3:2 18:6	25:20 31:11 44:6
49:11 55:7 59:13	99:22	51:25 52:6 81:9	54:16 71:22 77:15	81:5,8,15 82:10
67:10 69:25 72:5	<b>November/Dece...</b>	83:16 89:17 90:16	<b>outcome</b> 8:23	82:15,17 84:6,16
73:3 76:5 78:25	1:25	90:18,21	<b>outline</b> 12:15 16:20	85:19
80:9 82:1 89:12	<b>nowadays</b> 63:19	<b>officer</b> 34:7	<b>outlined</b> 12:12	<b>parliament</b> 22:18
90:3 91:21 92:13	<b>Nugent</b> 61:17 87:13	<b>officers</b> 11:25 23:1	20:20 77:20,23	<b>part</b> 12:22 15:17
95:14 96:3,18	<b>number</b> 13:10	23:2 34:22	81:24 90:6	23:17 25:22 32:23
97:24 99:13	24:12 33:7 60:17	<b>ongoing</b> 6:12 15:5	<b>outstanding</b> 75:11	35:15 41:12,25
<b>needs</b> 2:23 15:13	70:12 74:1 86:16	25:12 28:21 33:20	85:2 99:20	56:13 78:12,13
16:7 22:20 26:21	87:20	63:14 82:25 83:20	<b>overall</b> 11:13 12:8	90:18 93:13 96:13
28:4,20 29:15	<hr/>	<b>online</b> 36:6	13:25 39:12 40:14	<b>participant</b> 5:12,17
30:23 31:1 35:7	<b>O</b>	<b>opening</b> 1:3 95:6	81:15 82:10 85:23	5:21 6:10 17:12
36:15 38:4,6 39:6	<b>O'Mara</b> 23:24 42:8	100:5	<b>overcome</b> 50:10	23:25 33:9 40:21
40:16 51:4 52:2	42:25	<b>openness</b> 58:14	<b>overlap</b> 53:13 56:3	53:18 60:8 69:11
59:18 75:15 77:25	<b>obfuscation</b> 16:14	<b>opens</b> 55:19	<b>overly</b> 51:7	70:9 81:19 93:5
82:5 86:20 90:20	<b>objection</b> 56:14	<b>operate</b> 32:25	<b>overriding</b> 7:24	99:12
90:23 91:14 99:12	91:8,13	<b>operation</b> 11:19	<b>overtly</b> 13:3	<b>participants</b> 2:9,11
<b>Neil</b> 4:3	<b>objective</b> 8:3	45:4 47:17 89:23	<b>owned</b> 85:15	6:7,10 10:3 12:9
<b>networks</b> 43:18	<b>objectives</b> 31:20	<b>operational</b> 34:14	<hr/>	13:9 23:16 24:14
<b>never</b> 21:23 32:18	<b>obligations</b> 21:15	<b>opinion</b> 19:4,11	<b>P</b>	24:17 27:14 28:5
83:15	<b>observation</b> 75:19	<b>opinions</b> 11:3 33:5	<b>page</b> 26:22 27:2,5	28:7,22 33:9,23
<b>new</b> 19:16,19 41:14	<b>observations</b> 12:11	<b>opportunity</b> 1:22	28:9 42:9 45:2	39:22 52:11 57:8
<b>nicely</b> 14:12	16:23 19:2 70:1	12:2,21 16:19	57:21,23 76:13	67:19 68:13,15,18
<b>Nigel</b> 3:21 23:24	<b>obstruction</b> 16:14	24:6 44:7 45:14	<b>pages</b> 6:14 23:8	69:2,16 70:25

73:13 74:16 75:8 80:15 81:6 82:19 83:18 86:2 88:4 90:12 92:17 93:24 94:10,17 95:7,11 96:9 97:22 <b>participate</b> 61:9 <b>particular</b> 2:20 6:2 9:5 10:4,17 12:24 14:13,14 15:4 17:16,17 21:19 24:19 27:9,22 30:17 35:18 37:8 37:14 38:8 43:20 50:19 52:12 55:4 68:17 72:5 74:17 80:19 81:7,17 83:13 85:24 88:1 88:19 90:22 91:12 97:20 <b>particularly</b> 17:22 23:6 67:10 68:5 <b>parties</b> 11:14 14:3 51:16 63:5 <b>partway</b> 69:7 <b>path</b> 14:10 <b>Paul</b> 3:24 <b>pause</b> 33:7 53:17 <b>Pausing</b> 12:7 <b>payable</b> 41:3 <b>paying</b> 38:22 <b>payments</b> 60:5 <b>Payne</b> 3:25 67:21 67:22 92:7,8 99:2 99:3 <b>Penelope</b> 44:9 <b>people</b> 12:15,17 15:17,25 16:24 18:9 24:4,12 33:8 34:12,12 35:22 40:6,20 41:15 42:5 44:7,20 48:12 50:8 52:9 59:2,4 75:8 84:6 86:17 96:11,16 97:25	<b>perceived</b> 81:18 85:25 <b>perfect</b> 90:17 <b>perfectly</b> 82:5 96:17 <b>performance</b> 58:17 <b>period</b> 29:17,22 30:1,12 35:17 36:1,25 37:1 49:17 50:12,12,20 51:5 66:10,12,21 74:2 82:6 88:22 <b>permissions</b> 75:11 <b>person</b> 24:20 48:4 61:18 <b>personal</b> 24:20 <b>Personally</b> 56:13 <b>persons</b> 5:16 7:20 93:25 96:9 <b>perspective</b> 26:8 28:20 39:2 43:12 52:10 <b>Peter</b> 2:14 3:16,19 <b>phase</b> 6:20 13:16 13:20,24 18:20 73:9 <b>phases</b> 13:17 <b>pick</b> 46:15 54:13 <b>picked</b> 73:12 <b>Picking</b> 19:7 <b>piece</b> 54:21,24 63:20 65:1 <b>pieces</b> 63:2 64:20 <b>pithily</b> 58:12 <b>place</b> 2:24 4:22 37:14 64:7 67:13 74:1 87:24 <b>places</b> 13:10 <b>placing</b> 13:4 <b>plc</b> 56:24 <b>please</b> 2:16 44:24 51:7 95:19 <b>Pleming</b> 3:21 56:22 56:23,24 58:4 76:22,23 84:18,19 87:2,3 92:3,4	98:17,18 100:20 <b>pm</b> 2:6 52:19,20,22 92:13 99:25 <b>point</b> 5:7 11:5,21 13:15 14:5 15:15 17:18 18:10,11 26:25 28:10 29:9 30:21 32:14 33:6 35:17,19 36:7,15 39:18 42:9 47:21 47:24 48:8,15 49:5,21 50:11 51:3,9 54:5 55:8 55:13 56:11 57:16 58:24 59:6 62:17 64:3 69:25 70:11 71:8,10,19,22 72:22 73:3 80:8 80:16 82:14 88:13 <b>pointed</b> 11:9 78:4 <b>points</b> 2:3 9:19 14:2,16 16:22 26:24 27:1,9,17 27:25 28:1,9,19 29:19 30:6,22 31:1 32:5 33:14 35:14 37:9 38:15 47:7 54:4,9,13 57:6,25 58:11 60:23 61:25 65:8 68:4 72:3,24 73:12 77:10 82:11 88:19 89:13 90:14 95:22 <b>police</b> 4:2,3,5,6 11:25,25 17:11,12 17:16 21:18 22:1 22:18,20 23:1,1 29:11 31:24 32:1 32:8 34:15,19 40:8 43:5,6 44:25 45:16 46:1,4,6,9 46:19,22,25 47:8 47:8,12,14,19,24 47:24 49:1,6 50:5 50:7,15 51:10,12	51:16 52:1 55:12 55:16 68:3,4,6,10 69:15,16 70:7 71:9,14 76:3,6,14 81:10 85:16 86:14 86:20,25 <b>policy</b> 19:7 20:2,19 <b>political</b> 34:7 78:23 <b>portray</b> 16:8 <b>portraying</b> 16:13 <b>position</b> 5:15 14:17 15:4 20:15 22:24 30:13 42:7 46:7 51:17 52:3 57:7 59:25 76:16 78:5 78:6 81:23 <b>positive</b> 61:10 <b>possibilities</b> 43:24 <b>possibility</b> 99:10 <b>possible</b> 11:4 17:16 37:16 49:16 65:14 80:17 83:11,14 91:20 93:7,8 94:12 96:10 98:13 <b>possibly</b> 35:10 95:24 <b>post</b> 16:7 <b>potential</b> 37:22 71:1 83:25 <b>potentially</b> 44:11 44:14 47:9 75:8 91:3 <b>practicable</b> 93:20 <b>practical</b> 8:4 51:11 <b>practicality</b> 65:11 <b>practice</b> 11:3 12:24 13:7 19:23 66:18 <b>practices</b> 11:11,16 71:23 72:2,8,9 <b>practitioners</b> 43:7 <b>prayed</b> 50:13 <b>preceded</b> 72:21 <b>precious</b> 68:6 <b>precluded</b> 20:11 <b>predecessor</b> 53:20 89:24	<b>prejudge</b> 17:15 <b>prejudice</b> 90:5 91:20 <b>preliminary</b> 1:14 1:22 2:1 3:5,10 5:1,11 21:11 45:6 89:25 93:2 99:21 99:23 <b>premium</b> 38:22 <b>premiums</b> 66:7 77:19 <b>preparation</b> 2:23 59:9 96:19 <b>preparations</b> 1:24 <b>prepare</b> 96:25 <b>prepared</b> 36:21 82:2 96:17 <b>preparing</b> 94:14 <b>presaged</b> 8:7 <b>present</b> 3:11,16 11:16 37:5 42:12 63:13 71:23 72:9 97:19 <b>presented</b> 86:23 <b>presenting</b> 36:10 97:21 <b>presently</b> 6:16 <b>President</b> 53:23 <b>prevalence</b> 40:13 <b>previous</b> 6:24 87:14 <b>previously</b> 5:16 32:3 71:12 87:13 <b>primarily</b> 55:24 <b>primary</b> 8:12 27:3 62:18 74:14 <b>principal</b> 4:12 77:11 <b>principle</b> 72:7 <b>prior</b> 94:10,19 <b>priority</b> 21:11 34:15 <b>private</b> 74:2 <b>privilege</b> 25:12 44:16 <b>proactively</b> 61:18
--	--	--	---	--

<b>probably</b> 41:16	<b>proportionality</b> 72:10	<b>providing</b> 16:19	29:17,21 30:19,24	71:4,22 81:1
<b>problem</b> 15:3,4,5	<b>proportionate</b> 8:9	18:5 43:5,7 59:14	36:9,14 37:7 39:3	<b>reason</b> 17:7 20:8
20:10 34:10,13	42:4 64:4 67:11	88:17,21	39:8,11 40:3	43:13 44:19 75:10
56:10 80:6 82:25	93:2	<b>provision</b> 68:12	42:10,15 43:23	77:11
<b>problems</b> 16:24	<b>proposals</b> 5:8 9:17	<b>provisional</b> 93:20	44:25 45:2 47:12	<b>reasonable</b> 42:4
17:4,21,25 45:20	22:24 61:10	94:25	49:18 51:22 64:11	48:24
51:19	<b>propose</b> 20:22 58:9	<b>psychology</b> 78:2	91:5	<b>reasons</b> 37:3 50:18
<b>procedural</b> 1:9	67:17 74:11,15	<b>public</b> 1:12,21 3:3	<b>questions</b> 31:23	60:8 76:5 94:5
18:17	81:14 85:22 87:25	3:6,18 17:17	86:15 90:24 91:1	96:11
<b>Procedure</b> 55:5	90:7	18:14 25:19 31:22	97:19	<b>reassure</b> 68:10
<b>procedures</b> 16:3	<b>proposed</b> 3:1 7:23	59:9 62:12 65:11	<b>quite</b> 30:6 38:17	<b>recall</b> 5:14 8:17
<b>proceedings</b> 2:7	26:15 42:13 67:6	65:18 70:19 71:3	54:2 56:3 77:5	21:21 65:22
7:11 29:22 36:12	<b>proposes</b> 67:14	78:16 92:14,22,24	<b>quote</b> 31:5,6 34:1	<b>recap</b> 73:25
46:3 64:19 74:3	<b>proposing</b> 35:21	94:15 102:8	36:17 39:23	<b>receive</b> 64:23 70:12
<b>proceeds</b> 25:5	<b>prosecute</b> 86:18	<b>publicly</b> 6:23 93:15	<b>quoted</b> 11:7 25:8	72:7
<b>process</b> 5:24 7:5	<b>prosecuted</b> 49:1	<b>publish</b> 33:5	33:25	<b>received</b> 5:23 6:15
9:4,6,8 11:14	50:2	<b>published</b> 2:8 4:10	<b>quoting</b> 46:16	41:4 94:11
17:24 19:6 21:19	<b>prosecuting</b> 22:19	5:3,5 7:2 11:6		<b>receiving</b> 57:5
22:21 28:15 29:24	<b>prosecution</b> 21:13	<b>pulling</b> 31:18	<b>R</b>	71:22
41:12 44:15,15	21:16 48:22,22	<b>purpose</b> 2:19 4:8	<b>raise</b> 63:13 68:18	<b>recognise</b> 14:6 40:4
45:24 48:14 49:4	50:16	7:21,24 11:2	80:15 90:14	40:12 42:3 44:13
55:14,15 56:5,6	<b>prosecutions</b> 46:11	22:13 48:17 60:15	<b>raised</b> 30:4,5,7 31:2	61:15 66:6
56:13,15 60:18,18	<b>prospect</b> 47:1	60:16 62:18 72:12	35:14 37:9 68:15	<b>recognised</b> 18:6
61:6,13 62:13	<b>protect</b> 21:15 22:15	<b>purposes</b> 26:8	70:25 71:3,11	36:8 42:6,8
65:22 69:6 71:16	<b>protected</b> 86:24	94:14	80:14 85:5 89:13	<b>recognising</b> 22:5
81:16 85:21,24	<b>protection</b> 58:18	<b>pursued</b> 79:17	99:9	<b>recommend</b> 39:15
88:1 94:23 96:2,4	<b>protections</b> 65:13	<b>put</b> 14:12 26:9 27:2	<b>raises</b> 80:16	41:8 65:21,25
96:20	<b>protocol</b> 95:3	29:5 30:11,18	<b>raising</b> 30:17	84:15
<b>processes</b> 9:12	<b>prove</b> 9:8 39:21	31:23 32:16 37:1	<b>ramifications</b>	<b>recommendation</b>
10:16 71:9 94:7	<b>proved</b> 92:16	47:6 48:18 49:22	66:18	19:21 41:10
<b>production</b> 5:24	<b>proven</b> 64:9	50:15 61:3 69:9	<b>range</b> 10:13 11:3	<b>recommendations</b>
<b>Professor</b> 1:7	<b>provide</b> 1:22 2:15	72:7	60:3 99:17	11:17 13:19 19:22
<b>profoundly</b> 46:20	2:19 17:7 24:10	<b>puts</b> 28:11	<b>raped</b> 43:13,15	26:5 34:3 40:17
<b>programme</b> 41:14	38:21 41:14 44:7	<b>putting</b> 38:19 41:19	<b>rare</b> 63:19	40:18 65:6,8,9
<b>progress</b> 61:2 75:6	44:21 47:9 51:17	52:10	<b>raw</b> 33:18 55:17	70:23 72:6
<b>progresses</b> 10:7	59:13 60:11 78:9	<b>Q</b>	<b>reach</b> 56:5	<b>recommends</b> 41:1
<b>project</b> 60:18	80:20 92:2 93:21	<b>QC</b> 2:14 3:18,21,22	<b>read</b> 12:21,22 22:9	<b>reconsider</b> 23:4
<b>prolonged</b> 63:6	94:12	3:23 4:1 14:12	26:23 57:8 77:10	<b>record</b> 61:3 67:13
<b>prolonging</b> 78:15	<b>provided</b> 4:24 5:6	26:17 27:21 44:11	93:4	84:14
<b>prominence</b> 9:25	45:18 46:1 59:10	45:3 69:9	<b>ready</b> 3:6	<b>records</b> 83:16,23
68:23	60:2 61:6,11 75:2	<b>quantification</b> 9:9	<b>real</b> 13:10 20:18	83:25 84:3,9,13
<b>proper</b> 45:23	75:10 91:10,11,12	30:19 32:15 33:16	22:7 98:1	<b>redaction</b> 96:1,4
<b>properly</b> 47:15	91:14 95:24	39:21	<b>realise</b> 76:18	<b>redactions</b> 94:25
48:25,25 49:1,25	<b>provides</b> 4:11	<b>queried</b> 72:19	<b>realistic</b> 88:17	95:2
49:25 50:5,8	10:23 46:18	<b>question</b> 23:5 26:11	<b>realistically</b> 64:12	<b>redress</b> 13:2,11
58:22 65:16			<b>really</b> 68:3 69:1,13	15:21 16:15 18:2

18:11 39:17 41:8 41:9,13,25 65:21 65:25 71:1 <b>reference</b> 14:4 22:11 23:11 66:20 72:22 <b>referred</b> 93:14 <b>referring</b> 21:22 <b>reflecting</b> 37:3 <b>reflects</b> 51:22 <b>reform</b> 19:14,20 61:10 66:14 <b>reforms</b> 65:14 66:22 <b>reformulate</b> 63:5 <b>refuges</b> 42:18 <b>refused</b> 55:2 <b>regard</b> 10:2 81:20 89:2 92:9 98:10 <b>regarding</b> 34:16 <b>regards</b> 32:21 34:4 61:2 76:6 <b>regime</b> 19:19 <b>register</b> 65:11 <b>reiterate</b> 85:7 <b>reiteration</b> 60:16 <b>relate</b> 44:16 47:7 51:12 53:10 79:24 82:11 84:1 <b>related</b> 44:8 <b>relates</b> 37:13 49:13 79:19 81:25 82:14 83:13 86:14,14 <b>relating</b> 7:15 80:1 84:1 95:2 <b>relation</b> 2:14 6:10 7:4 14:2 16:22 21:7,10 22:23 23:3 30:11 32:4 35:5 37:7 43:12 43:23 46:3,11,12 46:21,25 47:10,20 49:22 57:7,17 58:20 70:21 82:9 86:6,13,15 88:11 88:18 89:2 90:14	91:10,19 95:23 <b>relatively</b> 14:10 92:15 <b>Relativity</b> 94:18,20 <b>relevance</b> 61:1 71:8 86:19 <b>relevant</b> 6:8,22 55:13 67:8 83:3,4 83:15,21 92:1 93:12,22 95:3 <b>reliance</b> 54:6 <b>relied</b> 93:13 <b>relieved</b> 17:12 89:5 <b>relive</b> 40:20 <b>reluctant</b> 17:14 <b>rely</b> 19:11 <b>remaining</b> 6:3 <b>remarks</b> 1:3 100:5 <b>remind</b> 13:24 22:12 34:1 41:5 47:13 <b>reminded</b> 41:5 <b>reminds</b> 77:5 <b>remorselessly</b> 25:6 <b>remove</b> 94:25 <b>removed</b> 69:11 <b>removing</b> 17:21 <b>reparation</b> 8:14 10:10 23:6 25:15 28:12,18 29:4 33:15 62:6 <b>reparations</b> 1:15 1:18 2:16 4:17 8:2 13:16 23:18 25:23 35:16 39:14 52:17 62:3 83:23 84:13 90:19 <b>repeat</b> 5:1 12:22 20:23 73:14 <b>repeated</b> 45:22 <b>repeating</b> 58:2 82:13 87:9 <b>report</b> 5:3,5 12:5 34:25 40:18 41:7 65:8 <b>reporting</b> 36:24 <b>reports</b> 6:24 34:19	34:21 <b>represent</b> 13:9 20:22 23:16 24:4 24:15 25:12 26:1 27:14 28:5,23 31:2,7,12 33:3 35:2 39:23 40:7 45:20 50:9 51:14 52:5,9,11 56:24 60:1 66:20 67:5 69:16 83:18 <b>representations</b> 80:5 90:12 <b>representative</b> 63:1 <b>representatives</b> 12:9 22:2 32:9 81:20 96:14,24 <b>represented</b> 51:15 79:21 <b>representing</b> 3:13 3:14,19,20 24:12 26:7 27:17 33:7 38:2 79:7 <b>request</b> 80:18 <b>requested</b> 6:5,13 59:11 61:12 <b>requests</b> 5:25 6:8,9 6:17 73:8 84:25 85:2,3,8 <b>require</b> 10:19 65:18 66:16 72:12 93:10,19 94:21 <b>required</b> 8:8 9:8,23 39:20 50:19 59:9 59:12 63:5 68:8 73:4 <b>requirements</b> 25:25 <b>requires</b> 66:1 <b>requisite</b> 97:24 <b>research</b> 4:23,25 60:18 65:19 <b>reserve</b> 57:7 <b>residential</b> 34:11 <b>resolution</b> 72:12 93:10	<b>resolve</b> 7:14 45:11 57:12 63:3 64:1,6 <b>resolved</b> 72:14 <b>resonate</b> 33:24 <b>resources</b> 17:23 18:5 26:11 38:7 59:19 68:5,6 69:17 <b>respect</b> 2:21 5:17 8:7 44:2 87:19 93:9 96:7 <b>respectful</b> 30:14 63:15 <b>respectfully</b> 43:22 50:21 64:11 65:15 <b>respective</b> 31:13,24 <b>respond</b> 12:3 45:15 67:17 69:24 72:17 80:4,18 <b>response</b> 21:6 46:9 51:17 61:7 80:16 87:8 <b>responses</b> 41:11 96:14 <b>responsibilities</b> 58:14 <b>responsibility</b> 38:5 38:5 41:20 89:17 <b>responsible</b> 7:21 20:9 21:25 31:10 31:15 48:10 60:3 86:17 <b>responsibly</b> 47:25 86:25 <b>rest</b> 21:18 22:21 <b>restrictions</b> 80:1 <b>result</b> 42:6 54:10 <b>resulted</b> 89:21 <b>resume</b> 52:19 <b>retrospective</b> 41:3 <b>returned</b> 83:15 <b>revealed</b> 14:7,9 <b>reviewing</b> 6:16 <b>revisit</b> 70:9 <b>ridiculous</b> 29:8 49:21	<b>right</b> 62:11 73:7 88:12 <b>rightly</b> 11:9 64:5 70:25 77:5 <b>rigid</b> 66:11 <b>road</b> 20:14 <b>Robson</b> 3:16 <b>role</b> 17:9,10 32:17 47:11 72:19 <b>rolling</b> 94:10 <b>room</b> 3:12,16 <b>root-and-branch</b> 7:18 71:17 <b>Rotherham</b> 34:3,5 34:10,21 35:5 50:7 <b>round</b> 76:10 <b>route</b> 38:17 <b>routinely</b> 30:5 <b>Royal</b> 3:22 14:4 35:20 39:16 41:10 60:1 <b>RSA</b> 11:10 60:8 61:1,3,6,11,14,19 64:15 <b>RSA's</b> 77:11 <b>rule</b> 66:4 92:1 <b>rules</b> 55:4,5 88:23 91:19 97:18,22 98:9 <b>run</b> 35:11 37:14 41:17 90:16 <b>running</b> 54:24 59:7 90:21 <b>runoff</b> 58:25
<hr/> <b>S</b> <hr/>				
<b>sadly</b> 76:16 <b>Sam</b> 3:18 <b>sat</b> 3:20 56:8 <b>satisfy</b> 20:12 <b>save</b> 97:4 <b>saying</b> 14:18 18:16 21:21 24:25 35:2 40:22 45:13 55:9 <b>says</b> 14:13 36:18				



<p>45:3 47:16 64:5  <b>scale</b> 14:8,9 34:13  <b>scandal</b> 74:6  <b>scepticism</b> 15:13  <b>schedules</b> 6:5 61:12  <b>scheme</b> 13:2 39:17  41:8,9,13,17,19  41:23 42:1 58:19  65:21,23,25  <b>schemes</b> 7:6 71:1  <b>school</b> 81:8 89:16  89:24 90:16  <b>schools</b> 60:11 87:14  89:18  <b>scope</b> 2:10 4:9,10  7:1,13,17 10:2  11:6 12:8 22:5,12  22:16 23:12 26:15  61:21 67:12 68:25  69:3,14 70:3,6  73:7,11,15 75:14  99:18  <b>scoping</b> 8:6  <b>Scottish</b> 66:19  <b>scrutinise</b> 62:12  <b>scrutiny</b> 15:14  <b>seated</b> 59:25  <b>second</b> 7:6 10:8  53:6 57:16 62:17  89:4 91:2  <b>secondly</b> 8:19  13:14 58:20 60:10  61:11 63:23 64:25  65:12 66:2 80:24  96:7,16  <b>Secretary</b> 4:4  <b>section</b> 66:13  <b>see</b> 13:7 19:17 20:7  20:24 27:19 32:6  38:11 65:5 71:6  86:3 88:15  <b>seek</b> 20:10  <b>seeking</b> 7:3 18:2  26:9 30:8 41:22  50:18,22 82:19,19  <b>seen</b> 12:23 21:4</p>	<p>57:23 69:9 75:4  83:7  <b>selected</b> 93:18  96:12  <b>self-explanatory</b>  58:8  <b>seminar</b> 5:4,6  53:25 54:1,3,12  55:22 60:18 61:6  61:9,9 65:22  <b>seminars</b> 4:22,25  5:6 8:18 30:7  71:12 72:19,20  <b>send</b> 94:19  <b>senior</b> 23:1 34:14  34:22 61:8  <b>sense</b> 14:16 17:8  28:21,24  <b>sensible</b> 36:13 42:3  65:10 67:10  <b>sensitive</b> 95:1  <b>sensitivity</b> 77:24  <b>sent</b> 24:17 61:8  <b>sentence</b> 4:13  <b>September</b> 2:1 3:5  99:21  <b>serious</b> 19:14 34:10  57:11  <b>seriously</b> 63:6  <b>seriousness</b> 34:13  <b>services</b> 1:16 4:16  7:9 8:1 9:15  10:15 22:1 42:10  42:15,22 43:10  62:7,16 76:14  78:16  <b>set</b> 3:10 9:16 14:22  23:7 27:1,1 28:2,9  29:19 30:20 31:4  33:22 36:16 39:16  41:7 44:5,21 45:1  47:5 50:20 57:21  66:22 70:4,13,16  73:7 86:6 90:15  <b>sets</b> 28:14 76:13  <b>setting</b> 33:12,14</p>	<p>46:8 51:18 57:1  <b>settle</b> 38:21 63:20  78:21  <b>settled</b> 79:14 81:17  85:25 90:2  <b>settlement</b> 9:10  81:18 85:25  <b>settling</b> 78:22  <b>seven</b> 82:7  <b>sex</b> 13:9  <b>sexual</b> 1:5,19 4:18  7:10,16 8:25 17:3  19:18 25:2,6 34:2  34:9,15 36:24  39:9,24 40:13  41:11 43:1,2,8  45:18 48:5 49:22  53:24 89:1  <b>sexually</b> 16:25  41:15  <b>shape</b> 20:25  <b>share</b> 22:4,4  <b>shareholders</b> 38:5  <b>Sharpling</b> 1:7  <b>shed</b> 13:22  <b>sheet</b> 39:3  <b>Sheldon</b> 4:3 69:19  69:20 99:6,7  <b>short</b> 21:6 27:13  52:21 58:8,10,11  65:7 66:25 68:3  95:22  <b>shortened</b> 18:13  <b>shortly</b> 6:3 60:20  92:15  <b>shown</b> 15:6  <b>side</b> 57:14 64:21  69:12 86:19 91:13  <b>sidelined</b> 35:4  <b>sides</b> 64:14  <b>signal</b> 97:19  <b>significant</b> 10:23  15:17 16:15 61:4  74:25 87:24  <b>significantly</b> 15:22  18:1</p>	<p><b>Simblett</b> 3:13 12:18  12:19,20 18:21,22  74:17,18,19,20  95:20,21,22 97:1  100:10 101:11  102:12  <b>similar</b> 35:5  <b>simple</b> 66:20  <b>simply</b> 19:11 36:14  53:10 61:3 67:13  85:7  <b>Simpson</b> 54:20  <b>Sir</b> 1:7  <b>sit</b> 1:10,12 56:3  75:16 92:19  <b>sitting</b> 1:6 3:18  24:6  <b>situation</b> 16:9  20:14 34:21 50:8  50:9,11,25  <b>six</b> 24:22 75:7 86:9  <b>Sixthly</b> 9:12  <b>Skelton</b> 2:14,16,17  2:18 12:18 26:17  27:21 29:2 45:3  55:7 57:18 60:14  61:22 69:22,23,24  73:18,19 75:17,22  75:24 76:22,24  77:1,4,7 80:12,13  84:18,20,22 85:10  85:12,13 87:2,4,6  87:8,10,11 88:7  89:4,9,12,14,15  90:15 91:24 92:3  92:5,7,9,23,24  95:19,20 97:2,9  97:11,15,21 98:3  98:7,17,19,21,23  98:25 99:2,4,6,8  99:15 100:8 101:5  101:9,17,21,25  102:4,10  <b>Skelton's</b> 21:7 79:1  <b>sketched</b> 12:7 62:1  <b>slightly</b> 15:15 92:19</p>	<p><b>small</b> 54:24 59:2,17  66:7  <b>Smith</b> 82:24 83:8  <b>social</b> 22:1 34:13  76:14  <b>Society</b> 87:13  <b>solely</b> 4:21  <b>solicitor</b> 44:9 53:16  53:21 54:19 79:21  82:24 83:8 91:22  <b>solicitors</b> 23:15  30:2,2,15 35:17  35:22 38:20 43:24  44:3,18 49:18  56:25 64:16 80:7  83:12  <b>somebody</b> 14:17  17:5 37:4  <b>somewhat</b> 29:8  45:11 59:8  <b>soon</b> 93:19 95:24  96:10,22  <b>sorry</b> 24:25 74:20  77:4  <b>sort</b> 16:18 19:9  <b>sorts</b> 13:23 18:16  <b>sought</b> 93:24  <b>space</b> 15:18  <b>spanned</b> 87:20  <b>spare</b> 26:21  <b>speak</b> 42:19 75:21  81:7 99:12  <b>speaking</b> 30:1  40:21  <b>specific</b> 10:24  66:18  <b>specifically</b> 61:6  85:5  <b>speed</b> 96:3  <b>spent</b> 69:17  <b>sphere</b> 36:10,11  <b>spoken</b> 91:7  <b>spread</b> 41:23 42:2  <b>square</b> 24:13  <b>St</b> 5:13,16,17 23:22  23:23,23 25:20,20</p>
---	---	--	--	--

53:15,16,17 56:16 56:16 62:24,25 77:12,12 79:5,5 79:16,16 81:2,2 85:14,14 86:7,7 86:13 87:11,12 88:12,12 <b>staff</b> 33:1,2 <b>stage</b> 12:10 17:17 18:18 37:6 52:16 53:19 70:24 71:20 75:16 <b>stages</b> 64:18 <b>stance</b> 15:1 <b>stand</b> 73:15 95:14 <b>standard</b> 48:23,23 49:9 <b>Stanhope</b> 5:20 23:22 24:21 25:21 46:20 89:15,16,24 90:15 <b>stark</b> 34:18 <b>start</b> 15:12 41:17 47:15 53:3 71:6 81:20 94:22 95:20 96:6 <b>started</b> 51:4 <b>starting</b> 3:6 5:6 26:25 29:9 47:21 47:24 48:15 49:5 50:11 51:3,9 74:17 86:3 88:5 <b>state</b> 4:4 19:16 22:14,16 28:24 33:10 <b>stated</b> 4:19 11:22 34:4 45:6 67:11 <b>statement</b> 46:8,8 48:2 51:17 59:14 59:14 76:8 <b>statements</b> 5:23 6:3 6:18 22:24 47:6 51:14 70:13 75:9 75:10 93:3 <b>states</b> 4:14 41:21 <b>statistical</b> 75:1	<b>status</b> 5:18 17:13 23:25 53:18 55:2 69:11 <b>statutory</b> 9:6 29:23 37:20 58:17 66:10 74:9 87:22 <b>stay</b> 69:12 <b>Stein</b> 3:18 22:23 23:13,14,15 52:18 55:8 56:11 70:11 70:24 71:8 75:24 76:1,2,21 78:4 79:22 80:2 81:21 81:22,23 86:4,5,6 88:7,8,9 89:3 90:12,13,14 97:11 97:12,13 99:9 100:16 101:13,19 101:23 102:2,6,14 <b>Stein's</b> 79:20 <b>Stephen</b> 3:13 <b>steps</b> 48:11 <b>stereotypical</b> 36:23 37:3 <b>Steven</b> 3:23 <b>stood</b> 74:20 81:1 <b>stories</b> 70:14 <b>straightforward</b> 14:10 65:10 <b>strands</b> 65:4 68:7 68:16 <b>strategy</b> 61:8 <b>stressed</b> 62:3 <b>strings</b> 31:18 <b>structured</b> 66:22 <b>struggle</b> 13:10 <b>Studd</b> 4:1 67:23 68:1,2 69:19 85:10,11 87:6,7 99:4,5 101:3 <b>studies</b> 1:21 2:10 2:21 3:1 4:22 5:10,22 6:23,25 7:1,4,13,23 8:12 8:16 9:3,25 10:12 10:17,23 11:2,12	12:13 19:9,24 25:19 26:15 27:3 53:12 60:10,19 62:22,23 64:8,19 66:24 68:24 71:4 71:5,7,25 72:23 72:25 73:17,20 77:8 80:25 87:14 87:25 89:19 92:11 93:4,14 94:5 99:19 101:7 <b>study</b> 5:13 8:7,10 9:18 13:21 71:20 71:21 74:11,15,17 81:7,14 85:13,22 87:11 90:7 93:23 <b>stuff</b> 13:12 <b>sub-bullet</b> 30:22 <b>subissues</b> 10:4 <b>subject</b> 10:23 21:12 29:25 60:23 68:19 74:6 76:3 81:10 86:8 91:11,19 <b>subjects</b> 60:25 62:14 <b>submission</b> 16:13 17:9 20:5,20 21:6 22:19 56:17 62:25 66:2 68:21 69:5 69:10 75:20 77:14 79:19 90:6 <b>submissions</b> 2:17 2:25 3:10 4:7 6:20 9:16,21 10:4 11:10 12:10,14,19 12:21 13:1,6 14:3 14:5,12,23 15:24 16:23 17:20,24 18:16 19:1 21:3,5 21:7,9,22 22:22 23:7,9,14 24:11 25:25 26:4,14,16 26:19 27:6,10,11 27:13,19 29:15 31:3,5 44:6 47:13 49:20 52:8 53:1,9	53:11 54:10,14,15 56:19,23 57:1,7,9 57:10,17,19,22 58:1,5,8,10 59:22 59:24 60:21 61:23 62:2 63:15 65:15 65:17 66:9,23,24 67:4,7,18,18,22 68:1,2 69:20,23 70:5 73:14,18,22 74:19 75:5 76:1 77:3,6,8,11 79:4 79:11,19,23 80:12 81:22 82:10,14 85:11,12 86:5,6 87:9,10 88:8,16 89:14 90:13 91:4 92:23 95:6,11,13 95:17,21 97:12 98:8 99:14,17 100:8,10,12,14,16 100:18,20,22,24 101:1,3,5,9,11,13 101:15,17,19,21 101:23,25 102:2,4 102:6,10,12,14,16 <b>submit</b> 15:11 23:10 62:13 64:2 <b>submitted</b> 63:8 <b>subsequently</b> 81:9 <b>successful</b> 21:13 <b>suffered</b> 28:6 32:16 40:1,7 42:5 <b>suffering</b> 39:25 76:15 <b>suggest</b> 24:5 27:4 28:2,4 29:15,20 33:22 35:8,23 36:25 37:10 38:3 38:16 39:12 40:3 41:1 42:3,17,25 43:9,19,22 45:23 46:6,9 47:4 51:11 51:19 64:22 65:16 76:15 82:13 83:9 84:8 86:12 88:15	90:21 91:2 92:19 <b>suggested</b> 37:14 39:19 <b>suggestion</b> 16:7 29:3 30:14 <b>suggestions</b> 44:23 <b>summaries</b> 61:16 62:22 63:7 <b>summarised</b> 58:12 <b>summary</b> 47:7 <b>Sun</b> 3:23 14:4 35:20 60:1 <b>sunnily</b> 16:9 <b>supplied</b> 61:16 <b>supplies</b> 60:4 <b>supply</b> 42:23 <b>support</b> 1:16 4:16 7:9,25 9:15 10:15 18:4 22:22 23:7 37:1 41:14 42:10 42:15,18,22,23 43:10,14,17,17 60:22 61:21 62:6 62:16 <b>supported</b> 48:5 <b>supporting</b> 37:24 65:12 <b>suppressed</b> 34:22 <b>Supreme</b> 15:8 <b>sure</b> 37:23 79:1,23 80:7 85:6 <b>surprising</b> 22:9 <b>surrounding</b> 74:24 <b>survivor</b> 3:20 25:8 43:1 46:15,17 47:22 96:9,23 <b>survivor's</b> 25:7 28:20 <b>survivors</b> 1:18 3:14 3:15,19 4:18 5:13 5:21 7:9,19 8:15 10:10,21 20:10,16 20:21 21:24 23:20 23:22 24:8 25:7 25:11 26:1,13 28:5,13,23 29:5
---	--	---	---	--

31:2,3,7,12,19,21 32:4,19,21 33:3 33:16 35:2,8 40:19,21 41:2,3 42:20,24 43:12 46:6 47:5 51:14 51:15 52:5 55:11 62:3 63:10 64:24 70:13 71:14 74:13 81:18 86:1 88:3 90:9 93:6 94:3 <b>survivors'</b> 45:24 <b>swept</b> 49:14 <b>swiftly</b> 86:25 <b>synthesis</b> 47:7 <b>system</b> 1:17 8:2 11:19,25 17:2,6 20:17 21:8 22:10 40:10 45:3,4,9 47:2,17 48:6,17 48:20 49:7 50:1 50:10,14,22,23 51:2 52:4 55:10 56:2,3,7 60:12 62:6,19,20 63:1 63:17 71:18 94:18 94:19,22 <b>systems</b> 4:17 11:8 15:10	<b>team</b> 6:16 26:8 83:20 99:10 <b>teams</b> 31:17 44:14 <b>technical</b> 80:8 <b>telephone</b> 24:19 <b>tell</b> 80:3 <b>ten</b> 75:8 90:2 <b>tension</b> 38:12 39:4 <b>term</b> 55:12 86:10 <b>terms</b> 17:19 18:17 22:11,16 23:11 28:15 57:21 59:1 60:22 66:4 74:22 75:6 84:23 88:25 <b>terrible</b> 14:8,9 <b>territories</b> 41:22 <b>thank</b> 2:18 12:18 12:20 18:21,22 19:2 21:2 23:12 23:13 52:18 56:22 58:4 59:20,21,23 67:1,2,2,3,23 69:19,20,24 75:16 75:23 76:21 77:7 80:11 87:7 88:6 89:3,8 92:4,24 95:22 97:1,8 98:16,18,20 99:5 99:7,15 <b>thanks</b> 98:24 99:15 99:24 <b>themes</b> 24:8 33:22 52:13 <b>things</b> 13:23 14:23 15:2,3 17:25 18:7 75:2 78:8 91:23 96:5 <b>think</b> 19:3 20:24 27:7,7,15 30:21 53:9,20 55:21 56:16 66:5 69:25 71:21,24 75:15,18 75:19 78:3 79:13 81:1 99:8 <b>third</b> 1:14 7:8 8:22 10:15 64:3 85:13	<b>thirdly</b> 58:24 65:2 66:9 <b>thoroughly</b> 49:24 <b>thought</b> 15:11 66:1 72:6 <b>threatening</b> 38:22 <b>three</b> 7:4 8:5 34:18 52:14 61:25 68:3 79:7,15 <b>three-week</b> 1:21 <b>throwing</b> 51:9 <b>Thursday</b> 95:9 <b>time</b> 5:11 6:13 9:6 16:1 18:9 24:4 26:11 27:15,23,23 29:24 31:15 36:2 49:11,20 50:20 56:6 59:3,5,7 61:4 70:9 74:9 82:6 87:22,24 88:5,22 89:4 93:16 94:14 94:22 <b>timely</b> 51:6 <b>times</b> 19:15 24:9 31:4 40:11 45:22 <b>timetable</b> 16:11 94:12 98:6 <b>today</b> 3:12,17 4:7 9:21 17:14 27:23 29:18 54:13,17 61:20 63:1,22 66:17 68:15 69:25 91:8 95:13 99:14 99:16 <b>today's</b> 1:22 2:7,19 65:15 <b>topics</b> 7:23 93:22 <b>total</b> 5:20 <b>totality</b> 94:11 <b>touch</b> 17:14 <b>touched</b> 19:12 20:4 <b>Tower</b> 85:16 <b>track</b> 83:19 <b>traffic</b> 20:14 <b>train</b> 53:5,6 <b>trained</b> 43:4	<b>training</b> 43:5,7 94:20 <b>transcript</b> 2:7 <b>transferred</b> 89:18 <b>travel</b> 98:13 <b>treated</b> 15:13 <b>treatment</b> 31:10,16 <b>trial</b> 49:2 63:21 78:22 81:13 85:20 <b>tribunal</b> 14:21 17:15 53:3 <b>tribunal's</b> 15:18 <b>tried</b> 65:23 <b>true</b> 21:24 32:19 38:12 54:12 <b>trust</b> 67:15 <b>try</b> 1:10 50:18 53:11 83:19 <b>trying</b> 20:10 40:24 <b>Tuesday</b> 1:1 <b>tug</b> 98:1 <b>turn</b> 38:1 73:19,20 81:5 82:9 91:4 92:13 <b>turning</b> 4:9 49:7 95:5 <b>turns</b> 74:25 <b>twists</b> 74:25 <b>two</b> 5:18 10:15 46:21 53:15 56:6 57:6 60:8,10 62:14 63:15 77:10 79:8,12,15 80:15 87:17,20 90:14 95:22 96:11 <b>two-day</b> 54:1 <b>type</b> 36:12 <b>types</b> 98:10	<b>uncertainty</b> 68:20 77:23 <b>unclear</b> 45:11 <b>underlying</b> 7:15 <b>underplayed</b> 34:14 <b>understand</b> 11:16 19:9,21,25 29:3 29:12 30:1,12,16 32:9 48:15,19 50:17 54:2 63:12 71:16 76:18 84:9 84:12 90:25 <b>understandably</b> 39:2 84:8 <b>understanding</b> 7:25 16:5 19:5 28:16 33:13,19 36:13 43:11 51:12 <b>understands</b> 57:13 <b>understatement</b> 84:5 <b>understood</b> 28:20 30:24 31:1 33:18 37:24 38:4 70:22 89:20 90:20,24 <b>undertake</b> 82:6 <b>undertaken</b> 2:21 2:23 <b>unfamiliar</b> 94:21 <b>unfortunately</b> 14:11 <b>unintentional</b> 74:21 <b>unqualified</b> 33:1 <b>unusual</b> 44:15,15 <b>update</b> 1:23 2:15 2:19 4:25 5:5 <b>updated</b> 5:3 <b>Uppal</b> 13:21 53:21 74:23 <b>urge</b> 80:10 <b>use</b> 17:25 30:8,9 36:5 48:17 51:13 69:4 83:25 84:4 93:16 <b>useful</b> 5:6 15:19
<b>T</b>				
<b>tactical</b> 15:4 <b>tailed</b> 17:19 <b>take</b> 2:4,24 13:3,25 15:1 17:9 27:7,10 29:20 41:25 48:2 52:18 65:20 67:14 <b>taken</b> 3:3 6:12 15:5 18:9 41:20 49:2 56:13 64:5 96:22 <b>takes</b> 15:12 56:6 <b>tale</b> 16:13 <b>talk</b> 81:1 <b>targeted</b> 6:7 8:8 64:4 67:11 <b>Taylor</b> 13:21 74:23				
			<b>U</b>	
			<b>ultimately</b> 18:6 31:10,15 81:12 85:20 <b>unavailability</b> 82:18 <b>unavailable</b> 48:13	

45:24 54:1,15 <b>usefully</b> 75:19	23:23 25:20 53:17 56:16 62:25 77:12 79:5,16 81:2 87:12 88:12	59:21 73:2 76:24 76:25 84:20,21 87:4,5 92:5,6 98:19,20 100:22	<b>word</b> 35:10 84:5 <b>words</b> 15:2 25:1 36:12 48:11 52:6 <b>work</b> 1:23 2:20,22 4:25 5:7 9:22 10:12 19:23 22:8 25:3,3,4 35:22 37:24 40:16 43:4 72:20 98:4	<b>young</b> 34:12 43:13 43:15 48:4 <b>youth</b> 34:11
<b>V</b>				<b>Z</b>
<b>valuable</b> 63:21 64:2 71:8 72:21 <b>value</b> 32:16 63:9 <b>various</b> 17:10 18:13 22:25 31:3 32:3,10 36:17 43:5 44:4 46:1 47:6,8 57:3,25 70:15 78:16 84:14 <b>vast</b> 20:6 84:5 <b>versus</b> 30:12 38:14 <b>vicarious</b> 14:15 15:8 <b>victim</b> 3:20 17:3 53:14 55:20 63:19 <b>victim/survivor</b> 3:16 6:11 <b>victims</b> 1:18 3:14 3:15,19 4:18 5:13 5:21 7:9,19 8:14 10:10,20 13:9 16:10 18:9,10 21:23 28:13 29:5 33:16 34:16 46:5 55:11 62:2 63:10 64:17,24 65:13 70:13 71:14 74:13 81:18 85:25 88:3 90:8 93:6 94:2 <b>victims'</b> 63:23 <b>victims/survivors</b> 5:19 <b>Victoria</b> 19:16 <b>videoconferencing</b> 98:10 <b>view</b> 8:11 14:1 37:3 64:22 <b>viewed</b> 72:8 <b>views</b> 10:13 12:6 33:5 56:15 60:12 92:18 93:24 <b>Vincent's</b> 5:17	<b>vital</b> 43:11 49:5 84:12 <b>vitality</b> 92:25	<b>website</b> 2:8 4:11 5:3 7:2 95:4 <b>week</b> 82:7 95:10 <b>weeks</b> 52:15 64:18 <b>welcome</b> 1:3,13 100:5 <b>welfare</b> 37:19 38:14 78:10 <b>whichever</b> 71:6 <b>whilst</b> 29:1,14 42:25 84:4 <b>wide</b> 4:20 99:17 <b>wider</b> 19:6 20:2 62:4 <b>widespread</b> 40:12 73:25 <b>widest</b> 25:17 <b>Williams</b> 3:12 26:7 26:17 98:4 <b>Williams'</b> 29:2 61:23 <b>willing</b> 78:8 <b>window</b> 16:8 <b>wiped</b> 47:18 <b>wish</b> 10:1 31:13 37:15 44:5 61:25 68:25 70:17 74:16 81:19 96:10,18 97:19 <b>wishes</b> 78:18,23 <b>wishing</b> 13:6 69:10 <b>withdrew</b> 83:13 <b>witness</b> 6:18 42:12 47:10 73:8 93:3,8 94:3 <b>witnesses</b> 10:22 42:13 43:19,21 44:1 45:16 70:3 93:17,21,25 96:23 97:6 <b>woke</b> 24:22 <b>women's</b> 42:17	<b>work/research</b> 72:24 <b>workers</b> 34:11 43:10 <b>working</b> 11:24 34:11 45:8 75:13 <b>works</b> 16:5 43:6 66:17 <b>world</b> 65:23 <b>worse</b> 19:10 78:16 <b>worth</b> 55:3 <b>wouldn't</b> 80:6 <b>writing</b> 27:14 <b>written</b> 4:7 9:16,20 10:4 11:10 12:21 14:3 16:23 17:24 20:5,20,23 21:5 31:4 44:5 56:25 57:9,17,19,22 67:7 69:10 <b>wrong</b> 13:5 50:21 69:4 96:6 <b>wrote</b> 21:10	<b>Zurich</b> 3:21 56:24 56:25 57:2,12 58:3
	<b>W</b>			<b>0</b>
	<b>waiting</b> 53:3 <b>waive</b> 82:3 <b>Wales</b> 4:6 13:12 14:7 18:18 25:21 46:3,12 53:22 62:24 73:24,25 74:6,22 81:4 <b>want</b> 17:20 19:17 21:14,24 31:21,21 32:6,9,13,15,22 32:24 55:16,17 58:10 68:9 85:7 96:17 <b>wanted</b> 14:17 <b>wants</b> 18:3 33:3 95:23 <b>war</b> 98:1 <b>Warrington</b> 79:9 <b>wasn't</b> 78:13 <b>watching</b> 24:1 <b>Waterhouse</b> 74:4 <b>way</b> 13:5 16:19 18:12 28:11,14 33:21 35:9 37:13 38:14 41:6 42:4 45:16 46:18,21 50:4 51:5,11 54:16 55:11 56:1 58:15 68:11 73:7 76:7,8,19 78:21 79:17 82:11 84:5 93:1 98:1 <b>ways</b> 74:25 <b>weak</b> 50:10 <b>wear</b> 53:15,23 <b>Webb-Jenkins</b> 3:22 58:4,5,6			<b>1</b>
				<b>1</b> 41:17 57:1 100:5 <b>1.00</b> 2:6 92:13 <b>1.10</b> 99:25 <b>10</b> 12:25 14:6 41:18 77:2 <b>10-minute</b> 2:4 <b>10.30</b> 1:2 <b>11</b> 77:2 <b>11.45</b> 2:5 <b>11.52</b> 52:20 <b>12</b> 34:6 89:10 100:10 <b>12.05</b> 52:19 <b>12.07</b> 52:22 <b>13</b> 23:8 27:6 28:10 57:20 61:22 89:10 <b>14</b> 21:7 23:8 61:24 95:9 <b>14-year</b> 56:15 <b>14(1)</b> 68:21 <b>19</b> 100:12
				<b>2</b>
				<b>2</b> 100:8 <b>2002</b> 34:18 <b>2003</b> 34:18 <b>2006</b> 34:18 <b>2013</b> 36:18 <b>2016</b> 4:22 <b>2017</b> 4:23 21:22 27:7 <b>2018</b> 1:1 5:2 19:4 19:10 20:25 57:1 <b>21</b> 100:14
			<b>X</b>	
			<b>X</b> 100:3	
			<b>Y</b>	
			<b>year</b> 1:12,20 2:2,24 5:12 15:7 21:10 27:8 41:17 52:13 54:7 <b>years</b> 13:13 24:22 34:6 36:20 41:18 54:18 56:6 59:1 63:3,25 79:15 87:20	

<p><b>23</b> 100:16  <b>25</b> 2:1 3:5 13:13                  23:16 33:8 54:18                  54:19 59:1 99:21  <b>26</b> 1:20 2:24 5:2,22                  94:15 95:8  <b>27</b> 23:22  <b>28</b> 5:12 21:22 23:8</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p><b>3</b> 14:13 65:20  <b>33</b> 66:13  <b>34</b> 23:21</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>41</b> 5:20  <b>42</b> 76:13 82:1</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p><b>5</b> 7:13 26:22 27:2,5                  28:9 42:9 57:21  <b>53</b> 100:18  <b>56</b> 100:20  <b>57</b> 91:4  <b>58</b> 91:5 100:22  <b>59</b> 100:24</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p><b>6</b> 14:23 45:2  <b>6(5)</b> 75:5  <b>60-plus</b> 74:23  <b>67</b> 101:1  <b>68</b> 27:16 101:3  <b>69</b> 101:5</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/> <p><b>7</b> 15:24  <b>7.15</b> 53:6  <b>73</b> 101:7,9  <b>74</b> 101:11  <b>76</b> 101:13  <b>77</b> 101:15</p> <hr/> <p style="text-align: center;"><b>8</b></p> <hr/> <p><b>8</b> 1:1 12:25  <b>80</b> 101:17  <b>81</b> 101:19</p>	<p><b>85</b> 101:21  <b>850-claimant</b> 54:21  <b>86</b> 101:23  <b>87</b> 101:25  <b>88</b> 102:2  <b>89</b> 102:4</p> <hr/> <p style="text-align: center;"><b>9</b></p> <hr/> <p><b>9</b> 92:1  <b>9(b)</b> 14:13  <b>9,300</b> 6:14  <b>90</b> 102:6  <b>92</b> 102:8,10  <b>95</b> 102:12  <b>97</b> 102:14  <b>98</b> 102:16</p>			
---	--	--	--	--