In the Matter of the Independent Inquiry into Child Sexual Abuse
Investigation: The Sexual Abuse of Children in Custodial Institutions

National Society for the Prevention of Cruelty to Children
P Noyes
First Statement (1)
17th October 2016

WITNESS STATEMENT OF PHILLIP NOYES

1 I, Phillip Noyes of the National Society for the Prevention of Cruelty to Children (NSPCC) 42 Curtain Road, London EC2A 3NH, will say as follows:

2 I am the NSPCC’s chief advisor on child protection reporting to the Chief Executive Officer and have been in this role since 2014. I hold a Master of Philosophy degree, and a Certificate of Qualification, in Social Work. I joined the NSPCC in 1980 and have been a board level director since 1998. I have been a professional advisor to the organisation Parents Against Injustice (PAIN) and a former chair of the Children’s Rights Alliance for England (CRAE). I was a member of the Home Office National Working Group on Sexual Violence against Children and Vulnerable People from 2013 to 2016. I am currently a trustee of the sexual health charity Brook Young People.

3 I am making this statement on behalf of the NSPCC in response to the request made by the Independent Inquiry into Child Sexual Abuse (the Inquiry). I have responded to those questions and topics set out in the in a letter dated 23rd August 2016 addressed to Peter Wanless of the NSPCC and which fall within the knowledge and/or expertise of the NSPCC. Where I have not responded to a question or topic, this is because it falls outside the knowledge and/or expertise of the NSPCC. In

NSPCC PN 1st Witness Statement
this statement I have used the same question numbering for my responses as used in the Inquiry letter referred to above.

4 The NSPCC was established in 1884 and has since then provided child protection services to local communities. Until the 1980s the NSPCC offered a national investigation service. From the time when local authorities were placed under legal duties to act to protect children the NSPCC has offered services in some places and not others. It currently runs 41 centres offering targeted help to children and families in the local authority areas in which the centre is sited and often in one or more adjacent local authority areas. In 1989 the NSPCC set up a national helpline for adults concerned about the abuse of children. This helpline has become widely used as part of police investigations – for example Operation Yewtree that followed the Savile exposure. In 2006 the NSPCC took over, at its request, Childline, the widely respected and heavily used helpline for children in danger or distress.

5 With the exception of a Childline helpline for young people in custody, to which I refer below in paragraphs 24-30, the NSPCC has not provided services for children in custody and so our direct experience is limited. However, the NSPCC does have considerable experience and expertise in working with children and young people who have been sexually abused, working with their parents, and in recent years some experience of working with sex offenders, and in particular with children and young people with harmful sexual behaviour. All of this work has informed the questions that we answer here.

6 **Question 3.** Any child can be affected by sexual abuse, but research and our experience suggest that there are a number of factors which may increase a child’s risk of sexual abuse. These are:
   - a history of previous sexual or other forms of abuse and neglect;
   - having a disability;
   - having a disrupted home life;
   - social isolation – some abusers target children who are neglected by their parents or have few friends. They may also pick children who are quiet, lacking in confidence and self-esteem or who are overly trusting. Such children may be perceived as easier to abuse;
• gender – both boys and girls can be sexually abused, but research suggests that girls are more likely to experience contact sexual abuse than boys (Radford et al, 2011);
• age – our research found that teenage girls aged between 15 and 17 reported the highest rates of sexual abuse (Radford et al, 2011) More information about risk factors for sexual abuse can be found on NSPCC website: [www.nspcc.org.uk/sexualabusewhois](http://www.nspcc.org.uk/sexualabusewhois).

7 Children who are experiencing sexual abuse may:
• avoid being alone with specific individuals;
• seem frightened of a person or reluctant to socialise with them;
• show sexual behaviour that’s inappropriate for their age e.g. become sexually active at a young age; behave promiscuously; use sexual language or know things about sex that are unexpected for their age or stage of development;
• have physical symptoms such as anal or vaginal soreness; an unusual discharge; sexually transmitted infections; pregnancy;
• exhibit self-harming behaviour

More information about the signs and symptoms of sexual and other forms of abuse on NSPCC website: [www.nspcc.org.uk/sexualabusesigns](http://www.nspcc.org.uk/sexualabusesigns).

8 A high number of incidents of sexual abuse may go unreported, undetected, unprosecuted and untreated. This is particularly likely to happen when child neglect or other concerns are the primary reason for referral. Young or disabled children may not be able to tell someone what’s happening, or may not understand that they’re being abused.

9 For further information I suggest:

Sexual abuse: a public health challenge: what we know about the causes, prevalence and consequences of child sexual abuse (Brown, O’Donnell and Erooga, 2011) [www.nspcc.org.uk/publichealth](http://www.nspcc.org.uk/publichealth)

Social workers confidence when working with cases of child sexual abuse can be found in ‘Research with social workers, managers
and LSCB chairs exploring issues and challenges’ (Martin et al, 2014) [www.nspcc.org.uk/socialworkersknowledge](http://www.nspcc.org.uk/socialworkersknowledge)

Preventing child sexual abuse: towards a national strategy: our call for a collaborative, co-ordinated and determined national response (Brown and Saied-Tessier, 2015) [www.nspcc.org.uk/preventingstrategy](http://www.nspcc.org.uk/preventingstrategy)

Child abuse and neglect in the UK today: research into the prevalence of child maltreatment in the United Kingdom (Radford et al, 2011) [www.nspcc.org.uk/childstudy](http://www.nspcc.org.uk/childstudy)

Caught in a trap: the impact of grooming in 2011/2012 (ChildLine et al, 2012) [www.nspcc.org.uk/caught](http://www.nspcc.org.uk/caught)

Keeping children safe together: preventing child sexual abuse (NSPCC internal briefing, October 2016)

10 **Question 4.** In the experience of the NSPCC, and the consensus from research literature is that child sexual abusers are a diverse group of individuals. Sexual abuse is committed by men, women, teenagers and other children. There is no one ‘type’ of person. Abusers come from all parts of society and from all backgrounds. They usually seem quite normal to other people. In fact, research on abusive school staff suggests that the ones who abuse children are often among the most competent and popular staff, highly respected by both colleagues and students (Bithell, 1991; Shakeshaft and Cohan, 1995; Shoop, 2004). Over 90% of children are sexually abused by someone they know, like a relative, a peer, or a person in a position of trust, rather than a stranger (Radford et al, 2011). Because so much abuse goes undisclosed and unreported, many perpetrators in communities are unknown to the authorities.

11 There is considerable variation in how abusers select and groom children, in their sexual and other related behaviours and how they avoid detection (Boer et al., 1997). They will also use a variety of grooming strategies to gain the trust of and undermine other adults such as carers, professionals and other members of the community. Research found that some children who experienced sexual abuse reported that
interactions escalated to involve a sexual element very soon after an initial contact, rather than following a more protracted grooming process. (The impact of online sexual abuse on young people (Hamilton-Giachritis, C. et al, due to be published early 2017.)

12 As child sexual offenders are heterogeneous, there is no single test or screening process that can identify an individual who poses a risk to children. However, Erooga (2009; 2012) recommends recruitment procedures which evaluate the risk through addressing an individual’s values, motives and behaviour in certain situations. For example, this could include addressing their attitudes to the control and punishment of children and their willingness and ability to protect children from others who might abuse. Organisations need to commit to a set of values promoting children’s welfare and wellbeing, and to the behaviours which reinforce these values. This could involve limiting opportunities for staff to spend time alone with children, both inside and outside of work, and fostering a culture of trust and openness which encourages staff to share their concerns about a colleague’s conduct.

13 For further information I suggest:

Towards safer organisations: adults who pose a risk to children in the workplace and implications for recruitment and selection (Erooga, 2009) [www.nspcc.org.uk/saferorganisations](http://www.nspcc.org.uk/saferorganisations)

Towards safer organisations II: what convicted offenders told us about organisational safeguarding of children (Erooga, Allnock and Telford, 2012)
[www.nspcc.org.uk/saferorganisations2](http://www.nspcc.org.uk/saferorganisations2)

Sexual abuse: a public health challenge: what we know about the causes, prevalence and consequences of child sexual abuse (Brown, O’Donnell and Erooga, 2011)
[www.nspcc.org.uk/publichealth](http://www.nspcc.org.uk/publichealth)

Child abuse and neglect in the UK today: research into the prevalence of child maltreatment in the United Kingdom (Radford et al, 2011)
[www.nspcc.org.uk/childstudy](http://www.nspcc.org.uk/childstudy)
Educator sexual abuse: a guide for prevention in the schools (Bithell, 1991)

Sexual abuse of students by school personnel (Shakeshaft and Cohan, 1995)

Sexual exploitation in schools: how to spot it and stop it (Shoop, 2004)

The impact of online sexual abuse on young people (Hamilton-Giachritsis, C. et al, due to be published early 2017)

14 **Question 5.** Most people do not disclose experiences of child sexual abuse until adulthood. Over some years the NSPCC has sought to understand this so that we can best help children talk about what has happened, or is happening, to them sooner. NSPCC research suggests 1 in 3 victims of child sexual abuse do not tell anyone what has happened to them (Radford et al, 2011). Adult survey results suggest that significant proportions of adults disclose abuse for the first time when responding to researchers’ questions. When disclosure does happen in childhood, significant delays are common (McElvaney, 2013, and Horvath, M.A.H. et al, 2014)

Disclosure of child sexual abuse: delays, non-disclosure and partial disclosure. What the research tells us and implications for practice (McElvaney, 2013)

www.dx.doi.org/10.1002/car.2280

"It's a lonely journey": a rapid evidence assessment on intrafamilial child sexual abuse (Horvath, M.A.H. et al, 2014)


15 NSPCC research involving interviews with 60 young adults (aged 18-24 years) found that despite research suggesting few children disclose sexual abuse; over 80% of young people in the study had tried to tell someone about the abuse. However, many disclosures were either not recognised or understood, or they were dismissed, played down or ignored; this meant that no action was taken to protect or support the young people (Allnock and Miller, 2013).
For further information I suggest:
Disclosure of child sexual abuse: delays, non-disclosure and partial disclosure. What the research tells us and implications for practice (McElvaney, 2013) www.dx.doi.org/10.1002/car.2280

No one noticed, no one heard: a study of disclosures of childhood abuse (Allnock and Miller, 2013) www.nspcc.org.uk/noonenoticed

Child abuse and neglect in the UK today: research into the prevalence of child maltreatment in the United Kingdom (Radford et al, 2011) www.nspcc.org.uk/childstudy

17 Question 6. There are a number of reasons why children delay disclosure, are reluctant to disclose, or do not disclose at all. These are:

- Having no one to turn to, particularly if they come from a family with multiple problems such as substance misuse, parental mental health, disability or violence.
- Not being developmentally able to understand the abuse was wrong, or else lacking the vocabulary to describe it.
- Feeling threatened or intimidated by the perpetrator to keep silent.
- Feeling ashamed, embarrassed or afraid that no one would believe them.
- Feeling apprehensive about going to the police and any subsequent court proceedings.
- Age – younger children are less likely to disclose than older children.
- Gender – boys can be more reluctant to disclose than girls.
- Children abused by a family member are less likely to disclose and more likely to delay disclosure than those abused by someone outside the family.
- Children who disclose are more likely to have parents who are supportive.
- Children can be reluctant to disclose for fear of upsetting their parents or out of concern for the consequences of their disclosure for other people.
- Mental health problems can impact on disclosure, particularly if the child is experiencing dissociative and post-traumatic stress symptoms.
18 For further information I suggest:

No one noticed, no one heard: a study of disclosures of childhood abuse (Allnock and Miller, 2013)
www.nspcc.org.uk/noonenoticed

Disclosure of child sexual abuse: delays, non-disclosure and partial disclosure. What the research tells us and implications for practice (McElvaney, 2013) www.dx.doi.org/10.1002/car.2280

Would they actually have believed me? A focus group exploration of the under-reporting of crimes by Jimmy Savile (NSPCC, 2013) www.nspcc.org.uk/wouldthey

19 Question 7. NSPCC considers that there are a number of ways that professionals and non-professionals can make it easier for a child (or others) to disclose sexual abuse. These include:

- Being aware of, recognising and responding appropriately to emotional distress, behavioural changes and other signs and symptoms of abuse. Sometimes children do not talk about experiences of abuse because no one ever asks them what’s wrong.
- Asking sensitive questions, encouraging an open conversation and reassuring them they will not get into trouble.
- Using age and developmentally appropriate words and communication styles.
- Giving children a safe space to talk, making them feel believed and providing emotional support.
- Giving children time to tell – professionals need to be open to the possibility of initial and further disclosures over a long period of time.
- Giving children a sense of control over the process of disclosure both in terms of their anonymity (not being identified until they are ready for this) and confidentiality (the right to control who knows).
- Taking prompt action to protect children.
- Giving children better information about boundaries, their rights to protection and safety, healthy relationships and where and how to seek help.
• Children, particularly teenagers, may disclose to their peers. Young people need to know how to respond and what to do if a friend tells them about abuse.

• Investigating police officers and other professionals such as teachers, social workers, and health practitioners, should be trained to recognise the on-going impact of sexual abuse and how their words and presentation could affect this.

• Police should also be prepared to listen to the emotional impact of the abuse rather than focussing solely on the facts of an allegation.

• Delaying disclosure and making partial or gradual disclosures is common, yet this can hinder successful legal investigations and prosecutions. The legal profession needs to build a knowledge base of the complexities involved in disclosing and reporting experiences of childhood abuse.

• Children and young people need information from the police and legal professionals about the legal process, the possible consequences of disclosure and ongoing developments in legal proceedings.

20 We recognise that in order to help children (and indeed adults) disclose sexual abuse sooner cultural change in organisations is needed. This involves committed leadership and governance; clear accountability; appropriate workforce development and training; and sensitive processes. If asked to summarise these in a word, the word would be kindness. It would be the kindness that we would wish for our children and loved ones.

21 For further information I suggest:

No one noticed, no one heard: a study of disclosures of childhood abuse (Allnock and Miller, 2013) www.nspcc.org.uk/noonenoticed

Disclosure of child sexual abuse: delays, non-disclosure and partial disclosure. What the research tells us and implications for practice (McElvaney, 2013) www.dx.doi.org/10.1002/car.2280
Would they actually have believed me? A focus group exploration of the under-reporting of crimes by Jimmy Savile? (NSPCC, 2013)

www.nspcc.org.uk/wouldthey


22 I turn now to the Inquiry’s request for information about cases coming to the Society’s attention in the last five years. Records of children and families who have received local face to face services in this period are stored electronically in a form that can be word searched.

23 Using search words: Medomsley; County Durham; Youth offender; Youth Justice Board; Prison Service; Secure Children’s Home; Custodial Institution; and Children’s Home, our searches found no cases involving child victims of sexual abuse whilst in custody. The searching would have shown incidents if the young person told us s/he was in custody at the time of contact with the NSPCC, or was released and described sexual abuse in custody retrospectively.

24 Adult helpline and Childline records are electronic but cannot be word searched other than by name and local authority. Many children who contact Childline prefer not to provide their name and/or address.

25 However, in 2012 Childline set up a service with nine Young Offenders’ Institutions (YOIs) (listed in para 28 below) which gave detainees access to a phone allowing them to contact Childline directly for emotional support. The line was set up in conjunction with the Ministry of Justice
(MoJ), and worked to a protocol agreed with the MoJ. The YOIs were self-selected. The protocol ended in March 2016.

26 Unlike other Childline records these records were given a specific dropdown which enabled them to be searched for, and accessed. The Inquiry has asked about the accessibility of any relevant records. We can confirm they are accessible.

27 **Question a.** There were reported to the Childline service:

- 24 incidents alleging sexual abuse by prison staff
- 14 incidents alleging sexual abuse by fellow detainees
- 4 not known to whom allegations relate

28 **Question b.** Nine establishments are named in the allegations these are:

<table>
<thead>
<tr>
<th>Institution</th>
<th>Number of allegations against staff</th>
<th>Number of allegations against detainees, (includes not known)</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetherby</td>
<td>6</td>
<td>3</td>
<td>28/02/12 to 28/03/16</td>
</tr>
<tr>
<td>Werrington</td>
<td>10</td>
<td>3</td>
<td>19/05/13 to 17/01/16</td>
</tr>
<tr>
<td>Feltham</td>
<td>2</td>
<td>3</td>
<td>06/05/15 to 21/05/15</td>
</tr>
<tr>
<td>Thorn Cross</td>
<td>1</td>
<td>0</td>
<td>02/12/15</td>
</tr>
<tr>
<td>Cookham Wood</td>
<td>3</td>
<td>6</td>
<td>06/07/13</td>
</tr>
<tr>
<td>Warren Hill</td>
<td>0</td>
<td>2</td>
<td>12/03/13</td>
</tr>
<tr>
<td>Rainsbrook</td>
<td>0</td>
<td>1</td>
<td>30/04/13</td>
</tr>
<tr>
<td>Hindley</td>
<td>1</td>
<td>0</td>
<td>19/05/13</td>
</tr>
<tr>
<td>Ashfield</td>
<td>1</td>
<td>0</td>
<td>24/07/12</td>
</tr>
</tbody>
</table>

29 **Question c.** Dates, name of YOI and brief details are as follows:
Allegations by detainees against staff

In a minority of instances the name of the staff member was provided.

<table>
<thead>
<tr>
<th>Case note date</th>
<th>Name of YOI</th>
<th>Role</th>
<th>Brief details</th>
</tr>
</thead>
<tbody>
<tr>
<td>28/02/2012</td>
<td>Wetherby</td>
<td>Not given</td>
<td>Alleged sexual abuse by an officer, no further details</td>
</tr>
<tr>
<td>01/03/2012</td>
<td>Wetherby</td>
<td>Prison Officer</td>
<td>Alleged digital penetration</td>
</tr>
<tr>
<td>24/07/2012</td>
<td>Ashfield prison</td>
<td>Prison Officer</td>
<td>Alleged abuse by a female prison officer, no details of behaviour</td>
</tr>
<tr>
<td>24/07/2012</td>
<td>Cookham Wood</td>
<td>Not given</td>
<td>Alleged sexual assault - behaviour unclear</td>
</tr>
<tr>
<td>19/05/2013</td>
<td>Werrington</td>
<td>Prison Officer female</td>
<td>Alleged sexual assault - Intercourse implied.</td>
</tr>
<tr>
<td>14/06/2013</td>
<td>Cookham Wood</td>
<td>Prison Officer</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>06/07/2013</td>
<td>Cookham Wood</td>
<td>Governor</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>09/08/2013</td>
<td>Hindley YOI</td>
<td>Senior Officer</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>01/07/2014</td>
<td>Werrington YOI</td>
<td>Prison Officer</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>09/03/2015</td>
<td>Werrington YOI</td>
<td>Prison Officer</td>
<td>Alleged attempted sexual touching</td>
</tr>
<tr>
<td>06/05/2015</td>
<td>Feltham YOI</td>
<td>Not given</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>21/05/2015</td>
<td>Feltham YOI</td>
<td>Not given</td>
<td>Alleged sexual assault - behaviour not clear</td>
</tr>
<tr>
<td>07/10/2015</td>
<td>Werrington YOI</td>
<td>Not given</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>16/11/2015</td>
<td>Wetherby YOI</td>
<td>Not given</td>
<td>Alleged sexual assault - behaviour not clear</td>
</tr>
<tr>
<td>02/12/2015</td>
<td>Thorn Cross YOI</td>
<td>Prison Officer</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>02/12/2015</td>
<td>Werrington YOI</td>
<td>Senior Officer</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>07/12/2015</td>
<td>Werrington YOI</td>
<td>Senior officer</td>
<td>Alleged sexual assault - behaviour not clear</td>
</tr>
<tr>
<td>16/12/2015</td>
<td>Werrington YOI</td>
<td>Not given</td>
<td>Alleged sexualised hitting and sexual touching</td>
</tr>
<tr>
<td>23/12/2015</td>
<td>Werrington YOI</td>
<td>Not given</td>
<td>Alleged sexual touching and physical assault</td>
</tr>
<tr>
<td>23/12/2015</td>
<td>Werrington YOI</td>
<td>Senior teacher female</td>
<td>Alleged sexualised hitting</td>
</tr>
<tr>
<td>17/01/2016</td>
<td>Werrington YOI</td>
<td>Prison officer</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>21/03/2016</td>
<td>Wetherby YOI</td>
<td>Not given</td>
<td>Alleged sexualised touching and physical assault</td>
</tr>
<tr>
<td>21/03/2016</td>
<td>Wetherby YOI</td>
<td>Not given</td>
<td>Alleged sexual touching during restraint</td>
</tr>
</tbody>
</table>
Allegations by detainees against other detainees

In one instance the first name of the alleged perpetrator was provided.

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Role</th>
<th>Allegation</th>
</tr>
</thead>
<tbody>
<tr>
<td>29/03/2012</td>
<td>Wetherby</td>
<td>Detainee</td>
<td>Alleged sexual assault – rape and/or digital penetration</td>
</tr>
<tr>
<td>24/05/2012</td>
<td>Cookham Wood</td>
<td>Detainee</td>
<td>Alleged forced oral sex</td>
</tr>
<tr>
<td>21/06/2012</td>
<td>Cookham Wood</td>
<td>Detainee</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>20/01/2013</td>
<td>Werrington YOI</td>
<td>Detainee</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>09/03/2013</td>
<td>Cookham Wood</td>
<td>Detainee</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>12/03/2013</td>
<td>Warren Hill</td>
<td>Not known</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>12/03/2013</td>
<td>Warren Hill</td>
<td>Not known</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>30/04/2013</td>
<td>Rainsbrook Werrington</td>
<td>Detainee</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>16/05/2013</td>
<td>Cookham Wood</td>
<td>Detainee</td>
<td>Alleged sexual touching</td>
</tr>
<tr>
<td>17/05/2013</td>
<td>Werrington</td>
<td>Detainee</td>
<td>Alleging sexual abuse – behaviour not clear</td>
</tr>
<tr>
<td>07/06/2013</td>
<td>Cookham Wood</td>
<td>Detainee</td>
<td>Alleged forced into sexual acts – behaviour unclear</td>
</tr>
<tr>
<td>06/07/2013</td>
<td>Cookham Wood YP based in Feltham</td>
<td>Detainee</td>
<td>Alleged witness to rape</td>
</tr>
<tr>
<td>09/10/2013</td>
<td>Cookham Wood</td>
<td>Not known</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>06/05/2015</td>
<td>Cookham Wood</td>
<td>Detainee</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>14/06/2015</td>
<td>Feltham</td>
<td>Detainee</td>
<td>Alleged rape</td>
</tr>
<tr>
<td>26/10/2015</td>
<td>Werrington</td>
<td>Unknown</td>
<td>Alleged sexual assault – behaviour not clear</td>
</tr>
<tr>
<td>28/10/2015</td>
<td>Wetherby</td>
<td>Detainee</td>
<td>Alleged sexual assault – behaviour not clear</td>
</tr>
<tr>
<td>03/12/2015</td>
<td>Wetherby</td>
<td>Detainee</td>
<td>Alleging attempted forced oral sex</td>
</tr>
</tbody>
</table>

30 Question d. None of the alleged incidents appear to have been reported by the YOI to state institutions at the time they are alleged to have occurred.

The following action was taken by Childline following contact by the young person through the dedicated helpline:

- 5 incidents were reported back to the relevant YOI
- 4 incidents were reported to the police
- 3 incidents were reported to the police and relevant YOI.

Following review of the files in October 2016 an additional 13 incidents were reported to the relevant LADO and a number also reported to Operation Hydrant.
31 The contents of this statement are true to the best of my knowledge and belief.

Signed: DPA

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