

<p>1 Wednesday, 31 October 2018 2 (10.30 am) 3 Welcome and opening remarks by THE CHAIR 4 THE CHAIR: Good morning, everyone. As you may know, I am 5 Alexis Jay, and I'm the chair of the Independent Inquiry 6 into Child Sexual Abuse. Sitting with me are the other 7 panel members of the inquiry: Ivor Frank and 8 Drusilla Sharpling. Professor Evans is not able to join 9 us today as he is abroad on United Nations business. 10 The decisions today are for me rather than the panel as 11 a whole, though we send to sit together at preliminary 12 hearings. Professor Evans will review the transcript 13 after today's proceedings, so that he knows what was 14 discussed. 15 On behalf of the inquiry, I welcome you all to this, 16 the third preliminary hearing in the investigation into 17 allegations of child sexual abuse linked to Lambeth. 18 This is one of 12 investigations currently being 19 conducted by this inquiry. Our task in each 20 investigation is to examine the extent to which public 21 and private institutions in England and Wales have 22 failed to protect children from sexual abuse in the 23 past, and to make meaningful recommendations to keep 24 children safe today and in the future. 25 In this investigation, the inquiry will consider the</p> <p style="text-align: center;">Page 1</p>	<p>1 experience of victims and survivors and examine the 2 scale and nature of the abuse that may have taken place 3 under the care of the relevant authorities. We will 4 investigate whether there were child protection failures 5 by the council, the police and other public authorities. 6 We will examine the extent to which particular 7 vulnerabilities of any children who were subject to 8 sexual abuse put them at risk and whether this may have 9 shaped how public authorities responded to them. 10 The purpose of this third preliminary hearing is to 11 provide a brief update on the investigation and to hear 12 submissions from counsel to the inquiry and core 13 participants on the selection of case studies in this 14 investigation. The structure of the hearing is set out 15 in the hearing agenda. 16 Before we hear from counsel, a couple of points on 17 timing this morning. We will take a 15-minute break at 18 around 11.45 am. If this hearing has not concluded 19 before 1.00 pm, we will take a break for lunch. 20 Directions arising from this hearing will be published 21 on the inquiry's website shortly after the hearing, as 22 will the hearing transcript. 23 I now invite the lead counsel to the inquiry, 24 Rachel Langdale QC, to provide us with further 25 background and an update on the investigation. So</p> <p style="text-align: center;">Page 2</p>
<p>1 please go ahead, Ms Langdale. 2 Submissions by MS LANGDALE 3 MS LANGDALE: Thank you. Good morning, chair, panel, core 4 participants and members of the public. My name is 5 Rachel Langdale and I appear as leading counsel in this 6 investigation, together with Clare Brown, Clair Dobbin 7 and Marlene Cayoun. 8 Chair, as you have said, this is the third 9 preliminary hearing in the investigation into Children 10 in the Care of Lambeth Council. The last hearing took 11 place on 27 July 2016. Much work has been undertaken 12 since then, and the main reason for today's hearing is 13 to enable you to consider any final submissions on the 14 proposed case studies which will form the basis for the 15 Lambeth oral hearing. 16 Before I address you on that, may I please introduce 17 the representatives of the parties before you: 18 Lambeth Council are represented by Mr Alex Verdan QC and 19 Cleo Perry. The MPS is represented by 20 Mr Jonathan Dixey. The CPS is represented by 21 Claire Harris. Ms Anna Tapsell is represented by 22 Mr Sam Jacobs. Dr Goldie, by Mr Chris Jacobs and the 23 Secretary of State for Education by 24 Ms Cathryn McGahey QC. 25 As is apparent from this list, since the last</p> <p style="text-align: center;">Page 3</p>	<p>1 hearing Ms Tapsell and Dr Goldie have been awarded core 2 participant status. 3 Chair, you will notice there is no representative of 4 SOSA at this hearing. The investigation has taken 5 account of detailed submissions which SOSA has made 6 about the proposals for case studies, which you have 7 available to you today among your papers. I am aware 8 that the panel has already considered all submissions, 9 including the SOSA submission, carefully. I will return 10 to the proposals about case studies shortly. 11 I propose to say a few words, chair, about SOSA's 12 involvement to date. As you know, SOSA are a body who 13 represent victims and survivors of child abuse in 14 Lambeth residential homes and we consider it crucial to 15 this investigation that victims and survivors remain at 16 the core of what we are doing. In respect of SOSA, 17 Raymond Stevenson, on its behalf, indicated in public 18 that SOSA was withdrawing from the inquiry on 19 18 November 2016. However, SOSA did not give formal 20 notice to that effect and continued to play a valuable 21 core participant role. 22 SOSA was encouraged by the inquiry to seek legal 23 funding so that it would have the benefit of legal 24 representation in the investigation. It bears repeating 25 that the inquiry does not fund the legal expenses of</p> <p style="text-align: center;">Page 4</p>

<p>1 large organisations like Lambeth Council or the MPS, but 2 it can provide legal funding for individuals or, in this 3 instance, for SOSA on behalf of victims and survivors of 4 sexual abuse where the criteria under section 40 of 5 the Inquiries Act 2005 is met. The solicitor to the 6 inquiry met with SOSA to explain this in April 2018. 7 SOSA subsequently made an application to the inquiry 8 for rule 40 funding. This application sought not just 9 legal funding, but also funding for SOSA staff and 10 administration costs for the running of SOSA. 11 Chair, by letter of 21 August 2018, the inquiry 12 informed SOSA that you had made an initial section 40 13 award for legal costs in SOSA's favour in relation to 14 the part of the application which related to the funding 15 of legal representatives. 16 However, whilst the inquiry was able to indicate its 17 willingness to provide SOSA with funding so that it 18 could be legally represented in the investigation, it 19 could not accede to the request that the inquiry fund 20 the running costs of SOSA. The reason for this is that 21 the inquiry cannot, as a matter of law, use public funds 22 to generally fund organisations who are core 23 participants. It can provide funding for legal costs or 24 for costs that are incidental to attendance at the 25 inquiry, like travel costs, but not more. The inquiry</p> <p style="text-align: center;">Page 5</p>	<p>1 informed Mr Stevenson that this was the position in 2 a meeting to discuss funding and also in correspondence. 3 We were informed on Monday by Mr Stevenson that SOSA 4 would not be attending today but that they had helpfully 5 spoken with members about individual participation in 6 the inquiry. We understand that a number of individuals 7 indicated to SOSA that they would like to participate in 8 the inquiry, and we look forward to hearing from them. 9 If members of SOSA already have solicitors 10 instructed on their behalf, for example, in relation to 11 the redress scheme, and they do wish to participate in 12 the inquiry, then the inquiry would invite them to apply 13 for core participant status, either as individuals or as 14 a group, and the inquiry may be able to provide funding 15 under section 40 of the Inquiries Act for those 16 solicitors to act for them in relation to their 17 participation in the inquiry. It is hoped, on behalf of 18 the inquiry, that SOSA will continue to play an active 19 part in the investigation. 20 I would reiterate, though, that any individual who 21 suffered sexual abuse whilst in the care of 22 Lambeth Council can apply in their own right to be 23 a core participant or can even just contact the inquiry 24 to understand what that might involve. We would very 25 much welcome that, and our telephone numbers and email</p> <p style="text-align: center;">Page 6</p>
<p>1 addresses are available on the website. All such 2 contact with the inquiry will be treated in the 3 strictest confidence. There is a great deal of support 4 and help available to anyone who wishes to speak to the 5 investigation. 6 May I turn, please, to the case studies? 7 On 15 March 2018, the inquiry circulated to core 8 participants submissions prepared by counsel to the 9 investigation as to how the effectiveness of oral 10 hearings might be best achieved. The oral hearings in 11 this investigation present a particular challenge. As 12 anyone familiar with children's homes in Lambeth will 13 appreciate, the scale of what is alleged to have 14 happened to children, and the background to this, is 15 substantial. The issues at stake not only encompass 16 sexual abuse by individual perpetrators, but also 17 include whether there was organised sexual abuse, 18 corruption, intimidation and coverups, and the extent of 19 failed police investigations, prosecutions and 20 institutional incompetence. Those are substantial 21 issues. 22 As I have said, what is vitally important is that 23 the experiences of individuals who lived in children's 24 homes in Lambeth are at the fore of these hearings. One 25 of the options submitted by counsel to the inquiry in</p> <p style="text-align: center;">Page 7</p>	<p>1 the March submissions was dedicating the hearings to an 2 overall consideration of Lambeth's children's homes over 3 time, perhaps calling key institutional figures who were 4 responsible for the council, for children's services and 5 for homes. There is complete agreement, however, 6 between counsel to the inquiry and the core participants 7 who responded to these submissions that a hearing like 8 that would be sterile -- it would omit the most 9 important evidence of all -- what it was like to be 10 a child in a Lambeth home. 11 As has been acknowledged by all core participants 12 who responded, the oral hearing cannot examine every 13 children's home that was operating in Lambeth. Choices 14 have to be made as to which homes would best convey, 15 publicly, what happened in Lambeth. Counsel initially 16 submitted that an examination of what happened at 17 Shirley Oaks, Angell Road and Southvale would best 18 achieve this objective. This was on the basis that 19 between them they capture some of the most serious 20 aspects of what went wrong in Lambeth and are the best 21 means of examining the institutional culture. 22 We arrived at this view upon analysis of materials 23 gathered thus far. This included consideration of files 24 which had been generated by the Children Homes in 25 Lambeth Enquiry, which ran between 1998 and 2003, and</p> <p style="text-align: center;">Page 8</p>

<p>1 which detailed allegations by those who lived in Lambeth 2 homes and information gathered about staff. It also 3 included analysis of reports which either considered or 4 were relevant to Lambeth children's homes and services, 5 and the products from various police investigations and 6 prosecutions, including historic and contemporary 7 investigations. We have also analysed material provided 8 to us from noninstitutional core participants, including 9 SOSA's interim report and the material provided by 10 Ms Tapsell.</p> <p>11 Looking at all of these materials together, the 12 counsel team is confident that these three homes would 13 afford the inquiry an opportunity to consider many 14 pressing concerns in the public domain about Lambeth 15 homes. They afford the inquiry the ability to look at 16 a number of incidents which are proved to have happened 17 and to critically examine the institutional responses to 18 them. The issues raised by these incidents are 19 demonstrative of the wider issues in Lambeth, including 20 the allegations of collusion, coverup and corruption. 21 They also represent a unique opportunity to look at 22 critical incidents in Lambeth's history as a whole, 23 rather than as isolated incidents.</p> <p>24 Chair, little would be gained by my going through 25 the entirety of the submissions provided to the panel as</p> <p style="text-align: center;">Page 9</p>	<p>1 to why these homes ought to form the basis of the oral 2 hearings in this matter, given the consensus amongst 3 counsel to the inquiry and core participants. We have, 4 however, identified a number of core issues that 5 consideration of these homes would permit you to examine 6 with the benefit of live witness evidence which we think 7 it would be helpful to outline orally to you today. 8 These matters include:</p> <p>9 (i) The recruitment, but, more importantly, the 10 retention, of Michael Carroll as the head of 11 a children's home after Lambeth became aware that he had 12 been convicted of an offence of child sexual abuse. You 13 will also wish to consider what happened to children in 14 the Angell Road home;</p> <p>15 (ii) Lambeth's handling of Michael Carroll's 16 attempts to foster children or to have children stay at 17 his home;</p> <p>18 (iii) Whether there was political interference in 19 Michael Carroll's attempts to foster;</p> <p>20 (iv) Whether there was interference in 21 Lambeth-related police investigations;</p> <p>22 (v) Whether there was organised sexual abuse of 23 children among Lambeth employees;</p> <p>24 (vi) Lambeth's recruitment of staff to work in care 25 homes;</p> <p style="text-align: center;">Page 10</p>
<p>1 (vii) Why Les Paul was able to sexually abuse 2 children from Lambeth for so long;</p> <p>3 (viii) The failures of various institutions to 4 respond to allegations or suspicions about Les Paul;</p> <p>5 (ix) Failures of Lambeth's internal investigations 6 to uncover abuse;</p> <p>7 (x) The failures of various institutions to respond 8 to evidence that children were being sexually abused by 9 Les Paul and others;</p> <p>10 (xi) Whether Les Paul was using children from 11 Lambeth to make pornography;</p> <p>12 (xii) Long-term drift in the planning for children 13 in care;</p> <p>14 (xiii) The extent and nature of abuse at 15 Shirley Oaks;</p> <p>16 (xiv) Examples of abuse which occurred in 17 Shirley Oaks and failures to prevent, identify and 18 adequately respond to this;</p> <p>19 (xv) The response to whistleblowing and attempted 20 whistleblowing within Lambeth;</p> <p>21 (xvi) Failures to deal with certain individuals when 22 abuse came to light;</p> <p>23 (xvii) Failures in a long-term police/local 24 authority investigation to uncover abuse;</p> <p>25 (xviii) The wider political and corporate culture</p> <p style="text-align: center;">Page 11</p>	<p>1 prevailing within Lambeth;</p> <p>2 (xix) Whether there is evidence of corruption in 3 police investigations into Lambeth; and</p> <p>4 (xx) Race as a factor in the protection of children.</p> <p>5 On the subject of race, the investigation team wish 6 to make it clear that they are acutely sensitive to the 7 need for the investigation to consider the extent to 8 which race bore upon the risk of sexual abuse that 9 children were exposed to in Lambeth, including both the 10 incidence of child sexual abuse and the institutional 11 response to it, and this is something that we will be 12 investigating when reviewing all of the documentation.</p> <p>13 It is clear that it will be a challenge to fit 14 examination of these three homes within the timeframe 15 allocated for oral hearings. It must be borne in mind 16 that Shirley Oaks, of itself, comprised some 38 homes. 17 I will say more about the approach to Shirley Oaks 18 shortly.</p> <p>19 It is also important that I make clear that, as part 20 of the investigation process, inevitably we will have 21 analysed a much greater volume of material than can be 22 adduced in evidence at the oral hearing. Please let me 23 take this opportunity, however, to reassure core 24 participants that all documents relevant to the 25 investigation will be disclosed to them on an ongoing</p> <p style="text-align: center;">Page 12</p>

<p>1 basis and there will be public oral hearings where 2 evidence will be adduced in the same way as it has been 3 in other investigations. 4 Core participants were invited to respond to the 5 submissions provided to the panel on case studies and to 6 set out their submissions as to the form and content of 7 the oral hearings. Counsel to the investigation 8 submitted to the panel, in particular, that it might 9 wish to consider submissions from core participants as 10 to how best to approach Shirley Oaks and whether, for 11 example, the hearing might focus on a family group or 12 a group of individuals and their time at Shirley Oaks. 13 Core participants were given an opportunity to 14 consider each other's submissions and to submit further 15 skeleton arguments if there were issues that they wished 16 to bring to your attention before the hearing. 17 Chair, I know that you are familiar with those 18 submissions and I don't propose to set them out in 19 detail but rather to summarise the main issues that 20 emerged. 21 In broad terms, there was consensus that the oral 22 hearings ought to encompass the three homes suggested. 23 SOSA considered that consideration of three homes was 24 not, however, enough. It proposed that the oral 25 hearings should also considering the following:</p> <p style="text-align: center;">Page 13</p>	<p>1 (i) The sexual abuse of children at Highland Road, 2 (where Michael Carroll worked before he went to 3 Angell Road); 4 (ii) any part that Michael Carroll played in 5 disciplinary proceedings against Les Paul (or in 6 Operation Bell); 7 (iii) Lambeth homes for children with special needs 8 (citing the examples of Chestnuts, Monkton Street and 9 Ivy House); 10 (iv) Fostering; and. 11 (v) The Children's Home in Lambeth Enquiry (CHILE) 12 and why it failed. 13 In respect of possible approaches to Shirley Oaks, 14 SOSA advocated that the case study follow the lives of 15 a selected group of children and suggested that there 16 were 20 individuals who could comprise this group. 17 The London Borough of Lambeth agreed with the 18 proposals for case studies but emphasised in respect of 19 Shirley Oaks that it regarded an approach which focused 20 upon information about alleged abusers was a reliable 21 way of tracing individuals or sibling groups whom the 22 case study might focus on. 23 The MPS in submissions made on their behalf endorse 24 our proposed focus on the three case studies and 25 observed that such a focus would be proportionate and</p> <p style="text-align: center;">Page 14</p>
<p>1 afford the views of victims and survivors proper 2 consideration. 3 The CPS has informed the inquiry that it is neutral 4 on the questions of which case studies should be 5 selected and on any approach to the issue of 6 Shirley Oaks. 7 In broad terms, Ms Tapsell stressed that she 8 considered it vitally important that the oral hearings 9 focus upon examining the role that corruption may have 10 played in putting children at risk of sexual abuse in 11 Lambeth. She pointed to specific incidents she 12 considered demonstrative of a wider culture of 13 corruption in Lambeth. She also suggested that we 14 consider investigating the council's redress scheme. We 15 are aware that the council's redress scheme was open to 16 applications from 2 January 2018 and is thus 17 a relatively recent development. The primary focus of 18 this investigation at the moment is on establishing what 19 happened to children in the care of Lambeth. We 20 consider that investigating a redress scheme which is 21 ongoing may present difficulties for those seeking 22 redress and those administering the scheme. Our 23 submission to the panel is that they keep the question 24 of whether to consider the scheme under review as the 25 investigation progresses and as the redress scheme</p> <p style="text-align: center;">Page 15</p>	<p>1 develops. 2 Dr Goldie appeared to agree with the homes which 3 have been selected and made a number of suggestions 4 which, on closer analysis, appear to us to fall within 5 the themes and issues that will be considered as part of 6 the wider investigation. 7 Chair, we approached the submissions by the core 8 participants on the basis that the case studies in the 9 original form proposed would require most of the four 10 weeks available. That said, we agree with and welcome 11 the observations made by SOSA that the oral hearing 12 ought to encompass specific consideration of alleged 13 sexual abuse of children with special needs and whether 14 and how that made them more vulnerable to abuse. Of 15 course, we are conscious that almost without exception, 16 children who came into the care of Lambeth were children 17 who were vulnerable for a variety of reasons and this 18 will inevitably be conveyed in the case studies. 19 However, there is material available which would 20 enable the panel to consider the additional risk to 21 children with special educational and other needs, 22 particularly needs which made communication very 23 difficult. After careful reflection, therefore, we are 24 of the view that the oral hearing should also consider 25 allegations which relate to children cared for at</p> <p style="text-align: center;">Page 16</p>

<p>1 Ivy House and Monkton Street. It is our recommendation 2 to the panel that the oral hearings should also include 3 these homes. 4 Core participants have made additional submissions 5 highlighting other areas that they consider the 6 investigation should investigate. One example is the 7 CHILE investigation. It is clear from our consideration 8 of the CHILE files that there are a number of cases 9 which appear on their face to be unresolved. There are 10 plainly issues as to why certain allegations were not, 11 on their face, pursued. It may be that these will be 12 touched upon as part of the selected case study 13 investigations. We would also welcome hearing from 14 individuals who were approached by CHILE and who feel 15 they were failed by it. 16 As for the issues raised by Ms Tapsell in respect of 17 corruption, we readily understand her concerns. Part of 18 the rationale for considering Southvale was to examine 19 the unresolved issues surrounding whether there was 20 distribution of pornographic images of children amongst 21 council staff. There are issues about corruption and 22 Michael Carroll which we envisage will come up in the 23 case study about Angell Road. 24 When we approach council employees or councillors, 25 we are asking them specific questions about corruption.</p> <p style="text-align: center;">Page 17</p>	<p>1 We hope to build up an evidential picture about 2 corruption as part of the wider picture which will then 3 feed into the evidence presented at the oral hearing. 4 We will also approach individuals who might have 5 specific evidence to give about the sort of corruption 6 issues that Ms Tapsell raises. 7 We have been asked by the London Borough of Lambeth 8 how we intend to go about investigating wider issues. 9 As I have already indicated, this work will be carried 10 out by analysis of documentary evidence, such as 11 previous reports, case files, statements and council 12 records, or by seeking statements from individuals on 13 specific issues. This will be an open process. 14 Relevant materials will be disclosed to core 15 participants as part of an ongoing process of disclosure 16 in due course. We are also considering whether the 17 process might additionally be assisted by expert 18 evidence. The aim ultimately is to provide the panel 19 with a robust evidential basis for making overarching 20 findings about institutional failings leading to the 21 sexual abuse of children in the care of Lambeth and to 22 meet the scope of this investigation. 23 All of this will take time. The inquiry has this 24 week established the dates of its public hearings 25 between April 2019 and March 2020. The hearing for this</p> <p style="text-align: center;">Page 18</p>
<p>1 investigation was not included in that period. The 2 dates for the next period, from April 2020, will not be 3 announced for some months, but I should say that the 4 inquiry announced in the summer that it expected to 5 complete its public hearings in 2020, and so, until 6 a more precise time is given, core participants can 7 expect the hearing to take place between April 8 and December 2020. We anticipate that there will be 9 a further preliminary hearing scheduled in the summer of 10 2019. 11 Chair, you will want to hear from core participants 12 in the event that they wish to address you about the 13 case studies. Before they have that opportunity, 14 however, it might assist if I explain some of the work 15 the investigation has been getting on with. As I hope 16 is clear, the identification of the homes for case 17 studies was based on analytical work of, amongst other 18 sources, CHILE files and police records. Although the 19 evidence-gathering process cannot start in full until 20 the panel determines the content of the case studies, 21 the investigation has nonetheless been gathering 22 evidence that will inevitably be required regardless of 23 the final shape of those case studies. We have been 24 approaching former employees and councillors for 25 statements and are in the process of preparing a number</p> <p style="text-align: center;">Page 19</p>	<p>1 of other rule 9 requests for key witnesses. We have 2 received the initial draft of the Lambeth corporate 3 statement, which is approximately 147 pages long and 4 exhibits a number of documents. We anticipate that 5 hereafter we will seek a number of directed statements 6 from Lambeth which relate to the case studies. 7 Further requests have been made of the police. We 8 are aware that there is some overlap between the 9 investigation and current police investigations that we 10 must be sensitive to. 11 We have received a considerable amount of material 12 from Ms Tapsell and we have received a statement from 13 Dr Goldie. We have of course also received and reviewed 14 SOSA's interim report. 15 May I say something about our approach to 16 disclosure? Lambeth has disclosed some 122,000 pages of 17 documents to the inquiry and holds a great deal more 18 material. There are approximately 8,000 pages of 19 documents from other providers who have disclosed 20 documents to the inquiry to date. These providers, and 21 others who we are yet to approach, are also likely to 22 hold a great deal more material. Depending on the 23 outcome of your decision as to the case studies, chair, 24 we will next seek disclosure from Lambeth (and indeed 25 other core participants) on a specific and targeted</p> <p style="text-align: center;">Page 20</p>

<p>1 basis. What we want to achieve is a level of disclosure 2 which is manageable, proportionate and of real value in 3 meeting the terms of reference for the scope of 4 the investigation. 5 Approach to Shirley Oaks. 6 As mentioned earlier, one of the matters that the 7 core participants were asked to express a view on was 8 possible approaches to the selection of individuals who 9 lived at Shirley Oaks and whose experiences might form 10 part of the case study. The inquiry would welcome 11 hearing from any SOSA members who wish their experiences 12 at Shirley Oaks to form part of the final oral hearing 13 and we understand, as I said earlier, from Mr Stevenson 14 that a number may wish to become involved. 15 The investigation will also continue to follow the 16 course which it has already adopted of identifying 17 individuals from disclosure provided (some of whom are 18 siblings) and exploring whether those individuals would 19 like to be part of the case study. For obvious reasons, 20 this will have to be carried out with a great deal of 21 care and sensitivity. We will therefore be guided by 22 the evidence and by the willingness of victims and 23 survivors as to how the Shirley Oaks case study is best 24 presented. 25 Chair, may I now hand over to core participants in</p> <p style="text-align: center;">Page 21</p>	<p>1 the event any wish to make submissions. 2 THE CHAIR: Thank you, Ms Langdale. Yes, we will now hear 3 any further submissions. I would be grateful if the 4 submissions could be limited to around ten minutes in 5 length, as we have a very full agenda today and 6 a further preliminary hearing this afternoon. Can we 7 begin with Mr Sam Jacobs? 8 Submissions by MR S JACOBS 9 MR S JACOBS: Thank you, madam, good morning, members of 10 the panel. 11 You have Ms Tapsell's written submissions, which 12 I am not going to regurgitate. We are content with the 13 approach proposed in relation to case studies. 14 Ms Tapsell's evidence, of course, goes to whether 15 there existed a culture of corruption within Lambeth 16 which both facilitated or enabled child sexual abuse to 17 occur and subsequently enabled it to be suppressed 18 rather than brought to the light of day. 19 She, in her evidence, gives a number of examples of 20 that. What Ms Tapsell is anxious about at the moment is 21 having clarity as to which of those examples, which of 22 those incidents, are going to form part of the oral 23 hearings and which are going to form part of what's 24 described as the wider investigation, which we 25 understand is going to proceed, in essence, on the</p> <p style="text-align: center;">Page 22</p>
<p>1 papers, on the documents, and which, if any, may simply 2 fall outside of scope. 3 To take just one example, Ms Langdale has made 4 reference to the issue of the production of pornographic 5 materials, and she suggests, and I am sure she is 6 correct in doing so, that the issue will come up in the 7 oral hearings. But in fact the issue is a much broader 8 and more significant one than that. As Ms Tapsell has 9 identified in her evidence, it goes to a culture within 10 the housing department which was discussed in the 11 Harris Report; it goes to the allegation by the lady 12 ciphered by the inquiry as A9 that she was raped and 13 abused at Southvale; it goes to the death of 14 Bulic Forsythe, who met his death shortly after leaving 15 the Housing Department. 16 At the moment, we don't really understand where 17 those issues are. Are they going to be explored in the 18 oral hearings? Are they going to be explored as part of 19 the wider investigation? Are they going to fall outside 20 it? Given that we are now, or shortly, to embark on the 21 disclosure exercise, we urge the inquiry to identify 22 with clarity at the earliest possible stage where all of 23 these issues stand. 24 The only other point I wish to make before I resume 25 my seat is an early warning marker, as it were, in</p> <p style="text-align: center;">Page 23</p>	<p>1 relation to the length of the oral hearings. We 2 understand and endorse the concern of the inquiry to 3 focus on the lived experiences of the children within 4 these children's homes, but the institutional response 5 is also very important. It is important so that this 6 inquiry cannot only understand what happened, but look 7 to the nature and make adequate and effective 8 recommendations, and so we urge that, as we move 9 forward, the inquiry does so with the expectation that 10 those issues will form a significant part of the oral 11 hearings, and those sort of thematic issues we would 12 suggest will take several weeks in addition to the 13 evidence of children within the homes. 14 Madam, other than the submissions we have already 15 made in writing, those are my points. 16 THE CHAIR: Thank you, Mr Jacobs. Mr Chris Jacobs? 17 Submissions by MR C JACOBS 18 MR C JACOBS: Madam chair, thank you, and good morning, 19 madam chair, and good morning, panel. I represent 20 Dr Nigel Goldie in this investigation and I am 21 instructed by Howe & Co. I would like to thank counsel 22 to the investigation for acknowledging that the issues 23 raised by Dr Goldie are relevant to the investigation. 24 I wish to address you briefly on the issue of 25 disclosure, which we say, on behalf of Dr Goldie, is</p> <p style="text-align: center;">Page 24</p>

1 very important in this investigation. Howe & Co are
 2 involved in a number of investigations within the
 3 inquiry and have repeatedly raised disclosure issues.
 4 Chair, you will no doubt recall at the Westminster
 5 preliminary investigation yesterday Mr Stein QC raised
 6 the disclosure issue on behalf of Howe & Co. This
 7 investigation has a long run-in, about a year and
 8 a half, and Dr Goldie and other core participants, such
 9 as Ms Tapsell, have a level of specialist knowledge and
 10 we have a great deal of time.
 11 I understand that there are 122,000 pages that
 12 Lambeth has already disclosed. There are a further
 13 8,000 pages from other providers, and much more will
 14 follow. What we don't want to happen in this
 15 investigation is to be inundated with disclosed material
 16 with little time to prepare. So I would like to set out
 17 a marker, perhaps, that in this investigation we can
 18 have early disclosure. Certainly Dr Goldie, in my
 19 submission, has particular expertise and a level of
 20 knowledge to be better able to assist this inquiry and
 21 identify and respond to issues raised by the disclosed
 22 documents if provided with adequate time. There is
 23 likely to be a substantial disclosure, as we have heard,
 24 in this investigation. There are a number of complex
 25 issues. So could we perhaps use the long run-in that we

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1 assist with, we don't propose to make any submissions
 2 orally today.
 3 THE CHAIR: Thank you. Ms Harris?
 4 MS HARRIS: No, thank you.
 5 THE CHAIR: Thank you. Ms McGahey?
 6 MS MCGAHEY: No, thank you.
 7 THE CHAIR: Ms Langdale?
 8 Reply submissions by MS LANGDALE
 9 MS LANGDALE: Chair, you may wish to reflect upon all of
 10 the submissions and to issue written determination as to
 11 the content of the case studies. We note what Mr Jacobs
 12 says on behalf of Ms Tapsell; but until we have worked
 13 through more of the evidence, it would be premature for
 14 us to say what material would be within the case
 15 studies.
 16 As far as disclosure is concerned, it is helpful of
 17 course to raise this issue at the outset. As we have
 18 said, we propose to disclose material on an ongoing
 19 basis and we can perhaps review where we are in respect
 20 of this at the preliminary hearing in 2019.
 21 Chair, the next item on the agenda and to which we
 22 have already referred to some extent is the update on
 23 core participant applications. There have in effect
 24 been three applications since the last preliminary
 25 hearing. Ms Tapsell was granted core participant status

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1 have got to ensure that those who instruct me are able
 2 to assist in this investigation in the most optimal way.
 3 Unless I can assist further, those are my
 4 submissions.
 5 MS LANGDALE: Chair, I think we need to ask for a short
 6 adjournment because I gather there is a problem with the
 7 microphones.
 8 THE CHAIR: I see. We can take a short adjournment for
 9 15 minutes.
 10 MS LANGDALE: Thank you.
 11 (11.02 am)
 12 (A short break)
 13 (11.17 am)
 14 THE CHAIR: Thank you. We will continue now with Mr Verdan.
 15 Submissions by MR VERDAN
 16 MR VERDAN: Chair, panel members, thank you, good morning.
 17 I know you have Lambeth's written submission and so the
 18 only thing I need to add at this stage is that Lambeth
 19 agree to the proposed extension to the case studies with
 20 the additional two. Unless I can assist further, that's
 21 all I would wish to say at this stage.
 22 THE CHAIR: Thank you, Mr Verdan. Mr Dixey?
 23 MR DIXEY: Chair, members of the channel, good morning. You
 24 have our written submissions. I don't propose to repeat
 25 those. Unless there is anything specifically I can

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1 on 10 March 2017; Dr Nigel Goldie on 7 September 2018;
 2 and survivors of institutional abuse was refused on
 3 19 August 2016, following oral renewal at the
 4 preliminary hearing on 27 July 2016.
 5 Chair, the last item on the agenda is any other
 6 applications or submissions from core participants. I'm
 7 not aware that any of them in fact does wish to raise
 8 anything, but if they do, now is the time.
 9 THE CHAIR: Does anyone wish to raise anything further? No?
 10 In that case, thanks to everyone for attending today.
 11 I will reflect on the submissions made and give my
 12 decision in writing in due course. Thank you very much
 13 for your attendance.
 14 (11.20 am)
 15 (The hearing concluded)
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