

<p>1 Friday, 15 February 2019</p> <p>2 (10.00 am)</p> <p>3 THE CHAIR: Good morning, everyone, and welcome to Day 5,</p> <p>4 the final day of this public hearing. Ms Hill?</p> <p>5 MS HILL: Good morning, chair. I call, please,</p> <p>6 Adrian Greer.</p> <p>7 MR ADRIAN GREER (affirmed)</p> <p>8 Examination by MS HILL</p> <p>9 MS HILL: Thank you very much. You are Adrian Greer; is</p> <p>10 that right?</p> <p>11 A. That's correct.</p> <p>12 Q. And you are the chief operating officer of</p> <p>13 the British Council?</p> <p>14 A. Yes.</p> <p>15 Q. Can you just give the panel a brief overview, please, of</p> <p>16 the work of the British Council and a little bit about</p> <p>17 your own background?</p> <p>18 A. So the British Council is Britain's cultural relations</p> <p>19 organisation overseas. We work in 110 countries,</p> <p>20 primarily to build close relationships between the UK</p> <p>21 and other countries, concentrating on work like</p> <p>22 education, English language, teaching and the arts.</p> <p>23 My own background, I have been in the organisation</p> <p>24 for 35 years now, and done a range of jobs overseas and</p> <p>25 in the UK. So I've been on the executive board of</p> <p style="text-align: center;">Page 1</p>	<p>1 the British Council for the last eight/nine years now.</p> <p>2 Q. Thank you, Mr Greer. Just to give some sense of</p> <p>3 the scale of the work of the British Council, can</p> <p>4 I bring up, please, BRC000352_002 and scroll in on</p> <p>5 paragraphs 5, 6 and 7. I should formally adduce,</p> <p>6 please, your witness statement, BRC000352, a witness</p> <p>7 statement dated 7 December 2018. If we scroll in on</p> <p>8 5 to 7 of this witness statement, we will see you</p> <p>9 indicate the Council has a physical presence in over</p> <p>10 100 countries around the world, you deliver programmes</p> <p>11 that reach over 50 million people face to face and at</p> <p>12 events through digital social media, as well as</p> <p>13 500 million online via broadcasts and publications:</p> <p>14 "Through teaching, we reach over 400,000 people</p> <p>15 a year, of whom 40 per cent are under the age of 18.</p> <p>16 The examinations that we administer are sat by some</p> <p>17 4.4 million people each year and, of these,</p> <p>18 15.6 per cent are under the age of 18."</p> <p>19 A. That's correct.</p> <p>20 Q. Scrolling in, please, on paragraph 7, to give the panel</p> <p>21 a sense of your pool or workforce, if I can call it</p> <p>22 that, you have 10,500 staff overseas, of whom 3,800 work</p> <p>23 as English teachers or administer examinations. There</p> <p>24 are 250 additional employees based overseas who were</p> <p>25 appointed in the UK. The remaining 6,450 are locally</p> <p style="text-align: center;">Page 2</p>
<p>1 engaged and generally nationals of the country in which</p> <p>2 they work:</p> <p>3 "We also employ some 1,150 staff in the UK."</p> <p>4 Is that right?</p> <p>5 A. That's right.</p> <p>6 Q. Then just, if I may, to give the panel a sense of</p> <p>7 the partnering relationships that you operate, just give</p> <p>8 the panel a little bit of information about what that</p> <p>9 means?</p> <p>10 A. So almost all of the work we do in different countries</p> <p>11 around the world, we work through local organisations,</p> <p>12 and we do that in a whole range of different ways, so,</p> <p>13 for example, we run contracts, often on behalf of DFID,</p> <p>14 where we're working with civil society organisations in</p> <p>15 the UK. We also work with a number of UK partner</p> <p>16 organisations, through from DFID itself to a number of</p> <p>17 organisations who support us in developing our contracts</p> <p>18 overseas, so providing funding for us.</p> <p>19 So the relationships vary from funding through to</p> <p>20 delivery partnerships.</p> <p>21 Q. Just to help understand this a little further, could</p> <p>22 I bring up, please, BRC000350_002, and bring that</p> <p>23 document up sideways-on, please. This just helps</p> <p>24 understand, when you refer to partnerships, you say here</p> <p>25 that this covers a spectrum of financial and contractual</p> <p style="text-align: center;">Page 3</p>	<p>1 relationships. The typology, you say, breaks down the</p> <p>2 relationships into contract for services, grant</p> <p>3 agreements, sponsorship agreements and things of that</p> <p>4 nature, so different types of agreement; is that right?</p> <p>5 A. That's correct.</p> <p>6 Q. We will come to the processes that you follow, but just</p> <p>7 scrolling in, please, then to internal page 5, you give</p> <p>8 some examples of the sort of partnership arrangements</p> <p>9 that you have. One is the Connecting Classrooms Project</p> <p>10 that we see here between the British Council and DFID,</p> <p>11 managed through an MOU. That uses financial</p> <p>12 contributions provided by the Council and DFID to</p> <p>13 support a range of activities for teachers and schools,</p> <p>14 including teacher exchange programmes, and things of</p> <p>15 that nature. Is that right?</p> <p>16 A. That's correct.</p> <p>17 Q. Then we see similar programmes, very briefly, please, at</p> <p>18 internal page 6. Premier Skills, and that's a project</p> <p>19 between the British Council and the Premier League,</p> <p>20 I think using expertise in football to create</p> <p>21 opportunities for young people around the world; is that</p> <p>22 right?</p> <p>23 A. That's right, and that would be an example I was using</p> <p>24 earlier where we are working with local institutions, so</p> <p>25 local organisations that are coaching young people in</p> <p style="text-align: center;">Page 4</p>

<p>1 the community, for example.</p> <p>2 Q. Thank you. I will turn now, please, Mr Greer, to your</p> <p>3 evidence about Civil Orders. You have provided some</p> <p>4 information about the nature of the searches that the</p> <p>5 British Council have carried out for the inquiry, and,</p> <p>6 broadly, you have carried out a mixture of searches of</p> <p>7 electronic and hard copy material. I hope I can</p> <p>8 summarise this fairly. You can take that down now,</p> <p>9 thank you.</p> <p>10 Some of the searches have been at servers in the UK,</p> <p>11 some have been at servers operating in the regional</p> <p>12 areas of the British Council and then some searches of</p> <p>13 hard copy material via a questionnaire process; is that</p> <p>14 right?</p> <p>15 A. That's correct.</p> <p>16 Q. We can pull up, please, internal paragraph 11 of your</p> <p>17 first witness statement, it's BRC000352_003. You have</p> <p>18 explained at internal paragraph 11 that your</p> <p>19 understanding is that, once a Civil Order is made,</p> <p>20 certainly if it is on conviction, it would form part of</p> <p>21 an individual's criminal record, and so your</p> <p>22 understanding is that searching the criminal records of</p> <p>23 individuals should generate at least some of</p> <p>24 the Civil Orders; is that right?</p> <p>25 A. That's right.</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. You explain that there were some retention periods and</p> <p>2 some data that had been destroyed through usual</p> <p>3 processes, but I think the conclusion at paragraph 12 of</p> <p>4 your search is that you did not identify any information</p> <p>5 which indicated a person engaged or employed by the</p> <p>6 British Council had been subject to one of these</p> <p>7 Civil Orders; is that right?</p> <p>8 A. That's correct.</p> <p>9 Q. To the extent that you have had any understanding of</p> <p>10 the Civil Orders regime, it's perhaps gleaned from what</p> <p>11 you have learned in these proceedings; is that right?</p> <p>12 A. And from documentation that I read beforehand, yes.</p> <p>13 Q. You indicate, referring to Mr Jones's statement, or</p> <p>14 evidence, that there is a suggestion that the criteria</p> <p>15 for applying a travel restriction appear to you narrow</p> <p>16 and your understanding is that relatively few orders are</p> <p>17 given?</p> <p>18 A. Yes, and I'm even more clear of that since hearing the</p> <p>19 evidence from Robert Jones and others this week.</p> <p>20 Q. I think I may have said in opening that you have</p> <p>21 a special knowledge of the Civil Orders regime, but what</p> <p>22 I really meant by that is, because of your employment</p> <p>23 capacity, this is something that you might have been</p> <p>24 made aware of, but in fact you're saying there isn't</p> <p>25 anybody who has come to your attention having had an</p> <p style="text-align: center;">Page 6</p>
<p>1 order in place; is that right?</p> <p>2 A. That's correct, through that process, yes.</p> <p>3 Q. You have provided the inquiry with a range of case study</p> <p>4 examples. I will just perhaps bring up one that might</p> <p>5 illustrate this point. Can I bring up, please,</p> <p>6 BRC000037. That's a case summary from Mexico. I hope</p> <p>7 I have the reference right for that. Just tell us</p> <p>8 a little bit about the particular circumstances here.</p> <p>9 I think this involved somebody who had been convicted</p> <p>10 and was known to Interpol. Can you scroll down, please,</p> <p>11 through it? Go to the incident there. So an allegation</p> <p>12 was made in February of 2015 because there was some news</p> <p>13 which indicated the British Council had aided a person</p> <p>14 pending trial for child sexual offences to enter Mexico.</p> <p>15 What did you understand was the underlying issue in this</p> <p>16 case study?</p> <p>17 A. So this was an individual who had, as I understand it,</p> <p>18 an Interpol Green Notice placed on them. It came to the</p> <p>19 attention of the British Council because our country</p> <p>20 director in Mexico at the time had a phone call from the</p> <p>21 immigration authorities saying that they had seen a note</p> <p>22 on the passport. They weren't aware what the</p> <p>23 Green Notice referred to. They didn't have details of</p> <p>24 that, and they asked our British Council country</p> <p>25 director to help with this.</p> <p style="text-align: center;">Page 7</p>	<p>1 We weren't involved in organising the tour. This</p> <p>2 was an individual who was a leader of an orchestra who</p> <p>3 had been invited to Mexico to play some concerts through</p> <p>4 a Mexican organisation. Our involvement was that we had</p> <p>5 provided some funding to the partner organisation but we</p> <p>6 weren't the organising organisation.</p> <p>7 Q. Can you just go down to the following page, please, to</p> <p>8 the investigation. What the case summary indicates is</p> <p>9 that the Mexico country director sought an investigation</p> <p>10 to identify how the individual was able to travel while</p> <p>11 pending trial for child sexual offences and when he was</p> <p>12 known to Interpol, why he had been assisted to enter</p> <p>13 Mexico despite pending trial and what checks had been</p> <p>14 carried out of the partnership organisation. I think</p> <p>15 the outcome of that investigation is at the foot of</p> <p>16 internal page 3. Tell us what the outcome of this was?</p> <p>17 I think a case panel had been convened about this?</p> <p>18 A. Yes. So we convened a case panel in order to try and</p> <p>19 find out what exactly had happened. In a sense, it was</p> <p>20 a difficult one for us because we had no particular</p> <p>21 locus on it. We had reported the incident to the</p> <p>22 consular services and the embassy in Mexico.</p> <p>23 Q. I think, just scrolling a bit further up on that page,</p> <p>24 please, to the third paragraph down, you had been in</p> <p>25 touch with the NCA, with CEOP, to question whether or</p> <p style="text-align: center;">Page 8</p>

<p>1 not there had been a Green Notice in place around this 2 individual. I think the advice you received is, because 3 he hadn't yet been convicted, it would be rare for 4 a Green Notice to be applied in his case. That's what 5 you were told? 6 A. Exactly right. You know, we were surprised by that, 7 I have to say, because we had assumed if someone was 8 awaiting trial for known offences, then there would have 9 been a travel order placed on them. I'm no expert on 10 travel orders, but that seemed surprising to me, that 11 someone sort of awaiting trial for known offences and 12 then later on he was actually convicted of those 13 offences, we would have expected there would have been 14 a travel order placed on him. 15 Q. An interim order in place? 16 A. An interim order, yes. 17 Q. Just over the page, please, to complete this. You 18 identified some learning, I think. In fact he was then 19 convicted and sentenced, I think. But some learning for 20 your organisation was around engaging with capacity 21 building in relation to contracts with partners, 22 specifically on child protection issues; following up 23 with the arts and music department and regional director 24 in the Americas to share learning; and reinforced the 25 need for early reporting; and agreed to share the</p> <p style="text-align: center;">Page 9</p>	<p>1 details of the case with the head of human resources for 2 the arts. Is that right? 3 A. That's correct. 4 Q. You have provided the inquiry with a series of examples 5 that we will perhaps come to in due course around 6 individuals, though, who are engaged by or employed by 7 the British Council who have not had an order made 8 against them, but in relation to whom allegations of 9 sexual abuse or inappropriate behaviour have been 10 raised. Is that right? 11 A. That's right. 12 Q. You have provided a certain amount of data around this, 13 and we will look at those by way of example in due 14 course. But is there anything else in particular on the 15 Civil Orders regime that you would like to say, 16 Mr Greer? 17 A. I think probably the major point is more in relation to 18 the DBS and ICPC system, an observation that there are 19 a lot of different elements here between which it's very 20 easy for there to be gaps. So deciding whether or not 21 you're able to get access to an ICPC certificate or 22 a DBS certificate or whether it's a DBS, you bring it up 23 through the England and Wales system or through Access 24 Northern Ireland or through Disclosure Scotland. It 25 seems like there are a lot of different organisations</p> <p style="text-align: center;">Page 10</p>
<p>1 involved in this and the different choices. 2 Q. I will come to look at that in a little more detail, but 3 on the Civil Orders issue in particular, I'm afraid 4 I think we forgot to put this on the topics list for 5 you, but I think you have been asked to look at the list 6 of concerns and reforms document. 7 A. Yes. 8 Q. Is there anything in particular on the Civil Orders 9 section of that -- you have already alluded to your 10 understanding that these orders are perhaps relatively 11 rare and only applied in narrow circumstances, but is 12 there anything else around the concerns or reforms of 13 these orders that you would like to comment on? 14 A. Probably just one to highlight, which is the need for 15 the NCA to engage with specialists in the field. 16 I think where we have referred cases to the NCA, I think 17 what we feel -- certainly our child protection officers 18 who come from a social work background note that with 19 domestic cases there's a lot more engagement with the 20 NCA than tends to be the case with overseas cases. 21 Q. I think you deal with that in one of the responses to 22 the IICSA request number 5. Could I ask you to pull up, 23 please, BRC000240, because you were asked questions 24 about Civil Order issues. You flagged the Mexican 25 example. Then at internal page 9 of this document,</p> <p style="text-align: center;">Page 11</p>	<p>1 which is your response to the request around the 2 Civil Orders issues, under the heading "Investigation 3 process", you set out, I think, in slightly further 4 detail, the point that you have just made about what 5 would happen in the UK if a child abuse referral was 6 made. Then over the page, please, you refer there to 7 this proposition: 8 "From a child protection case management 9 perspective, none of the procedures followed in the UK 10 have been applied to cases referred to NCA-CEOP." 11 There seemed to be limited guidance or feedback from 12 the police, the sharing of any intelligence which might 13 help appeared to be rare. You're not aware of MAPPA 14 processes in relation to overseas cases. You're not 15 involved in strategy meetings with the tracker team and 16 things like that. You say this: 17 "The result is that it is very difficult for the 18 British Council child protection team to progress cases 19 in which allegations of child sexual abuse are raised. 20 We are often left with a decision to dismiss an employee 21 for a breach of the code of conduct rather than progress 22 our child protection investigation." 23 Is there anything else you would like to say on that 24 issue, which may feed into section 72 as well as 25 Civil Orders, but is there anything else on that issue</p> <p style="text-align: center;">Page 12</p>

1 you would like to say?

2 **A. I think that is correct. In certain countries, there is**

3 **a very close relationship with the ILOs, but that often**

4 **tends to be specific to the relationship with the**

5 **individual, so it's rather ad hoc sometimes rather than**

6 **systematic.**

7 Q. Do you have any observation on a proposal that's been

8 made by some witnesses that if there are to be

9 notifications of Civil Orders or indeed other

10 notifications, such as Green Notices and things like

11 that, that, paragraph 14, they should be shared with

12 NGOs that are properly vetted rather than just with the

13 police agencies?

14 **A. I think for us -- I mean, I'm not an expert in this**

15 **area, but that would seem a helpful observation, as**

16 **would the idea of -- maybe you're coming to it later**

17 **on -- of a register for people wanting to work with**

18 **children as well.**

19 Q. Turn then, please, to section 72, if I may. Again, can

20 I pull up, please, your first witness statement,

21 BRC000352, and go to paragraph 14, please. You have

22 conducted some checks again in relation to this issue.

23 You indicate that you have no particular data around

24 section 72. That would be held by the UK law

25 enforcement agencies. But there is, nevertheless,

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1 or by way of a formal statutory request, which obviously

2 you comply with as best you can?

3 **A. That's correct, and there are a number of cases I think**

4 **we have given evidence of where we have referred**

5 **information to the NCA on concerns we have had around**

6 **the world.**

7 Q. You make the point that you are often, though, as you

8 have just said, I think, not necessarily informed about

9 the progress of cases, and so your understanding of

10 section 72 is perhaps limited to what is otherwise

11 publicly known about the cases when it has been used; is

12 that right?

13 **A. Yes. Once the information has been fed in -- we**

14 **sometimes get some feedback, but normally the feedback**

15 **is really on a very general nature, that the progress is**

16 **ongoing or "We are further investigating".**

17 **I understand, obviously, that there is a need for**

18 **confidentiality in information that might jeopardise any**

19 **prosecution process, but it would be helpful to have**

20 **a kind of confidential sharing of information.**

21 Q. Your observations around the efficacy of section 72,

22 please, paragraph 17 of your witness statement. You

23 note that it has been used successfully in some cases

24 and then you make this observation:

25 "It has been used successfully to secure the

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1 specialist child protection training and specialist

2 child protection teams within your organisation. So

3 tell us a little bit about that, please?

4 **A. So we have quite an extensive network over the last**

5 **ten years -- or certainly, since 2010, we have developed**

6 **quite an extensive programme of child protection through**

7 **a number of full-time child protection officers based in**

8 **the UK, in our regions and in our strategic business**

9 **units, and a network of child focal points around the**

10 **world, so some 110 of them. These aren't working full**

11 **time, but they are working very closely with country**

12 **teams to develop national child-safe action plans for**

13 **every one of the countries in which we operate.**

14 Q. I think, just scrolling in towards the end of

15 paragraph 15, you indicate that if there is potentially

16 a need to refer a child protection concern, there is

17 a process for that, which is that it's made jointly at

18 a child protection case panel with senior representation

19 from child protection, legal and HR, and relevant senior

20 business and regional management, and they together will

21 decide whether to refer a particular case to the CEOP;

22 is that right?

23 **A. That's correct, yes.**

24 Q. And sometimes the tracker teams at CEOP request further

25 information from the British Council either informally

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1 prosecution of UK nationals in countries where the age

2 of consent is low, where there is little or no offender

3 management regime or extradition treaty in place. So to

4 that extent, it appears to be an effective tool."

5 Can you give us any particular examples of those

6 certain -- those themes in the countries where you

7 believe it's been successful or effective?

8 **A. I'm not familiar with the individual cases, and my**

9 **familiarity really comes from Robert Jones's evidence**

10 **earlier. He talked about the number of places where it**

11 **has been successfully applied. But I'm also aware from**

12 **his evidence, and also from Glen Hulley from Karma and**

13 **the Australian organisation of the difficulties of**

14 **applying this. The reason I wrote what I did here is**

15 **that my feeling is that it's a crucial signal, part of**

16 **the toolkit, to demonstrate that where you're committing**

17 **what would be an offence in the UK as a British**

18 **national, it will still be considered an offence. So**

19 **for me it seems akin to the Bribery Act, which was**

20 **a huge change for businesses and a real culture change**

21 **in terms of signalling and intent. So that's why I feel**

22 **this is a really important part of the toolkit.**

23 Q. Is this right, that the reason you flag the age of

24 consent issue is because that illustrates, does it,

25 countries where sexual contact with a child which would

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1 be illegal here might not be illegal in other countries
 2 because the age of consent is low?
 3 **A. That's exactly right. I was really shocked by how many**
 4 **countries have a very low age of consent, and many of**
 5 **those coincide with the areas that are high-risk**
 6 **countries for predators.**
 7 Q. Is there anything you can add in relation to the other
 8 themes, that certain countries would have little or no
 9 offender management or extradition treaty in place? Are
 10 you simply flagging those as examples of situations
 11 where section 72 can add significant value?
 12 **A. Yes, and I am aware from other evidence in a number of**
 13 **specific countries where this is a particular problem.**
 14 **I'm not an expert in that area, so I don't want to go**
 15 **into it in detail, but I'm -- I have certainly observed**
 16 **that from my work in South-East Asia in particular, and**
 17 **also South Asia.**
 18 Q. Is that because, if there is no management regime for an
 19 offender or extradition treaty in place, if there wasn't
 20 section 72, it would be difficult to bring that person
 21 before a criminal court?
 22 **A. I wouldn't be able to comment on the detail on that.**
 23 Q. You have commented, I think, slightly further on
 24 section 72 in -- I suppose it is the document I brought
 25 up before, I think, raised concerns around the ongoing

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1 British Council's perspective, to highlight some gaps --
 2 this is, as I say, back in 2007 -- in the pre-employment
 3 checking regime. Is that right?
 4 **A. That's correct. So it was an individual who had**
 5 **a couple of convictions that hadn't shown up in the**
 6 **checks that we had done before we employed that**
 7 **individual, and that was a real wake-up call for the**
 8 **organisation. I think that was -- the event, as you**
 9 **say, was 2007, but from 2008 onwards, we went through an**
 10 **exercise to carry out 1,800 checks on all of**
 11 **the teachers working in regulated activities, and that**
 12 **was really the beginning of a much more systematic**
 13 **process of child protection being introduced across the**
 14 **organisation.**
 15 Q. Just while we are on this, can I flag another case
 16 study, that's case study 6 from China, BRC000014,
 17 please. This raised another series of concerns -- is
 18 that right? -- because there had been a criminal offence
 19 that I think had not been disclosed and no criminal
 20 record check had been done on this individual, I think,
 21 by the school where he'd been employed. Is that right?
 22 **A. That's correct, yes.**
 23 Q. If you go, please, to the "Lessons Learned" part of this
 24 document, internal page 5, what appears to have been the
 25 finding here is that British Council policy was that all

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1 involvement of British Council in investigations.
 2 I think that perhaps feeds into section 72 as well. Is
 3 there anything else from the "Concerns and Reforms"
 4 document on section 72, Mr Greer, that you would like to
 5 draw out or comment on?
 6 **A. I think we have already covered it, but the low number**
 7 **of prosecutions, obviously, is a concern, but note the**
 8 **difficulties of doing that.**
 9 Q. I will move on now, please, to the Disclosure and
 10 Barring issue. You have provided a lot of information
 11 to the inquiry about these issues. I go back, please,
 12 to your witness statement, BRC000352 and bring up
 13 paragraph 18, which I think we have here. Tell us
 14 generally what your view is from the British Council's
 15 perspective on the importance of criminal records
 16 vetting and other screening processes?
 17 **A. It is absolutely crucial. It is just one of a number of**
 18 **different tools, though. But without any mechanism for**
 19 **checking back to people's previous convictions, it would**
 20 **be very difficult to exercise control. So we see that**
 21 **the DBS and ICPC system as absolutely fundamental.**
 22 Q. I think you have provided information about a particular
 23 case from Egypt. This is case summary 19. BRC000053,
 24 please. This was a case, I think, that led to an
 25 internal review because it appeared, from the

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1 schools within this group did carry out criminal record
 2 checks, but it did not appear to have happened in this
 3 particular case. Is that right?
 4 **A. Yes. Just to be clear, this was an English language**
 5 **assistant, and the employment of the individual was**
 6 **through a Chinese partner, and the Chinese partner**
 7 **should have carried out a criminal records check, and**
 8 **we'd found they hadn't done so. So we convened a case**
 9 **panel to find out why that was the case and then**
 10 **tightened our procedures and our briefing of those**
 11 **partners.**
 12 Q. Can I go back to your witness statement, please,
 13 BRC000352_005. Just taking this relatively briefly, if
 14 I may, because you've got different groups of
 15 individuals working for or engaged with the
 16 British Council. You set out at internal paragraph 20
 17 what we are familiar with now, the Disclosure and
 18 Barring Service different levels of certificates. You
 19 remind us, at paragraph 21, of the restrictions to apply
 20 for a certificate from the Disclosure and Barring
 21 Service. Just summarise for us what they are, as far as
 22 the British Council is concerned?
 23 **A. So the post holder needs to be over the age of 16, and**
 24 **they need to be an organisation that is based in the UK**
 25 **and an employer and also the certificates won't be sent**

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<p>1 overseas, they will only be sent to a UK address.</p> <p>2 Q. You give a little bit further detail on this in your</p> <p>3 reply to one of the inquiry questions. Can I bring up,</p> <p>4 please, BRC000005_008, where you flag for the panel --</p> <p>5 that's a point of detail I think we have not come across</p> <p>6 yet; it might have been read, actually. Forgive me, if</p> <p>7 we scroll in towards the top:</p> <p>8 "The DBS check application form asks for the</p> <p>9 applicant's five-year address history. If living or</p> <p>10 travelling abroad in the last five years, the name of</p> <p>11 the country and the dates the applicant was residing in</p> <p>12 that country should be supplied. If currently living</p> <p>13 abroad and applying for a DBS check, with the</p> <p>14 organisation's agreement the applicant can use the</p> <p>15 correspondence address of the employer or the registered</p> <p>16 body. Where the applicant has been living overseas, the</p> <p>17 Home Office provides guidance in obtaining alternative</p> <p>18 verification of an individual's criminal records history</p> <p>19 or a certificate of good character from the country of</p> <p>20 residence they have been living in."</p> <p>21 Is that your understanding of the international</p> <p>22 element, if I can put it that way, of a DBS check?</p> <p>23 A. Yes. So my understanding is that what it excludes is</p> <p>24 any convictions or indeed investigations related to the</p> <p>25 individual overseas.</p> <p style="text-align: center;">Page 21</p>	<p>1 Q. So the requirement, if there is one, to obtain that</p> <p>2 information is to go to a local police force in that</p> <p>3 particular country to obtain some police checks. Is</p> <p>4 that correct?</p> <p>5 A. That's correct, and that is not always straightforward,</p> <p>6 because often there will be restrictions on that data</p> <p>7 being released to you. Sometimes it is not possible at</p> <p>8 all because of local labour law.</p> <p>9 Q. We will come to that. You indicate in your witness</p> <p>10 statement that -- perhaps we can bring this up, to be</p> <p>11 clear, BRC000352, paragraph 22, that those who are</p> <p>12 working for the British Council in what's defined as</p> <p>13 regulated activity are required by the Council to apply</p> <p>14 for an enhanced certificate, and because of this gap</p> <p>15 with work overseas, you go on to say at paragraph 23</p> <p>16 that where an applicant has been living overseas or is</p> <p>17 a national of another country, the British Council</p> <p>18 requires that local police checks are obtained from the</p> <p>19 most recent country of residence. Is that right?</p> <p>20 A. That's correct.</p> <p>21 Q. You indicate that sometimes that is difficult, you go</p> <p>22 down to say that, because of issues with releasing that</p> <p>23 information. So tell us, please, about the</p> <p>24 self-declaration form and what that tries to achieve?</p> <p>25 A. So our feeling is very much that the criminal records</p> <p style="text-align: center;">Page 22</p>
<p>1 checking system can only be one of a range of different</p> <p>2 mechanisms you use. Research that we've seen suggests</p> <p>3 that self-declaration is actually a disincentive.</p> <p>4 Q. In what sense, Mr Greer?</p> <p>5 A. I think probably in terms of a psychological</p> <p>6 disincentive, but also a sense that this is an</p> <p>7 organisation that will scrutinise you carefully. But</p> <p>8 that goes along with quite extensive qualification</p> <p>9 checks as well, and also checks in terms of the detail</p> <p>10 that the individual is who they said they are and that</p> <p>11 they have been in all the places. So we look at gaps,</p> <p>12 for example, in employment.</p> <p>13 Q. So it might operate as a disincentive to somebody who</p> <p>14 did have a background who thought they might be able to</p> <p>15 conceal that, do you mean?</p> <p>16 A. It is, but obviously that is not watertight.</p> <p>17 Q. You have provided the panel with various exhibits that</p> <p>18 are the DBS's own guidance on the scheme. I don't</p> <p>19 propose those up, but could I bring up, please, the</p> <p>20 information you have given us about the detail of</p> <p>21 applying to different countries for police checks?</p> <p>22 That's, please, your exhibit AG3. Just bear with me</p> <p>23 a second while I bring up the index. It is BRC000357.</p> <p>24 Turn that sideways-on if we can, please. The panel</p> <p>25 don't need to go through all of this document, but this</p> <p style="text-align: center;">Page 23</p>	<p>1 is a very comprehensive summary, is this right, of how</p> <p>2 in particular countries police checks are carried out?</p> <p>3 A. That's right. So this is a check we make -- this is</p> <p>4 a document we make available to all our country</p> <p>5 operations and this is the mechanism they need to use to</p> <p>6 apply for criminal records checks.</p> <p>7 Q. Very broadly, for each country that you have a presence</p> <p>8 in, there is a section about local requests and</p> <p>9 a section about nonresident requests. And then there is</p> <p>10 pretty detailed information about how to obtain a check</p> <p>11 from the police with contact information and what the</p> <p>12 formalities for doing that are -- different countries</p> <p>13 are applying obviously different requirements to fill in</p> <p>14 the form, different fees, things like that, but it tries</p> <p>15 to capture, does it, police checks at a local level</p> <p>16 across the countries where you have a presence?</p> <p>17 A. Yes, that's right. I mean, we drew up this document</p> <p>18 I think in 2015. One of the difficulties with documents</p> <p>19 like this is making sure it's completely up to date,</p> <p>20 because the situation changes quite quickly around the</p> <p>21 world.</p> <p>22 Q. Just to be clear, which categories of workers or</p> <p>23 volunteers that the British Council has contact with</p> <p>24 would these police checks be carried out in relation to?</p> <p>25 A. So at the moment we're using the definition of</p> <p style="text-align: center;">Page 24</p>

1 **"regulated activity" from the Disclosure and Barring**
 2 **Service.**
 3 Q. Which essentially captures, as we have heard from your
 4 evidence before, those who are, in the course of their
 5 employment as a volunteer, permanent or nonpermanent
 6 worker, engaging with children on a regular basis. Is
 7 that correct?
 8 **A. That's right, yes, broadly.**
 9 Q. Can I pull up, please, BRC000004. This is the quick
 10 guide document produced by the British Council. I'm
 11 just seeing if I can find a date on this. I'm not sure
 12 I know what the date of this document is.
 13 **A. It was first produced in 2012, but it's been updated**
 14 **a number of times since then. I think most recently in**
 15 **2017, I believe.**
 16 Q. The section headed "Police checks" on the left-hand
 17 side, can you see that? Scroll in perhaps on that.
 18 This suggests that the decision to request a police
 19 check needs to be made with regard to proportionality,
 20 ie, only requested for post holders engaged in regulated
 21 activity.
 22 Does that mean -- it may follow from your answer to
 23 this -- that if there is someone working for the
 24 British Council in a different capacity, such as
 25 involved with IT, that is not then in regulated

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1 Is that right?
 2 **A. That's right.**
 3 Q. So, overall, how relevant is the international
 4 certificate to your processes?
 5 **A. It's very relevant, and certainly our child protection**
 6 **staff feel that the ICPC is a better document because**
 7 **the two-part process means that there is fuller**
 8 **information and it tends to give more information about**
 9 **investigations rather than just sticking to a very high**
 10 **bar in terms of disclosing evidence of convictions.**
 11 Q. So your evidence at paragraph 28 is that it could be
 12 improved -- well, that the regime within the UK, insofar
 13 as it applies abroad, could be improved by implementing
 14 a wider use of the intelligence and background
 15 information on the certificate, the international
 16 certificate, including that held in foreign
 17 jurisdictions, and it could be simplified by uniting the
 18 agencies operating across the UK into one agency. Just
 19 tell us a little bit about those two points, please,
 20 Mr Greer?
 21 **A. I think there are two different but related points: one,**
 22 **that the ICPC and DBS are different documents trying to**
 23 **do really the same thing, but managed by different**
 24 **organisations, and it would seem like there's less**
 25 **likely to be gaps if those are united. The second point**

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1 activity, that a police check will not be carried out
 2 for that person?
 3 **A. So there's a number of different types of IT roles. So**
 4 **if someone is working in a digital role where they're**
 5 **moderating discussions or activities that are mainly**
 6 **targeted at young people, then they would come under the**
 7 **category of regulated activity.**
 8 **Just to be clear, we don't normally employ IT staff**
 9 **who are UK-appointed in our countries overseas. So this**
 10 **would apply to locally engaged staff.**
 11 Q. You also have evidence to give about the international
 12 certificate. Can I go back, please, to your witness
 13 statement, BRC000352_006 at paragraph 25, please, where
 14 you indicate, as we have heard, what the ICPC does.
 15 Then go down, please, to internal paragraph 27, where
 16 you say that, as the ICPC is available for UK nationals
 17 or residents employed by overseas organisations, it is
 18 not generally available to individuals working directly
 19 for the British Council:
 20 "We do, however, have access to it when recruiting
 21 for English language assistants on behalf of schools and
 22 higher education institutions abroad. It is
 23 a requirement of the programme that ELAs obtain an ICPC
 24 certificate in order to be eligible to be placed with an
 25 overseas organisation."

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1 **is the one I made earlier, that if you want to get a DBS**
 2 **or equivalent, you have to go to each of the three**
 3 **constituent parts of the United Kingdom, of Access**
 4 **Northern Ireland, Disclosure Scotland and the DBS system**
 5 **itself. It feels like it would make sense to have**
 6 **a more united one-stop shop approach, as the**
 7 **recommendations, I think, suggest.**
 8 Q. You make clear, a point you have made before, that the
 9 research tells us that many individuals engaged in the
 10 abuse of children overseas go undetected or operate in
 11 countries where child protection legislation is weak.
 12 The vetting and barring regime can only identify
 13 offenders after they have been convicted, largely. It
 14 can never be the sole means of preventing child sexual
 15 abuse from happening. It is perhaps because the
 16 international certificate doesn't focus solely on
 17 convictions that you give it the value you do; is that
 18 right?
 19 **A. That's exactly right. It talks more in terms of**
 20 **investigations. Therefore, it's more likely to pick up**
 21 **concerns that have been flagged than the DBS system,**
 22 **which is much narrower.**
 23 Q. Even allowing for that, though, I think you'd recognise,
 24 or your evidence suggests, that the international
 25 certificate as part of a disclosure and barring regime

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<p>1 generally is still only one part of the picture?</p> <p>2 A. I think for any organisation to rely only on that would</p> <p>3 really miss probably – well, our research suggests it</p> <p>4 is something between only 1 and 5 per cent of potential</p> <p>5 predators have been through any kind of legal process.</p> <p>6 Therefore, you are going to be missing all of those</p> <p>7 95 to 99 per cent unless you've got a whole range of</p> <p>8 mechanisms in place within your own organisation.</p> <p>9 Q. Those are figures based on British Council research, are</p> <p>10 they?</p> <p>11 A. I'm afraid I'm not sure where that research comes from.</p> <p>12 I'm sorry about that.</p> <p>13 Q. But your broad understanding is that there is a very</p> <p>14 significant part of the cohort of offenders who would</p> <p>15 not be captured by these processes?</p> <p>16 A. I think that's correct, yes.</p> <p>17 Q. Is there anything else on the "Concerns and Reforms"</p> <p>18 document that deals with this topic that you would like</p> <p>19 to comment on; in particular, perhaps, around the</p> <p>20 proposals for making the international certificate</p> <p>21 mandatory or placing it on a statutory footing?</p> <p>22 A. So I think, in terms of the recommendations, it does</p> <p>23 seem to make sense to provide greater access, so I noted</p> <p>24 the evidence of COBIS, who are concerned about not</p> <p>25 having access to the DBS system. So maybe</p> <p style="text-align: center;">Page 29</p>	<p>1 a recommendation to combine them would cover that off.</p> <p>2 And also, yes, the non-mandatory nature of ICPC, which</p> <p>3 I think a number of witnesses have referred to, that</p> <p>4 seems to make sense, to make that a mandatory process.</p> <p>5 Q. Insofar as it is possible to do so, if the international</p> <p>6 certificate process was made mandatory and/or put on</p> <p>7 a statutory footing, from your experience, can you help</p> <p>8 define the group of employees or volunteers to whom it</p> <p>9 should apply? I mean, if it was to be made mandatory,</p> <p>10 and we are trying -- you have plenty of experience of</p> <p>11 individuals employed directly by the British Council,</p> <p>12 right down to those who work in partner organisations,</p> <p>13 but can you give us any sense of how to make -- how, if</p> <p>14 that were a proposal, to make it effective?</p> <p>15 A. I mean, this is always very difficult, because if you</p> <p>16 broaden the scope too much, you end up devaluing it and</p> <p>17 making it much harder to apply, but if you make it too</p> <p>18 narrow, then you run the risk of still employing people</p> <p>19 and giving yourself false assurance, which takes us back</p> <p>20 to the issue of the organisation putting a range of</p> <p>21 other measures in place. So I think the balance of</p> <p>22 those two would lead me to suggest that the DBS</p> <p>23 definition of regulated activity seems like a good</p> <p>24 starting point.</p> <p>25 Q. I would just like to put some flesh on the bones of</p> <p style="text-align: center;">Page 30</p>
<p>1 the detail of the British Council systems, if I may,</p> <p>2 because you have provided a lot of information to the</p> <p>3 panel about that. I think -- is it fair to summarise</p> <p>4 the position in this way, that your own recruitment</p> <p>5 processes have been the subject of extensive review over</p> <p>6 many years, particularly since that case we looked at</p> <p>7 from 2007. Is that a fair summary?</p> <p>8 A. That's a good summary.</p> <p>9 Q. You have provided the panel with a detailed explanation</p> <p>10 of how your current systems operate; is that right?</p> <p>11 A. That's right.</p> <p>12 Q. You have explained that chronologically over the years</p> <p>13 there have been various reviews that you have carried</p> <p>14 out specifically on this issue?</p> <p>15 A. That's right.</p> <p>16 Q. If we can perhaps just try and bring up some further</p> <p>17 detail, just to let the panel know what information we</p> <p>18 have. You have also provided the panel with information</p> <p>19 about the different training materials that are</p> <p>20 available, the different child protection policies and</p> <p>21 things of that nature; is that right?</p> <p>22 A. That's right, yes.</p> <p>23 Q. Perhaps just bring up this one summary document, please,</p> <p>24 it's BRC000152_002. I think we will just scroll through</p> <p>25 this, but this sets out for the panel, does it,</p> <p style="text-align: center;">Page 31</p>	<p>1 a chronological history of your various policies around</p> <p>2 child protection that include some material about</p> <p>3 vetting and recruitment, and it goes right through from</p> <p>4 2004, I think, bringing it up to the present day, so we</p> <p>5 will perhaps just look at the last few pages a bit more</p> <p>6 closely. If we can go, please, to internal page 10, you</p> <p>7 refer there to the annual workshop in 2015 which looked</p> <p>8 particularly at, in one session, some child protection</p> <p>9 risks, including negligent hire through the use of case</p> <p>10 studies; there was some training in 2016 that picked up</p> <p>11 on the Davis report and the Serious Case Review on the</p> <p>12 Southbank International School. Just pausing there,</p> <p>13 perhaps to anchor those for the panel, I don't think</p> <p>14 they have heard very much about this. The Davies Report</p> <p>15 is not in fact the Davies Report on the Civil Orders</p> <p>16 regime but the Davies Report about a particular school</p> <p>17 on the South Bank; is that right?</p> <p>18 A. That's right. We use this as an example case study of</p> <p>19 what can go wrong.</p> <p>20 Q. I will just bring that up very briefly for the panel,</p> <p>21 please, BRC000155. That's a report from November 2014</p> <p>22 about the criminal conduct of an individual who had been</p> <p>23 able to obtain work in the Southbank with a history of</p> <p>24 sexual offending; is that right?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 32</p>

<p>1 Q. If we can just scroll down to internal page 94, please, 2 there are some conclusions there around how this had 3 been able to happen. 9.3, I think there were 4 unquestionably flaws in the procedure that had been used 5 at the particular school; and went on to make -- very 6 briefly, internal page 96 -- particular recommendations. 7 That was, in fairness, an individual travelling from 8 overseas into this country? 9 A. Yes, yes. 10 Q. There was a similar review, I think, a Serious Case 11 Review, carried out by Dame Moira Gibb in January 2016. 12 Bring that up, please, it's BRC000143. Again, that 13 focused on learning from a particular set of 14 circumstances, I think involving the same individual; is 15 that right? 16 A. Yes, and these were -- this was within a workshop, so 17 this was very much to raise awareness. I mean, our 18 whole approach is very much about an organisational 19 culture and making sure that there is awareness right 20 down through the organisation at all levels. 21 Q. I think you have also provided us with certain slides 22 from your training processes. We have got your Safer 23 Recruitment PowerPoint, and things of that nature; is 24 that right? 25 A. That's right.</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. I think I will, just for completeness, bring up some of 2 these core documents, please. Your child protection 3 strategy is at BRC000202. That's the current child 4 protection strategy; is that right? 5 A. Yes. 6 Q. That includes all of your work, but if we go, please, to 7 internal page 4, does have under paragraph 3 as a key 8 priority "Safer recruitment". 9 A. That's right. I mean, as I say, the recruitment process 10 is only part of a sort of package of controls that we 11 put in place. A lot of this is about changing the 12 culture. But if you have allowed the individuals into 13 the organisation in the first place, then, clearly, it's 14 very much harder to do your job. 15 Q. Just a further document, please, BRC000225. We can see 16 that your executive board in July 2017 was looking again 17 at the issue of the pre-appointment screening checks 18 that were carried out; is that right? 19 A. That's correct. So I think our observation had been 20 that the DBS check -- and we used an agent security 21 watchdog, we carried out some 5,500 checks over 22 a seven-year period, but our concern was that, even 23 then, a couple of audits had demonstrated that some 24 cases had slipped through the net and not everyone had 25 gone through a CRB or a DBS check before they'd entered</p> <p style="text-align: center;">Page 34</p>
<p>1 the organisation, and so we took the decision in the 2 executive board a year or so ago that we had to 3 introduce a globally controlled pre-appointment 4 screening process to try and stop those gaps appearing. 5 I think it's probably just worth emphasising that 6 that wasn't an easy decision to make, because the costs 7 and resource involved in it are really enormous. 8 I noted the conclusion about some smaller charities 9 finding it difficult to find the resource for this, and 10 we are a very large organisation with a £1.2 billion 11 turnover. But finding the £1 million/£1.5 million that 12 it would take to carry this out was still a major 13 decision for us, so I can see that that would be a real 14 potential challenge for many organisations. 15 Q. So the proposal that we see at the end of this, the 16 proposed pre-appointment screening policy, or PAS, what 17 does that involve actually happening in real terms? 18 A. So it's now controlled centrally, and it means we are 19 also working through another organisation called 20 First Advantage, who have got officers in 44 countries 21 overseas. We felt that the previous supplier was a bit 22 limited in their overseas experience. They have got 23 experience of working with a number of international 24 NGOs and charities. So before any employee is given 25 a contract, they will have to go through a full enhanced</p> <p style="text-align: center;">Page 35</p>	<p>1 checking process. 2 Q. We can scroll in just underneath the heading "The 3 proposed pre-appointment screening policy". We can see 4 on the first bullet point: 5 "This will apply for all those wishing to work for, 6 with or on behalf of the British Council, including 7 current and prospective employees, temporary workers, 8 partners, contractors and consultants." 9 There are different categories of screening. Again, 10 you are looking at an enhanced plus category for those 11 working unsupervised with children. Over the page, we 12 don't need to go to it in detail, it scrolls through by 13 way of a table exactly what sort of checks are 14 appropriate for each level, and then goes on to explain 15 the rationale for this new PAS scheme. Is that right? 16 A. That's correct. 17 Q. Just to finalise this group of documents, please, 18 BRC000141 is, I think, some slides that help train 19 people on the introduction of this PAS project; is that 20 right? 21 A. That's correct, yes. 22 Q. If you go to internal page 2, please, you can see that 23 there's a background to what the project is, there are 24 various slides that indicate why it's happening. If you 25 go, please, to internal page 4, they again reflect the</p> <p style="text-align: center;">Page 36</p>

<p>1 different levels of check. I think for completeness, 2 internal page 7, the background to the review includes 3 that there were 35 cases had been raised with concerns 4 in 2016/17, so you're perhaps illustrating the need, the 5 business need, or the moral need, perhaps, for this 6 review; is that right? 7 A. Yes. I probably should just give a little bit more 8 background to those 35 cases, though. So, of those, 19 9 were in relation to British Council staff; the others 10 were referrals from working with external organisations. 11 Q. We can go to internal page 8 and 9 that make that good. 12 Page 8 also indicates that, of the abuse in question, 13 a percentage was sexual abuse -- I think 2.6 per cent -- 14 forgive me, 20.57 per cent. The others were categorised 15 in the way set out there. Then you make clear over the 16 page at 9 that, as you have said, 16 of those 17 allegations were related to third parties, 19 were 18 related to staff, and so, finally on the sexual abuse 19 allegations, going to internal page 10, please, of 20 the 19 staff allegations, 9 related to sexual abuse and 21 7 of those resulted in dismissal or warnings. Is that 22 right? 23 A. That's right. And only one of those seven met the 24 benchmark to be referred to the authorities, and that's 25 one of our case studies. That's the Spain case study.</p> <p style="text-align: center;">Page 37</p>	<p>1 Q. In terms of the learning from this, can you go to 2 internal page 12, please. It was made clear on the 3 slides that, of those nine cases, 11 per cent were safe 4 recruitment compliant, 67 per cent were partially 5 compliant and 22 per cent I think were noncompliant; is 6 that right? 7 A. That's right. And that's what's given rise to the 8 pre-appointment screening approach. 9 Q. Then there are similar figures given for the third party 10 allegations, and similar figures for the compliance with 11 safe recruitment. So if one looks, in fact, please, at 12 internal page 14, 73 per cent of the third party sexual 13 abuse cases involved noncompliant recruitment processes; 14 is that right? 15 A. Yes. So these are ones where we don't have direct 16 control over the appointment. So the Premier Skills 17 Project you referred to earlier would be a good example 18 where we're working with coaches who are working in the 19 community. 20 Q. Just for completeness, then, please, I think BRC000153 21 is your safer recruitment policy; is that right? 22 A. Yes. 23 Q. This is the current policy, I think; is that right? 24 A. That's correct, yes. 25 Q. If the panel wish to see it, the self-declaration form</p> <p style="text-align: center;">Page 38</p>
<p>1 for consultants and suppliers is at BRC000349. That's 2 a form, a self-completion form, that we have talked 3 about. 4 You have provided the panel with the various reviews 5 that have led to this policy. I haven't gone to them in 6 any detail. Is there any other sort of key theme that 7 you feel the need to draw out, Mr Greer? 8 A. No, I think we have probably covered it. Thank you. 9 Q. In relation to temporary and casual staff, I think, 10 historically, one of those reviews had raised concerns 11 about the recruitment of that group of staff, temporary 12 or casual staff. How often now would checks be carried 13 out on a temporary or casual member of staff? 14 A. So under our new pre-appointment screening process, any 15 staff member would be subject to the full enhanced 16 checking process. Casual or temporary staff are really 17 problematic because, in running a teaching centre, very 18 often you don't know until very late in the process 19 exactly how many staff you're going to need to cover all 20 of the classes. So very often there is a need to 21 recruit at short notice, and there is always a tension 22 between the people running what's essentially a business 23 and the child protection needs, and that is exactly why 24 we made the decision to make it mandatory across the 25 organisation to have the pre-appointment screening in</p> <p style="text-align: center;">Page 39</p>	<p>1 advance of the recruitment process. 2 Q. You have provided some information about your policy for 3 retaining data. I will just bring this up briefly, if 4 I may. It's BRC000005_043- 044. I think the 5 understanding we have is that a casework file, including 6 actual or suspected abuse involving a child or children 7 would be kept for ten years after the end of 8 the committee. Concerns raised by staff are kept for 9 seven years. The question that I'm asked to put to you 10 is whether or not you think those periods are 11 appropriate: should the records be kept for longer? 12 A. So where it's a serious case, we've now sort of changed 13 that to 40 years. For seven years, these are cases 14 where there has been a concern but they don't meet the 15 standards required, or the benchmark required, to 16 convene a panel. So an example of that would be 17 a complaint we had from a parent that alcohol had been 18 served in a school where there were 5-year-old children 19 present. So these are often kind of cases where there 20 is a cultural concern but they're not sexual abuse 21 cases, just to clarify. 22 Q. Just to remind you, perhaps -- I couldn't remember 23 earlier -- where your figure comes from of the very 24 small number of individuals who do not have a criminal 25 record who are then suspected or found to be abusers.</p> <p style="text-align: center;">Page 40</p>

<p>1 It is BRC000206_001. I think this is one of these 2 reports that led to that new change in policy around 3 screening. So this is a 2010 report. This was 4 a general risk analysis report, but the findings in the 5 research box, if we scroll in on the grey box at the 6 top, draw on, I think, Australian research on 7 child abuse. I think the bullet point there is: 8 "Many child abusers do not have a criminal record -- 9 estimate as only 1-5 per cent of child abusers." 10 That's perhaps where you got that figure from? 11 A. Yes, indeed. I'm not sure what the source of it 12 originally was. 13 Q. I think the footnote tells us it is Australian research? 14 A. Ah. 15 Q. Can you help us, please, with some details on the 16 Richard Huckle case. We can take that down now, please. 17 I think you have confirmed in your witness statement 18 that Mr Huckle, about whom we have heard, completed a -- 19 I think it is the English language teaching course in 20 2008, but the British Council has no record that he was 21 ever employed or engaged to work with the 22 British Council in a permanent, nonpermanent or 23 volunteer capacity. Is that correct? 24 A. That's correct. I mean, this was a really shocking case 25 that we were horrified by. The course that he took is</p> <p style="text-align: center;">Page 41</p>	<p>1 a certificate of English language teaching for adults 2 course. It is a relatively short course. It is the 3 basic entry level to teaching as a foreign language. 4 Q. Have there been any internal reviews or lessons learnt 5 from the Huckle case by the British Council? 6 A. We looked at -- I mean, we did quite a lot of soul 7 searching on this one and looked quite hard. To be 8 honest, I think the answer is no. Robert Jones's 9 evidence indicates that Huckle wasn't known to the 10 authorities before, at this time, so there certainly 11 wouldn't have been any criminal records checks, and also 12 he was a student at a language school, and we wouldn't 13 normally carry out any kind of check for students, 14 and -- you know, which is pretty much the case I think 15 for all training courses. 16 So it is one of those -- 17 Q. So now -- just to roll that forward, if somebody were to 18 sign up for an English language teaching course now with 19 the British Council as students on that course, they 20 would not be required to provide any certificate? 21 A. No, and I'm not sure what mechanism you would use to do 22 that checking. I wouldn't recommend that we did try and 23 extend that further, because I think that would be 24 setting -- it's so broad that it would swamp the system. 25 Q. And make it unworkable?</p> <p style="text-align: center;">Page 42</p>
<p>1 A. Yes, exactly. 2 Q. What generally does happen if the British Council is 3 alerted to someone who had obtained a teaching 4 qualification from the Council and was then found out to 5 have abused children? What would you generally do? 6 A. We would refer that to the NCA or the ILO in an 7 individual country. 8 Q. I think -- I didn't adduce this detail, but the 9 screening processes that you now apply, you understand, 10 is a screening scheme that is benchmarked with similar 11 organisations in the field -- with Save the Children, 12 Oxfam, RBS and the Leonard Cheshire disability groups; 13 is that right? 14 A. That's correct. Just on your previous question, 15 counsel, I think a number of the case studies indicate 16 instances where we have referred things to NCA even 17 though they weren't related to our own employees, but 18 our staff had picked up information about them and then 19 referred them on. 20 Q. For completeness, I will just bring up a couple of those 21 examples of you providing information in a similar way 22 to the NCA, please, case summary 18, BRC000043, relating 23 to Vietnam, I think; is that right? 24 A. That's correct, yes. 25 Q. Just tell us a little bit about what happened there?</p> <p style="text-align: center;">Page 43</p>	<p>1 A. So, as I understand it, it was some individual had been 2 seen talking to a young girl very late at night. This 3 wasn't an individual who worked for the teaching centre, 4 but there was a concern that he might be an English 5 teacher and might seek to work with the British Council. 6 So we investigated -- somebody took a photograph and 7 then referred it on to the NCA. 8 Q. I think if the panel wish to see it, if you go to 9 internal page 4, please, you will see that there is 10 further detail about the contact you had between -- the 11 contact that was had between the child protection group 12 and CEOP, providing information about the individual and 13 toing and froing of communications. Is that right? 14 A. That's correct. 15 Q. If we can bring up the case summary from Spain, please, 16 it's BRC000023. Sorry, some of the numbering has gone 17 a bit awry on the topics list, but I hope we can follow 18 it. This is case summary 14 from Spain. This involves, 19 I think, does it, information being provided -- let's 20 first of all look at the incident, please. It's the top 21 of internal page 2. There was a concern raised about 22 a female teacher kissing a male student, who was 17, at 23 a party, I think in Spain. The outcome was that you 24 referred this to the DBS. If we go to internal page 3, 25 that sets out what the outcome overall was. Can you</p> <p style="text-align: center;">Page 44</p>

<p>1 help us with that, Mr Greer?</p> <p>2 A. Yes, this was the case that I referred to earlier from</p> <p>3 that seminar where we were -- we ran through the</p> <p>4 44 cases that had been investigated. This was the one</p> <p>5 that ended up being referred to the DBS. So we convened</p> <p>6 an action panel and then the child protection team made</p> <p>7 a formal referral to the DBS -- sorry, to -- yes, to the</p> <p>8 DBS.</p> <p>9 Q. Then finally, I think, if we can look at the China</p> <p>10 example, BRC000024. What was the allegation that was</p> <p>11 raised in this case? Internal page 2, scroll down to</p> <p>12 the heading "Allegations". It looks to be about</p> <p>13 a freelance examiner in his 50s working for the</p> <p>14 British Council travelling throughout test centres,</p> <p>15 I think was thought to have conducted a relationship</p> <p>16 with a young woman who was thought to be under 18?</p> <p>17 A. That's correct. So this was one where somebody has</p> <p>18 whistle blown, alerted us to the fact that an examiner</p> <p>19 seemed to be carrying out a relationship with someone</p> <p>20 who might have been underage.</p> <p>21 Q. What was the action of the British Council in that case</p> <p>22 and the outcome?</p> <p>23 A. So we investigated and the examiner was dismissed, and</p> <p>24 then we also referred it to CEOP.</p> <p>25 Q. I think, for completeness, bring up, please, the last</p> <p style="text-align: center;">Page 45</p>	<p>1 example from Bangladesh, BRC000054, where concerns were</p> <p>2 raised about a senior teacher in Bangladesh, and</p> <p>3 concerns raised about a child exploitation ring</p> <p>4 operating in that country that led, I think, ultimately</p> <p>5 to a full investigation and to the dismissal of an</p> <p>6 individual. Is that right?</p> <p>7 A. That's correct.</p> <p>8 Q. The conclusion, internal page 7, was to that effect as</p> <p>9 far as the individual was concerned, and then there were</p> <p>10 some recommendations made I think as far as reporting to</p> <p>11 the police is concerned; is that right?</p> <p>12 A. Yes. So we reported it to the local authorities, who</p> <p>13 carried out an investigation themselves. We also</p> <p>14 reported it to the NCA --</p> <p>15 Q. To CEOP?</p> <p>16 A. To CEOP, who agreed that they should -- we should report</p> <p>17 to the local authorities. So this was a case where an</p> <p>18 individual was providing private tuition to a young boy</p> <p>19 in his own home, and he was dismissed for gross</p> <p>20 misconduct as well as being referred.</p> <p>21 Q. I think there is just one further document I would like</p> <p>22 to adduce through your evidence, please, BRC000002,</p> <p>23 please. This is a document., in fairness, that's</p> <p>24 provided by you, although it is not produced by you. It</p> <p>25 is some general guidance that's given -- is this</p> <p style="text-align: center;">Page 46</p>
<p>1 right? -- to schools and organisations about the</p> <p>2 international criminal certificate --</p> <p>3 A. That's correct.</p> <p>4 Q. -- which the panel can look at if they wish. And it</p> <p>5 helps organisations understand -- let's perhaps look at</p> <p>6 it in quite simple terms. Internal page 6:</p> <p>7 "Is the ICPC suitable for your organisation?</p> <p>8 "It is only appropriate if your organisation is</p> <p>9 formally connected with the UK. Yes, you can apply for</p> <p>10 a CRB check. No, you can apply for an ICPC through</p> <p>11 ACRO."</p> <p>12 A. That's correct.</p> <p>13 Q. Thank you very much, Mr Greer. Unless there is anything</p> <p>14 you think I have missed. I'm sorry I have gone through</p> <p>15 some of your documents quite briefly, but is there</p> <p>16 anything else you think we need to understand?</p> <p>17 A. I think just in terms of the themes you've picked up,</p> <p>18 probably one more that I'd quite like to highlight is</p> <p>19 the proposal for a minimum set of standards for NGOs and</p> <p>20 charities working overseas with children. That feels</p> <p>21 like -- that and also a register for people wanting to</p> <p>22 work with children would seem like two really good</p> <p>23 recommendations.</p> <p>24 Q. Might the first of those feed into some of the work that</p> <p>25 you know is happening through DFID?</p> <p style="text-align: center;">Page 47</p>	<p>1 A. Absolutely, yes.</p> <p>2 Q. It's part of a similar piece?</p> <p>3 A. I know DFID now is taking a very proactive approach to</p> <p>4 this and we are working closely with them, and of course</p> <p>5 we manage a number of contracts on behalf of DFID, so we</p> <p>6 are quite close to them.</p> <p>7 MS HILL: Thank you. Those are all my questions, chair.</p> <p>8 THE CHAIR: Thank you, Ms Hill. We have no further</p> <p>9 questions.</p> <p>10 A. Thank you, chair.</p> <p>11 MS HILL: Thank you very much, Mr Greer.</p> <p>12 A. Thank you.</p> <p style="text-align: center;">(The witness withdrew)</p> <p>14 MS HILL: I call now, please, two witnesses concurrently:</p> <p>15 Colin Bell, please, and Jane Larsson.</p> <p>16 Chair, while the arrangements are being made, we are</p> <p>17 not going to read the Ministry of Defence schools</p> <p>18 evidence, but I would like to formally adduce it, while</p> <p>19 the witness box is being made available. Chair, could</p> <p>20 I formally adduce, please, a witness statement from</p> <p>21 Mike Cooper of MOD schools. His witness statement is</p> <p>22 MOD000001 and MOD000002. Just very briefly, chair,</p> <p>23 I will summarise the evidence in this way: Mr Cooper</p> <p>24 gives two witness statements, addressing the</p> <p>25 safeguarding of children and young people in MOD</p> <p style="text-align: center;">Page 48</p>

<p>1 schools. He informs you that there are 19 schools and 2 10 nurseries overseas -- in Germany, Cyprus, the 3 Falklands, Gibraltar, the Netherlands, Belgium, Italy 4 and Brunei. He provides, at his annex A, a full list of 5 the MOD schools and nurseries. He sets out the use of 6 the D&B scheme by MOD schools which are employed for 7 staff. He notes that statutory vetting and barring 8 provides a level of safeguarding for children overseas 9 but expresses his view that it is limited on the basis 10 that the DBS cannot access, he understands, overseas 11 records or convictions. He notes the DBS could be 12 reformed to include overseas information. He provides 13 information on the legislation applicable overseas. 14 Chair, he addresses the Armed Forces Act 2006 and the 15 service justice system. He notes that the MOD and the 16 armed forces have no involvement in the making of 17 Civil Orders and will not always be aware of 18 a conviction for a sexual offence or a resulting order. 19 He consulted the service police and indicates that he's 20 not aware of any specific case where a service person 21 has been the subject of a Civil Order, and the MOD 22 schools have had no involvement in section 72. 23 You do have the statement in full, but that is 24 I think a fair summary. Thank you, chair. I will call, 25 please, Ms Larsson and Mr Bell.</p> <p style="text-align: center;">Page 49</p>	<p>1 MS JANE LARSSON (sworn) 2 MR COLIN BELL (sworn) 3 Examination by MS HILL 4 MS HILL: Thank you very much. You are Jane Larsson; is 5 that right? 6 MS LARSSON: Correct. 7 MS HILL: You have given a witness statement to the inquiry, 8 which I will formally adduce, please, dated 9 22 January 2019. It is INQ003866. Your current role, 10 Ms Larsson, is as executive director of the Council of 11 International Schools -- is that CIS? -- 12 MS LARSSON: CIS. 13 MS HILL: -- which you have held as a position 14 since July 2010. You also serve in a volunteer capacity 15 as chair of the International Task Force on Child 16 Protection since it was formed in April 2014; is that 17 right. 18 MS LARSSON: That's correct. 19 MS HILL: Mr Bell, you have provided a witness statement to 20 the inquiry with reference INQ0003785. You are the 21 chief executive officer of the Council of British 22 Schools, COBIS, I think; is that right? 23 MR BELL: Yes, that's correct. Council of British 24 International Schools. 25 MS HILL: Your witness statement dated 8 January 2019 also</p> <p style="text-align: center;">Page 50</p>
<p>1 makes clear that you have involvement -- I think you 2 were a founder member of the international task force 3 about which we have just heard; is that right? 4 MR BELL: That's correct. 5 MS HILL: Can I just understand firstly a little bit, 6 Ms Larsson, very briefly, please -- can we bring up on 7 screen INQ003866 to help understand a little bit about 8 what your council does. If we scroll in on your 9 paragraph 3, just help the panel, does that offer 10 a summary of the work that your council does? 11 MS LARSSON: It does. 12 MS HILL: So you offer services to members. Your members 13 are schools and post-secondary institutions; is that 14 right? 15 MS LARSSON: Correct. 16 MS HILL: You promote international and intercultural 17 understanding, collaboration and support through your 18 members' activities; provide a professional forum for 19 members; and cooperate with other organisations and 20 individuals with similar objectives; is that correct? 21 MS LARSSON: That's correct. 22 MS HILL: Typically -- just help us with this, Ms Larsson -- 23 who are the members of your organisation? What sort of 24 institutions are they? 25 MS LARSSON: They are primary and secondary schools of all</p> <p style="text-align: center;">Page 51</p>	<p>1 types -- government, proprietary, private, 2 not-for-profit/for-profit schools, currently across 3 116 countries. What they have in common is, they share 4 a commitment to international education and to issues 5 concerning student mobility or mobility of educators 6 working in these schools. And then the other half of 7 the membership are higher education institutions from 8 across 45 countries. We are very interested in working 9 with the schools to develop transition pathways for 10 students who want to pursue higher education globally. 11 MS HILL: A similar question, please, for you, Mr Bell. Can 12 I bring up INQ003785_001, internal paragraph 1.2 and 13 scroll in on that, please. Because your organisation, 14 the Council of British International Schools, Mr Bell, 15 is a member organisation of British International 16 Schools. You give some figures there. Just help us 17 with how many schools or members you have? 18 MR BELL: Certainly. The school network, 258 British 19 international schools, similar to CIS, schools within 20 our global network have primary and secondary provision 21 plus also nursery provision in some schools. Again, 22 a mixture of for-profit/not-for-profit schools. A large 23 number which have campuses which are cross-phase 24 schools. And our footprint is in 80 countries worldwide 25 currently.</p> <p style="text-align: center;">Page 52</p>

<p>1 MS HILL: Can I go a bit further into your statement, 2 Mr Bell. You have given us information about the 3 governance structure for your council, but then scroll 4 in, please, on internal page 5, where you set out the 5 history of membership of the council and the criteria 6 that you apply for membership which you indicate has 7 changed over time. You have, I think, higher 8 expectations over time. 9 Tell us, please -- I think perhaps we can just go 10 down to the most recent evidence you give about this, 11 4.7, please, where you indicate that you have applied, 12 I think more recently, in 2017, what you call the 13 Patron's Accreditation and Compliance Scheme. So tell 14 us a little bit about that, please? 15 MR BELL: Certainly. The Patron's Accreditation and 16 Compliance Scheme was introduced after extensive 17 consultation with our members and also with other 18 schools, British international schools, within the 19 sector. So what we wanted to do is to introduce an 20 internationally-minded, stretching and very rigorous set 21 of standards which would look at all the elements of 22 the school governance but also curriculum and, most 23 importantly, to reflect the COBIS commitment to child 24 protection and safeguarding. 25 We were very much keen to focus in on those issues</p> <p style="text-align: center;">Page 53</p>	<p>1 of child protection and safeguarding, pastoral care, 2 safer recruitment, the prevention and reporting of any 3 incidents. That's why we introduced this scheme, which 4 is very much reflecting the United Nations Convention's 5 Rights of the Child, but also findings from PISA, also 6 findings from Ofsted -- 7 MS HILL: Let's pull up, please, 4.9. You indicate the 8 sources of the good practice in your new scheme is -- 9 I think you said PISA, the Programme for International 10 Student Assessment, the British Council, the United 11 Nations Convention, the guidance issued by 12 Dame Moira Gibb following the Southbank School 13 investigation that we have heard about, and Ofsted as 14 well. Just scroll down, please, to 4.13. I think these 15 are the key principles of your accreditation scheme: 16 a strong emphasis, it says, on the effectiveness of 17 safeguarding practice. It sets out, I think, a tiered 18 approach for members, does it? 19 MR BELL: That's correct. 20 MS HILL: Tell us a little bit about that, please. 21 MR BELL: Certainly. So there are two options available to 22 our members through this Patron's Accreditation and 23 Compliance. The first option is, a process whereby 24 schools will have six months to provide evidence against 25 a set of six compliance standards. So that's one</p> <p style="text-align: center;">Page 54</p>
<p>1 option. If a school successfully meets these standards 2 after assessment via the digital workbook but also an 3 assessment over at least two and a half days of a lead 4 improvement partner, the school will be eligible to be 5 offered member status, so COBIS member school status. 6 That's an offer which is made to the school but then 7 ratified by our overall board, the COBIS board, under 8 the direction of the COBIS Membership and Accreditation 9 Committee. 10 The second option a school has, if they wish to gain 11 membership to COBIS, is to complete the compliance 12 element of the standards but also standards 7, 8, 9 and 13 10. 9 and 10 are optional, but that will lead to the 14 full accreditation of COBIS, which will lead to the 15 status of a COBIS Patron's Accredited Member school. 16 But in addition, it is worth pointing out, too, 17 counsel, that the current British schools overseas 18 inspection system, which is a voluntary system offered 19 by the Department of Education, is also another eligible 20 route into COBIS membership. If a school successfully 21 completes an inspection against those standards, they 22 will be offered a COBIS Accredited Member status. 23 MS HILL: Just for completeness, once somebody becomes 24 a COBIS member -- go, please, to further down that page, 25 one of the elements of the member services is access to</p> <p style="text-align: center;">Page 55</p>	<p>1 your CPD certified training on a range of topics. If we 2 go to the top of internal page 9, please, those topics 3 include things such as safer recruitment in child 4 protection. Is that right? 5 MR BELL: Yes, that's correct. 6 MS HILL: You produce at least biannually, you say here at 7 5.7, a safeguarding and child protection e-newsletter 8 and you promote good practice in safer recruitment; is 9 that right? 10 MR BELL: Yes, that's correct, and that reflects our deep 11 commitment to school improvement and also to child 12 protection and safeguarding internationally. 13 MS HILL: If you go, please, to the bottom of that page, to 14 5.8, the vacancies that are advertised I think through 15 your e-bulletin, are accompanied by this indication that 16 you're, "committed to safeguarding and promoting 17 welfare. All applicants to COBIS schools must be 18 willing to undergo" -- over the page -- "child 19 protection screening, including checks with past 20 employers", and so on. 21 Then scroll in, please, on 5.9. This also promotes 22 and signposts the ICPC, the UK guidance and things of 23 that nature; is that right? 24 MR BELL: That's correct. 25 MS HILL: Ms Larsson, coming back to you, if I may, you</p> <p style="text-align: center;">Page 56</p>

<p>1 provide some evidence about a confusion, I think, that 2 had existed among your members about, firstly, the 3 ability to carry out a DBS check and the requirements 4 for an international certificate. Can you just 5 summarise, please, the issues that you have raised 6 there? Perhaps just bring up your statement to assist 7 the panel, INQ003866_002.</p> <p>8 MS LARSSON: The challenges that exist for schools around 9 the world are really accessing, knowing first of all 10 where to go for the most complete information on anyone 11 applying to teach across national borders and what the 12 level of information would be shared. So, for example, 13 would it just be criminal information or would it be 14 complaints? And recently there has been confusion among 15 our members and us about, for instance, which is the 16 gold standard: the ICPC or the enhanced DBS check. And 17 of course, with the recent move to limit or restrict the 18 availability of the DBS check to schools outside the UK, 19 we see this as very challenging and in fact a step in 20 the wrong direction, in terms of keeping children safe 21 around the world.</p> <p>22 So we would like to see some clarity about what 23 information is available to schools in any country 24 around the world for citizens from the UK or people who 25 have spent time in the UK, as far as it pertains to</p> <p style="text-align: center;">Page 57</p>	<p>1 getting a complete picture of their history when they 2 were residing in this country.</p> <p>3 MS HILL: I think when you're talking about the recent 4 changes, you're referring to the correspondence, 5 I think, between COBIS in fact and the Home Office that 6 we looked at through the evidence of the Home Office 7 witness earlier this week. I hope I can summarise it 8 fairly but the Home Office position, through Ms French, 9 was that there had not been a removal of an ability to 10 access DBS checks, but that a correction had taken place 11 as to the proper application of the statutory framework. 12 Is that how you understood the information you were 13 given? Maybe that's a question for Mr Bell?</p> <p>14 MR BELL: Yes, that's -- from the correspondence we 15 received, that's what we understood to be the position. 16 But it left COBIS and our members and others within the 17 sector with complete puzzlement why this decision had 18 been made by the Home Office after a period of 15 years 19 whereby COBIS had been conducting, on behalf of its 20 members and non-member schools, within international 21 schools sector, enhanced DBS checks.</p> <p>22 MS HILL: I think we can perhaps bring up your witness 23 statement on this, Mr Bell: INQ003785_012.</p> <p>24 Essentially, you had gone on, I think, for many 25 years requesting DBS checks on behalf of member schools.</p> <p style="text-align: center;">Page 58</p>
<p>1 You believed you were entitled to. This went 2 unchallenged, you say, for many years. You'd never 3 previously been made aware that schools outside England 4 and Wales were not eligible to request them, it had 5 never been picked up by the DBS or the Home Office.</p> <p>6 At 7.2 you say, despite thousands of applications 7 from the British School at Tokyo, Dubai College, the 8 British School in Shanghai and Paris, the majority of 9 the applicants for these enhanced DBS checks were 10 already residing overseas, which would have been evident 11 from the proof of current address which was submitted, 12 but I think you say that when you were informed of 13 the Home Office decision you stopped doing these online 14 checks; is that right?</p> <p>15 MR BELL: Yes, that's correct. We followed the guidance 16 from the Home Office. It is also key to point out that 17 we didn't restrict the DBS service just to members. It 18 was open to all international schools and not just COBIS 19 member schools.</p> <p>20 MS HILL: Scroll in, please, on 7.4. I think you indicated 21 that you were very disappointed by this decision. You 22 say your organisation is a staunch advocate of safer 23 recruiting practices, you expressed your severe 24 disappointment to the Home Office about the decision. 25 I think some attempts were made to engage with the</p> <p style="text-align: center;">Page 59</p>	<p>1 Home Office about this. You have -- if you go on, 2 please, at 7.7 and 7.8, scroll in on that, please, and 3 7.9, and indeed the whole of that page, I think the 4 whole of internal page 13, indicates that you have, 5 I think, tried to lobby around this issue, meeting with 6 various representatives of DFID, the British Council, of 7 DBS and so on, to try and move this issue on; is that 8 right?</p> <p>9 MR BELL: That's correct, yes. We also have the support of 10 other associations that represent not only British 11 international schools but international schools which 12 are listed in the witness statement, but also, 13 importantly, from the International Task Force on Child 14 Protection, which brings the majority of international 15 school community together.</p> <p>16 MS HILL: I think we can go, please, to internal page 14. 17 You have set out in your evidence there a summary of 18 the questions that you are being asked by individuals 19 and schools overseas about this change in approach and 20 how it is you're answering. So 7.13.1: why has the 21 Home Office stopped these checks? And the answer is, 22 I think, that it's because of interpretation of 23 the statutory regime. The second question is: if the 24 legislation hasn't changed, why have checks been carried 25 out on staff in international schools for so long? You</p> <p style="text-align: center;">Page 60</p>

<p>1 say that, broadly, you think the Home Office is now 2 applying a more strict interpretation than hitherto. 3 Are previous checks still valid? You say yes. Over the 4 page: 5 "In the absence of DBS checks, how do schools ensure 6 high levels of safeguarding and safer recruitment?" 7 You give advice, I think, about what can be done in 8 the alternative; is that right? So broadly, what do you 9 advise people to do? 10 MR BELL: We advise schools, members and non-members, to 11 approach the ICPC, the international child protection 12 certificate. Again, this is clearly signposted in the 13 advice and guidance that we give to schools. We also 14 advise them to conduct local background checks, police 15 checks. It's of paramount importance as well that 16 professional references are sought, at least two, and 17 that those references are also checked not only by email 18 but by personal telephone calls too. 19 We follow the -- well, we promote the excellent 20 guidance provided by CIS which signposts how schools can 21 access individual criminal -- sorry, police background 22 checks in various countries worldwide. This is a very 23 concerted effort in collaboration with the International 24 Task Force on Child Protection which, as I said, brings 25 together a number of different associations that</p> <p style="text-align: center;">Page 61</p>	<p>1 represent British and other international schools. 2 MS HILL: I think the end of your evidence on this topic, 3 Mr Bell, is that, most recently, September 2018 -- can 4 we go down to paragraph 7.14 of your witness 5 statement -- there was a meeting of the International 6 Task Force in the Netherlands. You, I think, made 7 a presentation around this issue, and I think it is 8 fair, isn't it, that there was also a presentation from 9 the ACRO Criminal Records Office about the international 10 certificate? 11 MR BELL: Yes, that's correct. Again, we were grateful for 12 our colleagues at ACRO for presenting, and it's 13 something which is very much a part of the COBIS annual 14 conference, which happens later in May, here in London, 15 to signpost, to promote and to ensure that more and more 16 schools within the international school community are 17 accessing that service as a result of the access to 18 enhanced DBS checks being ceased. 19 MS HILL: I think you have provided, for completeness, 20 Mr Bell, your accreditation and compliance standards for 21 those who wish to become the patrons, as you indicate, 22 in the school council. The standards for compliance 23 that deal with recruitment -- this document, please, is 24 INQ003786_005. These are, I think, the standards that 25 you expect in terms of recruitment; is that right?</p> <p style="text-align: center;">Page 62</p>
<p>1 MR BELL: That's correct. 2 MS HILL: They are met, though, by different ways in which 3 these processes are carried out; is that right? 4 MR BELL: That's correct. 5 MS HILL: Coming back, please, to you, if I may, Ms Larsson, 6 on this issue of the barring regime, and so on, is there 7 anything that you would like to add on what Mr Bell has 8 said around the work of the International Task Force on 9 this topic? 10 MS LARSSON: Well, our primary objective is to collaborate, 11 to build access to information across national borders 12 and put our collective resources together to strengthen 13 child protection challenges. Immediately, the 14 recruitment of educators and leaders to work in these 15 schools received high, high attention and in fact we 16 reached out to work with law enforcement across a range 17 of countries, and specifically Interpol, to ask them to 18 look into creating a common certificate so that anyone 19 applying to work across national borders to work with 20 children would have to go through a unified clearance 21 that would link all 191 Interpol countries. That effort 22 was stalled due to liability issues, but it's our firm 23 belief on the Task Force that the safety of children 24 should be paramount and that we all need to work 25 together to create some sort of a central register, not</p> <p style="text-align: center;">Page 63</p>	<p>1 just by law enforcement dealing with criminal 2 complaints, but also by teacher registration agencies to 3 deal with general complaints, because we know from 4 working with the experts that there's a whole range of 5 information that needs to be taken into consideration 6 when considering someone for a job, and it's not just 7 going to be one check that will solve the challenge for 8 us, it will be a broader approach. 9 So we will do everything we can to encourage and 10 bring together national agencies to work with their 11 counterparts in other countries to see how we can create 12 better systems that are more relevant for the way we 13 live and work in the world today. 14 MS HILL: I think you have put some further detail around 15 that in your witness statement, please, if I can pull up 16 INQ003866_003. Chair, I see the time. I think I have 17 about five to ten more minutes of questioning for both 18 of these witnesses, so are you content to proceed? 19 THE CHAIR: Yes. 20 MS HILL: You have indicated at the bottom of that page that 21 there is a lack of clarity around the difference between 22 an enhanced DBS check and an international certificate. 23 That's one of the issues that you identify. You have 24 set out various bullet points around those contrasting 25 systems. You then go on at section 6 of your witness</p> <p style="text-align: center;">Page 64</p>

<p>1 statement to give some further detail around this move 2 to a more central or international process; is that 3 right? 4 MS LARSSON: That's correct. 5 MS HILL: You make the point that an international 6 certificate would be a significant improvement, that's 7 a more thorough process I think than what we currently 8 have, but it would only still go so far. Is there 9 anything else that you would like to indicate around 10 your proposals for change in this area? 11 MS LARSSON: It would be of tremendous help to have the 12 co-operation of any agency responsible for the quality 13 of people who work with children to come together and 14 share how they create those standards for what is 15 perceived to be a high-quality teacher regarding 16 behaviour with children. So we would encourage everyone 17 to look or compare, for example, what is the threshold 18 for a complaint for a specific behaviour, what is the 19 threshold for a crime? These are some of the challenges 20 that exist because these definitions differ across 21 countries. So hopefully we are going to continue to 22 work collaboratively together with Colin and other 23 members of the Task Force to work across professions. 24 We believe one of the challenges that we have 25 noticed, if I may say, is that this issue isn't going to</p> <p style="text-align: center;">Page 65</p>	<p>1 be solved by educators alone or by the police alone. It 2 is going to require co-operation across professions. 3 But the way we organise ourselves with our 4 governmental systems and even our private systems, these 5 barriers don't help. There are people who have great 6 knowledge that can be transferred or shared if we have 7 a more integrated approach. So I would simply say 8 that's where we need to go. 9 MS HILL: You make the point -- scroll in, please, on 10 internal page 5 of your witness statement -- that your 11 Task Force has developed an international protocol on 12 managing allegations of child abuse by educators and 13 other adults; is that right? 14 MS LARSSON: That's correct. 15 MS HILL: I will adduce, please, and bring up INQ003841. 16 That's a lengthy document prepared by your safeguarding 17 unit that provides advice, quite detailed advice, on how 18 to manage allegations of abuse made in this context? 19 MS LARSSON: Now, this was a two-year effort, and it was 20 a highly rewarding project, I will say, because a number 21 of the participants aren't listed as contributing to 22 this, just simply because they work at the highest 23 levels of government and wouldn't have gotten -- to get 24 official approval would have taken years, to be honest. 25 So why am I telling you that? Because it is very, very</p> <p style="text-align: center;">Page 66</p>
<p>1 well informed about the very complex challenges that we 2 face when managing allegations of abuse across different 3 countries, due to mobility issues, due to differences in 4 law and due to especially cultural differences, in terms 5 of how these allegations are addressed. 6 So this is one example of a very concise, and we 7 hope useful and usable, document that's been informed 8 not only by international police, but by governmental 9 education agencies and by independent agencies, anyone 10 working to protect children from harm. 11 MS HILL: Just scroll to internal page 2. We can see the 12 members who did contribute. I think you're saying 13 there's a broader pool of individuals, but there's 14 clearly a broad school of expertise, and the panel can 15 see from internal page 3 the sort of guidance given. It 16 is a substantial 40-something-page document. 17 You are also, I think, Ms Larsson, working on an 18 international protocol around references; is that right? 19 MS LARSSON: That's correct. 20 MS HILL: The model you are using I think is the 21 Working Together model -- forgive me, it is the Keeping 22 Children Safe in Education protocol. You have concerns 23 around guidance to suggest that unsubstantiated concerns 24 need not be disclosed in a reference, I think because 25 you think they could well be probative and pertinent</p> <p style="text-align: center;">Page 67</p>	<p>1 material; is that right? 2 MS LARSSON: Yes, this is a huge area of challenge. For 3 example, there are many policies in schools around the 4 world that will say, if a complaint is anonymous, it 5 should be disregarded. We disagree with that. So 6 trying to elevate, that is just one example of behaviour 7 and practice that needs to be improved. 8 Many, many school leaders have told us that they 9 actually want to stop putting in writing any references 10 because they're worried about litigation, being sued, 11 and so we need a lot of training and guidance for our 12 educational leaders, and in fact leaders in any 13 profession, for going about this, obtaining this 14 information in a legally compliant way that is factual. 15 So that's an area of development where we need to work 16 together to come up with clearer guidelines and we hope 17 in the future to come out with a comprehensive document 18 similar to this "Managing Allegations" document that 19 will give clear guidance to educators about how to 20 fulfil their responsibility when screening and checking 21 personally on the qualifications and references of 22 people who have been referred to them. 23 MS HILL: You anchor the need for this sort of guidance at 24 the foot of your witness statement. I will just read it 25 out. You indicate that the Teaching Regulation Agency</p> <p style="text-align: center;">Page 68</p>

<p>1 which performs a role of collating information about 2 safeguarding concerns in England and Wales does not 3 exist in many countries. That means that if an 4 individual is dismissed from an international school, 5 the head teacher often doesn't have a body to report 6 concerns to; there have been cases of individuals 7 manipulating their CVs to hide employers who might 8 disclose concerns about them in a reference, and many 9 schools still don't seek sufficient references, so the 10 lack of some central reporting body or indeed protocol 11 is a concern? 12 MS LARSSON: It's a huge challenge. For example, when 13 working with DfE colleagues in putting the Managing 14 Allegations protocol together, there were questions when 15 we came to how to give a proper reference or obtain this 16 information, "Well, what about the school's local 17 authority in X country or the TRA", and we said, 18 actually, those don't exist, so the school has no-one to 19 go to. In fact, the school becomes the local authority 20 and the TRA because they have no-one to rely upon. This 21 is why we propose that the sharing of information across 22 national borders has to improve, because people are 23 there with limited support networks, limited expertise, 24 and we intend to build bridges and create systems so 25 that they have access to the information and the advice</p> <p style="text-align: center;">Page 69</p>	<p>1 and the support that they need. 2 MS HILL: Just a couple of further topics, please. I think, 3 Mr Bell, you haven't got any views, I think, to give in 4 particular about the Civil Orders regime or about 5 section 72. That's something that you have had very 6 limited contact with. Is that right? 7 MR BELL: That's correct. 8 MS HILL: Ms Larsson, as far as the first of those is 9 concerned, Civil Orders, can I bring up INQ003866_007, 10 paragraph 11 of your witness statement. You indicate 11 that, assuming the risk issue is assessed properly, you 12 believe these orders are necessary and important. You 13 are aware of an argument that they are a distraction 14 from prosecutions. You believe the ideal situation is 15 for there to be prosecutions and for those orders not to 16 be needed, perhaps only if the person is restrained from 17 travel anyway, but there is a danger that they could 18 lower the standards of investigation pursued by law 19 enforcement is a concern you have identified? 20 MS LARSSON: Absolutely. I mean, the Civil Orders are 21 necessary. However, if they are only in place because 22 of lack of training or expertise in order to get the 23 information needed to pursue with a criminal complaint, 24 this is a concern, as I have mentioned before, we have. 25 We need more suitably trained forensic psychologists</p> <p style="text-align: center;">Page 70</p>
<p>1 available to lead schools in how to conduct an effective 2 enquiry. Actually, we don't want the schools to be 3 investigating criminals, we want law enforcement to do 4 that, but they need access to law enforcement who will 5 take action and also experts who can help them get the 6 information they need so that a criminal case can be 7 pursued. 8 I'm sure that you're aware that there's very, very 9 few cases that get to that level because they simply 10 can't obtain the information needed to bring the case 11 forward. So we see civil restrictions as a fallback in 12 many instances when that occurs. 13 MS HILL: Finally, can I bring up the following page, 14 internal paragraph 16. You have set out some issues 15 with the use of extra-territorial jurisdiction that we 16 have heard about quite a bit from other witnesses, but 17 I will just flag that you have also said you understand 18 that there can be issues around sharing information 19 between law enforcement agencies, partly human rights 20 concerns, concerns around the scope of the powers, 21 resource issues, and so on. And you have helpfully 22 provided for the panel, I think, the Charity Commission 23 document -- I will just pull this up, please, if I may; 24 INQ003837 -- about guidance to charities about how to 25 report matters to the UK police. Is that right?</p> <p style="text-align: center;">Page 71</p>	<p>1 MS LARSSON: That's correct. 2 MS HILL: Is there anything else that either of you would 3 wish to add on the efficacy or the potential reform of 4 the three systems that we have talked about? I think 5 you have both been sent the list of concerns and 6 recommendations. Is there anything that either of you 7 would like to add in terms of how the panel might make 8 recommendations to reform either of these or any of 9 those systems? 10 MR BELL: Thank you. The position of COBIS would be that 11 the reintroduction of the enhanced DBS checks and 12 standard DBS checks for international schools based 13 outside of England and Wales would be very much 14 welcomed. Also, just to point out as well that COBIS is 15 licensed by the TRA to conduct the prohibition checks 16 and there is concern from our members as to the 17 cross-border sharing of information post 29 March. But 18 our belief is certainly that as COBIS is an organisation 19 and working in conjunction with others like CIS and the 20 Task Force, we are definitely very much stronger 21 together. COBIS is an accrediting body, not 22 a regulator, and stronger together also with our 23 colleagues in law enforcement agencies UK and also 24 internationally, and that will help reduce the risk to 25 children and young people worldwide, which is what we</p> <p style="text-align: center;">Page 72</p>

<p>1 are clearly committed to.</p> <p>2 MS HILL: Do you have anything further to add, Ms Larsson?</p> <p>3 MS LARSSON: I want to echo Colin's comments. I agree with</p> <p>4 everything he said. And, again, just even urge this</p> <p>5 inquiry to seek remedies that can be applied to improve</p> <p>6 practices here in the UK, but also globally, and to</p> <p>7 always remember that, no matter what actions or laws we</p> <p>8 implement, they may in fact unintentionally weaken or</p> <p>9 make our ability to keep children safe globally less</p> <p>10 strong. So we always have to think about the</p> <p>11 application in the whole world and not just in this</p> <p>12 country.</p> <p>13 MS HILL: Those are all my questions, chair.</p> <p>14 THE CHAIR: Thank you. We have no questions. Thank you,</p> <p>15 Ms Larsson and Mr Bell.</p> <p>16 (The witnesses withdrew)</p> <p>17 THE CHAIR: We will return at noon.</p> <p>18 MS HILL: Thank you, chair.</p> <p>19 (11.45 am)</p> <p>20 (A short break)</p> <p>21 (12.10 pm)</p> <p>22 MS HILL: Chair, the final piece of evidence I would like to</p> <p>23 adduce in this phase, please, is a further witness</p> <p>24 statement from Matthew Gould of the MoJ, dated</p> <p>25 14 February 2019, where he gives answers to the</p> <p style="text-align: center;">Page 73</p>	<p>1 question:</p> <p>2 "Firstly, given that the MoJ is the policy lead for</p> <p>3 section 72, please explain why it does not collate data</p> <p>4 on how often section 72 is used?"</p> <p>5 In answer to which he indicates that section 72 does</p> <p>6 not contain any distinct offences. While the MoJ does</p> <p>7 collate information on the underlying offences, it would</p> <p>8 not be notified of the circumstances in which any of</p> <p>9 those offences is carried out under section 72.</p> <p>10 It would be for investigators and prosecutors to</p> <p>11 collate this information as it is they who would be</p> <p>12 deploying or relying on the power set out in section 72.</p> <p>13 In answer to the question, "Why does the MoJ, given</p> <p>14 its policy responsibility, not conduct reviews of</p> <p>15 the efficacy of section 72?", again the answer that is</p> <p>16 given is:</p> <p>17 "We do not routinely monitor the use of section 72,</p> <p>18 that being a matter for the prosecution practitioners</p> <p>19 using it. We regularly engage with our colleagues</p> <p>20 across the criminal justice system and would respond to</p> <p>21 any concerns which the police or CPS raised in relation</p> <p>22 to the power within section 72. We are not aware of any</p> <p>23 such concerns having been raised. Whilst section 72</p> <p>24 does not contain any substantive offences, the MoJ does</p> <p>25 seek to ensure that the offences covered by the</p> <p style="text-align: center;">Page 74</p>
<p>1 prosecution power contained within it are working</p> <p>2 effectively and appropriately, again engaging with the</p> <p>3 CPS, police and others across the criminal justice</p> <p>4 system."</p> <p>5 Chair, that concludes the evidence that we propose</p> <p>6 to place before you. Thank you.</p> <p>7 THE CHAIR: Thank you, Ms Hill. We will now go on to the</p> <p>8 closings, calling on Ms Gallagher.</p> <p>9 Closing statement by MS GALLAGHER</p> <p>10 MS GALLAGHER: Thank you, chair and panel. I make these</p> <p>11 closing remarks on behalf of ECPAT UK first, who</p> <p>12 I represent along with Ms Yoshida and</p> <p>13 Deighton Pierce Glynn.</p> <p>14 ECPAT UK first of all welcomes the fact that the</p> <p>15 inquiry is shining a spotlight onto this critical topic</p> <p>16 about the sexual abuse and exploitation of some of</p> <p>17 the world's most vulnerable children by British child</p> <p>18 sex offenders, in particular, those with a connection to</p> <p>19 England and Wales.</p> <p>20 The inquiry will have seen, and indeed I know has</p> <p>21 seen, in other investigative strands an all too familiar</p> <p>22 pattern of there being a flurry of activity in the days</p> <p>23 and weeks leading up to its public hearings. Reviews</p> <p>24 taking place, new guidance and protocols being</p> <p>25 introduced, staffing changes, apologies long requested</p> <p style="text-align: center;">Page 75</p>	<p>1 finally being made to victims and survivors. We have</p> <p>2 seen this week a repeat of that familiar pattern.</p> <p>3 The inquiry's spotlight focusing on this issue in</p> <p>4 these public hearings has already had results which</p> <p>5 ECPAT UK warmly welcomes. To give you three examples,</p> <p>6 firstly, Rob Jones of the NCA in his evidence told us</p> <p>7 that within the past two weeks -- that was his</p> <p>8 evidence -- the document which referred to section 72</p> <p>9 being a last resort or in extremis option only, which we</p> <p>10 criticised in our opening, has been withdrawn and</p> <p>11 replaced.</p> <p>12 We have seen this morning a new document -- we</p> <p>13 haven't had a chance to go through it in detail -- dated</p> <p>14 11 February, the first day of this hearing.</p> <p>15 A second example, we have learnt of a new liaison</p> <p>16 officer in the Philippines.</p> <p>17 A third example, the NPCC in their evidence</p> <p>18 yesterday referred to a new coding in respect of</p> <p>19 section 72 in force from June 2019.</p> <p>20 So ECPAT UK welcomes this constructive engagement,</p> <p>21 increased focus and these changes, but it wishes, above</p> <p>22 all else, to ensure that the momentum which we have had</p> <p>23 from the public hearing this week is not lost and that</p> <p>24 this inquiry takes the opportunity to make specific</p> <p>25 practical recommendations which have tangible results</p> <p style="text-align: center;">Page 76</p>

<p>1 which improve protection for some of the world's most 2 vulnerable children. 3 Bharti Patel, ECPAT UK's CEO, proposed in her 4 witness statement, and we echoed in opening, the ask of 5 the establishment of a national approach to the policing 6 of extra-territorial sexual offending against children 7 rather than the existing local force strategy. You will 8 know that this week many of the institutional witnesses 9 have referred to current reviews which are now under 10 way, including from the Home Office two reviews, one 11 mandated by legislation, the Foreign and Commonwealth 12 Office referring to refreshing its documentation 13 yesterday, and evidence from the NCA about its current 14 review and update. 15 Whilst we recognise that there are multiple agencies 16 involved and those internal reviews have an important 17 role to play, ECPAT UK's primary submission to you today 18 is that it is imperative that there is an overall 19 coherent national plan. That is the approach adopted to 20 trafficking and terrorism, for example, and it is 21 essential that such an approach is adopted in this 22 field. 23 In questioning on the very first day of this 24 hearing, Ivor Frank asked Ms Patel about the UK's 25 national plan of action, and he said:</p> <p style="text-align: center;">Page 77</p>	<p>1 "So far as I can understand it, the last time there 2 was a UK national plan of action in regard to this 3 subject was in 2001, at time of the Yokohama Conference. 4 Is that right?" 5 And Ms Patel confirmed that it was right, and 6 Ivor Frank said: 7 "So that's about 20 years ago, nearly. Do you think 8 there's a case for having a review of that and seeing 9 whether the debate could be had at a central level to 10 see whether that plan needs to be updated?" 11 And Ms Patel in response said: 12 "This is absolutely critical. It is long overdue." 13 Two decades on, we now say in closing, it is long 14 overdue and imperative. ECPAT UK seeks a recommendation 15 that there be a comprehensive review of the UK plan of 16 action, and a new national approach established. The 17 range of internal reviews referred to, whilst welcome, 18 are not enough, and they risk continuing the disparate, 19 disjointed approach which we have seen all too often in 20 evidence this week. 21 We also ask that the inquiry be updated within 22 a specific period by all institutional core participants 23 on the outcomes of the internal reviews that they have 24 referred to in answers to questions this week, and the 25 timeframe we suggest is a three-month one. We ask that</p> <p style="text-align: center;">Page 78</p>
<p>1 they update the inquiry within three months and that 2 those updates be shared with all core participants. 3 We also seek, as part of the national plan of action 4 review, input by stakeholders outside law enforcement. 5 That should include organisations such as ECPAT UK, but 6 critically it must also include input from on-the-ground 7 organisations such as those who have given evidence to 8 this inquiry this week, including EQUATIONS in India, 9 Voices of the Free and APLE Cambodia. Only then will we 10 have a proper review and a coherent overall strategy. 11 Now, in our opening, we referred to three different 12 categories of offender who commit sexual exploitation of 13 children abroad through contact abuse, and we said that 14 each raises different but overlapping challenges. In 15 our submission, the review must carefully consider how 16 to minimise the risk posed in each of those categories 17 because they do raise different questions. Just 18 a reminder, the first category we highlighted was UK 19 nationals and residents who are already known to be 20 child sex offenders who travel to other countries, often 21 developing countries ravaged by poverty with poor 22 safeguarding practices, to target vulnerable children 23 there. Into that category fall abusers such as 24 Mark Frost, Paul Gadd -- Gary Glitter -- and 25 Paul Charles Wilkins, all with convictions in this</p> <p style="text-align: center;">Page 79</p>	<p>1 country when they travelled abroad, all known risks to 2 children. In each case, those risks were realised and 3 they went on to abuse children abroad. ECPAT UK 4 considers it imperative that the Civil Orders regime is 5 used more often and more effectively to restrict the 6 travel of predators such as these. 7 The second category was UK nationals and residents 8 without previous convictions, not on the sex offenders 9 register, who travel when they are not known to be 10 a risk but later come to the attention of the UK 11 authorities whilst abroad, so the Richard Huckle type 12 offender. 13 ECPAT UK asked in opening how Huckle was able to 14 abuse children over a decade, including abuse conducted 15 after law enforcement agencies in this country had been 16 made aware of his activities, alerted by international 17 law enforcement agencies, and we asked why was there 18 a delay in him being apprehended and stopped once the 19 risk was known. We said in opening, we predicted, that 20 you would see a common theme in the evidence this week: 21 witnesses raising concerns that the NCA is too slow and 22 too sluggish to respond in these circumstances, in stark 23 contrast to the response from the US, Australian and 24 other European law enforcement agencies. That has been 25 the evidence that you have heard.</p> <p style="text-align: center;">Page 80</p>

<p>1 For example, OU-X1's very powerful statement, read 2 yesterday, echoed it. He contrasted unfavourably the 3 response of the UK authorities and that of 4 the Norwegian, Belgian, German, Dutch, Australian and US 5 authorities. And ECPAT UK say that his evidence or her 6 evidence, OU-X1's evidence, was powerful and compelling 7 and highlighted the gap between the rhetoric of this 8 being a top priority and the reality on the ground when 9 the UK, England and Wales in particular, as you're 10 focused upon now, are left wanting when you compare them 11 unfavourably to these other agencies. 12 Similar evidence was heard from Joyatri Ray, from 13 Seila Samleang, from Christine Beddoe, from 14 Professor Warren Binford. 15 The third category we refer to was that of 16 voluntourism: the opportunistic, situational abusers who 17 take advantage of lack of structures and safeguarding. 18 ECPAT UK welcomes the fact that DFID has a particular 19 focus at the moment on the aid sector. There is 20 a renewed focus on that because of the Oxfam situation, 21 but again, it is a crisis-reactive response to the Oxfam 22 issue rather than there being a coherent, proactive plan 23 in advance. ECPAT UK agrees with the evidence given by 24 Professor Binford of Child Redress International to the 25 effect that there is no reason why that new approach</p> <p style="text-align: center;">Page 81</p>	<p>1 should be restricted to the aid sector. The approach 2 should be rolled out to others, including the religious 3 sector and the teaching sector, for example. The aid 4 sector is on the list because of a crisis, but 5 a proactive plan should be broader. 6 ECPAT UK also recognises the importance of 7 the national review considering a fourth category of 8 offender, who has been referred to in evidence this 9 week: the internet user who views and may direct the 10 abuse of children abroad from England and Wales, spoken 11 of so powerfully by Professor Binford. Those 12 individuals are highly likely, the evidence suggests, to 13 eventually fall within ECPAT UK's first category, unless 14 their travel is restricted. That was also very evident 15 from the evidence of Rob Jones who described graphically 16 the trajectory, the common trajectory, which the NCA 17 sees. 18 Now, a few specific issues that ECPAT wishes to draw 19 attention to in these brief closing remarks, and we will 20 of course be providing far more detail in our written 21 submissions. Firstly, data gaps. We indicated in 22 opening that we were concerned about inadequacy of data, 23 it being in a scattered and disparate way across 24 multiple agencies, but we are also very concerned, and 25 we hope the inquiry is concerned, that much data which</p> <p style="text-align: center;">Page 82</p>
<p>1 would have been very relevant to the hearing this week 2 was not even gathered for the inquiry. So repeat 3 witnesses said, "Well, I could get that information. 4 I can provide it later". So even with the spotlight of 5 this inquiry, that information hadn't in fact been 6 strand tied, brought together, provided to you and 7 provided to us. We reiterate what we said in opening 8 about the importance of having a good, robust evidential 9 basis for considering the efficacy of the current tools 10 to tackle this pernicious type of offending and 11 analysing where the change is needed. That's a critical 12 issue. 13 We also highlighted in opening the guidance gap. 14 ECPAT UK does call for a specific recommendation for 15 guidance to be issued to the NCA on their obligations 16 under the Children Act 2004. Parliament, when it 17 amended the Children Act 2004 a number of years ago, 18 specifically decided to include the NCA in the bodies 19 that are subject to the duty in section 11 in respect of 20 England and section 28 in respect of Wales, yet the 21 guidance which is then issued is silent in relation to 22 the NCA's role apart from one passing reference, which 23 just gives a link to NCA guidance in respect of 24 the internet. 25 That is a gap which should be filled, and you will</p> <p style="text-align: center;">Page 83</p>	<p>1 recall that both Bharti Patel and 2 Professor Warren Binford called for that in their 3 evidence this week. 4 In respect of section 72, ECPAT UK endorses and 5 supports the evidence of a number of witnesses who have 6 criticised the absence of an on-the-ground presence and 7 what they call for is more resources and a widening of 8 the liaison officer role. You will have heard there was 9 a substantial degree of overlap between the evidence 10 given by Bharti Patel on this issue and indeed by 11 Rob Jones of the NCA, whose evidence we welcome. Both 12 of them referred to the importance of recognising that 13 this is a global issue, you need to expand the liaison 14 officer network, resources are critically important and 15 you need to make assessments based on risk. ECPAT UK 16 wish to back Rob Jones of the NCA on that issue, and we 17 say resources are critical and, unless we have proper 18 resources, the network simply will not expand as needed. 19 In respect of Disclosure and Barring, just very 20 briefly, ECPAT UK agrees that the ICPC should be 21 mandatory. There are some complex questions which I can 22 summarise under the heading of, "Mandatory for whom", 23 which we are going to deal with in a bit more detail in 24 the written submissions. But for it to be effective, 25 those practical issues must be grappled with.</p> <p style="text-align: center;">Page 84</p>

<p>1 In respect of Civil Orders, in summary, ECPAT UK's 2 position is that it does not consider the current 3 Civil Orders regime containing foreign travel 4 restrictions to be working effectively, although there 5 are some doubts over the numbers. The numbers we have 6 seen show that these are only applied in a very tiny 7 number of cases, and it also appears there's a postcode 8 lottery with individual forces adopting different 9 approaches.</p> <p>10 Whilst ECPAT UK recognises the challenges involved 11 in having to ensure restrictions applied through SHPOs 12 are necessary and proportionate, the numbers, and some 13 of the specific examples before the inquiry suggest 14 travel restrictions are not being granted or indeed even 15 being sought for some high-risk offenders for whom such 16 restrictions would plainly be justified.</p> <p>17 We are concerned that the CPS witness, 18 Gregor McGill's answer to counsel to the investigation's 19 question about whether travel restrictions should be 20 mentioned in the list of possible conditions in their 21 guidance was defensive: "Our decision makers are highly 22 trained", and so on. We think it is quite apparent this 23 is a common restriction which should be considered and 24 it not appearing on the menu of obvious options may be 25 one reason why we don't then see it feature, so we ask</p> <p style="text-align: center;">Page 85</p>	<p>1 for that to be amended.</p> <p>2 We also note that in individual cases there may be 3 a justified basis for restricting travel even where 4 travel previously played no part in a particular 5 offending. In particular, we are thinking of an 6 individual who has been based in England and Wales, has 7 been live streaming child abuse images from, for 8 example, South-East Asia, and we have heard in evidence 9 about the risk that that may pose if that individual 10 then travels. So you shouldn't necessarily have to have 11 history of travel in order for travel to be a risk.</p> <p>12 We have brought to your attention the very recent 13 case of Marco Cheyne from the Court of Appeal Criminal 14 Division. We have provided you with a copy, but we 15 understand in fact, having provided it, that your 16 counsel had also found it, and that a transcript is 17 awaited. The reason we draw that to your attention is 18 that the Court of Appeal, in its decision from seven 19 days ago, last Friday, have made clear that in that 20 particular case the police were unable to monitor the 21 risk this individual presented when he was abroad, and 22 their duty to protect children and vulnerable people 23 from the offender included those both in and out of 24 the UK. In the summary you will see a very powerful 25 summary of the court having indicated that the need to</p> <p style="text-align: center;">Page 86</p>
<p>1 protect people, as set out in section 103E, means that 2 the chief constable has a clear duty, including 3 a protective duty, to children outside the UK, and there 4 was there a proper and compelling basis for extending 5 the order abroad. ECPAT UK very much agrees with that.</p> <p>6 Just finally, we did in opening draw your attention 7 to the phrase "off the radar" which is in the title of 8 one of ECPAT UK's reports that's been gone to on 9 a number of occasions this week. This inquiry means 10 that these very vulnerable children are, for this week 11 only, on the radar, although you haven't heard from them 12 directly. Children abroad deserve and require 13 protection from British offenders. We say this is 14 a critical opportunity for the inquiry to ensure that 15 they remain on the radar, that this scrutiny continues 16 and that the reality matches the powerful rhetoric you 17 have heard this week. That, above all, ECPAT UK say, 18 requires increased resources. Thank you.</p> <p>19 THE CHAIR: Thank you, Ms Gallagher.</p> <p>20 Closing statement by MS GALLAGHER 21 MS GALLAGHER: We talked about doing a Bucks Fizz-style 22 change. I'm afraid it is just me again.</p> <p>23 So I make this closing statement on behalf of Child 24 Redress International. As you know, I also appear with 25 Ms Yoshida, the same junior counsel, but we have</p> <p style="text-align: center;">Page 87</p>	<p>1 different solicitors from Simpson Millar, who sit to my 2 right. Child Redress International is very grateful for 3 this opportunity to make a closing statement today. In 4 our oral submissions we highlight a small number of key 5 points and we will be providing more detailed written 6 submissions in due course.</p> <p>7 Now, this week, the inquiry has heard evidence from 8 NGOs, independent witnesses, law enforcement agencies 9 and employers about the challenges in this area towards 10 ensuring that children abroad are effectively protected 11 from abuse and exploitation by perpetrators from England 12 and Wales.</p> <p>13 However, this inquiry has not heard evidence 14 directly from any of the tens of thousands of children 15 in the Philippines, Cambodia, India, Kenya and elsewhere 16 who are sexually abused by British nationals and 17 residents today. These perpetrators, as we have heard, 18 exploit extreme poverty and travel to abuse these most 19 vulnerable children. The inquiry hasn't heard from any 20 of the many children who were abused on line through 21 live streaming of sexual abuse images, where British 22 perpetrators direct the abuse from their homes. These 23 children, as we have heard from 24 Professor Warren Binford, are sometimes exploited by 25 desperate parents, sometimes they are trafficked and</p> <p style="text-align: center;">Page 88</p>

<p>1 exploited by criminal gangs. OU-X1, the undercover 2 witness whose evidence was read yesterday, also 3 described this spectrum of abuse of these children. 4 They are often held captive and exploited in 5 unimaginable conditions, and their voices have not been 6 heard this week, so it is very important to CRI that the 7 inquiry hear from just one of these children, known as 8 Lorna, who was abused in the Philippines. We have asked 9 for a short video to be played which was prepared by 10 UNICEF Philippines and WeProtect. For those watching 11 the live stream, the inquiry team have asked me to 12 indicate that the subtitled video will be uploaded with 13 other evidence today. I think Henry is now going to 14 play the video. 15 (Video played) 16 MS GALLAGHER: So Lorna is one of the great many children 17 abused by foreign offenders. As the inquiry heard from 18 Voice of the Free earlier this week, an estimated 19 100,000 children are currently being abused in the 20 Philippines alone. So for every Lorna there are 100,000 21 others in a single country. There are tens of thousands 22 of Lornas in many other countries. These are the 23 individuals who lie behind the statistics that we have 24 seen on our screens and in our folders this week. As 25 I speak, this abuse is highly likely to be occurring.</p> <p style="text-align: center;">Page 89</p>	<p>1 It is almost inevitable that it's being perpetrated at 2 the moment by residents and nationals of England and 3 Wales. 4 The inquiry has heard from many witnesses this week 5 that the UK regularly features in the list of countries 6 whose nationals and residents travel and abuse children 7 abroad. Seila Samleang of APLE Cambodia, for example, 8 said that British offenders are in the top five foreign 9 nationalities who abuse children in Cambodia. 10 In addition to the UK's appearance high in the lists 11 of those involved in contact abuse, it is also clear 12 that British offenders are prevalent in viewing and 13 directing online abuse of children abroad, sometimes 14 doing so from home soil. You will recall the evidence 15 of OU-X1 in this regard. OU-X1 also described in 16 chilling detail investigation of a particular cyber sex 17 den in the Philippines which involved men based in the 18 UK making payments to view the sexual exploitation of 19 children and one particular UK man was in fact one of 20 the worst, you were told. He wished to view the abuse 21 of very young children, made explicit requests in 22 relation to one particular young child and provided the 23 family with a Dropbox facility and provided 24 technological assistance from the UK. OU-X1 says this 25 fits a common pattern she or he has seen in which</p> <p style="text-align: center;">Page 90</p>
<p>1 suppliers are educated by the viewing offenders on how 2 to store and access materials. It is imperative that 3 this inquiry ensures that these children are better 4 protected from British offenders like these. 5 Unlike many of the inquiry's strands, this 6 investigation focuses upon contemporaneous abuse and 7 exploitation of children, and so the need for the 8 inquiry's analysis and urgent recommendations could not 9 be stronger. 10 There are two features of the hearing this week 11 which reinforce the concerns raised by CRI. First, you 12 may have noticed that there has been minimal media 13 interest in this hearing, in contrast to the very 14 substantial coverage of many other strands, such as the 15 Roman Catholic Church, for example. And CRI believe 16 that this is in part due to the victims and survivors of 17 this abuse being faceless individuals, thousands of 18 miles away. They do not have MPs in this country who 19 raise questions in parliament, who press ministers. 20 They face substantial barriers in accessing legal 21 mechanisms which can be used by those based in this 22 country, such as challenging police investigations not 23 to investigate in the courts or challenging CPS 24 decisions not to prosecute. A second feature is that 25 time and again we have seen difficulties with</p> <p style="text-align: center;">Page 91</p>	<p>1 connections, despite the great work of the inquiry's 2 expert AV team. The evidence of Glen Hulley and 3 Seila Samleang, for example, was interrupted by 4 technical hitches. The inquiry will be aware that the 5 process of obtaining statements from NGOs in the field 6 has been painstaking and difficult, given time zone 7 differences, poor connections, limited email and Skype 8 access and the sheer volume of work which individuals 9 like Seila Samleang, Sherryl Loseno and Joyatri Ray 10 undertake. That for us reinforces the impossibility of 11 managing these issues from a desk in London or, indeed, 12 from a risk in another neighbouring country in the 13 region. 14 Boots on the ground, CRI say, is essential. 15 A common theme from the independent witnesses on the 16 ground has been that the UK is far less visible, far 17 less available and far slower to respond than agencies 18 from other countries, and this must change. 19 Professor Binford called for an expansion of the liaison 20 officer network, including at least the placement of 21 a liaison officer in a country such as Cambodia, for 22 example, which is currently managed from Vietnam. Also, 23 once in place, they must engage with stakeholders and be 24 responsive. We do not know, for example, when the newly 25 appointed liaison officer commenced in the Philippines,</p> <p style="text-align: center;">Page 92</p>

<p>1 but it's striking that the witnesses who gave evidence 2 to this inquiry, who have expertise on the ground in the 3 Philippines, did not know that he or she exists. 4 CRI was particularly surprised and concerned to hear 5 the evidence from the Home Office, from Ms French, on 6 this point. She was asked in relation to section 72 by 7 your counsel about an idea around having more 8 on-the-ground support in countries, particularly 9 high-risk countries. She was then invited to look at 10 the proposal summary document in this regard. Her 11 response was, reading from the transcript: 12 "Okay, if I could take these collectively, I think 13 that goes to the point I was making about, to make them 14 really effective, we need to have good capability 15 in-country. It is described here as 'on-the-ground 16 support'. I saw it described in another NGO statement 17 as 'boots on the ground'. I think we recognise that we 18 may not ever hope to have the amount of capability that 19 the US and Australia have on the ground, but nonetheless 20 it's something we want to reinforce and make more 21 effective." 22 CRI asks, why would the Home Office not hope to ever 23 have the amount of capability that the US and Australia 24 have on the ground? We acknowledge that the US may be 25 on a different scale, but Australia has a far smaller</p> <p style="text-align: center;">Page 93</p>	<p>1 population than the UK, a population of under 2 25 million, versus the UK's over 66 million. The 3 evidence we have heard this week shows the scale of this 4 problem. The Home Office were told it's apparently 5 providing political leadership on these issues. We know 6 from its evidence it has responsibility for the 7 Civil Orders framework, the disclosure and barring 8 regime, it is responsible for keeping those matters 9 under review, ensuring that they continue to be 10 effective. Not only should the UK hope to have the 11 amount of capability that Australia has on the ground, 12 CRI say it should be exceeding their capability, it 13 should be ensuring that the resources allocated reflect 14 the scale of the issue and the imperative of complying 15 with its international obligations concerning the vast 16 interests of children. 17 In respect of the institutional witnesses, CRI do 18 wish to acknowledge the spirit with which the NCA has 19 engaged the inquiry this week and the changes that they 20 have made to their guidance. CRI, however, have been 21 very disappointed by the engagement of some bodies, and 22 I highlight a number of them. CRI is disappointed by 23 the Home Office's evidence. I have given one example. 24 Another particular example is the response given to your 25 counsel in relation to data collection. When asked,</p> <p style="text-align: center;">Page 94</p>
<p>1 "Why does the Home Office not collect statistics and 2 data?", the answer given was: 3 "The reason for that is because, although we provide 4 for the Civil Orders and the statutory regime, it is for 5 the police to manage them in the community day-to-day. 6 They do so by inputting the data onto the ViSOR 7 database. Our reasoning is that they're the best place 8 to manage those statistics and data. We don't at 9 present collect specifically on the Civil Orders regime 10 data anything centrally in the Home Office." 11 But, as I mentioned before, we can make requests to 12 get access so we're not completely blinded." 13 But Ms French says in her witness statement the 14 department developed the legislative provisions, is 15 responsible for keeping them under review and ensuring 16 they continue to be effective. There is a fundamental 17 mismatch between what is said at paragraph 13 of her 18 statement and the answer she gave to Ms Hill QC in her 19 evidence. 20 The FCO, who, as the inquiry heard, provided an 21 initial witness statement confined only to its role as 22 an employer and who have had to be pushed to refresh, 23 their word, their outdated diplomatic guidance on 24 extra-territorial powers, is also a concern for CRI. 25 CRI are concerned and disappointed that a body which</p> <p style="text-align: center;">Page 95</p>	<p>1 Christine Beddoe described as having previously taken 2 a leading role appears to have lost its focus on 3 preventing child sexual abuse and exploitation abroad. 4 Finally, we want to draw attention to the CPS. 5 Because Mr McGill, when asked yesterday about the 6 Victims Right to Review scheme, indicated that victims 7 abroad do have access to the scheme. You will have seen 8 from Professor Binford's third witness statement that we 9 entirely accept that, in principle, victims abroad have 10 access to the scheme. There is no jurisdictional 11 requirement to be based in England and Wales to access 12 it. 13 CRI's point is a more nuanced one: the scheme is not 14 constructed or operated in a way which makes this right 15 in principle, effective in practice, for child victims 16 abroad. The scheme assumes victims are based here. 17 That assumption underlies, for example, the role of 18 victim liaison units and local resolution schemes. For 19 the children we are considering here, like Lorna, these 20 mechanisms are meaningless. They are literally 21 thousands of miles away. They are in a different 22 language. They use systems that they have no access to. 23 And CRI seeks change to the scheme to reflect that 24 reality to enable children and their representatives, 25 including victim-focused NGOs, as many have no lawyers,</p> <p style="text-align: center;">Page 96</p>

<p>1 to be informed of the reason why a decision is taken not 2 to prosecute under section 72 and to challenge that 3 decision if they wish to do so. 4 Given the time, I am just going to highlight some 5 key points that we are going to develop further in our 6 written submissions. 7 Firstly, international law. CRI in its written 8 submissions will address a number of matters arising in 9 this regard. In headline: (a) CRI emphasises that the 10 UK has obligations under international human rights law 11 and that the UK should strengthen its commitments 12 including signing up to the Third Optional Protocol on 13 the UN Convention on the Rights of the Child. 14 Second, with regards to article 4 of the Second 15 Optional Protocol, Professor Binford made clear in her 16 evidence that international human rights law is 17 consistent with, and even mandates, the exercise of 18 extra-territorial jurisdiction in certain circumstances. 19 We are conscious of the exchange that was had 20 between the panel and Professor Binford on this point. 21 If the panel does not consider that the current system, 22 and indeed article 4 itself, is sufficiently strong, CRI 23 would support the call for a recommendation for that to 24 be strengthened. In another context, we are very 25 conscious that Sir Malcolm Evans, a member of this</p> <p style="text-align: center;">Page 97</p>	<p>1 panel, referred to the idea of looking at human rights 2 issues through the lens of prevention, and in respect of 3 torture he has said: 4 "There must always be remedies for breach, there 5 must always be accountability for perpetrators, there 6 must always be redress for victims and survivors. But 7 above all, there has to be less opportunity for torture 8 to take place." 9 That is what the OPCAT is intended to help achieve. 10 CRI very much agrees with that and considers it equally 11 applicable in this context. There must be remedies and 12 redress for children, there must be accountability for 13 perpetrators, but above all there has to be less 14 opportunity for this abuse to occur in the first place. 15 In that regard, CRI notes that throughout the week 16 the inquiry has heard evidence from law enforcement 17 bodies about the Human Rights Act and the European 18 Convention on Human Rights and the need to ensure that 19 measures in place are necessary and proportionate. CRI 20 has a concern that, while those bodies have placed great 21 emphasis on human rights in respect of proportionality 22 and necessity in relation to British perpetrators, you 23 have heard nothing about the positive obligations that 24 this government has under articles 3 and 4 of 25 the European Convention on Human Rights to prevent child</p> <p style="text-align: center;">Page 98</p>
<p>1 sexual abuse from happening in the first place. 2 We will be dealing with that in more detail in 3 writing. 4 One specific example before I close. There have 5 been a number of references made to the Supreme Court's 6 recent decision in PW and Others, the very recent 7 decision. For example, Cecilia French of 8 the Home Office suggested to you in her evidence that 9 that Supreme Court decision is a good example of the way 10 in which the Home Office has been pulled in an opposite 11 direction to some of the reforms being advocated by 12 those giving evidence to the inquiry. It is very 13 difficult for us to understand how the Home Office 14 considers that a person stealing a sandwich and a 99p 15 book or a woman not using seat belts in a car in the 16 1990s can possibly be compared to the case study we are 17 looking at concerning adult offenders of child sexual 18 exploitation whose convictions are rightly and legally 19 caught within the regime. It simply doesn't pull the 20 Home Office in a different direction, and we will be 21 dealing with that in more detail in writing. 22 We will also in writing be dealing in more detail 23 with a particular issue which has been absent this week, 24 which is the role of companies, and on that issue CRI 25 would say that we have heard quite a lot about corporate</p> <p style="text-align: center;">Page 99</p>	<p>1 social responsibility but not very much about corporate 2 legal accountability. And we do not think the example 3 given of the Home Secretary holding a hackathon in the 4 US is an example of leadership in this area and we will 5 be explaining in our written submissions why there 6 should be suggested amendments to the national model 7 response on this particular issue. Unless I can assist 8 further, they are our submissions. 9 THE CHAIR: Thank you, Ms Gallagher. Ms Weereratne? 10 Closing statement by MS WEERERATNE 11 MS WEERERATNE: Thank you, chair and panel. This 12 investigation has focused on the provisions of three 13 interrelated strands of UK legislation which together 14 have the dual purpose of preventing the abuse and 15 exploitation of children by UK nationals or residents 16 overseas and the prosecution in England and Wales of 17 offences committed against these children overseas by UK 18 nationals. 19 The British Council has a keen interest in the 20 proper application and pursuit of the aims and purposes 21 of that legislation. By these brief submissions, the 22 British Council seeks only to highlight and make some 23 observations in relation to some key topics emerging 24 from the evidence heard this week, and we are grateful 25 for the opportunity to put down in writing more detailed</p> <p style="text-align: center;">Page 100</p>

<p>1 submissions in due course.</p> <p>2 So the key points are as follows. Firstly, the</p> <p>3 inquiry has heard -- and I am going to say shocking</p> <p>4 evidence of the prevalence and extent of predatory and</p> <p>5 opportunist sexual abuse of children overseas due, we</p> <p>6 were told, mainly to poverty, which creates a special</p> <p>7 vulnerability to sexual exploitation of children often</p> <p>8 involving family members.</p> <p>9 The inquiry has heard predominantly about South-East</p> <p>10 Asia, but the problem we have heard is also not</p> <p>11 geographically confined. Poverty, wherever it occurs,</p> <p>12 creates a honeypot for paedophile activity.</p> <p>13 The commitment and tireless work of organisations</p> <p>14 like ECPAT, APLE, Karma, Voice of the Free, PREDA, the</p> <p>15 covert work of OU-X1 and of course many others must be</p> <p>16 applauded, but that clearly is not enough, and</p> <p>17 governments and law enforcement agencies and others must</p> <p>18 act swiftly to respond.</p> <p>19 This is not a problem that's confined to hands-on</p> <p>20 abuse, we have heard; it is also online and includes</p> <p>21 cyber sex. We have seen and heard graphic evidence of</p> <p>22 the worst imaginable atrocities committed against</p> <p>23 children, and transmitted in places such as the dark</p> <p>24 web. Ms Gallagher has eloquently outlined for you the</p> <p>25 real terminology, the human rights terminology, that</p> <p style="text-align: center;">Page 101</p>	<p>1 would aptly refer to these acts as torture and inhumane</p> <p>2 and degrading treatment.</p> <p>3 The available statistics show that such abuse is</p> <p>4 committed by local nationals and foreigners from the UK,</p> <p>5 Europe, US, Australia, Canada. It seems that there is</p> <p>6 some variation, we have heard, through South-East Asia</p> <p>7 so that UK nationals may not appear to be among the most</p> <p>8 predatory in every country in that region. Yet the</p> <p>9 evidence of Mr Hulley and OU-X1 and others is that the</p> <p>10 UK's response is limited and agencies are less engaged</p> <p>11 than we have heard, again, powerfully explained,</p> <p>12 Australia, USA and other European countries.</p> <p>13 OU-X1 explained his or her perception that there is</p> <p>14 an absence of organisations on the ground from the UK</p> <p>15 authorities.</p> <p>16 The statistics that the inquiry has heard presented</p> <p>17 give the overall impression, in fact, support the</p> <p>18 proposition that the imposition of Civil Orders by the</p> <p>19 courts in England and Wales is low, whether following</p> <p>20 a conviction for a sexual offence against a child or</p> <p>21 not, and the rate of Civil Orders, including foreign</p> <p>22 travel restrictions, is lower still. Importantly also</p> <p>23 the rate of prosecutions under section 72 of nationals</p> <p>24 and residents abusing children overseas is also low, and</p> <p>25 has been acknowledged to be low.</p> <p style="text-align: center;">Page 102</p>
<p>1 Robert Jones from the NCA and Ms French from the</p> <p>2 Home Office attempted to offer some justification for</p> <p>3 these low rates. We have heard human rights law, high</p> <p>4 standard of proof, the lack of Public Interest Immunity</p> <p>5 procedures, the complex and resource-intensive nature of</p> <p>6 section 72 investigations and prosecutions, because key</p> <p>7 witnesses are abroad and often fearful of giving</p> <p>8 evidence. But these are unlikely to be insuperable.</p> <p>9 Prosecution requires detection and investigation.</p> <p>10 Mr Jones's evidence was that the NCA does have boots on</p> <p>11 the ground and globally, I think he referred to about</p> <p>12 140 officers. And he said not simply confined to</p> <p>13 South-East Asia. Yet there have been few</p> <p>14 extra-territorial prosecutions, and the inquiry heard</p> <p>15 about six such cases.</p> <p>16 Mr Peter Jones of the FCO described the efforts of</p> <p>17 the British ambassador in Thailand to engage -- and the</p> <p>18 fact that there's an NCA liaison officer attached to</p> <p>19 that embassy. But the evidence that this inquiry has</p> <p>20 heard appears to -- does not appear to correspond with</p> <p>21 a throughput of prosecutions of offences committed in</p> <p>22 Thailand or its neighbours, Myanmar, Cambodia and</p> <p>23 Vietnam.</p> <p>24 We offer this observation: the lack of prosecutions</p> <p>25 under section 72 may well explain the lack of</p> <p style="text-align: center;">Page 103</p>	<p>1 Civil Orders with foreign travel restrictions made by UK</p> <p>2 courts. The inquiry has heard, again from</p> <p>3 Mr Robert Jones and Mr McGill from the CPS, that the UK</p> <p>4 courts require evidence of a link with foreign travel in</p> <p>5 order to justify a foreign travel ban. But surely, we</p> <p>6 pose this question, this evidential burden is most</p> <p>7 easily overcome if you prosecute offences committed</p> <p>8 overseas? Additionally, if you do prosecute such</p> <p>9 offences, then you are unlikely, we pose, to need</p> <p>10 a blanket foreign travel ban for all sex offenders as in</p> <p>11 Australia because those who offend overseas will most</p> <p>12 likely be subject to travel restrictions, and those can</p> <p>13 be global to avoid manipulation and evasion.</p> <p>14 We have heard reference to the fact that there is</p> <p>15 considered to be tricky legal issues otherwise in</p> <p>16 relation to global bans.</p> <p>17 So we say, far from double jeopardy, offenders</p> <p>18 currently benefit from the double immunity or weak local</p> <p>19 laws and a lack of reach by UK prosecutorial</p> <p>20 authorities. So section 72 looks like it could be</p> <p>21 a gateway to Civil Orders with travel bans and to the</p> <p>22 prevention of sexual abuse and exploitation of children</p> <p>23 overseas.</p> <p>24 Most importantly, from the point of view of</p> <p>25 potential employers, it feeds into the information</p> <p style="text-align: center;">Page 104</p>

<p>1 available to employers through vetting and barring 2 procedures, and turning to that, this is where the 3 British Council hope it has been of value to the 4 inquiry, it is one of the many thousands of potential 5 employers overseas of UK nationals, it may be one of 6 the largest employers of UK nationals in the field of 7 education in particular. By opening up its servers and 8 information to the inquiry, it has sought to demonstrate 9 a transparency of approach that is intended to assist 10 the inquiry in understanding the challenges that face 11 employers and it is eager to share this experience, and 12 has shared its experience with the inquiry. 13 It has provided a sample of case summaries -- you 14 have heard Mr Greer being asked about them this 15 morning -- provided to the inquiry to demonstrate the 16 range of child protection issues that have arisen over 17 the years since Civil Orders have been available and how 18 they have been dealt with and the lessons learned along 19 the way. Lessons are continually being learned, you 20 heard, and this is a dynamic process. 21 The British Council does not profess to have 22 resolved the difficulties it faces in this arena, but it 23 has had a global child protection team since 2010, 24 which, together with its human resources team, puts 25 together an evolving programme of measures of</p> <p style="text-align: center;">Page 105</p>	<p>1 safeguarding children and preventing the recruitment of 2 paedophiles into the organisation, and, again, you heard 3 Mr Greer give some detailed evidence on that this 4 morning. 5 It operates a zero tolerance policy towards 6 child abuse. The British Council are investing in 7 a major set of reforms around pre-appointment screening 8 of all employees and not just those in regulated 9 activities with children. Of course, criminal checks 10 are only one part of the process for an employer. 11 The vetting of new employees is a starting point. 12 Employers overseas need reliable information, often 13 quickly and without great expense. For UK nationals or 14 residents, at present, the choice lies between the 15 statutory DBS and the non-statutory international 16 certificate, the child protection certificate. We have 17 heard evidence this morning of the clear confusion at 18 the heart of those two systems and clearly expressed by 19 both Ms Larsson and Mr Bell in addition. 20 The British Council has understood that it is 21 possible to obtain information about international 22 criminal convictions through an ICPC check, though these 23 are not routinely available to the British Council 24 because it is a UK organisation and is eligible to use 25 the DBS system.</p> <p style="text-align: center;">Page 106</p>
<p>1 So there is a lack of clarity of precisely what 2 information is available through these systems and this 3 is unhelpful to employers and it is unsafe for children. 4 The British Council's proposals for reform, Mr Greer has 5 referred to in his statement, a single certificate 6 covering all relevant information, drawn from the 7 existing enhanced DBS, ICPC systems ensuring the 8 inclusion of international criminal checks administered 9 by one single agency and available to UK and non-UK 10 companies employing UK nationals or residents will 11 provide a much-needed one-stop shop. 12 He also talked about the register of people working 13 with children and also the need for minimum standards to 14 be applied for the employment of people within NGOs and 15 other organisations and charities working with children. 16 Information sharing on the ground between employers 17 and agencies about an individual seeking employment or 18 one who has been dismissed for reasons relating to 19 child abuse and exploitation is a difficult issue, but 20 one we say merits revisiting and emphasis in this 21 special context. Information sharing with law 22 enforcement agencies is another important feature of the 23 system, and the notification of employers and 24 organisations on the ground was also referred to by 25 Mr Greer in his evidence today.</p> <p style="text-align: center;">Page 107</p>	<p>1 Of course there may be some, even many, of 2 the employers in the region who do not have the 3 resources of the British Council to set up and monitor 4 robust appointment processes and to conduct background 5 checks, and that alone is a major weakness that can 6 permit offenders to operate without detection, and 7 Mr Greer spoke about the cost to the British Council of 8 implementing its pre-appointment screening checks and 9 also of the tension for smaller organisations between 10 their business needs and their child protection needs as 11 well. 12 An organisation like the British Council can be 13 trusted to exert maximum effort into getting child 14 protection processes right. It is a public body open to 15 proper scrutiny. But the same cannot be said of other 16 private organisations, NGOs and charities, sometimes 17 unregulated, unlicensed and set up as a front to enable 18 and mask criminal activity, including against children. 19 Overall, the inquiry's recommendations in this 20 strand of the investigation, as contained in the 21 document that's been used by the inquiry counsel this 22 week, seem wholly appropriate. There are no easy 23 answers to these complex issues posed and those that are 24 at play, but this inquiry's scrutiny this week has been 25 thorough, and welcomed by the British Council, and its</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 recommendations will be keenly awaited. Thank you, 2 chair. 3 THE CHAIR: Thank you, Ms Weeraratne. It seems appropriate 4 to take a break now and return just at 2.00 pm for the 5 further closings. Thank you. 6 (12.57 pm) 7 (The short adjournment) 8 (2.04 pm) 9 THE CHAIR: Mr Griffin. 10 Closing statement by MR GRIFFIN 11 MR GRIFFIN: Thank you, chair and panel. My intention in 12 this closing statement on behalf of the Home Office is 13 to address certain significant themes that have arisen 14 in the evidence that you have heard over the last five 15 days, and we will follow it up with a much more detailed 16 written closing. 17 I would like to start by acknowledging the size of 18 the problem that we are considering in this phase of 19 the investigation, and you heard from 20 Marie-Laure Lemineur the 2013 figures from the 21 UN Special Rapporteur estimating that 2 million children 22 are sexually exploited each year worldwide. So, 23 clearly, these are crimes on a huge scale. 24 As the inquiry has heard from the NCA, whilst a lot 25 of the focus here has been on hotspots in Asia, the</p> <p style="text-align: center;">Page 109</p>	<p>1 problem is more widespread. 2 It is right also that at the outset the Home Office 3 recognises and acknowledges the extraordinary work done 4 by NGOs, charities and other civil organisations in 5 combating the problem of child sexual abuse and 6 exploitation, and you have heard from some of those 7 organisations during this week. We also acknowledge the 8 work of the National Crime Agency which it does both at 9 home and abroad and in concert with law enforcement in 10 the UK and across the world. 11 But I would like to start now to deal with the 12 Civil Orders regime, which is an area of Home Office 13 policy responsibility. 14 The first point I want to make is that the operation 15 of the Civil Orders has been an area of considerable 16 Home Office interest, and you have heard that since the 17 inception of the new orders in March 2015, there have 18 been three reviews to have a look at how they are 19 working in practice. These reviews are part of 20 the overall monitoring by the Home Office to check that 21 the orders are actually doing what they are meant to be 22 doing. 23 Further monitoring and discussion has taken place, 24 as is reflected in some of the documents. You have seen 25 the advice to minister documents that you were taken to</p> <p style="text-align: center;">Page 110</p>
<p>1 and the minutes of the meeting of the Sexual Offender 2 and Violent Offender Management Board. 3 The three reviews, they have taken into 4 consideration police data concerning the number of 5 orders that have been made and in some cases they have 6 also involved going to the police forces and speaking to 7 officers to get a more qualitative judgment on the way 8 the Civil Orders are working. Generally, as you have 9 heard, the reviews show there had been a relatively 10 smooth transition from the old regime to the new regime 11 and feedback on the orders was mainly positive. 12 However, certain issues have become apparent, and most 13 significantly for our purposes, perhaps, in relation to 14 the numbers of Sexual Risk Orders that are being made 15 and, similarly, the number of foreign travel 16 restrictions. 17 It's the fourth review, the current ongoing review 18 that is perhaps of greatest significance for our 19 purposes. It will look at the Civil Orders since they 20 came into effect and will take matters right up to 21 present day, and whereas some of the focus, or a lot of 22 the focus, of the previous reviews has been really 23 domestic, this fourth review will be looking at foreign 24 travel restrictions and looking on an international 25 basis, more than those reviews that preceded it. It</p> <p style="text-align: center;">Page 111</p>	<p>1 will report in spring and, as Cecilia French said, the 2 review report will be provided immediately to the 3 inquiry. 4 So the Home Office views the Civil Order regime as 5 making an important contribution towards the prevention 6 and disruption of sexual harm. It is a strong domestic 7 regime. In terms of its reach overseas and the 8 management of child sex offenders travelling abroad, you 9 heard from Cecilia French that there are always ways in 10 which we might be able to improve the regime and we 11 remain alert and want to dig down a bit deeper now as 12 part of this current review to see whether there is 13 anything that's proving a particular stumbling block. 14 The reviews and the monitoring that is taking place 15 outside the reviews reflect the Home Office's 16 significant interest in the success of the Civil Order 17 regime. They will be used to inform future policy work 18 on this issue, as will the work of this inquiry in this 19 phase of the investigation. 20 I would like to refer to -- just still dealing with 21 Civil Orders, I would like to refer to one issue, 22 because it brings out a couple of points that should be 23 made, and that is in relation to foreign travel 24 restrictions and whether we should adopt the Australian 25 model of an outright ban or the US approach which</p> <p style="text-align: center;">Page 112</p>

<p>1 involves a stamp or an identifier within a passport. 2 I want to raise two points, first of all. The first 3 point is the reality of the legal and human rights 4 landscape which we work with in England and Wales, and 5 that may preclude some approaches that work abroad; and 6 the second point is that this is a difficult area, in 7 fact, and there is a lack of consensus in the evidence 8 that you have heard about the best way to proceed. 9 Cecilia French's evidence was, "I think we recognise 10 that we operate in a different human rights jurisdiction 11 to Australia. We abide by the ECHR, which places 12 certain obligations on us to do things that are 13 proportionate, and I think at the moment the position of 14 the Home Office would be that ...", and she's referring 15 to the Australian approach, "... would probably be 16 disproportionate, particularly as we have got the power 17 to have a global travel ban attached to our 18 Civil Orders". We had an example of that just recently 19 in the case of Marco Cheyne with a restriction being 20 attached to an SHPO. 21 Bharti Patel from ECPAT also told you she does not 22 believe a blanket approach is in any way proportionate. 23 She thinks we need to be very clear whether a travel ban 24 is going to be effective in addressing the broader 25 aspects of sexual exploitation and she concludes that</p> <p style="text-align: center;">Page 113</p>	<p>1 ECPAT would like to see more evidence whether this 2 travel ban or this blanket approach to travel is going 3 to be as effective as has been claimed. There is some 4 significant doubt that you have heard about the passport 5 stamp, the US approach. Glen Hulley of Project Karma 6 and CRI, as Professor Bidford tells us, don't think that 7 the passport stamp approach would work in practice. 8 The situation is not, therefore, straightforward, 9 and it is a matter that we will return to in our written 10 closing statement. 11 The disclosure and barring regime is the other of 12 the three areas that you are looking at where there is 13 Home Office responsibility for the statutory regime. 14 The Home Office considers that the regime contributes to 15 protecting children overseas from abuse, but -- and this 16 is an important "but" -- it is part of a larger picture, 17 and this was evidence that was reinforced today 18 repeatedly by Mr Greer from the British Council, and 19 also by the international schools witnesses that we have 20 just heard from. Criminal records checks are one 21 element of the actions that employers should take. 22 Employers should also have in place robust safeguarding 23 policies and practices to ensure that children anywhere 24 can be protected from abuse and, where the eligibility 25 criteria are not met to allow for a certificate under</p> <p style="text-align: center;">Page 114</p>
<p>1 the disclosure and barring regime, ACRO's international 2 child protection certificate may be available. 3 Concerns have been raised that the disclosure and 4 barring regime is complex, and there have been 5 suggestions that it should be simplified, for example, 6 that there should be a one-stop shop or that there 7 should be a single certificate providing a greater 8 amount of information. We will address these points in 9 our written closing, but the short response is this: 10 a great deal of sector-specific guidance is available. 11 Further, the regime that we operate must be 12 proportionate. It's subject to the jurisdiction of 13 the ECHR and review by the courts. A balance must be 14 struck between those who want more disclosure in 15 a greater range of circumstances and those who want less 16 disclosure for fewer people in a more limited range of 17 circumstances, and, bluntly, that applies to the regime 18 and to the situation you are considering now, as it did 19 in the recent Supreme Court decision, as a general 20 point. 21 I want to finish by picking up on a point that has 22 been raised, and that is really political leadership, 23 and the fact that responsibility for the areas that you 24 are considering aren't under the remit of a single 25 minister, for example, but are split.</p> <p style="text-align: center;">Page 115</p>	<p>1 The first point, really, is this, it is about 2 liaison. As you have heard, significant liaison does in 3 fact take place across government and law enforcement. 4 In terms of the management of sex offenders, you have 5 heard about the liaison that takes place at the Sex 6 Offenders and Violent Offenders Management Board, which 7 brings together representatives from the relevant 8 government departments, the courts, CPS, police and 9 others, and that is where discussions take place at 10 a strategic level, and, as you have heard, those 11 discussions have touched on matters concerning the 12 Civil Orders. 13 The Home Office also attends the NPCC's management 14 of Sexual Offenders and Violent Offenders National 15 Working Group, and that is covering similar territory 16 but at a more operational level, and there are other 17 opportunities that you have heard of where liaison takes 18 place. 19 Similarly, dealing with liaison, there is 20 a bilateral relationship between the Home Office and the 21 Ministry of Justice. There is an underpinning flow of 22 information between the two departments in relation to 23 their respective responsibilities here under the Sexual 24 Offences Act 2003. There is, I suggest, an appropriate 25 level of liaison in the different areas under</p> <p style="text-align: center;">Page 116</p>

<p>1 consideration.</p> <p>2 The leadership point. There should be no doubt</p> <p>3 about how seriously the Home Secretary takes the threat</p> <p>4 of child sexual abuse. He is on record about this and</p> <p>5 he has been clear that the UK would not be focusing its</p> <p>6 efforts solely on this jurisdiction, this country.</p> <p>7 I want to just point to some initiatives as examples</p> <p>8 to illustrate my point. What I am about to deal with is</p> <p>9 not the full picture, but some examples.</p> <p>10 There are new initiatives to press the government's</p> <p>11 agenda forward, such as the creation of</p> <p>12 a cross-government network of overseas policy</p> <p>13 specialists called SOcNET. Cecilia French talked about</p> <p>14 this. It's run jointly by the Home Office, the FCO and</p> <p>15 DFID and they will complement the operational work of</p> <p>16 existing law enforcement networks. The idea is they</p> <p>17 will use all of the levers available to them, political</p> <p>18 and diplomatic, to apply pressure on building up</p> <p>19 capability in-country. The Home Office is currently</p> <p>20 bidding for funds from the fund for conflict</p> <p>21 stabilisation and security to give funds to the NCA to</p> <p>22 strengthen their capability overseas, to include the</p> <p>23 operation of the ILOs, the international liaison</p> <p>24 officers.</p> <p>25 So whilst there is always room for improvement, and</p> <p style="text-align: center;">Page 117</p>	<p>1 the Home Office will listen very carefully to what the</p> <p>2 inquiry has to say in this regard, the Home Office</p> <p>3 suggests that there is clear leadership and commitment</p> <p>4 here.</p> <p>5 So, in conclusion, the Home Office and government</p> <p>6 more widely have a keen interest in the work of</p> <p>7 the inquiry in this phase of the investigation. It</p> <p>8 provides an important and welcome further opportunity to</p> <p>9 review its approach in this vitally important area. As</p> <p>10 I said at the start, we are grateful for the opportunity</p> <p>11 to address you in further detail in our written</p> <p>12 submissions, which will follow soon. Thank you very</p> <p>13 much.</p> <p>14 THE CHAIR: Thank you, Mr Griffin. Mr Sheldon?</p> <p>15 Closing statement by MR SHELDON</p> <p>16 MR SHELDON: Chair, members of the panel, these short</p> <p>17 closing submissions are made on behalf of the National</p> <p>18 Crime Agency, which is very grateful for the opportunity</p> <p>19 to participate in this important strand of the inquiry's</p> <p>20 work.</p> <p>21 We have listened with care to what we consider to</p> <p>22 have been a very valuable week of evidence, and we hope</p> <p>23 that these brief observations on a number of key issues</p> <p>24 will be of assistance to the inquiry in formulating your</p> <p>25 conclusions and recommendations.</p> <p style="text-align: center;">Page 118</p>
<p>1 May I turn, first, to the issue of prosecution of</p> <p>2 British nationals for offences committed abroad. The</p> <p>3 inquiry has taken a large amount of evidence on this</p> <p>4 topic, in particular on the use and operation of</p> <p>5 section 72 of the Sexual Offences Act 2003, much of</p> <p>6 which has been focused on the frequency with which this</p> <p>7 provision is used to bring prosecutions in the domestic</p> <p>8 court, with a number of witnesses expressing the opinion</p> <p>9 that section 72 is a tool which is not deployed</p> <p>10 sufficiently frequently.</p> <p>11 Let me make one thing clear at the outset, if I may:</p> <p>12 the NCA does not have a policy of using section 72 to</p> <p>13 prosecute British nationals who commit sexual offences</p> <p>14 overseas as a last resort or in extremis. That is not</p> <p>15 the NCA's policy nor, as at least one witness suggested,</p> <p>16 is it the NCA's phantom policy. Mr McGill made clear</p> <p>17 yesterday that it is not the CPS's policy either.</p> <p>18 The NCA's actual policy, as explained by Mr Jones in</p> <p>19 the course of his evidence, is to follow the principle</p> <p>20 of "first country first", which ECPAT and others have</p> <p>21 endorsed as the appropriate starting point and to assist</p> <p>22 in the bringing of a prosecution in the country in which</p> <p>23 the offence was committed, unless and until it becomes</p> <p>24 apparent that such a prosecution cannot be effectively</p> <p>25 achieved. Mr Jones acknowledged that the guidance to</p> <p style="text-align: center;">Page 119</p>	<p>1 ILOs in existence at the start of this hearing, as</p> <p>2 distinct from the NCA's published safeguarding policy,</p> <p>3 referred erroneously to section 72 being a last resort</p> <p>4 and explained how that inaccurate drafting has now been</p> <p>5 corrected.</p> <p>6 The inquiry has been provided with the updated</p> <p>7 guidance.</p> <p>8 He acknowledged that the NCA may not have stated its</p> <p>9 policy with sufficient clarity in the past, but it has</p> <p>10 been stated clearly now.</p> <p>11 The NCA will seek early investigative advice from</p> <p>12 the CPS and, if there is sufficient evidence,</p> <p>13 a section 72 prosecution will be pursued if it is not</p> <p>14 possible to pursue an effective prosecution in the</p> <p>15 country in which the offence has been committed.</p> <p>16 There are a number of good and obvious reasons why</p> <p>17 the "first country first" principle should be the</p> <p>18 starting point, and you will recall Mr Jones's evidence</p> <p>19 about this. The quickest and most effective way of</p> <p>20 safeguarding a child and stopping the offending is by</p> <p>21 way of an in-country response. Furthermore, and as</p> <p>22 other witnesses have identified, local prosecution</p> <p>23 minimises the disruption to the child and avoids the</p> <p>24 need for the child to be brought to the UK to give</p> <p>25 evidence. Longer-term safeguarding measures are usually</p> <p style="text-align: center;">Page 120</p>

<p>1 more effectively delivered in the child's home country. 2 Moreover, a policy which encourages collaboration 3 with, and demonstrates confidence in, local law 4 enforcement is far more likely to generate a positive 5 and effective working relationship than an approach 6 which assumes as its starting point that only UK law 7 enforcement will be able to deliver an effective 8 prosecution. The latter approach would risk betraying 9 precisely the sort of bias that Ms Beddoe deprecated, 10 rightly, in her evidence. 11 Finally, as a matter of principle, we would suggest, 12 the society in which a crime has been committed should 13 be given the opportunity of bringing the perpetrator to 14 justice and of providing redress to its own citizens in 15 accordance with its own law, provided it is capable of 16 doing so. 17 Any assessment of the number of section 72 18 prosecutions brought by the NCA must be conducted in 19 this context. It must take account of the steps taken 20 by the NCA to build capability in countries where this 21 type of offending occurs, by the provision of training, 22 resources, assistance with evidence handling and liaison 23 support. It would be simplistic and wrong, we would 24 submit, to proceed on the basis that a higher number of 25 section 72 prosecutions is necessarily indicative of</p> <p style="text-align: center;">Page 121</p>	<p>1 success or progress. On the contrary, in many cases, 2 the facilitation of a successful local prosecution may 3 represent the better outcome. 4 The Kenyan example is instructive in this regard. 5 The NCA supported the establishment in Kenya of an 6 antihuman trafficking and child protection unit by the 7 provision of resources, training and mentoring of staff. 8 The unit currently has over 100 live investigations 9 under way and, since March 2016, has protected some 400 10 children and arrested 40 suspects. 11 A prosecution of a British national by this unit for 12 crimes committed against Kenyan children which resulted 13 in the perpetrator serving a sentence in a Kenyan gaol 14 and the children being effectively safeguarded in Kenya 15 would not represent a failure to use section 72. On the 16 contrary, it would represent the successful facilitation 17 of a local prosecution through the commitment of NCA 18 resources and expertise. 19 Similarly, there may be cases in which co-operation 20 between international law enforcement agencies will see 21 a different country taking the lead in the investigation 22 of a case involving a British national. At paragraphs 23 76 to 77 of his first statement, Shay Cullen describes 24 a case in which the UK authorities ask the Australian 25 Federal Police to follow up on a lead on the whereabouts</p> <p style="text-align: center;">Page 122</p>
<p>1 of a suspect believed to be located in a particular 2 South-east Asian country. The AFP responded by seeking 3 the assistance of the PREDA Foundation, who were able 4 swiftly to locate the individual, who was subsequently 5 extradited and convicted. Collaboration of this sort 6 between international law enforcement agencies is 7 vitally important in achieving effective global coverage 8 of the child sex abuse threat. 9 There are areas of the world in which the NCA is 10 particularly well resourced and integrated with local 11 law enforcement, such as Kenya and other parts of 12 Africa, and there are areas such as South-East Asia 13 where the US and Australian law enforcement authorities 14 are better represented. 15 Close collaboration between the Five Eyes partners 16 is an invaluable reciprocal relationship, and the fact 17 that in Father Cullen's example the UK authorities were 18 able to draw directly on the expertise and resources of 19 the AFP should be seen as a positive indication of 20 the effectiveness of UK law enforcement and not 21 a negative one. 22 We provide similar assistance to our Five Eyes 23 partners and more widely on a regular basis. 24 Accordingly, the 140 NCA ILOs in post around the 25 world should be seen as part of a larger network of law</p> <p style="text-align: center;">Page 123</p>	<p>1 enforcement officers to which the UK has access as 2 a Five Eyes member. This is clearly relevant to the 3 "boots on the ground" proposals that you have heard from 4 a number of sources. This evidence has ranged from the 5 proposition advanced by Ms Patel that there should be 6 specialist teams located in every country in the world, 7 to the perhaps more realistic suggestion that there 8 should be more officers deployed to regions where 9 foreign national abuse is particularly prevalent. 10 Additional boots on the ground may help and, subject 11 to inevitable resource issues, the NCA would certainly 12 have no difficulty at all with more officers being 13 deployed to more countries. However, boots on the 14 ground is only one constituent part of the picture that 15 also includes international co-operation, particularly 16 amongst the Five Eyes, building local capability and 17 establishing close relationships with local law 18 enforcement. There are a number of effective ways of 19 bringing British national offenders to justice beyond 20 simply deploying more officers. 21 Any assessment of the frequency with which 22 section 72 is used must also take account of 23 the challenges and complexity of such cases. These 24 challenges are not unique to the UK. In her witness 25 statement, Carol Smolenski of ECPAT USA identifies</p> <p style="text-align: center;">Page 124</p>

<p>1 precisely the same challenges in achieving successful 2 prosecutions in the US courts. 3 The NCA does not suggest that difficulty and 4 complexity are reasons not to bring such prosecutions. 5 Mr Jones could not have been clearer about that in his 6 evidence, and you will recall his answer to the question 7 posed by Ms Sharpling on precisely that issue: if 8 a section 72 prosecution is viable, and it represents 9 the most effective means of safeguarding a child and 10 bringing an offender to justice, then whatever resources 11 are required will be devoted to it. The Morris case 12 provides a stark illustration of the lengths to which 13 the NCA is prepared to go in order to achieve 14 a successful section 72 prosecution. In that case, as 15 you heard, four separate deployments to Kenya took place 16 over the course of a 17-month period, involving 17 24 officers, investigators and social workers. 18 A further five officers were deployed to the case team 19 in the UK, and the Kenyan unit to which I have referred 20 was heavily involved. Dozens of officers, investigators 21 and social workers worked on that case for a period of 22 approximately two years. There is no lack of 23 willingness on the part of the NCA to devote resources 24 to a section 72 prosecution in appropriate 25 circumstances.</p> <p style="text-align: center;">Page 125</p>	<p>1 The point is simply that an assessment of the volume 2 of section 72 convictions has to take account of how 3 difficult these cases are to prosecute. As you have 4 heard, offences may often take place with the complicity 5 of victims' carers or family members; they may be 6 facilitated by extensive criminal networks operating in 7 the locality; witnesses and victims may be readily 8 susceptible to intimidation or bribery; there may be 9 difficult cultural issues which inhibit co-operation; 10 there may be intense practical difficulties in ensuring 11 that witnesses are properly protected and supported 12 during the process. The rigorous evidential 13 requirements that have to be met to ensure fairness in 14 a criminal prosecution in our courts can pose 15 significant challenges in some parts of the world. 16 There may be issues regarding collaboration with 17 local law enforcement or evidence collection, 18 particularly in areas where there are human rights 19 concerns. Most importantly of all, Mr Jones explained 20 that these are all victim-centred crimes and any 21 prosecution has to be accompanied by a complementary 22 safeguarding response which can be extremely challenging 23 in some of the countries in which these offences are 24 committed. 25 Our domestic standards of evidence gathering and the</p> <p style="text-align: center;">Page 126</p>
<p>1 procedural requirements designed to ensure an individual 2 receives a fair trial are rigorous and rightly so. 3 A successful section 72 prosecution can have a powerful 4 deterrent effect which extends far beyond the individual 5 concerned but an unsuccessful prosecution can have the 6 opposite effect. There appeared at times to be an 7 assumption underlying the evidence of some witnesses 8 that, where the CPS and/or in-house legal advice is to 9 the effect that a section 72 prosecution is not viable 10 on the available evidence, this advice betrays a lack of 11 ambition or an excess of caution. If that was the 12 assumption, we would respectfully suggest it is an 13 unsafe one and not one which the inquiry should adopt in 14 the absence of a careful analysis of the advice given in 15 individual cases. 16 "Achieve more section 72 convictions", is 17 a straightforward enough instruction to give. It is 18 a far more difficult result to deliver, particularly 19 when you keep in mind that a successful prosecution 20 involves not only locking up the perpetrator, but also 21 ensuring that the child is effectively safeguarded. 22 Finally, on this topic, any assessment of the number 23 of section 72 prosecutions brought by the NCA must take 24 account of the fact that section 72 is one constituent 25 part of the NCA reports to child sexual abuse. That</p> <p style="text-align: center;">Page 127</p>	<p>1 response includes, as you have heard in a different 2 strand of your inquiry, an enormous increase in the 3 number of arrests and prosecutions of those who engage 4 in online abuse and co-ordinated activity within UK law 5 enforcement is currently running at 400 arrests per 6 month with more than 500 children being safeguarded 7 every month. 8 As Bharti Patel correctly identified, a significant 9 proportion of extra-territorial child sex offences occur 10 online, and as Mr Jones explained, most transnational 11 child sex offenders have committed indecent imagery 12 offences at some point in their offending history. This 13 online offending includes cases of individuals viewing 14 abuse perpetrated overseas, providing a market for that 15 abuse and financing it. They also include cases where 16 the individual actively directs the abuse. 17 Section 72 prosecutions in respect of contact abuse 18 committed abroad are relatively rare, for the reasons 19 I have outlined. But prosecutions of those who abuse 20 children over the internet overseas are very much more 21 common, as are local prosecutions facilitated by NCA 22 support and resources. 23 Focus on section 72 prosecutions, which are 24 primarily concerned with British nationals engaged in 25 direct contact abuse overseas, should not obscure or</p> <p style="text-align: center;">Page 128</p>

<p>1 diminish the importance of prosecutions for online 2 offences involving children abroad.</p> <p>3 Mr Jones referenced the live streaming of live abuse 4 as an example of the escalation of offending. In 5 a recent case dealt with by the NCA, the rape of 6 a 6-year-old child in a country overseas was live 7 streamed into an online chat room. All six UK nationals 8 who viewed that video were traced, arrested, prosecuted 9 and sentenced to a total of 26 years in prison. The 10 child was safeguarded and the perpetrator was convicted 11 and sentenced in the country in which the offence took 12 place.</p> <p>13 In linked activity to that case, over 70 UK 14 nationals who were viewing abuse inflicted on children 15 overseas were prosecuted and over 2,000 leads were 16 disseminated to foreign law enforcement partners.</p> <p>17 These individuals not only provide a demand for the 18 abuse perpetrated overseas, they are the potential 19 contact abusers of the future, and so action taken 20 against them in respect of their online activities may 21 well prevent an escalation to overseas contact abuse, 22 and cases of this sort are no less part of our discharge 23 of our obligations to safeguard children overseas and 24 bring their abusers to justice than a section 72 25 prosecution.</p> <p style="text-align: center;">Page 129</p>	<p>1 Contrary to the perception of Ms Beddoe, the UK is 2 perceived internationally as a leader in this field. It 3 is held in high regard. You have received evidence in 4 this strand of the inquiry and in others concerning the 5 WeProtect initiative. As you know, in December 2014, 6 the then Prime Minister hosted a Global Summit focused 7 particularly on online abuse which concluded with the 8 signature of 48 countries to a statement of action to 9 eradicate abuse online. In 2016, WeProtect merged with 10 the Global Alliance Against Sexual Abuse Online which 11 now comprises 84 countries and a whole host of regional 12 organisations, industry bodies and international civil 13 society organisations. The UK is at the very forefront 14 of this initiative.</p> <p>15 The model national response which is applied 16 internationally and was endorsed by a number of 17 witnesses, including Ms Lemineur of ECPAT International, 18 was devised, written and promoted by the NCA. The UK is 19 one of the foremost sources of funding for initiatives 20 to tackle child abuse around the world. In addition to 21 the local capacity building to which I have referred, in 22 2015 the UK Government committed £50 million of funding 23 over five years which has been provided to the 24 UNICEF-administered Fund to End Violence Against 25 Children.</p> <p style="text-align: center;">Page 130</p>
<p>1 A recent report, briefly referenced by Mr Jones, and 2 which we have subsequently provided to the inquiry, by 3 the Economist Intelligence Unit, entitled "Out of 4 the shadows: shining light on the response to child 5 abuse and exploitation", assessed the response of 6 40 developed countries to child abuse. The UK was 7 ranked first with a score of 82.7 out of 100.</p> <p>8 Anecdotal evidence from one or more individuals, 9 including the anonymous witness designated OU-X1, to the 10 effect that the UK is not perceived to be a leader in 11 this field has, we would respectfully suggest, the 12 potential to be misleading.</p> <p>13 Also relevant to the issue of international 14 perception is the evidence of Ms Lemineur of 15 ECPAT International and paragraphs 27 to 29 of her 16 statement in particular. In contrast with the evidence 17 provided by ECPAT UK -- Ms Patel and Ms Beddoe in 18 particular -- she painted a positive picture of the work 19 done by British law enforcement overseas and expressed 20 doubts as to the efficacy of measures adopted by 21 countries such as the USA and Australia. You also 22 received evidence from Carol Smolenski of ECPAT USA in 23 which she highlighted difficulties with the US model. 24 There is an inevitable tendency towards self-criticism 25 in this area where, perhaps above all others, there is</p> <p style="text-align: center;">Page 131</p>	<p>1 an understandable refusal to tolerate the abuse of any 2 child anywhere. The adoption of a self-critical 3 mind-set is no bad thing, but it should not obscure the 4 objective and evidence-based assessment of where the UK 5 sits on the international plain when it comes to leading 6 the fight against child sexual abuse.</p> <p>7 There is much of which the UK, and the NCA in 8 particular, can be justly proud.</p> <p>9 The NCA is a law enforcement agency. Its officers 10 go to work each day with the sole objective of 11 protecting children and bringing to justice those 12 criminals who abuse them. As you will readily 13 understand, the officers who work in this particularly 14 challenging field, which exposes them often to the most 15 unimaginably distressing evidence are amongst the most 16 dedicated and resilient officers we have.</p> <p>17 You simply cannot do this work on a daily basis 18 without a strong and deeply-held vocation to protect 19 children and a corresponding desire to see those who 20 abuse them behind bars where they belong.</p> <p>21 You will recall the evidence of Ms Lemineur on 22 Day 2, and indeed in her statement, attesting to the 23 dedication of the officers with whom she comes into 24 contact. It would be easy, on behalf of those officers, 25 simply to say that the answer is simply to bring more</p> <p style="text-align: center;">Page 132</p>

<p>1 successful section 72 prosecutions, a lot more people 2 are. But as the panel will have appreciated from the 3 evidence it has heard this week, the answer to the 4 question of whether section 72 is being used 5 sufficiently frequently is more sophisticated and 6 nuanced than that. 7 That said, there is clearly scope to increase and 8 develop the capabilities for prosecuting British 9 nationals for offences committed abroad. The NCA 10 considers that section 72 remains an effective tool 11 within the package of measures available for this 12 purpose. It may be that it can and should be used more 13 frequently, notwithstanding the issues we have just 14 addressed, and the NCA will of course be very interested 15 to see the inquiry's analysis of this issue. 16 But a focus on section 72 should not be at the 17 expense of building local capability and investing in 18 relationships with local law enforcement, such as the 19 creation of the new ILO post in the Philippines -- the 20 officer took up post in October 2018 -- which meets 21 a specific need identified in the evidence of OU-X1. 22 He or she takes up his place alongside 140 NCA ILOs 23 located in 52 countries worldwide. 24 It should not obscure initiatives such as the 25 current project to train and mentor officers in the</p> <p style="text-align: center;">Page 133</p>	<p>1 Namibian police force, the extensive collaboration with 2 Kenyan law enforcement and a range of similar 3 initiatives around the globe. 4 May I turn now very much more briefly to the subject 5 of Civil Orders. You have heard extensive evidence to 6 the effect that Civil Orders rarely include travel 7 restrictions and that this is an underused tool in 8 meeting the threat of extra-territorial offending. You 9 have been told about measures adopted in other countries 10 with particular focus on the passport stamp used in the 11 USA and the general travel ban operated in Australia. 12 It will be a matter for your assessment, but you may 13 consider that the balance of the evidence given by the 14 relevant witnesses tended towards the promotion of 15 the Australian model rather than the American one, which 16 Professor Binford, for one, did not regard as effective 17 and which may place individuals at very serious risk 18 when travelling to some countries. 19 The NCA's position on this issue is straightforward: 20 Mr Jones is a senior leader of a law enforcement agency. 21 He had, as you would expect, no difficulty at all in 22 principle with the adoption of measures that would 23 enable the NCA to exercise greater control over those 24 who would seek to travel abroad to commit crimes. He 25 expressed a degree of understandable frustration at</p> <p style="text-align: center;">Page 134</p>
<p>1 cases in which travel restrictions have been sought but 2 refused by the courts on the grounds of proportionality 3 or necessity or a perceived failure to draw 4 a sufficiently strong link between the offending and 5 foreign travel. Those applications would not have been 6 made had they not been considered by the NCA at least to 7 be a proportionate response to the threat posed by the 8 individual in question. But the court took a different 9 view. 10 The evidence of Chief Constable Skeer was to similar 11 effect. She highlighted the difficulties in persuading 12 the court to impose travel restrictions without clear 13 evidence proved to the criminal standard establishing 14 a link between the abuse and foreign travel. But the 15 NCA recognises that the question of whether to adopt, 16 for example, an Australian-style travel ban which places 17 the onus on the individual to justify a desire to travel 18 is a policy issue rather than a matter of operational 19 delivery, and a policy issue which requires a balance to 20 be struck between the rights of the individual, on the 21 one hand, and the management of risk to children, on the 22 other. 23 Ms French set out clearly the Home Office's position 24 on this issue and the reasons why it was unlikely to 25 become government policy. You have heard evidence to</p> <p style="text-align: center;">Page 135</p>	<p>1 the effect that the ease of modern travel is such that, 2 if it is to be fully effective, any travel ban would 3 have to prohibit all foreign travel, and we would 4 suggest that's probably correct. 5 There are also issues of enforcement in 6 circumstances where the onus is on the offender to 7 inform the authorities of an intention to travel. We 8 would also be concerned to ensure that proper 9 consideration was given for the potential for a travel 10 ban to encourage at least some of the relevant 11 individuals to engage in online forms of abuse, perhaps 12 by directing abuse carried out by other individuals 13 overseas. 14 The NCA will be very interested to see the inquiry's 15 conclusions as to how this difficult balance should be 16 struck. 17 Mr Jones explained that the NCA does consider that 18 there is scope further to exploit the SRO tool in 19 complex covert investigations, particularly in those 20 cases where there is an opportunity to restrict the 21 actions of those who may be inciting others to commit 22 abuse, but who have yet to reach the threshold of 23 criminal offending themselves. Where the acts of 24 the individual in question constitute criminal conduct, 25 then the requirement for the facts to be proved to the</p> <p style="text-align: center;">Page 136</p>

<p>1 criminal standard in any SRO application, as explained 2 by Mr Jones, Ms French and Chief Constable Skeer, means 3 that the better course is likely to be criminal 4 prosecution, and it is this feature of the current 5 system which explains the low number of SRO applications 6 made by the NCA to date, along with the difficulties 7 that arise in deploying intelligence in support of such 8 applications in the absence of a closed material 9 procedure. But there may be scope for the more creative 10 and ambitious use of SROs.</p> <p>11 It is important to bear in mind that this framework 12 was only introduced in 2015 and is less than four years 13 old. How they can most effectively be used and the 14 extent to which the courts are prepared to grant them is 15 inevitably a process involving a degree of trial and 16 error, and Mr Jones made clear the NCA's willingness to 17 test the boundaries of this measures.</p> <p>18 There are a number of other respects in which the 19 Civil Order regime may be developed and improved, and we 20 will address those, if we may, in our written 21 submissions rather than taking up time now. Similarly, 22 we will deal in writing, again, if we may, with the 23 Disclosure and Barring aspect of the evidence you have 24 heard, including the ICPC.</p> <p>25 Could I make two very short points about referrals.</p> <p style="text-align: center;">Page 137</p>	<p>1 There was some evidence given on behalf of ECPAT UK to 2 the effect that the online reporting system operated by 3 CEOP was not sufficiently user friendly. You were shown 4 a screenshot of the form used by the Australian 5 authorities, and it was suggested that the format was 6 better because it started with a description of 7 the alleged abuse.</p> <p>8 Chair, you will recall having reviewed the 9 Click CEOP online reporting tool in a different strand 10 of this inquiry. You will have formed your own view of 11 its efficacy and simplicity, and it may be that you will 12 wish to revisit it in light of the evidence you have 13 heard. As we have explained previously, the Click CEOP 14 tool was developed with expert social worker input and 15 has been designed with the primary objective of making 16 it as easy as possible for children to report abuse 17 perpetrated against them or other children they know.</p> <p>18 The evidence would suggest that it has been 19 successful in this regard, with the number of reports 20 increasing 68 per cent in the first year of its 21 operation. Requiring a child as the first step in the 22 process to provide a description of what has been done 23 to them is unlikely to be the most effective way of 24 encouraging them to engage, and there have been recent 25 cases in which children overseas have used the</p> <p style="text-align: center;">Page 138</p>
<p>1 Click CEOP tool to report abuse, enabling the NCA to 2 take action to ensure that the child is safeguarded, and 3 we would be very anxious to ensure that any proposals 4 for the modification of the online reporting system 5 directed to obtaining reports from third party adults 6 abroad take proper account of their potential impact on 7 direct reporting by children.</p> <p>8 As to referrals made directly by organisations such 9 as the British Council, about which you have heard some 10 comment this morning, the NCA reviews and actions 11 appropriately all referrals overseas, whether they 12 relate to offending in the UK or overseas. But our 13 ability to provide a running commentary on that response 14 is necessarily restricted, and the NCA is generally 15 unable to provide specific information about an 16 individual case unless and until there has been 17 a judicial outcome. Revealing the detail of an ongoing 18 investigation before that point may reveal sensitive 19 operational techniques for the identity of victims and 20 witnesses, and so put individuals at risk or jeopardise 21 the case.</p> <p>22 Accordingly, and whilst we understand the desire of 23 a referring organisation to be kept up to date with the 24 action taken in response to the referral, that is often 25 not possible, for reasons the inquiry will readily</p> <p style="text-align: center;">Page 139</p>	<p>1 identify.</p> <p>2 Can I just finally deal with this: in the course of 3 their opening statements, ECPAT and the CRI made 4 a serious allegation to the effect that the NCA was 5 failing in its statutory obligation to safeguard and 6 promote the welfare of children pursuant to section 11 7 of the Children Act 2004. There was also reference to 8 what were referred to as the UK's "international 9 obligations under the UN Convention on the Rights of 10 the Child". Those were clearly serious assertions and 11 they require a considered and direct response.</p> <p>12 First, and lest there be any doubt about it, the NCA 13 acknowledges and is committed to its ethical and moral 14 obligation to protect any child at risk across the globe 15 of whom it becomes aware. This ethical and moral 16 obligation is discharged in the various ways you have 17 heard described to you over the course of this week's 18 evidence. It is reflected in prosecutions brought under 19 section 72, in applications made for Civil Orders, 20 capacity building overseas, collaboration with law 21 enforcement and the 400 arrests per month of which 22 I have spoken already.</p> <p>23 A large number of NCA staff, both in the UK and 24 overseas, go to work each day expressly in order to 25 discharge that moral and ethical obligation. However,</p> <p style="text-align: center;">Page 140</p>

<p>1 neither the 2004 Act nor the UN Convention impose legal 2 obligations on the NCA to safeguard and promote the 3 welfare of children outside the UK. Section 68 of 4 the 2004 Act provides that the extent of part 2 of 5 the Act, which includes section 11, is restricted to 6 England and Wales, contrary to Professor Binford's 7 understanding.</p> <p>8 The UN Convention expressly provides at article 2 9 that each state party shall ensure the rights set out in 10 the Convention to each child within their jurisdiction. 11 So although it is open to ECPAT or the CRI to suggest 12 that more can and should be done to discharge the moral 13 and ethical obligation to which I have referred, it is 14 quite wrong to assert that anything done or not done in 15 this regard represents a breach of statutory duty or 16 a legal duty imposed under international law. That is 17 simply incorrect, and it is important that the inquiry 18 keeps clearly in mind this important distinction.</p> <p>19 We would wish to express our thanks to the inquiry's 20 legal team, who have done an extraordinary job in 21 collating and presenting an enormous body of evidence 22 and who have dealt with us at all times with the highest 23 degree of courtesy and professionalism. We would wish 24 to express our admiration for those individuals from 25 whom we have heard this week who dedicate their working</p> <p style="text-align: center;">Page 141</p>	<p>1 lives to protecting vulnerable children around the world 2 in a variety of ways. The NCA works closely with NGOs 3 around the world, it benefits greatly from their 4 expertise and dedication and it values those 5 relationships very highly. No-one who engages in this 6 work in the law enforcement field does so for any other 7 reason than a deep and abiding commitment to the welfare 8 of children, and a desire, as far as humanly possible, 9 to see an end to this type of offending. The NCA would 10 wish to conclude by assuring the inquiry of our 11 continued co-operation and support in working towards 12 that shared objective. Thank you very much.</p> <p>13 THE CHAIR: Thank you, Mr Sheldon. Mr Morley? 14 Closing statement by MR MORLEY 15 MR MORLEY: Chair, members of the panel, I have three short 16 points to make on behalf of the National Police Chiefs' 17 Council, the NPCC.</p> <p>18 Firstly, the NPCC and the police service as a whole 19 manifestly wishes to do everything it can to prevent 20 offending against children. The Civil Order regime 21 described in the evidence that you have heard this week 22 is but one part of an extensive toolkit available to law 23 enforcement agencies in this country and the NPCC is 24 always keen to improve the efficiency and the efficacy 25 of any particular element of that toolkit.</p> <p style="text-align: center;">Page 142</p>
<p>1 Secondly, and as a consequence, any recommendations 2 made by this inquiry as to how the NPCC and the wider 3 police service can work more efficiently and more 4 effectively to prevent the abuse of children abroad by 5 UK nationals or residents or to apprehend and prosecute 6 those that do so offend will be enthusiastically 7 received by the NPCC.</p> <p>8 Thirdly, Chief Constable Skeer indicated on Thursday 9 that she would, at the request of counsel to the 10 inquiry, undertake some further research, in particular 11 in relation to the statistical analysis of SHPOs and 12 SROs, the number that have been applied for and the 13 number that have been refused. I'm pleased to report 14 that that work has already started, and supplementary 15 evidence will be provided to the inquiry very shortly. 16 The NPCC would of course be very happy to provide any 17 further assistance that the inquiry may require.</p> <p>18 Can I lastly, please, echo and endorse Mr Sheldon's 19 praise of the legal team, the professionals that we have 20 heard from, but also the staff of the inquiry inside and 21 outside this room that have treated the chief constable 22 and those that have attended from the NPCC with the 23 utmost courtesy and professionalism, for which we are 24 very grateful. Thank you, chair.</p> <p>25 THE CHAIR: Thank you, Mr Morley. Ms Johnson?</p> <p style="text-align: center;">Page 143</p>	<p>1 Closing statement by MS JOHNSON 2 MS JOHNSON: Chair, panel, I propose to make some general 3 points which the Crown Prosecution Service submit should 4 inform the panel's decisions, and we will of course then 5 follow those up with, I hope, concise written 6 submissions.</p> <p>7 The Crown Prosecution Service takes its 8 responsibility to prosecute all sex offenders extremely 9 seriously and is always keen to improve its performance. 10 As Mr McGill stated in evidence, prosecution of child 11 sex abuse and exploitation is a priority for the CPS. 12 The CPS refute the suggestion made by Professor Binford 13 that there is not the same level of commitment to 14 prosecute child sex abuse if the child resides outside 15 England and Wales. Perhaps that commitment towards 16 children is demonstrated, by way of example, by the fact 17 that a third party can, with the consent of the child 18 residing outside this jurisdiction, challenge a CPS 19 decision not to prosecute.</p> <p>20 Ms Gallagher said something about that earlier today 21 in her closing submissions, and we will perhaps deal 22 with it in a little more detail in writing, but suffice 23 to say at this stage that all victims are treated with 24 the same respect by the Crown Prosecution Service 25 wherever they reside. Victims are informed of any</p> <p style="text-align: center;">Page 144</p>

<p>1 decision taken in respect of their case in accordance 2 with the Victims' Code. 3 Now, perhaps the starting point has to be an 4 understanding of the CPS's role. The CPS does not 5 investigate, it does not gather evidence. But the CPS 6 will robustly and fairly prosecute any case brought to 7 them, as long as there is sufficient relevant and 8 admissible evidence. In each case, there must be 9 sufficient evidence to provide a realistic prospect of 10 conviction. 11 The case which does not pass the evidential stage 12 must not proceed, as a matter of law, however serious or 13 sensitive it might be. 14 Ms Beddoe called this the threshold problem. We 15 submit it isn't a problem, it's the law which the CPS 16 must apply, and any suggestion that the evidential test 17 should somehow be diluted in child sex abuse cases 18 committed abroad is contrary to the law: a law designed 19 to protect the accused and the complainants. 20 Of course, it's never in a complainant's interest 21 for a prosecution to be embarked upon only subsequently 22 to be stopped by the court, perhaps after a complainant 23 has given evidence, with everything that that entails. 24 Moreover, and echoing a point just made by 25 Mr Sheldon, it would be an error to assume that if the</p> <p style="text-align: center;">Page 145</p>	<p>1 Crown Prosecution Service does not advise a charge, that 2 means that the Crown Prosecution Service has been too 3 cautious. Every charging decision is made in accordance 4 with the Code for Crown Prosecutors, and the CPS are the 5 experts in assessing the evidential stage. 6 You may think that Mr McGill offered an interesting 7 insight into the evidence that the panel has received 8 this week. He said that there seems to be a gap between 9 the expectations of parts of civil society and what is 10 possible under the current legislative regime in this 11 country. You may think that that has a degree of force. 12 The CPS can only apply the law in force in this 13 country at this time. The CPS must apply the principles 14 of the ECHR in accordance with the Human Rights Act 15 1998, the Attorney General's Guidelines and general 16 common law. 17 So, chair, against those introductory comments, let 18 me turn then to section 72. Now, as is, I am sure, 19 abundantly clear now, section 72 is an enabling 20 provision. It is not an offence in its own right. That 21 feeds into this question of data collection. As you 22 know, the CPS does not collect official statistics. 23 Data is collected via its case management system, which 24 only allows a search under a defendant's name, the 25 unique reference number of the case or the offence.</p> <p style="text-align: center;">Page 146</p>
<p>1 Now, as Mr McGill said, that system could be 2 changed, in theory, to allow the capture of the use of 3 section 72, but the panel may wish to consider the 4 benefit of that as against a further depletion of 5 precious funds to bring perpetrators to justice, and you 6 might think, if this is a matter which you consider to 7 be important, data collection, that the MoJ would be 8 best placed to acquire the sort of reliable data 9 demanded. 10 We had, as the last piece of evidence placed before 11 you this morning, a statement on this from the MoJ -- 12 dare I say it, perhaps a little disingenuous -- 13 suggesting that because investigators and prosecutors 14 rely on section 72, well, then, they should be 15 responsible for the collation of statistics. That 16 ignores the fact that the MoJ is the policy lead for 17 section 72 and has official responsibility for the 18 collation of relevant statistics. 19 You will also bear in mind the very helpful evidence 20 you heard from Chief Constable Skeer that she has 21 already requested a marker be put on the ViSOR system to 22 capture section 72. 23 Now, because there are no statistics on how often 24 section 72 is deployed, the inquiry will need to regard 25 the numbers and, perhaps more importantly, what is</p> <p style="text-align: center;">Page 147</p>	<p>1 seeking to be extrapolated from those numbers with 2 a degree of caution. Professor Binford asserted that 3 section 72 was not used sufficiently regularly. But we 4 suggest that assertion needs to be treated with some 5 care. How do we assess the use of section 72 if the 6 data is incomplete? 7 Moreover, we would submit that it would be illogical 8 to infer that, because there are limited occasions when 9 section 72 has been used, the provision is ineffective 10 or insufficiently used. Because, and, again, echoing 11 the detailed submissions of Mr Sheldon, that would be to 12 ignore the challenges of securing the necessary evidence 13 to prosecute an offence which was committed abroad. 14 Investigating and prosecuting the offences which 15 occur in another jurisdiction is complex, it is 16 difficult, and that is a common theme emerging from the 17 evidence of those with direct experience of 18 investigation and prosecution. 19 You have heard some evidence suggesting that the use 20 of section 72 is a measure of last resort. Well, as 21 Mr McGill made clear, the CPS has never had such 22 a policy and section 72 will always be used where 23 appropriate. The CPS advise the police and the NCA 24 about section 72. Now, you have seen the training 25 materials in relation to section 72 that the CPS have</p> <p style="text-align: center;">Page 148</p>

<p>1 produced, and, importantly, Mr McGill explained to you 2 that cases which may involve section 72 are conducted by 3 specialist prosecutors who have been carefully trained. 4 In other words, as far as the CPS is concerned, there 5 already is an overall specialist body coordinating and 6 dealing with section 72, and the CPS is satisfied that 7 there is no lacuna in its training materials. And, 8 moreover, as you heard, the CPS has access to a wide 9 range of sources, including ILOs, in order to ensure 10 that any CPS approach for mutual assistance in a foreign 11 jurisdiction is done in a sensitive manner. 12 The successful prosecutions about which you have 13 heard is, we suggest, a demonstration of the efficacy of 14 section 72, and it is of note that all those 15 prosecutions are high-profile cases dealing with 16 pernicious, persistent paedophiles. In other words, the 17 most serious cases are being successfully prosecuted 18 under this section. 19 Professor Binford described what she called the dual 20 criminality loophole, which you are now familiar with. 21 Mr McGill said, it is not a loophole, but a distinction 22 which parliament deemed necessary. It is perhaps right 23 to note that some of the criticisms about the legal 24 regime emanate from experts -- I have no doubt about 25 that, but experts from the United States and Australia,</p> <p style="text-align: center;">Page 149</p>	<p>1 who perhaps fail to appreciate the role of the ECHR 2 which is embedded in our legal system. 3 The CPS believes that section 72 is a powerful and 4 effective tool and, when assessing the use of 5 section 72, that provision just cannot be seen in 6 a vacuum. As has already been said this afternoon, 7 regard must be had to the evidential and legislative 8 realities of prosecuting sexual offences committed 9 abroad, and it is the CPS's position that, when looked 10 at in the round, it is clear that section 72 is being 11 used with excellent results. 12 Turning then briefly to Civil Orders, the figures 13 for travel restrictions within the current Civil Order 14 regime do appear low. Professor Binford suggested that 15 amounts to travel restrictions being the exception 16 rather than the rule. We would suggest that that 17 conclusion needs to be assessed with care and, in 18 particular, with regard to other regimes applicable to 19 a convicted person, and to be assessed with regard to 20 the fact that a court demands any order to be necessary 21 and proportionate. 22 Now, as you know, the CPS apply for SHPOs on 23 conviction and prosecute breaches of those and SROs, and 24 there are a large number of SHPOs being made and, 25 indeed, successful prosecutions for breaches of the two</p> <p style="text-align: center;">Page 150</p>
<p>1 orders. 2 I just want to touch briefly on this aspect of 3 the evidence, because perhaps it has not had the status 4 or the emphasis that perhaps it deserves. It must not 5 be forgotten that a convicted sex offender is subject to 6 the Sex Offender Notification Rules. These derive from 7 the Sex Offenders Act 1997 and are now contained in 8 sections 80 to 102 of the 2003 Act. They follow 9 automatically upon conviction of relevant offences, 10 which include most sexual offences. They require no 11 order of the court, but they do require a convicted 12 person to notify his local police station of various 13 personal details, but, more importantly, to give prior 14 notification of any travel abroad, with flight details 15 and places of accommodation, and that offender must 16 attend personally to give these various prior 17 notifications. As is well known, these requirements 18 last for different periods according to the length of 19 the sentence. 20 In all cases, breach of those requirements is itself 21 a criminal offence punishable with up to five years' 22 imprisonment, and the CPS prosecutes those breaches. 23 So we would submit that an appreciation of travel 24 restrictions must be seen through the lens of this 25 mandatory regime. Now, whatever the criticisms may be</p> <p style="text-align: center;">Page 151</p>	<p>1 about the onus being on the offender, that is the law, 2 the law which the CPS must abide by, and which perhaps, 3 to a degree, informs the question of travel restrictions 4 as a whole. Indeed, it is of note that the courts 5 deplore the inclusion of a restriction in an SHPO which 6 duplicates another existing regime. 7 Of course, SROs apply to non-convicted persons, and 8 so thus these automatic notification requirements do not 9 apply. But you have heard of perhaps the understandably 10 high threshold for travel restrictions in respect of 11 non-convicted persons. 12 Finally on this topic, Mr McGill explained that, 13 again, specialist prosecutors apply for and prosecute 14 breaches of these orders, and he described them as just 15 one tool in the prosecution's armoury. 16 Now, the CPS guidance, about which there was some 17 criticism this morning, gives a few examples of 18 the sorts of restrictions that might be considered in 19 any given case, and the criticism was made, "Well, that 20 doesn't include a travel restriction". Well, it's of 21 note that those examples echo absolutely the examples 22 given in the Judicial College Crown Court Compendium On 23 Sentencing, but perhaps the really important point 24 here -- in the grand scheme of things, this is not the 25 most significant issue that the panel is going to have</p> <p style="text-align: center;">Page 152</p>

<p>1 to deal with, but the real point here is that 2 restrictions have to be bespoke to the individual case. 3 That's the critical point that any guidance needs to 4 emphasise, not an ever-growing list of possible 5 restrictions. 6 So, by way of conclusion, the Crown Prosecution 7 Service is acutely aware of, and properly trained upon, 8 the powers provided by section 72 and the Civil Orders. 9 But the use of these powers must be seen within the 10 overall rigorous legal framework, which simply cannot be 11 ignored by prosecutors. Where a legal power exists, it 12 can only be used if the relevant legal test is met, and 13 that has, we suggest, on occasion been misunderstood in 14 some of the testimony that you have heard. Thank you 15 very much. 16 THE CHAIR: Thank you, Ms Johnson. Ms Hill? 17 Closing statement by MS HILL 18 MS HILL: Chair, it now falls to me to summarise the 19 evidence you have heard very briefly just to assist you 20 in your deliberations. Obviously this has been 21 a relatively short hearing and you have heard the 22 evidence. I'm sure it is fresh in your minds. 23 Chair, you will recall earlier this week you heard 24 evidence from a series of NGOs. You heard from 25 Bharti Patel at ECPAT UK. She began the testimony by</p> <p style="text-align: center;">Page 153</p>	<p>1 talking about the quite shocking low numbers of foreign 2 travel restrictions and her concerns about the 3 underutilisation of section 72. You will recall the 4 evidence you heard about ways in which the situation 5 might be remedied and you will recall she gave evidence 6 that a travel ban of a blanket nature, in her view, 7 would not be proportionate. She expressed concerns 8 about the roles of the FCO and the NCA-CEOP by 9 comparison with some of the other country's systems. 10 You will recollect the read evidence from 11 Sherryl Loseno from the Voice of the Free in the 12 Philippines and the shocking statistics she gave about 13 the individuals they support in the Philippines. She 14 detailed of course the appalling conditions that 15 children are kept in and the psychological harm and 16 trauma that they suffer. 17 You will remember the evidence from 18 Catherine Spreckley that was also read to you about the 19 scheme she had worked on in Uganda and about the abuse 20 perpetrated by OU-F2 in the late 1980s and thereafter. 21 She described the efforts to intervene and ensure he did 22 not return to Uganda after allegations had surfaced and 23 raised some observations on the three areas you are 24 considering. 25 Chair, on Tuesday, you heard evidence from</p> <p style="text-align: center;">Page 154</p>
<p>1 Seila Samleang by videolink from Cambodia who described 2 the efforts that are made to support investigations in 3 Cambodia and provide social support to those affected by 4 sexual abuse. He explained he worked largely through 5 his organisation with street children who are sexually 6 exploited by foreign perpetrators and reminded you of 7 the fact that one of the push factors for this 8 particular form of exploitation is poverty, leading 9 children to be vulnerable to exploitation. That was 10 made perhaps very clear by the video you watched just 11 today. 12 He alluded to the particular issues caused by the 13 legal system in Cambodia, that cases weren't always 14 properly investigated, the response wasn't always 15 reactive as well as they would like, or proactive to 16 prevent abuse from occurring. 17 He gave evidence about the comparison between 18 working with the US and Australian authorities and his 19 experience with contact with the NCA that was more 20 generally by email. 21 He talked about the importance of sharing 22 information with NGOs. He noted that information about 23 an offender's background can be crucial in bringing 24 a prosecution in Cambodia. He described the limited 25 impact that he'd seen the international certificate</p> <p style="text-align: center;">Page 155</p>	<p>1 having in Cambodia. 2 You will remember the evidence of 3 Marie-Laure Lemineur from ECPAT International that you 4 also heard by videolink. She took a different view 5 about the prospects of a complete travel ban and thought 6 that would be valuable, although time was needed to 7 assess the impact of the measures taken in Australia and 8 the USA. Her overall perception was that the officers 9 and civil servants in this area are highly committed but 10 overstretched and struggling with the challenges that 11 they faced. She also supported a proposal to share 12 notifications with properly vetted NGOs and referred to 13 the threats that victims themselves often experience 14 that prevents them from participating in the criminal 15 process. 16 You will recall the evidence from Professor Binford, 17 the trustee of Child Redress International, who spoke 18 about the origins of CRI's work being the need to secure 19 compensation for the victims of sexual abuse but how 20 their work is now much broader. Her overall impression, 21 you will remember, was that the UK appears to be behind 22 other countries in terms of "boots on the ground", even 23 if it is perceived as being a leader in restricting 24 internet-based exploitation. She also supported 25 a uniform travel ban, having reflected further with CRI</p> <p style="text-align: center;">Page 156</p>

<p>1 colleagues on the issue.</p> <p>2 She also expressed concern about the</p> <p>3 underutilisation of section 72 compared again to the</p> <p>4 apparently higher numbers through the American</p> <p>5 extra-territoriality provisions.</p> <p>6 She also supported the international certificate</p> <p>7 being made mandatory when considering the Disclosure and</p> <p>8 Barring issues.</p> <p>9 The statement from Carol Smolenski from ECPAT USA</p> <p>10 was read to you, chair, and that gave you a very</p> <p>11 specific example of a particular set of circumstances in</p> <p>12 the US illustrating perpetrators travelling abroad to</p> <p>13 sexually exploit children. She described the case</p> <p>14 involving a lack of co-operation from the local law</p> <p>15 enforcement, the need to gather the evidence in a way</p> <p>16 that it could be presented in the US court and the</p> <p>17 challenges of bringing children who have been exploited</p> <p>18 to the US to testify. She talks about the seal on the</p> <p>19 passport from the US recording that an individual was</p> <p>20 a convicted sex offender. She explained that that law</p> <p>21 was controversial and may not prevent all known sex</p> <p>22 offenders from travelling abroad.</p> <p>23 She felt that the US embassies had found it of</p> <p>24 assistance in policing sex offenders and on balance felt</p> <p>25 it was a good measure.</p> <p style="text-align: center;">Page 157</p>	<p>1 The evidence of Father Shay Cullen from PREDA was</p> <p>2 also read to you and summarised in part. He described</p> <p>3 the case of Douglas Slade against whom, to his</p> <p>4 knowledge, no Civil Orders had been imposed. He talked</p> <p>5 about how systems could be improved. He mentioned the</p> <p>6 cancelling of passports because he did not believe the</p> <p>7 current foreign travel restriction system was effective</p> <p>8 enough. He also mentioned problems with section 72 and</p> <p>9 again referred to issues such as individuals escaping</p> <p>10 prosecution by bribing individuals or fleeing the</p> <p>11 country. Again, he stressed the role of partnership</p> <p>12 between local police and the NGOs.</p> <p>13 He stressed the need for UK officers to be appointed</p> <p>14 in the Philippines and neighbouring countries and</p> <p>15 obviously you have now heard more evidence about that.</p> <p>16 On Wednesday, chair, you will recollect that you heard</p> <p>17 from Glen Hulley, the former Australian police officer</p> <p>18 from Project Karma who described the widespread problems</p> <p>19 of child sexual exploitation in South-East Asia. He</p> <p>20 talked from his experience about the change in the law</p> <p>21 in Australia and how that had been effective and why he</p> <p>22 felt it was more effective than the</p> <p>23 stamp-in-the-passport system operated in America. He</p> <p>24 was keen to advocate England and Wales adopting</p> <p>25 a similar approach to Australia in that regard.</p> <p style="text-align: center;">Page 158</p>
<p>1 He also had not seen a significant impact by the</p> <p>2 international certificate.</p> <p>3 The evidence from Joyatri Ray from EQUATIONS was</p> <p>4 read to you and summarised in part. She highlighted</p> <p>5 what she described as the "current red flag system" not</p> <p>6 working well. She felt that individuals would target</p> <p>7 places with a small local police presence, meaning that</p> <p>8 flags do not ring alarm bells in the right places. She</p> <p>9 felt that Indian officials and NGOs did not have a full</p> <p>10 understanding of the Civil Orders regime.</p> <p>11 You will remember the evidence from Cecilia French</p> <p>12 from the Home Office who described the origins of</p> <p>13 the Civil Orders regime and the reviews that have taken</p> <p>14 place to ensure it continues to be effective. She gave</p> <p>15 evidence about the changes to the database so that</p> <p>16 searches for foreign travel restrictions can be</p> <p>17 conducted more easily, although you will recollect that</p> <p>18 we still await data on the number of SROs with foreign</p> <p>19 travel restrictions in them.</p> <p>20 She took you through the minutes of the SOVO</p> <p>21 management board and the times when the efficacy of</p> <p>22 the Civil Orders regime had been considered. And how,</p> <p>23 ultimately, the Home Office remained of the view that</p> <p>24 this was effective and working well but only, as others</p> <p>25 have said, as one part of managing sex offenders.</p> <p style="text-align: center;">Page 159</p>	<p>1 She felt the Home Office would find a global travel</p> <p>2 ban similar to Australia to be disproportionate and that</p> <p>3 similar issues of human rights would arise from the</p> <p>4 stamp-in-the-passport system and she reflected a similar</p> <p>5 balance, as you have heard, to be drawn in the</p> <p>6 disclosure and barring regime.</p> <p>7 Robert Jones from the NCA addressed the Civil Orders</p> <p>8 issue as well, confirming the numbers reported in the</p> <p>9 MAPPA annual report. He explained the difficulties in</p> <p>10 applying for these orders, the standard of proof and the</p> <p>11 lack of a closed material procedure. You may wish to</p> <p>12 reflect on those aspects.</p> <p>13 He felt that a blanket ban on travel would face</p> <p>14 a human rights challenge. There were also problems with</p> <p>15 the stamp system in the passport.</p> <p>16 As far as section 72 was concerned, he said there</p> <p>17 was not any case that had not been pursued due to a lack</p> <p>18 of resources although obviously there was some</p> <p>19 stretching of resources because these are demanding</p> <p>20 prosecutions.</p> <p>21 You will remember that he confirmed the changes made</p> <p>22 to the international liaison officer guidance, so it</p> <p>23 does not give the impression of being a last resort</p> <p>24 policy and we have received yesterday, chair, the</p> <p>25 updated guidance from the NCA with which I think you</p> <p style="text-align: center;">Page 160</p>

<p>1 have been provided. He explained where there were ILOs 2 in place and where there were plans to have ILOs, in 3 summary saying the position was kept under review based 4 on the current threat picture. 5 Chair, we have calculated the number of SHPOs that 6 have a foreign travel restriction order from the MAPPA 7 statistics that Mr Jones was taken to as being 118. We 8 calculate that if one adds up all of the SHPOs and, 9 indeed, I think, the FTOs, the figure is 118, to which 10 will need to be added the SROs once that information is 11 provided by Chief Constable Skeer. 12 Chair, you will remember that the detail of 13 the disclosure and barring regime and the international 14 certificate regime were read and summarised to you via 15 the evidence of Adele Downey and Robert Price, but, 16 broadly, as I'm sure will become apparent, you will 17 appreciate that there are limits on the ways in which 18 the Disclosure and Barring Scheme operates overseas 19 unless the employer is based in the UK and the 20 employment decision is based here. There are also 21 limits about the way in which the international 22 certificate operates, as you have heard from some 23 witnesses, it not being mandatory, there being some 24 concerns about the cost, and some concerns about the 25 takeup in certain parts of the world, albeit that the</p> <p style="text-align: center;">Page 161</p>	<p>1 overall figure is that some 45,578 have been provided. 2 Chair, yesterday you will remember you heard from 3 Chief Constable Michelle Skeer, the NPCC lead for the 4 management of sexual offenders and violent offenders, 5 and, again, she stressed the proportionality and 6 necessity issues that underpin the applications for 7 these orders. She described the ways in which the data 8 is recorded. Her impression was that there was a good 9 success rate when Civil Orders were applied for and 10 there was a high level of training. She shared concerns 11 about a complete travel ban in human rights terms and 12 she felt also that the passport issue might be thought 13 of in a difficult way. She stressed also the systems in 14 place under the SIS II system already lead to challenge. 15 She supported the argument that there might need to 16 be a closed procedure to enable greater efficacy to the 17 orders regime. 18 She explained how section 72 prosecutions are not 19 recorded per se. She didn't overall think there was 20 a lack of awareness of section 72. She has now 21 requested there to be a marker put on the ViSOR system 22 so that in the future there can be greater clarity about 23 the number of those prosecutions each year. 24 She felt that including section 72 in the APP 25 training material might assist in cascading knowledge.</p> <p style="text-align: center;">Page 162</p>
<p>1 That may be something that you think about, chair, when 2 looking at the evidence from the six forces, because you 3 will recollect that some of those forces did indicate 4 a lack of awareness of some of these issues. You will 5 look, no doubt, at the numbers that those forces 6 provided you with of their own Civil Order applications 7 and their own prosecutions. 8 You will recollect the evidence from Mr McGill from 9 the Crown Prosecution Service yesterday, who again 10 reiterated his view that the Civil Order regime was one 11 tool in a prosecutor's armoury. He confirmed it was not 12 a policy, section 72, of last resort. It was not 13 a complex piece of legislation but those prosecutions 14 were themselves complex and resource intensive. 15 He gave evidence as well about the ability of 16 children abroad via an NGO or on their own to request 17 a decision not to prosecute to be reviewed. The 18 Ministry of Justice data was read to you yesterday and 19 the most recent evidence was summarised to you today. 20 You will remember from yesterday afternoon the evidence 21 from the Foreign and Commonwealth Office, Mr Jones, 22 about the ways in which consular guidance is given to 23 individuals arrested abroad, the ways in which there are 24 processes for referring individuals who generate 25 a concern to law enforcement and some sharing of</p> <p style="text-align: center;">Page 163</p>	<p>1 statistical information with ACRO by the Foreign Office. 2 The DFID evidence was read to you that talked of 3 the wider work that DFID had been doing around effective 4 safeguarding in the international aid sector, that no 5 doubt you will fit together as part of this piece of 6 work. 7 Finally, yesterday, you will remember the evidence 8 that was read to you from OU-X1 who described the 9 undercover investigations on which the witness worked 10 and the particular difficulties posed by this 11 particularly challenging area of work in which the 12 witness is involved. 13 The witness questioned the effectiveness of 14 the Civil Orders regime and noted comparisons, as you 15 have heard summarised by ECPAT and CRI counsel, between 16 the British presence overseas and that of other 17 countries. 18 Finally, of course, today, chair, you have heard 19 from Adrian Greer of the British Council who has 20 described comprehensively their own recruitment 21 processes, the learning they have brought to that in 22 recent years, and his lack of knowledge of 23 the Civil Orders regime, given that there's been no 24 British Council employee who has had a Civil Order now 25 having researched and interrogated their databases very</p> <p style="text-align: center;">Page 164</p>

<p>1 carefully.</p> <p>2 He explained his understanding of section 72 but the</p> <p>3 principal focus of his evidence of course was on the</p> <p>4 checks that the British Council carry out.</p> <p>5 The statistics that he directed you to suggesting</p> <p>6 that between 1 and 5 per cent of child abusers have</p> <p>7 a criminal record and so vetting can only be one of</p> <p>8 the available means of protecting children is something</p> <p>9 you will no doubt have regard to.</p> <p>10 The MOD schools' evidence has also been summarised</p> <p>11 to you and finally today this morning, chair, you heard</p> <p>12 from Jane Larsson and from Colin Bell from the</p> <p>13 International Schools and British Schools Council. You</p> <p>14 will confirm -- you will recollect that confirmation was</p> <p>15 given of the changes to the way in which DBS checks can</p> <p>16 be accessed by such organisations and the work that's</p> <p>17 being done by the Task Force to try and improve and</p> <p>18 strengthen checks in this area.</p> <p>19 Chair, I hope that brief summary assists you as you</p> <p>20 and the panel retire to consider the evidence.</p> <p>21 THE CHAIR: Thank you, Ms Hill. It was very helpful.</p> <p>22 As Ms Hill has indicated, that concludes this phase</p> <p>23 of the Children Outside the UK Investigation public</p> <p>24 hearing on Civil Orders, section 72 of the Sexual</p> <p>25 Offences Act 2003 and the disclosure and barring regime.</p> <p style="text-align: center;">Page 165</p>	<p>1 We are grateful to all the witnesses who have come</p> <p>2 to testify before the inquiry over the course of this</p> <p>3 week.</p> <p>4 Of course we would like to extend our thanks to all</p> <p>5 of the representatives and to all of the inquiry staff</p> <p>6 for ensuring the smooth progress of this hearing.</p> <p>7 We will now review the material already provided to</p> <p>8 us and the remaining items of evidence and further</p> <p>9 submissions which we are expecting. We will then</p> <p>10 provide a report on this phase of the investigation in</p> <p>11 the autumn.</p> <p>12 With that, I will draw the hearings to a close.</p> <p>13 Thank you all very much.</p> <p>14 (3.29 pm)</p> <p>15 (The hearing concluded)</p> <p>16</p> <p>17</p> <p>18 I N D E X</p> <p>19</p> <p>20 MR ADRIAN GREER (affirmed)1</p> <p>21</p> <p>22 Examination by MS HILL1</p> <p>23</p> <p>24 MS JANE LARSSON (sworn)50</p> <p>25</p> <p style="text-align: center;">Page 166</p>
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