

Wednesday, 27 October 2021

(10.00 am)

LADY SMITH: Good morning. As explained yesterday, we move to the last day in the boarding schools case study during which we're looking into Queen Victoria School and we have witnesses ready for us, I think, and the first is ready now; is that right, Mr Brown?

MR BROWN: Yes, my Lady, the first witness is 'Grant'.

LADY SMITH: Thank you.

'Grant' (affirmed)

LADY SMITH: 'Grant', you'll see there's a red folder in front of you. It has a copy of your statement in it. The statement will also come up on the screen in front of you, so please feel free to use either or neither as you find convenient.

Will you let me know if you have any questions as we go along during your evidence or if you need a break. Don't hesitate to ask me.

A. Thank you.

LADY SMITH: Because it's important that you feel as comfortable as you can when giving your evidence. Whatever works for you will work for me, let me assure you of that.

A. Thank you.

LADY SMITH: If you're ready, I'll hand over to Mr Brown and

1 he'll take it from there; is that all right?

2 A. That's great, yes, thanks.

3 LADY SMITH: Mr Brown.

4 Questions from Mr Brown

5 MR BROWN: 'Grant', good morning. I use the microphone
6 because I'm softly spoken and I think you are too. So
7 could you make sure that you perhaps bring the
8 microphone close or speak into it --

9 A. Of course.

10 Q. -- because not only are you the most important person in
11 the sense we must hear what you say, but the evidence is
12 being transcribed and it's being done through the
13 microphones so it's very important that you keep your
14 voice up, please.

15 A. Okay.

16 Q. If we can start with the statement which has reference
17 WIT-1-000000472, I think we can agree it runs to 19
18 pages, and on the final page, if you can turn to that,
19 there's a paragraph 111, the final paragraph, which
20 states:

21 "I have no objection to my witness statement being
22 published as part of the evidence to the Inquiry.
23 I believe the facts stated in this witness statement are
24 true."

25 And you signed that on 27 October 2020; is that

1 correct?

2 A. That's correct.

3 Q. And we should understand, was the statement prepared

4 essentially online with you answering questions?

5 A. Yes, that's correct.

6 Q. And then you were sent a final form you were happy with

7 and you read it and signed it?

8 A. I did, yes.

9 Q. And you're content it's accurate?

10 A. I'm content it's accurate.

11 Q. Thank you very much indeed. I don't wish to labour

12 everything that's in it because we can take account of

13 it, but there are several chapters that I'd like to look

14 at in a little more detail.

15 A. Okay.

16 Q. The first is really just your background and in

17 particular computing, because, as we know, that's what

18 you teach as your speciality and that obviously has

19 an impact in terms of child protection and looking after

20 children, as you will know, with the advancement of

21 technology over the last 25 years?

22 A. Yeah.

23 Q. Okay. You're 52 and you did a degree in maths,

24 obviously, and then went on to teacher training and we

25 read that you had four years in the state sector; is

1 that correct?

2 A. That's correct, yes.

3 Q. You then took employment in 1996 at

4 Queen Victoria School in Dunblane.

5 A. That's correct.

6 Q. Can you remember why you applied for QVS?

7 A. I think I was just looking for a new challenge and the

8 role came up. You know, you're looking at the TES,

9 a lot of people do, and it was obviously quite local to

10 where I stayed as well. So yeah, it looked like

11 an interesting challenge for me at that time. As much

12 as I really enjoyed my first school, I thought that, you

13 know, taking on a [REDACTED] teacher's role, even though

14 I was quite young, to do that would be a great

15 challenge. I didn't really think I was going to get the

16 job, it was the first thing I applied for, but yeah,

17 I was delighted when I got given the opportunity.

18 Q. What did you know of Queen Victoria School prior to

19 going there?

20 A. Not much. I'd done a little bit of research in the

21 library beforehand, in the library in Stirling, and just

22 found out a little bit about its history and the fact it

23 was an all boys' school, boarding school.

24 Q. Although I think as you came in that was beginning to

25 change?

1 A. That's correct, yes.

2 Q. And were you aware that that change was going to take
3 place as you arrived?

4 A. To be honest, I can't remember whether I were or not.

5 Q. But I think we've heard that the introduction of girls
6 to the school was staggered, starting off with senior
7 girls?

8 A. That's correct.

9 Q. And then bringing in from the bottom up?

10 A. Yeah.

11 Q. Is that correct?

12 A. There was a smaller cohort of girls to start off with,
13 yes.

14 LADY SMITH: That would have begun within quite a short time
15 of you starting in 1996?

16 A. Yeah, I think it was actually they came the same time as
17 I started.

18 MR BROWN: Yes, you presumably started in the autumn term?

19 A. Yes.

20 Q. An academic year begins, so you're new and girls were
21 new?

22 A. Yes, that's right.

23 Q. Do you remember that having any teething problems? It
24 was a change of culture, clearly?

25 A. There was a change of culture. I think a lot of the

1 staff -- staff who had been at school before, found it
2 quite difficult to discipline the girls. I seem to
3 remember there was a lot of punishment exercise given
4 out, the girls never got a punishment exercise for the
5 first four or five months or something crazy like that.
6 I don't know why that would be, but maybe just found it
7 difficult to bring that in. And obviously there's not
8 that many girls in the classroom as well, there's only
9 two or three girls in each of the classes, so I suppose
10 it would stand out a little bit more, but yeah.

11 Q. You were employed, as you said, [REDACTED] teacher,
12 computing.

13 A. Yeah.

14 Q. This is 1996 and again allow me the luxury of having
15 complete ignorance about things computing. At that
16 stage, presumably, it was a nascent subject, it was new.
17 People before will have had some computer learning, but
18 was it pretty basic?

19 A. In the department?

20 Q. Yes.

21 A. Yeah, it was -- it probably would be classed as
22 a struggling department at the time when I came into it.
23 A lot of the students weren't taking the subject so
24 I only had -- nobody taking higher because the teacher
25 wasn't capable of doing higher and there were two or

1 three pupils doing standard grade computing science. So
2 it was a struggling department when I came into it. In
3 terms of the computing technology it was fairly basic,
4 even compared to what I had at the previous school. No
5 networks, just standalone terminal computers.

6 Q. The school in employing you was obviously trying to
7 remedy that?

8 A. Exactly, yes, it was a big bang approach which meant my
9 remit was very, very detailed. In fact at the job
10 interview one of the people who was doing the interview,
11 which is the head of the Central Scotland -- central
12 schools in Stirling, he said it was a job for superman.
13 There's just too much in the actual remit.

14 Q. I think we've heard already that in terms of the
15 interview process, Queen Victoria School, which is
16 obviously an independent MoD school, set apart from the
17 standard state sector that you've just come from, used
18 local authority teachers for their interview purposes?

19 A. That's right, yeah.

20 Q. Was that something that you saw regularly?

21 A. Yeah, I think they tried to get the subject leaders
22 often so obviously we used to have these subject leaders
23 who would be in charge of the subjects in the central
24 region.

25 So we had one for computing science, one for maths

1 and things like that, and they would come in as part of
2 the interview panel and try and help out a little bit
3 with the interview panel.

4 Q. Did you see the sense in that?

5 A. Yeah, yeah.

6 Q. Did that connection continue beyond interviews?

7 A. Not so much, no. They did give us a little bit of
8 support with some hardware, because I remember driving
9 through to Riverside and getting some help from them
10 with some hardware issues that I had, so they would help
11 a little bit, but --

12 Q. So there was liaison certainly?

13 A. -- they certainly didn't help in terms of the looking
14 over advisory role, no.

15 Q. No, but it would be open to you, if you had an issue, to
16 phone someone locally perhaps to discuss how they were
17 doing it?

18 A. I probably would phone my previous colleague in my
19 previous school would probably be my first point of call
20 with that.

21 Q. I think in terms of the interview process you say on
22 page 2 at paragraph 7 that your two references were
23 taken up?

24 A. Yes.

25 Q. Is that because they told you they'd been contacted or

1 did you ask?

2 A. Yeah, because the headteacher told me that he'd been
3 contacted.

4 Q. And that you then had a year's probation and then you
5 were offered and took a full contract?

6 A. That's correct.

7 Q. And if we stick with the educational side and the
8 computing side, you were going in as the [REDACTED]
9 teacher. Do we take it from that that [REDACTED]
10 a department which contained other people?

11 A. There was the -- it was really awkward because it was
12 [REDACTED]
13 [REDACTED] so he stayed in the department [REDACTED] I guess,
14 in terms of the line management.

15 Q. And the department, I take it, over the last [REDACTED]
16 [REDACTED] --

17 A. Yeah.

18 Q. -- has grown, I imagine?

19 A. Yeah, yeah. We've always had one or two members of
20 staff, generally two members of staff in the department,
21 which is actually quite big for QVS in terms of
22 comparing it with other schools who do computer science,
23 given the size of QVS to have two members of staff is
24 pretty good.

25 Q. But I think also because of your experience and the

1 development of computers within education, were you
2 expected to bear the weight of practical tasks about
3 trying to introduce computers into the school more
4 widely?

5 A. The first two to three years of the job was really
6 demanding because essentially I was a teacher, I was
7 also in charge of the network, making sure the network
8 ran. I was also in charge of fixing things as well so
9 I had to go round and actually fix the monitors and
10 keyboards and things that weren't working, so I was
11 really doing everything in the school in terms of
12 computing.

13 Q. And I think if we go to page 5 of your statement,
14 paragraph 3, under the broad heading, "Strategic
15 planning", you say:

16 "I have been involved in many iterations of the
17 whole ICT planning including the acquisition and
18 planning of networks, computers, et cetera and the use
19 of these devices in the school to support education."

20 But we should understand beyond that you've been the
21 person certainly initially --

22 A. Initially, yeah. The job just became ludicrous by
23 around the turn of the century and so they managed to
24 employ someone else to help out.

25 LADY SMITH: 'Grant', could I ask you to try and get the

1 microphone closer to you.

2 A. Sorry, I do apologise.

3 LADY SMITH: Because your voice is tailing away at times.

4 Thank you.

5 A. Is that better?

6 LADY SMITH: Much better.

7 A. Thank you.

8 MR BROWN: I'm obliged.

9 We know, clearly, because of reports of online abuse

10 that that has become an ever-increasing problem within

11 schools?

12 A. Yeah.

13 Q. You agree with that, I take it?

14 A. Yes.

15 Q. In terms of planning to try and address developing

16 issues, can we take it that you have been heavily

17 involved in that?

18 A. I was certainly involved very heavily in the early days

19 when I was in charge of the network. I would be

20 monitoring the -- we had monitoring software which would

21 pick up keywords and would let me know if any keywords

22 had been done by the pupils, put in by the pupils. So

23 I was certainly involved with that. Then the technician

24 would come in. In the early days obviously they weren't

25 networked, but once the network came in, then we brought

1 that monitoring software in and then the technician took
2 on the role of actually monitoring the software.

3 Q. You mentioned checking if pupils had used words --

4 A. Yeah, or staff.

5 Q. -- what about staff?

6 A. Yeah, yeah, or staff, yeah, it would check it all, yeah.

7 Q. It was everyone?

8 A. Yeah.

9 Q. And can I take it that there were staff INSET days about
10 the use of computers and what they should and shouldn't
11 do?

12 A. Yeah, I run INSET days in computing, all aspects of
13 computing, really, from usage through to safe usage.
14 I also got a lot -- be a lot of emails, trying to get
15 an email policy where we tell staff about good data
16 hygiene and things like that too. That comes down from
17 the MoD quite a lot well.

18 Q. I was coming to that. At 25 you say, and it's a long
19 paragraph which I won't read out in toto, but as far as
20 I recall you say:

21 "The MoD school strategy regarding online activity
22 was closely linked to the policies/best practices from
23 the South West Grid for Learning charity ..."

24 A. Yeah.

25 Q. Was that at the beginning or has that been a constant?

1 A. It's been a constant, really. The SWG is a sort of
2 website that provides a lot of template information for
3 schools to use and best practice for schools to use and
4 to utilise.

5 Q. So should we understand within the educational world,
6 putting the MoD to the side for a moment --

7 A. Yes, it's used throughout schools, yeah.

8 Q. Is there a great deal of information sharing as between
9 schools because this is an ongoing problem they need to
10 address?

11 A. Yeah, and I think having these central websites that
12 people can go into, like the South West Grid and also
13 the Digital Schools websites and things like that, it
14 really does help having that central resource and bank
15 of resource to actually utilise.

16 Q. But then the MoD, bringing it back into the equation, is
17 an added layer of supervision?

18 A. Yes.

19 Q. And help?

20 A. So the MoD obviously now, certainly since probably
21 around 2013, has really taken -- it's become
22 a centralised network where they're in control of the
23 network essentially. QVS is not in control of the
24 network any more. It's an MoD-controlled network. So
25 they do monitoring on top of the monitoring that we do

1 as well.

2 Q. And I think we see you talk about a global safeguarding

3 team was set up within DCYP, which I think we understand

4 is the MoD body responsible for QVS and other schools?

5 A. Yeah. So they've got these teams that will provide

6 advice if the school required it and safeguarding and

7 other aspects of school life as well, I believe.

8 Q. Is the loss of control you were saying that it's now

9 with the MoD, is that a good or a bad thing?

10 A. Well, initially I thought it was a bad thing because

11 I like to be quite technical and especially when there

12 were a lot of candidates who really like to get

13 nitty-gritty with computers and mess around with sort of

14 things and the network and I could really do a lot of

15 learning that way, we've had some excellent computing

16 scientists over the years. It's now more difficult

17 because obviously the network is shut down but it's

18 a good thing in the sense that it's fully controlled

19 within the MoD and they have access to all the computers

20 and they can fix things very quickly because they've got

21 access to it.

22 Q. Thinking more particularly about child protection though

23 --

24 A. Uh-huh.

25 Q. -- is it a good thing that they have that oversight?

1 A. Well, it's an extra layer of security, yes.

2 Q. And from your experience, do they pick things up?

3 A. I'm not sure. I wouldn't be told if there was or not

4 necessarily be told if there was an issue due to

5 confidentiality so I'm not sure.

6 Q. All right. But again, thinking perhaps of now,

7 currently, if someone misuses the system, we understand

8 there are processes in place which should pick it up?

9 A. We have an extra layer of support now on top of the MoD

10 system called Securly, which picks up the keywords and

11 monitors for terms that it thinks might suggest abuse.

12 Q. I think if we could look to a document, MOD 649, page 3,

13 it will appear on the screen in front of you --

14 LADY SMITH: Just while that document is coming up, this

15 system called Securly that you refer to, is that

16 a system that QVS had chosen to use for QVS?

17 A. That's correct. It's not an MoD-wide system.

18 LADY SMITH: So that's not dependent on the MoD provision?

19 A. No, no.

20 LADY SMITH: Thank you.

21 MR BROWN: And I think this is a document provided by the

22 MoD or QVS which sets out:

23 "Securly is a cloud-based web filter and AI-based

24 software system that helps keep pupils safe online when

25 using the school domain and school hardware. It

1 provides full visibility into our pupils' online
2 activity."

3 A. Particularly for the Chromebooks that we utilise in the
4 school.

5 Q. Do all pupils have a Chromebook?

6 A. Yes.

7 Q. Same question as I asked before, though, does it monitor
8 staff online activity?

9 A. I'm not sure that it does.

10 Q. Do you think it should?

11 A. Potentially, yes.

12 Q. It would seem --

13 A. It would seem to make sense, wouldn't it, yeah.

14 Q. Yes. And it reads on:

15 "The system alerts in real-time and sends
16 notifications to the safeguarding team."

17 As her Ladyship has asked, that's within QVS?

18 A. Yes. We have a technician and we also have somebody who
19 leads with Securly within the school.

20 Q. Is it kept to them or would you be alerted too?

21 A. I'd be alerted because I'm an admin user. They're the
22 ones who actually check it for the alerts.

23 Q. If a flag comes up, it's then reported and presumably
24 goes to senior management as well?

25 A. Yes. We find it very, very effective. A lot of the

1 things it picks up obviously are pupils doing just
2 normal reports and the phraseology they're using
3 obviously highlights the system. So it is working. In
4 terms of how many things it's actually picked up,
5 I don't know. I haven't been made aware of that. I can
6 obviously see the flags on the system, but I've not been
7 told if there's been any particular incident which has
8 been further monitored.

9 Q. Right, that's not your responsibility?

10 A. No.

11 Q. Presumably if the flags go up, some of them may be more,
12 just reading them, instructive than others?

13 A. Absolutely.

14 Q. Or concerning than others?

15 A. Yeah.

16 Q. But I think we see the list of items that it's looking
17 out for: bullying, profanity, violence, nudity, grief,
18 self-harm/suicide. Then it says:

19 "Notifications are triaged, actioned and logged."

20 This is by the technician?

21 A. The technician or the person who's in charge of the
22 Securly system or it could well be the deputy
23 headteacher as well.

24 Q. And when did this come in?

25 A. Securly has been -- we've had it for about a year now,

1 just over a year.

2 Q. So when it says it's reviewed annually, presumably the

3 first review has yet to take place or has it taken

4 place?

5 A. I'm not sure if there's been a review of the system.

6 We've certainly enhanced it recently, so that may well

7 have been part of the review process. We've brought

8 an extra level of security onto the system where we can

9 actually go onto the screens and see what the pupils are

10 working on as well.

11 Q. But the issue of looking at teachers too might be taken

12 on?

13 A. Yes.

14 Q. Thank you. That's the school achieving an overview of

15 pupils working online within the school context, but

16 I take it it also covers their use of Chromebooks in the

17 houses in their spare time as well?

18 A. Yes, it does, yes.

19 Q. More broadly, though, the advent of the mobile phone

20 presumably has been a real problem?

21 A. Yes.

22 Q. When did that begin, from your experience, to be

23 an issue?

24 A. Mobile phones?

25 Q. Yeah.

1 A. Probably when they came out round about -- social media
2 based mobile phones where you could send more messages
3 rather than just simple text messages, so I would say
4 round about 2008, something like that.

5 Q. Is that a problem that has just grown and grown or --

6 A. Obviously the more use of mobile phones, we obviously
7 have to have a strategy in the school to try and hold
8 back on the use of mobile phones just for usage as well
9 as any online abuse so that the kids are quite well
10 monitored in the sense of handing phones in at certain
11 times of the day so we know when the phones are in place
12 in the houses and monitoring their use of the phones.

13 Q. I'm just interested because you have the background with
14 technology which I imagine many of your colleagues
15 don't, and do you find that your colleagues are coming
16 to you saying, "What can we do about this?"

17 A. No, I don't find that, no. The kids are not allowed
18 mobile phones in the school teaching block at all, so
19 they're completely banned from the teaching block so the
20 kids don't have them when they're in the classroom as
21 such.

22 Q. They don't need them, they have their Chromebooks?

23 A. Their Chromebooks, yes.

24 Q. But once they're away from the classroom environment and
25 obviously it's a 24/7 environment for the school --

1 A. Yes.

2 Q. -- what supervision is there to prevent abuse?

3 A. I think obviously if any abuse would crop up and it's
4 obviously reported then it would be investigated fully
5 by the Senior Management Team but that would obviously
6 require somebody to report it. If the pupil was using
7 the Google technology on their phones, the school-based
8 technology, which some of them do, then Securly will
9 monitor it as well, but really that's an option for them
10 to choose, whether they want the school to be monitoring
11 their mobile phones.

12 Q. All right. Page 6 of your statement, paragraph 28, you
13 previous talked about acceptable use policies which are
14 no doubt shared with the pupils and they are no doubt
15 given material suggesting what they can and can't do.
16 But you say:

17 "I am aware of two cases where messaging apps were
18 used to send toxic comments to another pupil. These
19 were dealt with via the school discipline guidelines and
20 in one of the cases police involvement also. QVS has
21 invested in technology that sits on top of the MoD
22 network security to attempt to provide improved
23 monitoring on these issues."

24 That I take it is Securly?

25 A. That's Securly, yeah.

1 Q. But that's not or does that cover their mobile phones?

2 A. It would monitor it if they have the Google technology

3 on their phone, yes, and they've logged into it.

4 Q. So it depends, presumably, if they're using their phone

5 on the network?

6 A. Yes. Erm, not the network, using their phone on the

7 Securly network. Actually the Google network that we

8 use in the classrooms is for education. So if they're

9 using their phone to log into the Google Classroom, for

10 example, to see some work, then Securly will monitor

11 because they're logging into the actual system.

12 Q. What I was thinking are, again forgive me for my

13 technological ignorance, but on the basis this building

14 has a wifi network which I can log into on my phone to

15 save using my allowance --

16 A. Yeah.

17 Q. -- is it not the same at QVS --

18 A. No. No, they're not allowed access to wifi network.

19 Q. They're not?

20 A. No.

21 Q. So it's either they can use the Chrome network --

22 A. The Chromebooks access the wifi network. The pupils

23 would access their own 4G.

24 LADY SMITH: So, 'Grant', remind me, non-Google-based

25 technology that young people might use?

1 A. Non-Google-based?

2 LADY SMITH: Yes.

3 A. I guess it could be things like Microsoft Word and apps
4 like that and also apps like Facebook.

5 LADY SMITH: Instagram?

6 A. Instagram.

7 LADY SMITH: So there are means of them communicating?

8 A. True, but as soon as they log into the Google
9 technology, it will then start monitoring those extra
10 apps. It's really depending on them logging into the
11 Google technology on the phones.

12 LADY SMITH: So that would catch, for example, what?

13 A. If they've logged into the Google technology and use the
14 sort of phraseologies that was on that last screen
15 there, that would catch that up.

16 LADY SMITH: I can see that would catch them searching for
17 information using Google technology. I'm just trying to
18 think of a means of communicating that involves Google
19 technology. What?

20 A. The Google technology monitors all use of the computers.
21 So if they were actually typing something in, then it
22 would monitor their use. If they've logged into the
23 actual system, into the Google system.

24 LADY SMITH: But on their phone?

25 A. On their phone, yeah.

1 LADY SMITH: Text messages?

2 A. Text messages, no, no. That's different. It's not wifi
3 based.

4 LADY SMITH: Mr Brown.

5 MR BROWN: That's what I was coming to. A child with
6 an iPhone who is using 4G can do whatever they like,
7 essentially.

8 A. Yes.

9 Q. Without any supervision by the school systems?

10 A. Which is where you need a lot of, obviously, training
11 with the pupils and acceptable use.

12 Q. Yes, acceptable use, but also at the end of the day
13 you're relying on people coming forward to tell you it's
14 happening?

15 A. Yeah.

16 Q. Is there any way that the use of mobile phone on 4G can
17 be overseen by a boarding school?

18 A. It's a difficult one because obviously you've got data
19 protection, et cetera, et cetera, and it's their own
20 personal devices that they're using. So it would just
21 be a case of the school saying if you're going to use
22 your devices then we're going to monitor your devices
23 and the kids would need to accept that, I guess, as part
24 of the -- it could certainly be done, there's not
25 an issue with that. It's just the issue is would the

1 kids -- would the pupils be okay with allowing their
2 phones to be monitored and would the parents be okay
3 with allowing their phones to be monitored?

4 Q. From what you've said, this is a nation-wide, both
5 Scottish and UK, problem. There are centralised bodies
6 which give you advice.

7 A. (Witness nods).

8 Q. Both private sector, MoD.

9 A. (Witness nods).

10 Q. Has that ever been canvassed in your experience, the
11 idea that as a matter of routine students have to sign
12 up to that level of supervision?

13 A. No, not that I'm aware of. I certainly do remember
14 a meeting where it was discussed, maybe it was an ICT
15 meeting where it was discussed about the issues of not
16 being able to track the mobile phones, but I think they
17 said that it wouldn't -- it would break some sort of
18 rights that the pupils have in terms of their own
19 personal technology if we track it -- or maybe it's the
20 parents who would have the actual say on that. We can't
21 track their phone if the parents say, "No, I don't want
22 their phone being tracked".

23 Q. But to be clear from what you said a moment ago, it can,
24 from a technology point of view, be done?

25 A. Yes. It can, yeah.

1 Q. So in theory at QVS, which is a tight campus, somehow in
2 the technology, and it would no doubt be beyond me, you
3 can monitor 4G phone usage?

4 A. Yeah, if the parents would allow us to do it, we could
5 do it. So we'd need to get the parents' sign-in for
6 that.

7 Q. Have you seen the harm that abuse by phone on 4G can
8 achieve?

9 A. In terms of psychological harm?

10 Q. Yes, we're coming on, obviously, to the other side of
11 your life at QVS which is the pastoral side because
12 you're a tutor [REDACTED] Is this something
13 you have experience of?

14 A. I can imagine it would cause a great deal of harm and
15 certainly the issues that I raised in section 28 did
16 cause a lot of mental health issues for the pupils
17 involved. But I'm sure there may well be other issues
18 that I wasn't aware of because obviously I don't get
19 told of every particular incident that would occur.

20 Q. Presumably you're alive just as everyone is to the use
21 of cameras, apart from anything else? We read in the
22 press about pupils being encouraged by others to
23 undress, to do things.

24 A. Yeah.

25 Q. Videos being passed around. Is that something you have

1 experience of at QVS?

2 A. Not that I was aware of, no.

3 Q. Okay. But what you were talking about in paragraph 28

4 is toxic comments?

5 A. Yeah.

6 Q. So just the spoken -- or the written word, presumably?

7 A. Yeah.

8 Q. And that toxicity, I take it, did have impact that you

9 saw?

10 A. Yeah. Particularly in the police case.

11 Q. Again without alluding to the individuals involved, can

12 you expand on what was being done?

13 A. Being done by the individuals?

14 Q. Yes.

15 A. Just sending messages to another person just saying

16 horrible, horrible things about them.

17 Q. Can you say whether those cases resulted in sanctions?

18 A. Yes.

19 Q. Were pupils --

20 A. Suspended.

21 Q. -- suspended?

22 A. Suspended, not expelled.

23 Q. And if that happens, is there then individual training

24 for the people who have been using their phones

25 inappropriately?

1 A. I'm not sure.

2 Q. Okay. But we should understand that there would be
3 education at least for all pupils about what they should
4 and shouldn't do?

5 A. Yes. There's obviously within the social side of the
6 education they've got internet safety.

7 Q. And I think we see in page 7 under training of staff you
8 have been heavily involved in training the staff on
9 matters technological?

10 A. Yes, particularly in the early days, yeah.

11 Q. Yeah. And that will be both the practicalities of how
12 to use the equipment and also for the safety aspects in
13 terms of child protection?

14 A. More so on the use of the materials for educational use.
15 Not so much on the child protection, no.

16 Q. Has that developed, though, the child protection side?

17 A. Yes.

18 Q. So teachers are alive to what may be going on?

19 A. Absolutely.

20 Q. I'm sorry, just to be clear, if that's not your
21 responsibility say so?

22 A. It's not my responsibility, no.

23 Q. But it's something that you are aware of?

24 A. Yes.

25 Q. And presumably you're brought in?

1 A. Yeah.

2 Q. Whose responsibility is it then?

3 A. Child protection would be one of the deputy heads.

4 Q. But your knowledge is relied upon, I imagine?

5 A. Less so, I would say, than it would have been at the

6 beginning. It's more the person who's in charge of the

7 Google technology within the school would be probably

8 more asked upon.

9 Q. Thank you. If we could go back to 1996 when you joined

10 the school, page 9, and culture within QVS, obviously

11 a world away from the state school you'd been teaching

12 in for four years?

13 A. Yes and no. Obviously in terms of the boarding side was

14 completely new to me and the sort of military ethos of

15 the school was new to me, but the actual classroom, it

16 just felt -- as I've actually just said there, it just

17 felt like a normal classroom to me. The kids didn't

18 feel any different to the state school experience that

19 I had.

20 Q. I'm just interested, paragraph 45, you say, page 9:

21 "That military tradition led to the encouragement of

22 manners, expectations and leadership qualities, for

23 example dress standards and standing when an adult

24 entered the classroom ..."

25 Does that still go on?

1 A. No, not so much now. In fact, I don't think it goes on
2 at all any more.

3 Q. Did that --

4 A. It was seen as very important in the early days, though.
5 If a member of staff came in and the pupils didn't stand
6 up, it was seen as a bit of a slight, I think, but not
7 now, no.

8 Q. That's relaxed --

9 A. I'm not sure whether it actually was stopped or it just
10 drifted away.

11 Q. From a teacher's point of view, though, were classes
12 easier to handle because the children were actually
13 better behaved?

14 A. Yes. I think that's always been the case as compared
15 with a sort of traditional state school. The pupils are
16 very well-behaved at QVS. They're outstanding in that
17 aspect.

18 Q. So from a teacher's point of view, we've heard it's
19 better paid than the state sector and in one view it's
20 easier?

21 A. I would say in terms of the teaching it's much more
22 focused on teaching and content, educational content
23 rather than disciplining, certainly.

24 Q. But the military side, from what you're saying, seems to
25 have relaxed? There's a greater informality now?

1 A. I would say that's certainly the case, yes.

2 Q. That's in the classroom?

3 A. I would say throughout, to be honest. It's less

4 military -- although we obviously still have the pipe

5 band and that aspect of it, but for me it doesn't quite

6 feel there's quite the same encouragement of manners

7 et cetera isn't quite perhaps what it was when I first

8 came in. It's much more relaxed, more focused on the

9 individual, I think, rather than having this expectation

10 of standards, et cetera. It's more focused on the

11 individual and the standards of the individual and

12 a more relaxed atmosphere in school.

13 Q. Has that been a gradual change or was it positively

14 introduced at some stage?

15 A. I think it's been a gradual change.

16 Q. All right.

17 A. And also obviously with things like SHANARRI and GIRFEC

18 and things like that where you're really focusing on

19 individuals' well-being as well, that's helpful to that.

20 Q. I think we will hear that there is an online system

21 which allows recording to take place of concerns about

22 pupils?

23 A. Yes.

24 Q. Is that correct?

25 A. Yes.

1 Q. When did that come in?

2 A. 3Systems probably came in around about 2008, 2009,

3 something like that.

4 Q. Is that something that has grown and grown and grown?

5 A. Yeah. The software's a little bit clunky to use,

6 difficult to use. QVS has actually done quite well to

7 make it work for what we want it to do. It doesn't

8 quite work perfectly so a lot of staff do have issues

9 forgetting about where to put things, so it could be

10 improved, certainly, but it's the system we use.

11 Q. Was it just an off-the-shelf product?

12 A. Yes.

13 Q. And you're aware --

14 A. But has been modified for QVS.

15 Q. I see. And it's clunky, you say, so it's difficult --

16 A. It's a clunky interface. It's got a lot of data inside

17 it, but the interface is not easy memorable, so you do

18 it one week and then you try to remember how to do it

19 the next, it's not quite -- to get access to it.

20 Q. It's not particularly intuitive?

21 A. Yes, particularly actually for what you just said, for

22 registering issues. A lot of staff have had problems

23 because I did see an email come out saying that they

24 couldn't remember how to do it, et cetera.

25 Q. Has that had an retrograde effect in the sense people

1 just don't record?

2 A. I would hope not.

3 Q. But it seems to be an issue?

4 A. It is an issue.

5 Q. What is being done about it?

6 A. Obviously in the past the staff would use emails because

7 it's so quick just to email the person who was in charge

8 with a particular issue. Whereas doing it in this

9 system, although it's better because it flags all the

10 different people who are involved with the actual pupil,

11 it takes more time for a member of staff to actually go

12 and do it within that system. We have had training on

13 the system and there is a very, very good documentation

14 on the system as well on how to use the system so it's

15 not really an excuse, but a lot of members of staff have

16 obviously had issues because there has been emails out

17 saying that they have trouble doing it or can't remember

18 how to do it.

19 Q. Looking at it from the other side, if you want to find

20 out about a pupil and see what has been reported, if you

21 individually think "I think there's something wrong, I'm

22 going to look and see for support for that", is it easy

23 to do that?

24 A. No. No -- well, the pupils will have a registered mark

25 next to their name telling you what type of support's

1 been given so you're getting that visual feedback of --
2 but you can't actually go in and look at the pupil's
3 records for obvious reasons.

4 Q. So if teacher A has expressed concern and managed to use
5 the system, will teacher B see that?

6 A. No. Not if they're not involved with that particular
7 thing. The well-being concerns will go to certain
8 individuals who are in charge of that pupil and their
9 GIRFEC. So another teacher wouldn't see a well-being
10 concern that's been sent out, although they would be
11 obviously flagged that a well-being concern has been
12 raised.

13 Q. So presumably at that point if they were worried they
14 could go to --

15 A. They could, yeah.

16 Q. -- the appropriate deputy head (pastoral) and try and
17 find out?

18 A. Absolutely.

19 Q. But it doesn't seem to be -- and is this because of the
20 concerns about data protection -- people can't see
21 everything?

22 A. Yeah.

23 Q. Has the culture of reporting changed over the time
24 you've been at QVS?

25 A. Culture of reporting?

1 Q. Concerns, using this system. It came in in 2008, it's
2 clunky, but is there now a culture that people say,
3 "Well, it may be clunky but I have to do it"?
4 A. Yes. I think, obviously, the system is pretty good --
5 it was actually patched together by a member of staff,
6 but it does organise for the people who are in charge of
7 this the information flow for a pupil. And you do get
8 feedback when you've actually raised a concern as well,
9 I should mention. You can see the feedback that has
10 gone through the various processes and been discussed by
11 the various people.
12 Q. Okay. Is it reviewed annually, the system?
13 A. I'm not sure.
14 Q. When you began in 1996, I think we would understand that
15 you took on pastoral responsibility [REDACTED]
16 as a tutor; is that correct?
17 A. That's correct.
18 Q. And you've continued to do that?
19 A. That's correct.
20 Q. And at practical levels does that mean you cover a night
21 a week and occasional weekends?
22 A. That's correct.
23 Q. Do you live in the house when that happens?
24 A. No.
25 Q. So you don't stay at any stage?

1 A. Never -- unless you're a promoted member of staff, you
2 wouldn't stay in the house.

3 Q. That would be entirely novel for you coming from a day
4 school?

5 A. (Witness nods).

6 Q. I think we can read from your statement that there was
7 a period of a fortnight where you followed the
8 housemaster and really learnt on the job, is that --

9 A. Yes.

10 Q. -- a fair summary?

11 A. Yeah.

12 Q. Was that sufficient, do you think?

13 A. I think there could have been more training in the
14 boarding -- actually, when I first came the boarding
15 side was perhaps more challenging than the teaching
16 side. The teaching side felt quite easy but the
17 boarding side, especially when you're a new member of
18 staff coming into the school, it was fairly informal,
19 the training. You just watched and you kind of learned
20 on your feet, if you like, over the first period in the
21 school until you got used to the systems and obviously
22 the pupils' names and all these little things that make
23 it really important to do a good job in the boarding.

24 Q. When you started, how many pupils were you responsible
25 for?

1 A. In the boarding side?

2 Q. Yes?

3 A. Probably round about 60.

4 Q. And were there times where you were it?

5 A. Well, yes, there was. In fact, in the early days of the

6 school you had something called the duty master who

7 would be in charge of everything, essentially. You get

8 a phone at the beginning of the day even when you were

9 teaching class and if there were any issues you would

10 have to be at the end of the phone to try and deal with

11 it and also you'd be in the dining hall by yourself when

12 the meals were on, that's obviously 120 pupils coming

13 through in two stages, so you're having to deal with the

14 lines, et cetera, so it's absolute night and day to what

15 it's like now. The duty actually now is much more

16 relaxed and organised and feels just so much better. It

17 was actually quite a stressful role being the duty

18 master I think.

19 Q. Presumably the staff/student ratio has improved?

20 A. Yes.

21 Q. So now if you're doing your night [REDACTED] are you

22 ever still it?

23 A. No.

24 Q. Just you?

25 A. There's another member of staff on with you.

1 Q. So it's --

2 A. Two members of staff. The only thing is on a Sunday and

3 a Saturday, you'd be on by yourself, although there was

4 always a contact, either SLT or often the housemaster

5 would be a contact if you have an issue. There's always

6 an SLT on duty.

7 Q. Why are those days so light?

8 A. I think it's a staffing issue, I would suspect, rather

9 than having two, you just can't get that number of staff

10 for the weekends. I should say that sometimes we do

11 have double up staff on weekends, but that would tend to

12 be generally only on special weekends like parade

13 weekends when more of the pupils would be -- because

14 often a lot of pupils go home at the weekends,

15 obviously.

16 Q. Is that a change too?

17 A. In terms of the pupils going home?

18 Q. Yeah.

19 A. No, they've always gone home at weekends.

20 Q. So pupil numbers are a bit lighter in all likelihood?

21 A. (Witness nods).

22 Q. Okay. You talked about the training you received.

23 A. [REDACTED] tutor now, is the training more formalised

24 or is it still essentially on the job?

25 A. No, it's more formalised now. They have a very formal

1 process they go through when a new member of staff
2 starts and they have to actually go through a fairly big
3 document with a tick through all the things and then the
4 people sign they've actually covered it, ICT, working in
5 the boarding house, and the housemaster will obviously
6 go through with that member of staff, so it's much more
7 formal now.

8 Q. But I think we would understand that increasingly over
9 your [REDACTED] years at the school policies have grown and
10 grown and grown? Policies obviously were introduced, we
11 know, in the mid 1990s for the first time there was
12 a pastoral deputy head?

13 A. (Witness nods).

14 Q. Alice Hainey?

15 A. (Witness nods).

16 Q. You remember her?

17 A. Yes.

18 Q. And policies were introduced at that stage in terms of
19 child protection?

20 A. (Witness nods).

21 Q. Is that an accurate reflection of what you remember?

22 A. From 19 -- I'm not sure before 1996 --

23 Q. Yes, but when you started there were policies in place?

24 A. There were policies in place, yeah.

25 Q. And one of those policies, we know, was warning of the

1 dangers of becoming too close to pupils, is that fair?

2 A. Yeah.

3 Q. Was that something that you had had training about in

4 teacher training or --

5 A. Yes, it would be, yeah.

6 Q. Sorry?

7 A. Yes, you would have training, teacher training.

8 Q. That was part of the curriculum?

9 A. Yeah.

10 Q. Can you remember, and you were obviously being trained

11 in the early 1990s, what that amounted to?

12 A. I can't individually remember, no. I can't actually

13 remember the training itself, but I can remember there

14 would have been definitely training on that.

15 Q. Okay. So it was no surprise, and it might be from your

16 perspective stating the obvious, that you don't become

17 involved with pupils?

18 A. Yes.

19 Q. And has obviously never changed; I imagine, if anything,

20 it's been reinforced?

21 A. Yes, that's true.

22 Q. But dealing with pupils in the house setting is

23 obviously different from the formality of the classroom,

24 is that fair?

25 A. Yes. Yes. Although I think the -- I've always actually

1 found the work you do in the house actually has
2 a positive influence on the classroom because the pupils
3 obviously get to know you a lot better and you can be
4 more relaxed with them in the house because obviously in
5 the classroom it's maybe a slightly more stricter
6 regime. So yeah, I think it has a positive influence on
7 the classroom work.

8 Q. But it's obviously a fine line to walk between the
9 informality that you've said is now more prevalent at
10 the school, but also keeping boundaries as between
11 teacher and pupil, is that something you would agree
12 with?

13 A. Yes.

14 Q. We'll come back to what might be done to ensure
15 children's safety in that regard, but thinking back to
16 the beginning of 1996 when you started teaching, were
17 there basic steps that you would take to ensure you were
18 not put at risk?

19 A. Yeah, obviously the basic steps would be to make sure
20 that you were not too informal with the pupils in your
21 behaviour, didn't use informal language with the pupils,
22 and obviously wouldn't be alone with the pupils as well.

23 Q. Now, we have heard of a number of scenarios where
24 teachers have to be alone with pupils. One-to-one
25 teaching being the obvious one, or music teachers who

1 are teaching an instrument --

2 A. Yeah.

3 Q. -- perhaps of necessity have to. What steps, if you can

4 remember, were taken back in 1996 to address possible

5 problems?

6 A. I would imagine they would just ask for the music

7 teachers to make sure that the rooms they were in were

8 visible, the doors were open.

9 Q. What about you, if you were doing one-to-one teaching

10 with a pupil in computing?

11 A. Exactly the same. Make sure the doors are open and

12 visible.

13 Q. And I think we understand, and we'll obviously come onto

14 a particular issue, one-to-one tuition in computing did

15 happen; is that correct? You were teaching pupils

16 one-to-one additional --

17 A. For the advanced higher potentially, yeah.

18 Q. And did that cause you anxiety?

19 A. No.

20 Q. No. Why not?

21 A. It just didn't. I think, you know, making sure that

22 you've got the rooms open and the pupil that you're

23 working with, you're totally focused on your subject.

24 It didn't cause anxiety.

25 Q. All right. In terms of staffing or the staff, rather,

1 at QVS, was the culture amongst the staff any different
2 from your experience of the state school you previously
3 taught at?

4 A. Well, because all this -- when I started at QVS, all the
5 staff lived on-site, there was quite a lot of
6 camaraderie amongst the staff, so you got certainly
7 a bond, but I would also say there was an awful lot of
8 gossip and things like that which would go on between
9 the staff which I probably didn't see so much in my
10 first school.

11 Q. Was that something that you saw immediately? It was
12 present in 1996?

13 A. I wouldn't say I saw it immediately, but certainly over
14 time. I think it's always been a kind of issue in QVS.
15 Just gossip and people bring up stories that are totally
16 not true.

17 Q. So there's a rumour mill?

18 A. Yes, that's correct.

19 Q. Did it become at times a malign rumour mill?

20 A. I wouldn't -- sort of "malign" is the right word, but
21 certainly people could be bringing up rumours that
22 they'd no information about just for the sake of
23 bringing it up. Maybe if a member of staff -- if there
24 was an issue with a member of staff, they might think
25 about what it was rather than actually getting the

1 facts.

2 Q. Sounds toxic. Was it?

3 A. It would be toxic for that member of staff, for sure,

4 yeah.

5 Q. But this was, from what you say, something that was part

6 of the QVS environment?

7 A. The rumour mill?

8 Q. Yeah.

9 A. Yeah.

10 Q. Was it known about by everyone?

11 A. I think it's certainly known about through the SLT. And

12 yes, everyone's aware that QVS was a little bit of

13 a rumour mill.

14 Q. Did it ebb and flow or was it just a constant?

15 A. I would say it probably ebbed and flowed.

16 Q. Was anything ever done to try and address it?

17 A. I'm not sure, to be honest. I think it's just one of

18 these things you almost accept. There may have been

19 a staff meeting once to discuss it and try and improve

20 it, but maybe it's just one of these things that people

21 just accept happens.

22 Q. You're still there now. Is it still present?

23 A. Yes. In fact I think the headteacher mentioned it in

24 one of his meetings quite recently.

25 Q. Can it cause harm?

1 A. It could cause harm for the member of staff who's at the
2 end of the rumour mill, yeah, potentially.

3 Q. And within the common room are there tensions between
4 different camps?

5 A. Yeah, yeah, the admin versus teaching staff, things like
6 that, could potentially be an issue, yeah.

7 Q. And I think you were there in 2004, and we've heard
8 evidence of two teachers being suspended because
9 pastoral care was an issue. Do you remember that? The
10 deputy head (pastoral)?

11 A. Yes. Yes, yeah.

12 Q. And there was an HMIE inspection which was critical.
13 Does that --

14 A. It was critical? I remember the suspension. I wasn't
15 sure of the HMIE part of it.

16 Q. All right, but was that, for example, a particularly
17 toxic, to use my word, period in the school?

18 A. Yes, I think that would be definitely the case, yeah.

19 Q. Did that have impact on the day-to-day running because
20 people were concentrating so much on the ebb and flow of
21 toxicity?

22 A. I'm not sure about how much of an effect it would have
23 on the day-to-day running because I wasn't involved with
24 the suspension or issues.

25 Q. No, no --

1 A. But I certainly knew of staff who had concerns and
2 I think they brought them up to the HMI.

3 Q. All right, but it was of sufficient moment that they
4 talked to people when inspectors came in. It was
5 a matter of concern?

6 A. Yes, yes.

7 Q. All right. I think around that time, though, a little
8 earlier, in 2002, a letter was received, we know, which
9 named you and two other teachers. You remember this?

10 A. I do.

11 Q. And we have a copy of it and the letter suggested that
12 the author had knowledge of a very tight sexual
13 relationship with you and a pupil?

14 A. Yes.

15 Q. And went on:

16 "I have heard of occasions in which sexual acts have
17 occurred inside the computer room, again with the door
18 being firmly locked."

19 I know that this is a matter that you then have had
20 to live with since then, is that fair?

21 A. Yes.

22 Q. And here we are in 2021 still talking about it.

23 A. Yeah.

24 Q. And your position is that there was no such activity?

25 A. There was no such activity.

1 Q. All right. But presumably that was a traumatic moment
2 for you?

3 A. It was, it was, although I think I did want to get the
4 thing sorted then. I was quite keen for it to be
5 investigated fully. I said that to the headteacher.

6 Q. But we would understand that the process began in 2002,
7 it was investigated within the school; is that correct?

8 A. Yes, I believe so.

9 Q. You were interviewed --

10 A. I was interviewed by the headteacher.

11 Q. The pupil involved was interviewed?

12 A. I presume so.

13 Q. You presume so. What did you know about what went on
14 within the school?

15 A. In terms of the process?

16 Q. Yes.

17 A. Nothing. I think the headteacher just mentioned that
18 the process would be ongoing. He never indicated what
19 the process would be to me.

20 Q. Was there any talk of suspension at that stage?

21 A. No.

22 Q. And from your perspective, did that allegation resolve
23 fairly quickly back in 2002?

24 A. I'm not sure, what do you mean by resolve?

25 Q. Well, in the sense you were made aware that this

1 allegation has been made. You deny it strenuously in
2 your interview with the headmaster and I take it the
3 deputy head (pastoral)?

4 A. Yeah -- I'm not sure if there was ever an actual
5 physical resolvment in terms of being spoken to.
6 I can't remember. There may have been, but I can't
7 remember that.

8 Q. Presumably from your perspective you wanted to know what
9 was happening?

10 A. Yes.

11 Q. Were you ever told or did it just roll on limbo-like?

12 A. I honestly can't remember being spoken to again by the
13 headteacher about that. But it could be the case that
14 I was but I just can't remember it.

15 LADY SMITH: Was the girl still at the school at the time
16 the letter arrived?

17 A. Yes.

18 LADY SMITH: When did she leave?

19 A. No.

20 LADY SMITH: Sorry, when did she leave the school?

21 A. 2002, June.

22 LADY SMITH: Summer 2002?

23 A. Yeah, summer 2002.

24 LADY SMITH: Thank you.

25 A. I think the fact that -- it was May 2002, was it, the

1 letter, wasn't it?

2 MR BROWN: That's right.

3 A. I think it was the fact it was right in the middle of
4 an exam diet may have had an impact. I'm not sure.

5 Q. Could we look at a document MOD 205 and I think, cutting
6 matters short, this, having arisen in 2002, matters
7 then, irrespective of whether there was formal
8 resolution, came back to life in 2004.

9 A. Yes.

10 Q. Was that because of it [REDACTED] or do you
11 remember the circumstances of it?

12 A. The investigation in 2004?

13 Q. Yes.

14 A. That was after the police interview intervention. I'm
15 not sure what caused the police investigation in 2004,
16 what was the genesis of that particular thing, but
17 I think it came from the police investigation and
18 then --

19 Q. If we go down the page we're looking at, we can see that
20 the allegations resurfaced in November 2004 when Central
21 Scotland Police received several allegations about the
22 school.

23 A. Yeah.

24 Q. And that's when things took off again.

25 A. I did write to Central Scotland Police and ask them

1 about -- when I had my hearing date, I wrote to Central
2 Scotland Police and asked them who was involved with the
3 allegations I'm quite happy for them to attend the
4 hearing.

5 Q. Okay. But I think, as we see at paragraph 5, the girl
6 was interviewed, who admitted that she had had
7 a relationship --

8 A. That's correct.

9 Q. -- with you and saying that that had happened while she
10 was a pupil at the school. That's something obviously
11 you do not accept?

12 A. That's correct.

13 Q. But that you then went on to have a relationship with
14 her for about a year after she had left school, and
15 that's something you do accept?

16 A. I do accept that, yes.

17 Q. All right. And if we go over the page to paragraph 9,
18 you were interviewed by the police and you made your
19 position clear.

20 A. Yes.

21 Q. That whilst at school your relationship had been purely
22 teacher/student, but that matters progressed once she
23 had left school. And again, reading matters short,
24 I would understand your position was that she was keen
25 to have a relationship?

1 A. Well, she contacted me, yes.

2 Q. All right. You were at that stage in your 30s?

3 A. 32, yeah.

4 Q. And she would be 18?

5 A. Yes.

6 Q. At paragraph 15 at the foot of that page, this is

7 an internal MoD inquiry, we understand, which followed

8 the police inquiry, is that what you remember? This

9 document is part of an MoD process.

10 A. Yes.

11 Q. There was an MoD process after the police --

12 A. After the police, yes. The MoD hearing system.

13 Q. Yes.

14 A. Yeah.

15 Q. Sorry, I think we see at 14, this is an MoD official who

16 is producing this document having been tasked with

17 making enquiry and a recommendation:

18 "I have been unable to establish what child

19 protection procedures guidelines were extant in 2002."

20 We actually know that they were there, we've seen

21 them. But whatever the position was, the staff

22 interviewed, including you, were quite clear that

23 teachers should avoid inappropriate relationships with

24 pupils as a teacher is in a position of trust and has to

25 maintain professional standards, and it goes on over the

1 page that that was part of the code for registered
2 teachers by the GTCS, which I think you were a member of
3 prior to coming to QVS?

4 A. Yes.

5 Q. And it then goes on:

6 "This is instilled in teachers from the very outset
7 of their training and career ..."

8 And you can confirm that that is so?

9 A. That's so, yes.

10 LADY SMITH: 'Grant', I appreciate that your position is
11 nothing intimate happened between you and the girl while
12 she was still at school. Did you become friendly with
13 her while she was still at school?

14 A. Well, obviously I -- she was in my [REDACTED] class. I never
15 taught the pupil, actually, but she was in my [REDACTED]
16 class in S5, end of S5, she joined late on, so I got to
17 know her there. And also she was a member of the team
18 I had for a sponsored walk that was taking place in
19 2002, the West Highland Way walk, and she was --
20 I didn't choose her, but she was one of the [REDACTED] for
21 that walk and was chosen by PE staff.

22 LADY SMITH: That, no doubt, would have involved spending
23 quite a lot of time with the group --

24 A. Yes.

25 LADY SMITH: -- that were going on the West Highland Way,

1 did it?

2 A. Yeah. Well, she didn't go on the West Highland Way --

3 LADY SMITH: But she was part of the group?

4 A. But she was part of the group. The walk was in June, so

5 it was after the May allegations, so I asked that she be

6 taken off the group.

7 LADY SMITH: When did she first contact you after she'd left

8 the school?

9 A. Within about four or five weeks of leaving, she sent me

10 an email which I ignored. And then another one, in

11 which I said, "There's no chance that we're going to

12 meet up".

13 LADY SMITH: Was that your school email address or had she

14 managed to get your personal email address?

15 A. It was a school email address but it was one I used --

16 because the school email system at that time wasn't

17 internet, it was intranet, so it was internally based,

18 so it would be an email address I used for school.

19 LADY SMITH: I see. At the time, did it occur to you that

20 there was a risk that the friendship, if I can call it

21 that, that had developed would go further than that

22 while she was still at school?

23 A. Sorry, could you repeat the question?

24 LADY SMITH: It sounds as though you developed some sort of

25 knowledge and friendship with the girl while she was at

1 school. Would I be right about that?

2 A. I think the relationship that I had with the pupil was

3 teacher -- supportive teacher and helping out with any

4 issues she had. She was certainly a pupil that

5 I respected an awful lot. I thought she was very

6 impressive in terms of her sporting prowess and we had

7 a lot of similarity in terms of liking outdoors life, so

8 yeah, there were a lot of similarities in terms of our

9 personality, I guess.

10 LADY SMITH: Did it occur to you at that time that you would

11 need to be alert to the risk of getting too close to

12 her?

13 A. Yes.

14 LADY SMITH: What did you do about it?

15 A. Well, obviously I finished any -- when we were doing the

16 maths tutoring, I finished any tutoring of her before --

17 round about February, March time, so there was obviously

18 no tutoring taking place after that point and then there

19 was no contact, really, between us after that point.

20 LADY SMITH: If you had received the email she sent after

21 she'd left school while she was still at school, what

22 would you have done?

23 A. I would have reported it, I guess.

24 LADY SMITH: You say you guess?

25 A. No, I would have reported it, sorry.

1 LADY SMITH: Who to?

2 A. I would have reported it to the headteacher.

3 LADY SMITH: Would you have replied to her?

4 A. Using the email system? No.

5 LADY SMITH: No, would you have replied to her email at all?

6 A. No.

7 LADY SMITH: Mr Brown?

8 MR BROWN: Thank you.

9 Could we go to page 5 of the same document, and this

10 is at the foot of paragraph 28 and there's a chronology

11 of events which is taken from interviews with you and

12 others.

13 Sorry, it's page 5 at the foot.

14 This sets out a history, and I appreciate we're

15 talking events approaching 20 years ago, but just to be

16 clear whether you agree with this. The girl used the

17 computer room to work on a [REDACTED] project in fifth year and

18 came into contact with you then.

19 A. Yes.

20 Q. This is the conclusion. Then over the page you

21 counselled her at the end of fifth year about a matter

22 involving a sixth year boy?

23 A. Yes.

24 Q. You didn't report the matter to the housemaster because

25 this might have led to their expulsion and you decided

1 that you would just deal with it yourself?

2 A. I'm pretty sure that I noted it down in the actual house

3 diary, though, at the time.

4 Q. If it happened now, would you report it more fully?

5 A. Yes, yes.

6 Q. And then on Grand Day, which we understand is the

7 biggest day of the QVS calendar, is that fair?

8 A. Yes.

9 Q. You were threatened by one of her relatives because,

10 again reading short, he may have formed the impression

11 that you were in some way involved with his relative?

12 A. Yeah. It's totally not the case, though.

13 Q. I appreciate that's your position, but that's the

14 background, that there was an episode where a relative

15 who was drunk was aggressive towards you?

16 A. Yeah. I'm quite happy to go into more detail about that

17 if you want.

18 Q. No, no, it's recorded there.

19 A. Yeah.

20 Q. And then going into the next academic year, because

21 that's June 2001, going down to the middle bullet point,

22 you agreed to tutor the girl on a one-to-one basis in

23 maths, as I think you've said?

24 A. Yes.

25 Q. And that was in the last period of the day on Monday?

1 A. Yes.

2 Q. And of course it's then later in the May that the
3 anonymous letter is received and you were spoken to by
4 the headmaster.

5 A. (Witness nods).

6 Q. And then finally, against all of that background, the
7 final bullet point, you enter a relationship with her in
8 approximately August 2002, a few months after she left
9 the school. It lasted a year, and you ended it?

10 A. Yeah. I think it was maybe October 2002. But yes, it
11 lasted for about a year, that's correct.

12 Q. Going on to page 8 and paragraph 33, the assessment of
13 the civil servant who produced this report -- can we go
14 to the foot -- was that you have at best shown "naivety
15 and very poor judgement in his dealings with [the girl].
16 The alarm bells should have been ringing loudly given
17 the incident at Grand Day 2001 ..."

18 You received, I think, a warning not to do things
19 from the PE teacher and then the letter of 2002. But
20 then it goes on:

21 "Nonetheless [you] put [yourself] in
22 an unnecessarily vulnerable position by agreeing to
23 tutor her on a one-to-one basis and by entering into
24 a relationship with her almost immediately after she
25 left school."

1 Would you agree with that?

2 A. I would agree with that, yes.

3 Q. Why did you not understand it then?

4 A. I think when you look at a sort of track timeline, it's

5 different to when it's actually happening. I was just

6 trying to help the pupil with her maths. She did ask me

7 for some help. It was that time when the departments

8 were getting facultised into bigger departments so there

9 was -- the computing department was going to be merged

10 with the maths department, was what was going to happen,

11 was put out was going to happen, and so in that case

12 I was actually trying to do as much maths as possible to

13 get extra maths in my timetable and also was doing the

14 maths notes, so when she asked, yeah, it was quite nice

15 to try and help her out, but it was fully with her

16 maths' teacher's awareness.

17 But I agree that the relationship after the school

18 was clearly a mistake. I'm not sure I agree with

19 "almost immediately after she left school". I don't

20 know -- what does that mean?

21 Q. Well, presumably she left school in June and on the

22 information available back in 2004, the relationship

23 started within a couple of months.

24 A. A few months, yeah.

25 Q. I imagine that's what "almost immediately" means.

1 A. Yeah.

2 Q. The net effect of this -- we don't have to go through
3 it -- is there were disciplinary proceedings, you were
4 found to have behaved inappropriately in relation to the
5 conduct we've just been discussing; is that correct, and
6 you were formally reprimanded?

7 A. I think it was "dealings", yes. I'm not entirely sure
8 what the -- it wasn't really ever explained to me what
9 the "dealings" meant, but yes, that's correct.

10 Q. And another allegation of conduct whilst she was a pupil
11 was found not proven?

12 A. Yes.

13 Q. I think if we look at one other document, which is MOD
14 452, this is in relation to the failure to share the
15 issue we mentioned a moment ago about the pupil and her
16 involvement with a sixth year boy, this is an email from
17 2005, and it obviously begins:

18 "I spoke to [the headmaster] concerning [your]
19 decision not to refer suspicions of a sexual
20 relationship between [two pupils] to senior management
21 within the school and instead opting to deal with the
22 matter himself.

23 From the recent exchange of correspondence on this,
24 it was clear that a teacher would normally be expected
25 to refer such concerns to the housemaster/houseparent

1 and the AHT (pastoral). As to whether [your] decision
2 to handle the matter himself was reasonable, [the
3 headmaster's] initial response on this was that it would
4 'depend on the circumstances and level of concern'."

5 Ultimately that was not, as we see at the foot of
6 the letter, brought into the disciplinary process, but
7 looking back now, would your view be that, really, there
8 was no option but to report?

9 A. Well, I did report it on the house --

10 Q. You wrote it on the notebook?

11 A. Yes. It would depend how serious I judged it.

12 Essentially it was me overhearing a sixth year boy
13 bragging.

14 Q. Perhaps it can be described as keeping it in-house?

15 A. Putting it in the house notebook? But the house
16 notebook has to be actioned by the housemaster. So the
17 housemaster would be aware of it when I wrote the actual
18 comment.

19 Q. But clearly from this letter it was kept in-house and
20 that was a matter of some concern?

21 A. Yes, but if I've actually noted it down in the diary,
22 that's for somebody else to action.

23 Q. If it happened today, [REDACTED]
24 [REDACTED] how would you act?

25 A. I would probably notify the housemaster verbally and

1 I would raise concerns on the 3Sys system.

2 Q. You wouldn't go direct to the pastoral head?

3 A. Well, through the 3Sys system, yeah.

4 Q. You would assume that would get through?

5 A. Yeah.

6 Q. Matters, I'm afraid, as we know, didn't end there

7 because GTCS then became involved. Correct?

8 A. Yes, that's correct.

9 Q. And we know, but we don't have to go into the details,

10 that you went through essentially the same process again

11 at a hearing in Edinburgh with the same result. The

12 charges against you were found not proven; is that

13 correct?

14 A. That's correct, yes.

15 Q. And you were allowed to continue teaching. That's going

16 on, I think, four or five years after the event. What

17 did you feel of this process?

18 A. Of the GTCS process?

19 Q. Of the whole process, MoD Inquiry followed up by --

20 A. It was really difficult because I'd made the decision

21 not to really go back to teaching. As I notice at the

22 bottom of the course there, that I'd done a university

23 course which I graduated from when I was suspended from

24 the school. Because the suspension process was quite

25 long as well. The school suspension process was nearly

1 two years. So it was quite a long period for me to be
2 outwith teaching. So I'd more or less decided that
3 I was probably going to go and do something else with my
4 life, but then obviously the opportunity came back to
5 teach and I just decided to give it a try. I knew it
6 was going to be difficult to go back to the school after
7 that length of time, and so then obviously just to try
8 and get my feet under the door again and try to
9 establish myself in the school again, to have something
10 like a GTCS hearing on top of it while I was still
11 teaching was quite traumatic, yes.

12 Q. I take it you weren't suspended again?

13 A. No.

14 Q. Did you feel the GTCS procedure was necessary, given
15 what had taken place before?

16 A. Yes, I think they are required to do their own sight of
17 an incident rather than just relying on schools.

18 Q. Or the MoD?

19 A. Or the MoD, yeah. It's an independent body.

20 Q. So you don't take issue with that being necessary?

21 A. No, I don't, no.

22 Q. Though presumably it was a great millstone around your
23 neck?

24 A. Well, it was difficult because you were teaching and
25 having to deal with it in the background, yes.

1 Q. When you came back after the suspension and then the
2 GTCS hearing, what was the rumour mill at QVS doing?

3 A. Well, obviously aiming to start a full-time university
4 course in September, in terms of general rumours or --

5 Q. Were you having a fairly difficult time at QVS whilst
6 all this was going on or --

7 A. While I was away from QVS?

8 Q. No, when you came back.

9 A. When I came back? To be honest, I was blown away with
10 how gracious the pupils were, particularly, in welcoming
11 me back. Particularly ones who I had obviously taught
12 in their earlier years and coming back and helping them
13 out with their -- it was incredible. It was like riding
14 a bike, I think, I just got right back into the teaching
15 process.

16 In terms of the staff, I'm not too sure if there
17 was, maybe there was rumour mills about me coming back.
18 I'm not sure.

19 Q. Practically, though, did you go straight back into your
20 pastoral role in the house?

21 A. Yes.

22 Q. Was there any --

23 A. There was a gradation process when I came back where
24 I only worked a certain number of days a week, so
25 I wasn't given a full teaching load to start with. I'm

1 not sure how long that lasted for, not very long, maybe
2 a week or so.

3 Q. That's the teaching side by the pastoral, was it just
4 back to what you'd been doing before?

5 A. I'm not sure whether I started my pastoral right away or
6 not. I might have done. I can't remember. Or whether
7 as part of the gradation process I came in after that.

8 Q. All right. But against the background, obviously, of
9 all these inquiries, was there any reticence to let you
10 back into the house as a tutor?

11 A. If there was, I wasn't made aware of it, no.

12 Q. Okay. But I think we know that it followed you still
13 because of PVG checks and the disclosure process.

14 A. Yes.

15 Q. Which we understand would take place every three years,
16 you have to get a fresh disclosure?

17 A. That's correct, yes.

18 Q. And I think we know that in 2013 Disclosure Scotland
19 made contact with the school; is that correct?

20 A. Yes, I think there's always -- sorry, there's always
21 been a check, obviously.

22 Q. Yeah.

23 A. But obviously the PVG system kicked in in 2013. So
24 right the way from 2004, the check document would be --
25 the Disclosure Scotland document would be in place. But

1 the PVG system kicked in, obviously, in 2013.

2 Q. Two thousand and?

3 A. 2013, did you say? Yeah.

4 Q. And at this point there was a review by Disclosure

5 Scotland of you?

6 A. Yes, that's correct.

7 Q. And I think if we look at MOD 335, and page 3, if you go

8 to the foot, this is an email, I think, from the

9 business manager to the head saying:

10 "Wendy - we are approaching a potentially

11 significant issue.

12 Susan has discovered from Disclosure Scotland that

13 this case is under review and DS advise that they will

14 be conducting their own investigation and gathering

15 information from the police and any other relevant

16 bodies to ascertain whether or not [you] will be added

17 to the 'barred from working with children' list. This

18 gathering of information will include contact with [you]

19 and the school will be advised of the outcome ...

20 Disclosure Scotland are unable to provide any idea or

21 commitment on timescales - each case is different ..."

22 I think moving on, we know that the school were

23 concerned to try and help you and wrote a positive

24 reference, is that fair?

25 A. I don't remember the reference that they wrote.

1 Q. Okay. I think if we go to --

2 A. Certainly, going back to the GTCS hearing, the school

3 did write a very positive reference.

4 Q. Yes, and that was from the then head, Wendy Bellars; is

5 that correct?

6 A. Yes.

7 Q. And then if we move on to MOD 481, we can see at page 4

8 the disclosure record, disclosure PVG scheme record for

9 you, which at the foot -- and we saw this yesterday --

10 has "other relevant information" which moves onto the

11 next page but set out briefly explains that there was

12 a background which was investigated and concludes that

13 no further proceedings were taken. You remember that?

14 A. Yes.

15 Q. And I think if we go back to page 3 of that document, we

16 see a letter from the business manager to the

17 headmistress saying:

18 "See attached the additional information and the

19 specific inclusion of the 2004 incident details.

20 I don't expect this changes the school's position over

21 the GTC's view on the matter but as Head you need to be

22 content that this has been noted and is acceptable."

23 And it clearly was, because you're still there?

24 A. Yeah. Obviously I wasn't aware of this communication.

25 Q. You weren't aware of that?

1 A. I wasn't aware of it.

2 Q. But you were aware because you had been given a copy of

3 the record?

4 A. The disclosure, yeah, yeah.

5 Q. And were you taken aback? Were you aware that there was

6 a consideration of listing?

7 A. Yes, I was.

8 Q. I take it you were content with the outcome because

9 obviously you continued to teach. Were you content with

10 the relevant information? Do you accept that's

11 something that --

12 A. The summary information at the bottom?

13 Q. Yeah.

14 A. Yeah, as I said, it changes every time you get

15 a disclosure check, so it doesn't stay fixed. It's

16 almost like somebody else's interpretation of the view.

17 Sometimes it can be quite strict in its language, other

18 times it can be quite soft and woolly. It's

19 interesting. I don't know why they do that.

20 Q. So we should understand that every three years you go

21 through the process again?

22 A. Yes.

23 Q. And you get issued with a new certificate?

24 A. Yes, but they don't just repeat the previous comments.

25 It's almost like it's been rewritten.

1 Q. Someone has considered it again?

2 A. Yes.

3 Q. But obviously you remain in post and it doesn't bar you

4 from teaching.

5 A. Yes.

6 Q. Do you have a view on whether that sort of relevant

7 information is reasonable for a teacher to have it on

8 their disclosure PVG record?

9 A. I suppose it is reasonable because it's just reporting

10 what actually happened. It's factually based. However,

11 I could understand why a teacher might be stressed by

12 it.

13 Q. Yes. Is it stressful?

14 A. I think it's stressful for the fact that you probably

15 think that if you try to get employment elsewhere it

16 would be difficult with that comment on your Disclosure

17 Scotland, yes.

18 Q. Although it would presumably flag up an issue that you

19 could then explain?

20 A. Yes.

21 Q. And the fact remains you're still teaching?

22 A. Yes.

23 Q. And are well thought of by the school?

24 A. Yes.

25 Q. Do you have a view about that sort of openness? Is that

1 something that is present currently in schools?

2 A. The openness to?

3 Q. Full background.

4 A. Background checks?

5 Q. Yes, of there being, in your case, an investigation

6 where no proceedings were taken.

7 A. I'm not sure, to be honest. I would imagine if I were

8 to try to get a job in another school and I handed in

9 that disclosure form, there would be a check just for

10 the fact that it's mentioned in additional information

11 and there would be obviously discussions amongst the

12 schools, I guess, but I'm not sure if it actually takes

13 place. Obviously I haven't applied for another job.

14 Q. No indeed, but would you understand why a school might

15 be interested to know that sort of information?

16 A. Yes.

17 Q. Is it relevant?

18 A. I think it is relevant, yes.

19 Q. And the counter to the anxiety you have about it being

20 a bar is that you could explain what happened?

21 A. Yes.

22 Q. Would you be happy to do that?

23 A. Yes. I think you'd need to.

24 Q. Sorry?

25 A. You'd need to be able to do that in that case.

1 Q. Given your experience of the difficulties of being
2 perceived to be too close with a pupil, under the last
3 chapter of your statement, which is, "Helping the
4 Inquiry", you say at 106, page 18:

5 "There should be clear and obvious opportunities to
6 raise a concern, whether anonymously or not."

7 A. Yes.

8 Q. "Any serious concerns raised should be fully
9 investigated in a timely manner. An independent body to
10 the school should be used where appropriate."

11 Why do you say that?

12 A. I think it just -- obviously to keep that independence
13 outwith the school circle. It gives another set of eyes
14 on the incident.

15 Q. Does it reflect any concerns on your part that in-house
16 investigations, either by headmaster or MoD, were in
17 some way not independent?

18 A. No, that wasn't what I was thinking when I wrote that,
19 no, sorry.

20 No, I was just thinking pragmatically in general it
21 would be better for that to take place. The independent
22 body could well be the police, potentially, or ...

23 Q. Or the MoD?

24 A. Or the MoD, yeah.

25 Q. Okay. Over the page on 19:

1 "Then there should be clear policy on record-taking and
2 records must always be retained."

3 A. Yes.

4 Q. Thinking of QVS, do they meet that desire?

5 A. They certainly seem to do it since I've been at the
6 school, yes. I think their record-keeping has been
7 pretty good. I don't know whether it was the case
8 before I was at the school or not.

9 Q. And then 109:

10 "There must be strict school policies regarding
11 pupil/staff socialising within a boarding environment."

12 A. Yes.

13 Q. You obviously have particular experience of the
14 downsides of that. As things stand at QVS, are the
15 policies sufficiently strict?

16 A. Yes, I think they're so much more stricter now than when
17 I started at the school.

18 Q. And how is that reflected?

19 A. When I started at the school it was common process --
20 common -- teachers, members of staff could often take
21 groups of pupils back to their house for drinks parties
22 and things like that, whereas now that just would not
23 happen because it's a no-alcohol school. Social events
24 are not -- don't take place in teachers' houses or
25 anything like that. So it's made a big difference,

1 I think.

2 Q. What about your experience of one-to-one teaching,
3 supervision? Has anything changed there or is it not
4 exactly the same as it was in 2002?

5 A. I'm not too sure about that, to be honest, in terms of
6 the actual policy on one-to-one teaching. Obviously
7 it's an open-door policy in the school.

8 Q. From what you're saying on one view the school generally
9 has become slightly more informal, as you were saying,
10 obviously thinking of the classroom, but also presumably
11 the informality of the house --

12 A. Oh, in terms of the military ethos, yeah.

13 Q. But in terms of informality within the house, are things
14 not just pretty much as they were back in 2002?

15 A. I think, as I say, getting rid of the alcohol, that
16 aspect of it has made a big difference to the school.
17 So there wouldn't be the situation that I talked about
18 before where staff members would have groups of students
19 over to socialise. It wouldn't happen nowadays.

20 Q. That seems to be the scenario of people who are living
21 on campus saying to a group of students, "Come back to
22 my house", presumably where their families live?

23 A. Yeah.

24 Q. And there's a bit of intimate -- or mixing?

25 A. Yeah.

1 Q. What I'm interested is what you think can be done to
2 address the circumstances that gave rise to all your
3 problems?

4 A. The one-to-one?

5 Q. The one-to-one or the perception of closeness with
6 a pupil?

7 A. I suppose we've got a clear policy document on code of
8 interactions with pupils. It's actually quite
9 a well-written document. So certainly utilising that
10 document and really reading it and really doing a lot of
11 training on that particular document would help a lot.
12 Maybe a policy document on actual one-to-one teaching
13 policy document might be useful as well, potentially.

14 Q. Forgive me, I'm not trying to criticise, but in a sense
15 you were saying in the '90s it was in your training, it
16 was in the policy documents in 1996 that you'd got to be
17 careful.

18 A. Yes.

19 Q. I'm just interested if you think there is more that can
20 be achieved beyond yet more policies?

21 A. I'm not sure.

22 Q. Okay. Say, perhaps, policies that create a culture of
23 greater awareness of the potential problems?

24 A. Yeah, but that does take place in training. Obviously
25 when you have training -- we do have training and there

1 is discussion with that. Every year we have the
2 training on child protection and the issues with that
3 would be discussed.

4 Q. It's just going back to that passage in the MoD document
5 where I think you acknowledged that, yes, looking back
6 you were perhaps naive or foolish.

7 A. Yes.

8 Q. Has your experience been shared with other teachers, for
9 example?

10 A. Oh, I'm not sure about that, no.

11 Q. But it might be a good learning experience --

12 A. Absolutely, yes.

13 Q. -- to warn others of the risks they --

14 A. Yeah.

15 Q. -- they put themselves in?

16 A. Definitely, yeah.

17 MR BROWN: 'Grant', thank you. I have no further questions.

18 LADY SMITH: Are there any outstanding applications for
19 questions of 'Grant'?

20 'Grant', that completes all the questions we have
21 for you today. Thank you for engaging with the Inquiry
22 as helpfully as you have done, both in terms of your
23 written statement and in coming along to answer more
24 questions today, which have enriched my understanding of
25 the systems and practices at QVS and your own experience

1 (12.00 am)

2 LADY SMITH: Mr Brown.

3 MR BROWN: My Lady, we conclude the QVS chapter with two

4 witnesses, which is one less than we started it, if you

5 remember there were three at one stage.

6 LADY SMITH: Yes.

7 MR BROWN: Today we have Donald Shaw, the current head of

8 Queen Victoria School, and again, by way of videolink,

9 Colonel Clive Knightley from the MoD.

10 Mr Donald Shaw (affirmed)

11 LADY SMITH: I know you've been listening to me talking to

12 every witness when they begin, so you know what the red

13 folder's for, you also know what it's for from when you

14 were last here and I should say welcome back. I think

15 I used your first name last time you were here to

16 address you. Are you still comfortable if I address you

17 as Donald?

18 A. Yes, please do.

19 LADY SMITH: As ever, let me know if you have any problems

20 or questions. You'll also be aware that

21 Colonel Knightley, I hope, is on the screen behind you.

22 Colonel Knightley, can you hear me?

23 COL KNIGHTLEY: I can, my Lady.

24 LADY SMITH: Thank you. Could we also begin by you taking

25 the oath.

1 COL KNIGHTLEY: Yes, please.

2 Colonel Clive Knightley (sworn)

3 LADY SMITH: How would you like me to address you? Colonel

4 Knightley or Clive? I can use either quite happily.

5 COL KNIGHTLEY: Clive will be fine, my Lady, thank you.

6 LADY SMITH: Thank you for that. As before, if you have any

7 problems with the link at all, please don't hesitate to

8 let us know so that we can deal with that immediately,

9 or any other questions or queries, don't hesitate to

10 say. If you're both ready, I'll hand over to Mr Brown,

11 and he'll take it from there. Thank you.

12 Questions from Mr Brown

13 MR BROWN: My Lady, thank you.

14 Gentlemen, good afternoon. Can you hear me?

15 COL KNIGHTLEY: (Witness nods).

16 MR BROWN: Obviously with three of us talking, we have

17 the potential for causing chaos if we talk at the same

18 time, as well as deep unhappiness. Could you bear with

19 me and try and answer just when you are asked direct

20 questions, and I'll try and make sure that I give you

21 the opportunity to answer. Okay?

22 COL KNIGHTLEY: (Witness nods).

23 MR SHAW: Sounds good.

24 MR BROWN: If I can start with you, Donald. On the last

25 occasion, obviously, we talked in general terms about

1 your background at QVS. I don't think we introduced the
2 statement you had produced for the Inquiry and I do that
3 now formally. It's WIT-1-000000479. I think you have
4 a copy of it on your left-hand side and it will appear
5 in front of you. It's a document that runs to 23 pages.
6 You signed it on 3 November 2020 and you said in the
7 last paragraph:

8 "I have no objection to my witness statement being
9 published as part of the evidence to the Inquiry.
10 I believe the facts stated in this witness statement are
11 true."

12 And that's correct?

13 MR SHAW: That is correct.

14 MR BROWN: Okay. We have been hearing a great deal from
15 many people about Queen Victoria School and I don't wish
16 to go through your background or experience of
17 Queen Victoria School because I imagine we have heard
18 much of it already.

19 Just a couple of things. Did you take any issue
20 with any of the narratives we heard from staff about
21 their experiences of QVS?

22 MR SHAW: No, I had no particular issue, no. I think some
23 of it was opinion-based at times rather than fact-based,
24 but I think that's an entirely natural part of this
25 process.

1 MR BROWN: Yesterday we heard from your predecessor,
2 Wendy Bellars, and we would understand that you had to
3 take over from her following her departure from
4 Queen Victoria School. Correct?

5 MR SHAW: That's correct, yes.

6 MR BROWN: And that presumably was quite a difficult time
7 for you; is that correct?

8 MR SHAW: Well, yes. I mean, when you're -- somebody comes
9 into your office and tells you you're now running the
10 school, it can be, you know, quite a challenge at that
11 time. But one I was happy to rise to.

12 MR BROWN: Yesterday we obviously -- and you've been present
13 following the evidence in order to respond to it on
14 behalf of the school, but yesterday we saw papers which
15 suggested that at an appeal hearing Wendy Bellars had
16 said she potentially acknowledged there being mistakes,
17 but yesterday I think she accepted the word
18 "potentially" could be taken out of the statement. Was
19 that something you would have agreed with, having lived
20 through it?

21 MR SHAW: Yes, yes. There was -- in my opinion, errors of
22 judgement were involved in that case.

23 LADY SMITH: Mr Brown, just let me find out if we can do
24 anything about this feedback.

25 Sorry, gentlemen, we're getting an odd feedback

1 coming through the sound system. I'll just find out if
2 it can be sorted. (Pause).

3 Perhaps, Clive, could you mute your mic?

4 COL KNIGHTLEY: Certainly, I'm just trying to turn my volume
5 down but I'll mute unless I'm talking.

6 MR BROWN: Thank you.

7 LADY SMITH: Thank you very much, Clive. That may well sort
8 the problem. We'll let you know if it doesn't.

9 Mr Brown.

10 MR BROWN: Yes.

11 Obviously you were aware of the background to the
12 proceedings that led to Wendy Bellars' departure.

13 MR SHAW: (Witness nods).

14 MR BROWN: If that situation arose again, would there be any
15 shielding of the information from your perspective or
16 would you share it immediately?

17 MR SHAW: Oh, share it immediately. I was involved in
18 a very similar case in 2019, as you're aware, involving
19 Mr James Clark, and I believe you --

20 MR BROWN: We'll come to that.

21 MR SHAW: -- we'll come to that in due course, yes. But
22 I had a similar situation and information sharing was
23 very different in the way I dealt with it.

24 MR BROWN: Going back to 2015 and 2016 when all of that was
25 going on, were you aware at any stage of the background?

1 MR SHAW: I was very uncomfortable, as senior deputy head,
2 with the way it had been dealt with in the school, and
3 I had some -- I had some concerns about the initial
4 actions of my predecessor at that time. I voiced those
5 concerns at a senior leadership team meeting, but there
6 was no particular changes due to my concerns, I don't
7 believe. But yeah, then I became aware that there was
8 a formal Ministry of Defence investigation into that
9 particular issue and I was interviewed as part of that
10 investigation and that was that.

11 MR BROWN: Thank you. The other thing that was mentioned
12 yesterday and might have come as a surprise was the
13 issue of references within the MoD appointment process.
14 Reading short, you don't get or you didn't get to see
15 references as the headmaster or head of the school?

16 MR SHAW: Yeah. It's not something I've been particularly
17 comfortable with, but you'll see from my statement that
18 I mentioned that we have DBS, Defence Business Services,
19 who review references, and we have an HR department in
20 the school who review references.

21 I am currently trying to change things because I am
22 not at all comfortable with that, and only in the last
23 three months to six months have things begun to change.
24 So, for example, the Ministry of Defence would only
25 collect references from the preferred candidate, whereas

1 I would much rather see all references as part of the
2 sift process for any recruitment, so we are moving
3 towards that system now in that all references are asked
4 for at the point of application, which of course will be
5 an additional admin burden, but I think from
6 a safeguarding point of view, it's really important for
7 me to see all references as chair of a sift panel before
8 doing that sift.

9 LADY SMITH: Donald, I heard yesterday that your involvement
10 or any head's involvement in sifting applications only
11 takes place once an initial sift has been carried out by
12 MoD. Is that still the case?

13 MR SHAW: That is -- as far as I'm aware, that is not the
14 case. I have no knowledge of an initial sift prior to
15 my sift.

16 LADY SMITH: Would I be right in thinking that as head of
17 the school, you would want to see the information and
18 application about everyone who was applying for
19 a vacancy to see what was potentially available to you?

20 MR SHAW: Yes, and it's my understanding that that is in
21 fact what happens.

22 LADY SMITH: Thank you.

23 MR BROWN: Thank you, my Lady.

24 Clive, if I can just briefly turn to you, obviously
25 for today's purposes you are the MoD, but I think one

1 practical change that has taken place perhaps since the
2 last time we spoke, we've been talking about DCYP, but
3 I understand the acronym has shortened, DCS?

4 COL KNIGHTLEY: Yes, a decision was taken to split the
5 delivery and policy responsibilities held by the former
6 Directorate Children and Young People, so the Defence
7 Children Services team have taken on the delivery
8 element, which includes the ownership of MoD schools and
9 thus includes QVS, whereas I have been part of the
10 element that's moved into the main part of the MoD,
11 working directly to the Chief of Defence People, dealing
12 with all high-level policy issues related to families
13 and children and their safeguarding. But I still retain
14 my policy responsibilities for Queen Victoria School,
15 given the very direct and clear responsibilities that
16 the Secretary of State has under the original minute of
17 agreement.

18 MR BROWN: Thank you. We'll come back, if we may, to
19 safeguarding a little later because I understand that
20 there have been investigations or inspections in
21 relation to safeguarding throughout the MoD estate,
22 including at QVS.

23 COL KNIGHTLEY: (Witness nods).

24 MR BROWN: That's correct, Clive?

25 COL KNIGHTLEY: It is, and there was a particular inspection

1 at the school's request at QVS but we have managed to
2 increase our numbers of trained safeguarding
3 professionals, so we are now able to be much more
4 proactive in going out and assisting people in their
5 safeguarding work as well as assuring it.

6 MR BROWN: Thank you. In relation to the issue of
7 employment, though, and references, has the MoD approach
8 changed from your perspective?

9 COL KNIGHTLEY: I think there are two elements there, and
10 I'm not directly involved in that policy. But I'm aware
11 that the initiative that Donald outlined is certainly
12 one that we're looking to take up for all those posts
13 where there is a child protection element, given the
14 significance of references in the sort of vetting
15 process and the sort of disclosure and barring process.
16 And I think that is welcome.

17 The only other thing I would add, really, just to
18 reinforce the point that Donald made, in terms of that
19 initial sift that Wendy Bellars mentioned yesterday,
20 I think she may have been mistaking that for the quite
21 sensible filtering that Defence Business Services
22 undertake, which essentially just makes sure that they
23 only present candidates to the recruiting process who
24 actually meet the requirements of the post as laid down
25 in the advert, so it would be filtering out those who

1 lack a degree or lack something which has been cited as
2 an essential element for a candidate. But beyond that,
3 it's just the filter is very much the responsibility of
4 the recruiting panel.

5 MR BROWN: Thank you very much indeed.

6 Donald, if I can come back to you, I think in terms
7 of your experience at the school, you confirmed that
8 there was change when your predecessor took over and
9 change for the better.

10 MR SHAW: Very much so, yes.

11 MR BROWN: And obviously we heard from both her and from
12 paperwork and from you previously that there was,
13 I think, satisfaction, and this is not leading to
14 criticism just for the sake of it, but there was
15 satisfaction that things were getting better.

16 MR SHAW: Sorry --

17 MR BROWN: In terms of child protection because policies
18 were in place, it was being thought about?

19 MR SHAW: Oh, very much so. We were on a pathway -- the
20 school -- and I think the evidence bears this out, that
21 we've been on a pathway since potentially the mid 1990s
22 on this child protection pathway and every single school
23 that I'm aware of strives for improvement at every
24 stage. So, you know, I'm speaking to you today from
25 2021 and things have massively improved since 2006, and

1 I would hope that if you spoke to somebody in 2031, they
2 would say that things have massively improved again in
3 the last ten years because you're never going to get it
4 perfectly right. You're just going to do your absolute
5 best for the children, and certainly my predecessor was
6 very much a part of that journey.

7 MR BROWN: But as we know, and you've referred to it already
8 and you alluded to this, although it was pre-conviction
9 the last time we spoke, you had been made aware, I think
10 in 2019 of a complaint by a pupil of abuse by the
11 drumming instructor?

12 MR SHAW: That's correct.

13 MR BROWN: And two things arise from that. Firstly, the
14 details, and we have obviously been provided with a copy
15 of the relevant indictment of the proceedings that took
16 place at Falkirk Sheriff Court, and we see from that
17 that there were a number of convictions which covered
18 a variety of sexual offences. Some, I think it can be
19 fairly said, more serious than others, none not serious.
20 Would you agree?

21 MR SHAW: I would agree with that, yes.

22 MR BROWN: And what's perhaps interesting is the timescale
23 of these offences. From the indictment we see that the
24 earliest offence is August of 2011.

25 MR SHAW: (Witness nods).

1 MR BROWN: And matters ran up to February 2019.

2 MR SHAW: (Witness nods).

3 MR BROWN: So an individual was present at the school for

4 a period of seven and a half/eight years, looking at the

5 indictment, and was committing offences throughout that

6 period, notwithstanding all the processes that were

7 being introduced were in place, and that perhaps

8 reinforces the point you make that it's constant

9 learning?

10 MR SHAW: It is. It is constant learning. Do you wish me

11 to comment on that case at the moment?

12 MR BROWN: We'll come to that. I think the first comment is

13 obviously the thrust from QVS and other schools is

14 a desire by policies and ethos to allow students to talk

15 and to raise concerns, as distinct -- and we can come to

16 this in a moment -- from the culture of silence that

17 I think we've heard a great deal about in previous

18 decades.

19 MR SHAW: Yes.

20 MR BROWN: And yet it was only in 2019 that a child chose to

21 come forward to you, I think; is that correct?

22 MR SHAW: Yeah, she did, yeah. I got the disclosure

23 in February 2019 and I think your point is entirely

24 valid. Despite having a culture of, "Please report

25 things" that, you know, kids clearly suffered from some

1 form of abuse for a number of years before somebody
2 eventually flagged it up, and of course that's a matter
3 of concern for me. But you'll also be aware that this
4 man was a very clever and open abuser, and hid in plain
5 sight, as many abusers have done in the past; normalise
6 their behaviour so that the young people did not
7 recognise it as abuse until they had time to reflect on
8 it at a later date.

9 MR BROWN: If we look at MOD 635, which is a useful document
10 produced by you which sets out a timeline of events
11 following a child protection disclosure -- and this is
12 in relation to the teacher James Clark.

13 MR SHAW: Yes.

14 MR BROWN: The first event is 18 February 2019 when
15 a pupil -- a current pupil?

16 MR SHAW: A current pupil, yes. The young lady was in S6 at
17 the time.

18 MR BROWN: Comes forward and discloses sexual assault.

19 MR SHAW: She did.

20 MR BROWN: And I think, as distinct, for example, from
21 concerns in the past, we can usefully see in this
22 document -- I don't know if it will appear on the screen
23 in front of you -- have you got it?

24 MR SHAW: I have got it here, yes, thank you.

25 MR BROWN: Good. I'm flying blind, obviously, because I'm

1 looking at Clive, but I think we see on the first
2 page at the foot: child protection procedures initiated
3 immediately by you and you reported or the child
4 reported the matter to the police in your present. Over
5 the page there's a senior leadership meeting chaired by
6 you. Primary focus is looking after the child, just
7 reading from it. The teacher is suspended immediately,
8 there's no faffing around.

9 MR SHAW: Zero faff, yeah.

10 MR BROWN: Police see the child that day. Notification is
11 widespread. Commissioners, Care Inspectorate, SSSC,
12 Registrar of Independent Schools, obviously the MoD, and
13 I think DBS -- is that Disclosure and Barring or is
14 that --

15 MR SHAW: No, that's Defence Business Services.

16 MR BROWN: That's the business side.

17 MR SHAW: It's almost like HR.

18 MR BROWN: Thank you, just to be clear. You then contact
19 the child's parents and all of that, we would
20 understand, is on the same day as the disclosure?

21 MR SHAW: Probably within one hour of the disclosure.

22 MR BROWN: Is that something you had planned for in that
23 eventuality, all these steps would be taken?

24 MR SHAW: You know, an recent formal safeguarding review
25 stated that our practice outstrips our policy and that

1 was the first time that the formal reviewer was able to
2 say such a thing. And the number of steps that we went
3 through, yes, they do form part of our policy, but to go
4 through them in such a way was almost instinctive,
5 because you're simply looking after a highly distressed
6 young person.

7 LADY SMITH: In passing disclosure was mentioned, would you
8 have expected one of the agencies to whom you reported
9 to tell Disclosure Scotland?

10 MR SHAW: To be honest, Lady Smith, I'm unsure about that.
11 I don't think I had any expectation that anyone else
12 would pass it on.

13 LADY SMITH: The reason I wonder is because conceivably
14 somebody in this teacher's position I suppose could
15 start trying to apply for other jobs while he had
16 a clean disclosure. The short point is the sooner
17 Disclosure Scotland know what all these other agencies
18 now know, the better.

19 MR SHAW: 100 per cent agreed.

20 LADY SMITH: Mr Brown.

21 MR BROWN: Thank you, my Lady.

22 Obviously the police are aware. It's perhaps
23 something we can find out from another source.

24 LADY SMITH: It may be somebody on that list is telling
25 them, I just don't know.

1 MR BROWN: But we can try and find out whether they did or
2 didn't, yes.

3 And thereafter -- again I don't want to go
4 through -- but the process continues and I think we see
5 perhaps an answer on page 4 -- and this is on the 19th,
6 there is a summary:

7 "RMC informed Disclosure Scotland."

8 So I think I've managed to answer our own question.

9 MR SHAW: I was sure we had told them but I couldn't
10 remember so I didn't want to say that we did. So I'm
11 glad that we did.

12 MR BROWN: RMC is what role?

13 MR SHAW: He was the HR manager at the time within the
14 school.

15 MR BROWN: So what we can say is within 24 hours the school
16 had done that.

17 MR SHAW: Yeah.

18 MR BROWN: Although the point may be still of interest if
19 the school hadn't, how would they find out, so we can
20 perhaps bottom that out.

21 In due course, obviously, you involve Barnardo's; is
22 that correct?

23 MR SHAW: Yes, we sought out help for counselling from
24 Barnardo's just --

25 MR BROWN: For whom? For anyone who wanted it?

1 MR SHAW: Yes, well, basically, of course, particularly for
2 the young girl who made the initial allegations, and
3 then as further allegations came in, for them as well.

4 MR BROWN: And can I take it, given that the scale of the
5 indictment in terms of time, that it was past pupils or
6 was it all --

7 MR SHAW: Given the time, eventually there were some past
8 pupils. By the time the case came to court, there were
9 actually some pupils on it that I had no awareness had
10 made a claim to the police, who were past pupils. But
11 part of our whole process of transparency when this
12 allegation was made -- and you'll know yourself, as soon
13 as a safeguarding allegation is made that has weight
14 behind it, that you know for an absolute certainty that
15 these allegations have a degree of truth to them, you
16 have to give other young people the chance to report
17 their own allegations as well. So I was very open about
18 this allegation against Mr Clark and made sure the rest
19 of the school knew about it and had opportunities to
20 therefore report their own allegations about him or any
21 other member of staff that they felt uncomfortable with.

22 MR BROWN: We can see from this document that the other
23 aspect of this is you were holding meetings with all
24 staff and all current pupils as well as emailing parents
25 full details of the situation as best you could as it

1 became known, and obviously it's an allegation so
2 there's a balance to be achieved.

3 What were you doing in terms of learning from this,
4 in terms of what had not worked? You talk of the man
5 abusing in plain sight, so what has QVS learnt since?

6 MR SHAW: So what we did was we had exactly the same
7 question that you've just raised there. We thought how
8 could this possibly have been missed? How can
9 somebody's behaviour have been abusive but it's been
10 missed by the whole school community?

11 So we had a safeguarding kind of review, a wash-up
12 of the whole case. I prepared a training exercise for
13 the whole staff, for all staff, and in that training
14 exercise we looked at the various scenarios and we
15 talked about the need to report concerns as soon as
16 a member of staff has a concern. What we wanted to
17 avoid was the scenario where somebody might say, "Oh,
18 the behaviour of that teacher's a bit dodgy but I'll
19 just keep it to myself", whereas three or four or five
20 teaches might be witnessing behaviour and think, "Och,
21 I'll just keep it to myself, it's probably nothing", so
22 we put a system in place on our intranet page where
23 immediately a staff member has a concern, they click
24 a button, they jot down their concern, they take their
25 concern out and that goes straight to the Child

1 Protection Co-ordinator, and the Child Protection
2 Co-ordinator then has the overview of a number of
3 concerns that may come in against a member of staff. So
4 every member of staff bought into this new idea that
5 they can report openly and without prejudice any
6 concerns they witness and those concerns will be
7 investigated by the Child Protection Co-ordinator.

8 MR BROWN: A number of things from that. That didn't exist
9 beforehand?

10 MR SHAW: It did not.

11 MR BROWN: Did after the event staff come forward and say,
12 "Well, actually, I was a bit concerned about"?

13 MR SHAW: You've mentioned the rumour mill on several
14 occasions during the evidence over the last six days and
15 as is normal in my experience in such a situation people
16 come forward and say things like, "Ah, I knew he was
17 a bit dodgy", or, "There was always something a bit
18 strange about him", and this is the reason for putting
19 this link on the intranet page, because I said to staff,
20 "If you do think somebody is a bit dodgy, if you do have
21 any concerns about their behaviour, click the button,
22 report the incident in to the Child Protection
23 Co-ordinator, and he will have the overview of what's
24 going on and he'll also be able to investigate every
25 single report in a non-confrontational, non-judgement

1 mental way.

2 MR BROWN: I think, to go back to the original question, did
3 anyone come forward after the event and say,
4 "I thought", in relation to Mr Clark, "things were
5 amiss"?

6 MR SHAW: As I've just reported, a few folk came in and
7 said, "I always thought that guy was a bit dodgy", but
8 nothing formal.

9 MR BROWN: I thought you were speaking generally in terms of
10 the rumour mill.

11 MR SHAW: Sorry, no that happened in that incident. What
12 I'm saying is that's common in any incident where
13 a member of staff is accused of something serious.

14 MR BROWN: QVS, as we heard yesterday from Wendy Bellars,
15 was in her experience worse in terms of the rumour mill
16 than other schools she'd worked at. Is that the same
17 view?

18 MR SHAW: I've only worked in two schools, and yes, it can
19 be -- because you're living in this goldfish bowl of
20 life, it can come to prominence at various times. You
21 used the phrase, I think, ebb and flow, and it does ebb
22 and flow through various years. But I am just one of
23 those people who just ignores the gossip, so as a person
24 it's never really affected me.

25 The first school I worked in for 13 years was

1 a state school in Livingstone and I found that there was
2 a similar level of rumour but it was perhaps quashed
3 more quickly in my last school.

4 MR BROWN: So can you quash it in QVS?

5 MR SHAW: You can, and I think the witness 'Grant' referred
6 to this morning that he'd heard me mention it in
7 a recent address to the staff, I am always saying to
8 staff, "Stop believing things, stop spreading things
9 that you think are true. Stick to facts and if you want
10 to know facts, come and get them from me and I'll tell
11 you the facts."

12 MR BROWN: The concern might be in what you're saying as
13 a way of addressing the potential of abuse in plain
14 sight to teachers, "Tell us everything", that will just
15 expand the rumour mill?

16 MR SHAW: No, because this is an arrangement where nobody
17 else on the site would know that this report has been
18 made through the intranet. So staff member A makes
19 a report about staff member B, the Child Protection
20 Co-ordinator addresses that report in a very calm,
21 non-judgemental manner. This was all agreed as part of
22 this whole staff meeting that this would be the process.
23 One person puts a report in, the Child Protection
24 Co-ordinator deals with it by a conversation with the
25 other person and decides if any further action is

1 necessary. But it's also to give that bigger picture.
2 If five staff have the same concern about a member of
3 staff, that's when the Child Protection Co-ordinator can
4 think this is going to have to move to a more serious
5 level.

6 MR BROWN: Are you aware of this in other schools being
7 used?

8 MR SHAW: No.

9 MR BROWN: Obviously 'Grant' was telling us about the
10 development of the IT systems and I'm sure you recognise
11 much of what he was saying because you've been there for
12 similar periods.

13 MR SHAW: (Witness nods).

14 MR BROWN: He described the -- and this is moving on to
15 looking at the students rather than the staff -- the
16 system is rather clunky. Would you agree with that?

17 MR SHAW: That is the word I've used several times to
18 describe our management information system, yes.

19 MR BROWN: Does it negatively impact on its purpose do you
20 think?

21 MR SHAW: It doesn't negatively impact, it just means that
22 staff have to spend a little bit more time in making
23 sure they write the report. All it is is -- in today's
24 society everything's so quick, isn't it? You want
25 something at the click of a button and it maybe takes

1 three or four different menus to get into the point of
2 the place where you're actually making your report on
3 this management information system.

4 You asked 'Grant' the question as to whether it was
5 actually holding staff back from making those reports.

6 I do not believe that to be the case.

7 MR BROWN: What auditing is there to check whether that's
8 right or wrong?

9 MR SHAW: Well, at the moment, and this is something
10 Education Scotland are becoming involved with us in, we
11 have what's called an intervention planning meeting for
12 every child who requires any level of support within the
13 school, and as part of that intervention planning
14 meeting all of the reports which have been placed on the
15 information management system are fed into that child's
16 meeting. And by the way, that child is at the heart of
17 that meeting and is a fully collaborative member of
18 their own support plan, of the creation of their own
19 support plan. That's probably another point --

20 MR BROWN: What do you mean by --

21 MR SHAW: Well, a child takes part in the meeting to decide
22 what support they will be involved -- particularly the
23 older children. They have a say in the interventions
24 the school puts in to support them in whatever level of
25 support they need.

1 MR BROWN: And younger children?

2 MR SHAW: Less so, but still very much a part of it. Every
3 single child support plan, even from the age of 10, 11
4 onwards. At the bottom of the support plan --

5 LADY SMITH: Donald, can I just ask you to slow down
6 slightly? Thank you.

7 MR SHAW: Sorry, I'm getting passionate about what I'm
8 talking about.

9 LADY SMITH: Well, I know, and everything you say is so
10 important, it will be helpful. Thank you.

11 MR SHAW: Even young children aged about 11, they still have
12 input in their own support plan. So yes, the adults may
13 make the decisions as to what interventions will take
14 place, but the child is given the opportunity to
15 evaluate those interventions. They are a key part of
16 their own support plan.

17 MR BROWN: We also heard this morning about Securly, which
18 is the system to try and monitor online usage of the
19 school system, if I can perhaps be a little loose in
20 language. It's only been set up within the last year.
21 There's an annual review. You heard what he said about
22 expanding potentially the scope to staff use. Any views
23 on that?

24 MR SHAW: I would have to balance that against what already
25 happens to monitor staff. Staff within the school are

1 already monitored by the Ministry of Defence.

2 Everything, absolutely everything I type on my desktop
3 PC or my staff Chromebook is available to be checked by
4 the Ministry of Defence already.

5 I would potentially judge Securly looking at this --
6 if I was looking at this from an outsider, I may have
7 concerns about privacy if that level of protection was
8 put on a staff computer. You're looking to safeguard
9 children. Staff are already subject to considerable
10 checks by the Ministry of Defence, which I think are
11 adequate. If I was typing in the Scottish Child Abuse
12 Inquiry on my computer, Securly would immediately flag
13 it up and, as you can imagine, over the last few years
14 it would be flagged up hundreds of times. So there's
15 a balance to be struck there, in my opinion. There
16 already is a high level of checking on what staff do on
17 their PCs.

18 MR BROWN: The MoD seems to do that, from what you're
19 saying, already, but how does it flag up?

20 MR SHAW: This is the advantage that could be put in place,
21 looking at it from the other side, Securly could provide
22 us with an advantage of that instant flag-up. I think
23 that's probably what you perhaps will recommend, that
24 systems are put in place for such a thing.

25 MR BROWN: Well, I don't know. How quickly does MoD --

1 presumably some central -- forgive the language --
2 bunker where these things are monitored. If someone
3 uses a computer in the staff of QVS, when would you as
4 the headmaster receive word that something had flagged?

5 MR SHAW: I can't answer that. I don't know because I've
6 never had that experience as yet. So I don't know. But
7 it wouldn't be instant, I'll tell you that. It would
8 not be instant. But when you're dealing with a child,
9 of course, if they type in, "How do you commit suicide"
10 or "What's the best way of committing suicide", that is
11 flagged instantly to a housemaster. The housemasters
12 are doing near as -- as admin. So that housemaster can
13 immediately have an impact on that child and that's
14 an advantage of Securly on the children's devices, which
15 I think is key.

16 But you're right, we need to review whether it
17 requires to go onto the staff devices as well.

18 MR BROWN: Clive, any thoughts from your side?

19 COL KNIGHTLEY: Really to agree with Donald. Yes, there
20 will inevitably be a time-lapse, which of course for
21 time-critical events is unacceptable, with the way that
22 the MoD system works. From my perspective, albeit
23 a layman in educationalist terms, I think we would be
24 missing a trick if we did not further assess the utility
25 of a system such as or similar to Securly for wider use,

1 perhaps with filters to make sure that it's not
2 generating a whole series of false alerts, as Donald
3 outlined, which of course would potentially defeat the
4 value of the system.

5 MR BROWN: Thank you. Something to think about, perhaps.

6 MR SHAW: Very much so, yeah.

7 COL KNIGHTLEY: (Witness nods).

8 MR BROWN: You told us, or you agreed with me that the
9 acronym has changed to DCS, and, as Clive was
10 explaining, he's now actively involved in the
11 safeguarding assessment side. I think, Donald, as part
12 of that change of direction perhaps,
13 Queen Victoria School was subject to an inspection in
14 terms of its safeguarding two months ago or last month,
15 rather?

16 MR SHAW: Yes, it happened in September, I think it was
17 around six weeks ago from now.

18 MR BROWN: And can you explain who caused that inspection to
19 take place?

20 MR SHAW: In my knowledge it was DCS. DCS, because of the
21 change in system and because of being able to recruit
22 more staff, have been able to appoint a chief
23 safeguarding officer and that chief safeguarding officer
24 has come in from an external agency who were used to
25 regular reviews of safeguarding in establishments. So

1 a system has been put in place to have a safeguarding
2 review in school, every MoD school every three years,
3 and it just so happened that QVS, I believe, happened to
4 be the first of those schools to have this safeguarding
5 review.

6 But we are very open to this kind of inspection and
7 I know that the Child Protection Co-ordinator, the
8 deputy head (pupil support), have both been very keen to
9 have the process reviewed independently and be given
10 items to improve. Obviously you want to have areas of
11 strength identified, but you also want your areas of
12 improvement to identify.

13 So the timing of it has been perfect for this
14 particular hearing because it has given me an idea of
15 what we do well and what we can improve on as we move
16 forward.

17 MR BROWN: We'll come back to that in a moment.

18 Clive, if I may, you are probably more aware of the
19 direction that the MoD has chosen to take in this
20 regard. Can you explain why the safeguarding role has
21 been put in place and why MoD has decided to have these
22 three-yearly inspections?

23 COL KNIGHTLEY: Yes. So there are two elements to this.

24 Within our team in the central MoD we own the Global
25 Safeguarding Team and that's the top level policy piece.

1 But that's mirrored within Defence Children Services by
2 safeguarding professionals who are looking at the
3 specifics of safeguarding in the MoD schools, including
4 QVS.

5 Those staff have always existed in DCS and its
6 predecessor organisations, both DCYP and Service
7 Children's Education.

8 Certain key purposes have been gapped and the
9 changes from DCYP to DCS and AFFS have acted as a useful
10 trigger, really to satisfy the new people with
11 responsibilities, overall responsibilities, who have
12 come in to satisfy themselves that what they've taken on
13 is a safe environment. So there were always levels of
14 safeguarding inspections carried out at MoD schools
15 whether they were advisory visits or actual enforcements
16 and inspections. So this is just a more formal way of
17 carrying that out and I think it's to be welcomed.

18 MR BROWN: Was there a particular trigger that led to this
19 increased formality?

20 COL KNIGHTLEY: Not that I'm aware of. I think the arrival
21 of the recently appointed Head of Defence Children
22 Services who was recruited as an educationalist of some
23 experience recruited from that sector and had not worked
24 within the MoD before, has usefully brought a fresh pair
25 of eyes with a very useful background to it, and she's

1 certainly imposing a number of -- Donald can speak to
2 this as well as a recipient, I'm a bystander. But no,
3 I would not -- as I said, these inspections did take
4 place before, but seem to have come back into a much
5 more formal routine so that we know that those
6 inspections will take place and there won't be
7 an interval that will end up being too long and people
8 will not notice that actually whatever assurance was
9 provided in that inspection is in reality no longer
10 valid because far too much time has elapsed.

11 MR BROWN: Just to be clear, you've described her as casting
12 a fresh pair of eyes and with a different background in
13 education. Just to be clear, who are we speaking about
14 and what was the background?

15 COL KNIGHTLEY: The head of the new organisation, Defence
16 Children Services, is a lady called Bev Martin. She's
17 had a range of posts. She's a teacher by trade. She's
18 headed up a multi-academy trust, and she has worked in
19 the child elements of Local Authorities. Most recently,
20 I think, in the West Country. So it is a welcome and
21 fresh perspective.

22 MR BROWN: Thank you very much indeed.

23 Donald, if I can come back to you, obviously there
24 were good bits, which you will have been proud of, and
25 then lessons to learn? What were they?

1 MR SHAW: Lessons to learn, we've covered one of them. One
2 of the lessons to learn was on safer recruitment
3 practices to do with references, and that's -- but
4 that's not just a QV recommendation. The safeguarding
5 reviewer has come in, looked at our recruitment policies
6 in relation to how we run it with the Ministry of
7 Defence in general. Certainly because we are working in
8 schools with young people, she would like to put in
9 place some -- just some better recruitment practices in
10 terms of ensuring that a safeguarding check is done on
11 every reference. Not just as part of a general review
12 of that reference, but a specific safeguarding check is
13 done on that reference. So she wants to introduce the
14 safer recruitment amongst all MoD schools.

15 LADY SMITH: So what in practice would that involve that's
16 any different from what's happened until now?

17 MR SHAW: I think it's -- well, as you'll be aware, you
18 know, we haven't seen references in the past. But
19 I think it's because there is maybe a general feeling
20 that when you're given a reference, you glance over it,
21 you look for any key points that might jump out at you
22 and then you say, "Well, that looks fine to me", and you
23 put it to the side.

24 What she wants us to do is actually look at the
25 reference in detail with a safeguarding point of view on

1 it and actually just maybe even go through it a second
2 time for safeguarding after that initial glance. And is
3 there anything at all within that reference which flags
4 up any form of safeguarding risk, then it has to be
5 noted at that point. It's just an additional check,
6 which I think is valuable, to be fair.

7 LADY SMITH: Mr Brown.

8 MR BROWN: I know we put a lot of weight on you asking for
9 things and the requests keep coming. If there was
10 a written report in relation to that inspection and you
11 would be willing to share it, we would be grateful
12 perhaps to see it, to see what the thoughts of someone
13 who has cast a fresh set of eyes can see.

14 MR SHAW: That will be with you very soon then, yes. One of
15 the other things was just to try and improve our
16 record-keeping a little bit. We have great records, but
17 if you'll excuse the use of the phrase
18 higgledy-piggledy, occasionally because of the various
19 systems that we use within the school, if someone was to
20 say, "Can you give me your pupil file on pupil X?", then
21 we would probably just have to get document A from this
22 source, document B from this source. So one of her
23 recommendations of course was just to try and make that
24 a little more of an efficient process.

25 MR BROWN: Thank you. I'm just concerned, thinking of

1 lessons learned, so far as the Clark case is concerned,
2 we talked obviously about the scope to report any staff
3 concerns. What other lessons were learned?

4 MR SHAW: You know, if you're going to learn a lesson from
5 it, you're going to learn that teenagers never act as
6 you assume they will act. You can never expect
7 a teenager to do exactly what you think they're going to
8 do. So you can say to them a hundred times, "Please
9 come forward and report any concerns", but they simply
10 may not necessarily do it. So another lesson learned is
11 just to make that message continuous. If it doesn't
12 work on a hundred tellings, then do the 101st telling.
13 Keep continuing that messaging out there, that,
14 "Children, you must come forward and share your concerns
15 with staff".

16 LADY SMITH: On the issue of sharing your concerns, is any
17 work done to try to understand why a child or young
18 person might not do that?

19 MR SHAW: In the course of the chats with the children who
20 came forward with historical allegations against
21 Mr Clark, they stated that they did not recognise that
22 it was abuse at the time and therefore never reported
23 it.

24 LADY SMITH: I can see that's one factor. Are there other
25 factors that may need to be addressed with children,

1 such as the obvious one is: it's not your fault. If
2 that's what might stop you from reporting it -- put that
3 to one side, it's not your fault.

4 MR SHAW: I completely agree with you, my Lady, and that's
5 exactly what we say. We tell them there's no fault
6 here.

7 You may be interested to know that following a chat
8 I had with 20 S5 and S6 girls at the end of June this
9 year, in keeping with society at the moment there is
10 a feeling that there is a culture of objectification,
11 sexualisation, harassment of people within society, and
12 the girls wanted to talk to me about how that impacts on
13 them within Queen Victoria School.

14 So instead of actually going away and thinking I'll
15 solve this for them, I'm currently working on
16 a Doctorate at Stirling University and part of that
17 learning has been something called radical collegiality.
18 So radical collegiality is when you actually set up
19 a group within a school and you allow the children to
20 lead that group. So who am I as a 51-year-old male to
21 answer the questions that they're finding difficulty
22 with: sexualisation, harassment, et cetera? So I have
23 recently set up a pupil advisory group on this topic and
24 I will meet with them -- and boys, it's a multi-gender
25 group -- and they will guide me through the process of

1 trying to deal with things to benefit them at
2 Queen Victoria School, to try and end any sexualisation
3 or harassment that they are suffering from.

4 So that's an example of how they can come forward.

5 They will be the group leaders in this process.

6 LADY SMITH: I was thinking more particularly of ways in
7 which you and other staff can learn what may act as
8 a disincentive to coming forward. You talked of
9 a couple. Another might be: I don't want my parents to
10 be worried, they've got enough on their plates already.

11 MR SHAW: Yes.

12 LADY SMITH: Is that addressed with them? Are they
13 reassured that their parents need to know?

14 MR SHAW: Yes. Yes. There have been several cases where
15 a young person has come forward and they have cited
16 their right to keep that information to themselves and
17 for it not to be shared with parents. But as a boarding
18 school and the fact that we are acting on behalf of
19 their parents, we have managed to talk them around and
20 just through conversations get their agreement that:
21 yes, actually, your parents can provide you with
22 an additional layer of support as you go through this
23 issue. So that has very much all been dealt with.

24 LADY SMITH: Are there any other disincentives you've come
25 across?

1 MR SHAW: I can't think of any right at this moment.

2 LADY SMITH: Thank you.

3 Mr Brown.

4 MR BROWN: Thank you, my Lady.

5 In relation to a comment you made that some of the
6 children didn't realise what was happening was abuse, we
7 know, because it was a question asked as a standard to
8 all witnesses who were providing statements, from
9 a teaching side, did the school have a definition of
10 abuse and the answer is just that they trotted out,
11 "Yes, and it's X", which encompasses many things.

12 From what you're saying, though, the current
13 definition may not cover all eventualities. Has the
14 definition changed to reflect what was not thought to be
15 abuse by pupils?

16 MR SHAW: The definition hasn't changed since that court
17 case, no.

18 MR BROWN: What was not being understood as abuse by pupils?

19 MR SHAW: Well, they saw the behaviour of Mr Clark, who was
20 perhaps knocking them on the backside with a drumstick
21 on their way out of a room, they saw that as normal
22 behaviour. They did not recognise that as abuse. He
23 had what you would call hid in plain sight and he had
24 done this as a matter of course with a number of
25 students, as you see from the indictment that came

1 forward. So they simply did not recognise that as
2 a form of abuse until they had time to reflect on it
3 when the main allegation came forward.

4 MR BROWN: So has anything been done to expand pupil
5 knowledge of what may constitute abuse?

6 MR SHAW: Our definition of abuse is very much up to date,
7 but nothing has been done since that case in terms of
8 the definition of abuse. It's still the same on paper.

9 LADY SMITH: Donald, on that, I understand you have five
10 elements in it; is that right?

11 MR SHAW: I am not going to be able to reference --

12 LADY SMITH: I think I can check them with you. Physical
13 abuse?

14 MR SHAW: (Witness nods).

15 LADY SMITH: Neglect?

16 MR SHAW: Mm-hmm.

17 LADY SMITH: Emotional abuse?

18 MR SHAW: Yes.

19 LADY SMITH: Sexual abuse?

20 MR SHAW: Yes.

21 LADY SMITH: And the fifth is described as "non-organic
22 failure to thrive"?

23 MR SHAW: Okay.

24 LADY SMITH: That's the one in particular I wanted to ask
25 you about. Isn't that something that potentially is

1 evidence of abuse taking place but it's wrong to put it
2 on a list of activities that could be abusive
3 activities?

4 MR SHAW: Eh, I'm sorry, I don't know how to answer your
5 point.

6 LADY SMITH: Maybe I can take that unto myself. But you
7 think I've got the list right?

8 MR SHAW: Yes, that's certainly the list of five things.
9 Obviously I think -- I don't know when that is dated
10 from, but I'm pretty sure that cyber abuse will be on
11 our most current list. I would be surprised if it's
12 not.

13 LADY SMITH: It may well be adequately covered by emotional
14 abuse.

15 MR SHAW: Possibly, yes.

16 LADY SMITH: Because it is emotionally traumatic for a child
17 to be the recipient of cyber abuse.

18 MR SHAW: I think I understand your point now, given a few
19 more seconds of reflection, on your "failure to thrive".
20 Yes, it's a sign of abuse rather than a type of abuse.

21 LADY SMITH: It may not be the only sign.

22 MR SHAW: No, of course not.

23 LADY SMITH: There are others you could watch for.
24 Thank you. Mr Brown.

25 MR BROWN: I think your statement at paragraph 82 is rather

1 general:

2 "Our annual child protection update and regular
3 safeguarding updates have underlined a variety of
4 different types of abuse, including neglect, emotional,
5 physical, et cetera."

6 There's obviously a wide range.

7 MR SHAW: Yes.

8 MR BROWN: But it may be, perhaps, that a lesson learned may
9 be to expand the knowledge of the pupils of something to
10 look out for as well as staff.

11 MR SHAW: Yes, yes.

12 MR BROWN: I think in that regard, when we spoke back
13 in April or so, we were discussing at that stage the
14 response the school had provided to the Inquiry.
15 Remember Part A, B, C and D, history, processes, and
16 then we got to D, which was abuse, and what the school
17 acknowledged as being abusive in the past, and I think
18 it's fair to say -- we don't need to look at it because
19 obviously we have the documents -- that QVS have updated
20 Part D quite significantly. At the outset, there really
21 wasn't terribly much in terms of actual abuse that the
22 school recognised. That has changed over the process of
23 the Child Abuse Inquiry; is that a fair summary?

24 MR SHAW: I would say it's a fair summary that through the
25 searching of previous student reports, previous

1 documentation, et cetera, that we have identified
2 basically just through our logs and our records that,
3 yeah, other cases have come forward -- have been made
4 known to us.

5 MR BROWN: And being provided with statements from
6 applicants to the Inquiry?

7 MR SHAW: Yes, very much so, yes. As I said, I value every
8 single person that's come forward. I think it's --
9 I used the phrase "a very difficult but very brave thing
10 to do", and I admire them for it.

11 MR BROWN: The point I make is there was perhaps more than
12 QVS were aware of?

13 MR SHAW: Yes, that's a fair point.

14 MR BROWN: And you've both, I know, spent the last five, six
15 days, in your case, Donald, being here listening to
16 events unfold; Clive, you have been following online.
17 Donald, starting with you, do you have any comment to
18 make on what you've heard?

19 MR SHAW: Yes, if I may, I've taken a few notes. If I may
20 respond?

21 LADY SMITH: Please do.

22 MR SHAW: To me, the evidence has shown past feelings have
23 had a massive impact on those who have suffered abuse.
24 It seems to me like children have been actively
25 discouraged from reporting things in the past, not just

1 by other boys but by the staff as well. My impression
2 of the evidence is that staff were simply not involved
3 enough in the lives of the children, and at times in the
4 past discipline has been left to senior students and
5 those senior students have dished out brutal punishments
6 that have no place in any school.

7 It seems like students had no place to go with their
8 problems. 'Andy' mentioned -- his phrase was
9 "a terrible culture of silence". That struck a chord
10 with me as to how it must have been back in the day,
11 a young person having nowhere to turn. 'James'
12 described teachers as "complicit" in this culture of
13 silence, and 'Clifton' actually summed it up as "the
14 collective consciousness of the school". 'Alex'
15 commented that staff were "indifferent" and that does
16 paint a picture of a very difficult place to live and be
17 educated.

18 At this moment in time, I'm exceptionally proud to
19 be the head of QVS as it is now. I believe that pupils
20 are supported, cared for, at the heart of everything we
21 do. But the version of the school portrayed by those
22 witnesses is something not to be proud of in any way.

23 As I said when I was appearing at the Inquiry
24 in March, I do find that I want to take responsibility
25 for helping those people find a little bit of closure

1 and I would urge again anyone -- like 'Felix', who said
2 he would like to come to the school and check up that
3 things are not happening in the same way that they were
4 in his day, I would like people like that to come to the
5 school, share their experiences with me, and allow me to
6 show them that things are better nowadays.

7 But my heart goes out to them, and yeah, it's not
8 been the most pleasant of listening but I'm so glad
9 I had the opportunity to hear and be able to respond to
10 their concerns.

11 MR BROWN: In relation to the staff failings you just
12 acknowledged, has it been particularly hard for you
13 because some of the staff you heard being complained of
14 you'd worked with for years?

15 MR SHAW: Yes. Yes, that's been difficult, yes.

16 MR BROWN: And did you recognise any of the specific
17 criticisms or were you surprised?

18 MR SHAW: No, I recognise -- no. This is difficult to
19 answer. I -- everyone changes dramatically over time.
20 Everyone does. Every human being changes dramatically
21 over time. What I recognise is that if somebody makes
22 a flippant comment to somebody and they think it's just
23 a flippant comment, that that could have a massive
24 impact on the person they've made that comment to. But
25 that flippant comment does not necessarily reflect the

1 person 30 years later when I worked with them.

2 Do you know what I mean by that? We all change, we
3 all improve, we all learn from our mistakes. And I did
4 hear the mention of one member in staff in particular,
5 who I won't name at this point, and I was shocked to
6 hear that because in every other statement he has been
7 remarked on positively. I think that's just one of
8 those things that I need to learn, I need to get across
9 to my staff, that flippant comments can cause a world of
10 hurt to somebody else.

11 MR BROWN: Thank you.

12 Clive, do you have anything to add?

13 COL KNIGHTLEY: I wouldn't attempt to repeat Donald's very
14 articulate words there. I have to say I found it
15 upsetting, verging on harrowing, listening to
16 particularly the earlier evidence, and even though I'm
17 not a direct part of the school, I've been very proud of
18 my association with QVS since it started back in 2012,
19 and I was sufficiently upset that I was sharing with
20 friends. I said, "We're hearing things here that are
21 making me really feel bad", and the predictable,
22 perhaps, response was: "Well, were they things that were
23 of that time?" And it caused me to reflect, and
24 actually I think that is the value of this Inquiry and
25 others like it, that if we are not confronted with what

1 happened in the past, there's always that risk that we
2 will unwittingly repeat it in the future. And I was
3 reassured as we progressed through the witnesses and
4 realised that things really had started to change in the
5 sort of early to mid-1990s, and that upwards trajectory
6 is exactly what I've seen in the last nine and a half
7 years.

8 I am, I think, a sufficient -- you know, I do have
9 enough of a distance from the school that I can remain
10 objective, and the thing that I would remark on which
11 has reassured me is not just the really impressive
12 measures that have been put in place, but I think it's
13 come across as well that there is now a deeply embedded
14 culture of continuous improvement in the school, that
15 means this is a continuous journey that the school is
16 on. As Donald said, people in ten years' time looking
17 back will see, I'm certain, an enormous further
18 improvement on how we look after our children and young
19 people in a boarding school setting. But I found those
20 earlier witnesses harrowing.

21 MR BROWN: You obviously represent the MoD side of the
22 equation or the formal MoD side. The MoD, I think we
23 touched on this in the original hearings: culture of
24 silence, closing of ranks. From the wider MoD point of
25 view, is openness, as you see it, becoming more

1 prevalent?

2 COL KNIGHTLEY: It is, and I have almost 46 years to reflect
3 on from when I first joined the Army, and again the
4 change has been immense over that period. But we still
5 come across examples of exactly what you've described
6 and simply creating a policy is not enough. It's got to
7 be enacted, it's got to be assured, and people have got
8 to look beyond the headlines. I was particularly taken
9 by the sort of discussion about the types of abuse.
10 It's not enough that people can quote by rote a series
11 of headings that they're meant to be living their lives
12 by. We need to have the means to show and see that
13 people are living that, not just quoting it.

14 MR BROWN: Because it's been quite clear that the military
15 ethos at times, perhaps, in the past has been positively
16 unhelpful for the education of children. Would you
17 agree with that?

18 COL KNIGHTLEY: I would, and I think again trying to -- not
19 gloss over it, but I think that's why, perhaps rather
20 more slowly than anyone would have wished, the gradual
21 moving away from that military culture, the fact that it
22 was to all intents and purposes a military
23 establishment, and of course, you know, the original
24 minute of agreement from 1905 that established the
25 school was explicit in saying that it was preparing

1 children for a career, in those days, in the Army or the
2 Navy.

3 I think, with the benefit of hindsight, we should
4 perhaps have moved away from that negative aspect of the
5 military connection and moved towards where I think we
6 are now, which is a healthy reflection of the school's
7 history which actually benefits the school. I think if
8 we could have moved to that a little faster in the past,
9 that would have been of enormous benefit to all.

10 MR BROWN: Thank you. Is there anything else you would like
11 to add, Clive?

12 COL KNIGHTLEY: I don't think so, but I am looking forward
13 to the findings of the Inquiry. I retire next year, but
14 I'll be making sure that from my perspective we take
15 everything we can from what we've heard here in our part
16 but also the wider lessons and good practice that have
17 been hopefully described.

18 MR BROWN: Thank you very much. Donald, do you have
19 anything else to add?

20 MR SHAW: Nothing to add.

21 MR BROWN: My Lady, I'm content.

22 LADY SMITH: Are there any outstanding applications for
23 questions?

24 Donald, Clive, thank you so much for engaging today
25 and before today, in your case, Donald, with the written

1 statements that you provided for us, but also all the
2 documents that I know we've gathered both from you and
3 the MoD, which have been of such enormous assistance to
4 aid our learning and our understanding. I'm very
5 grateful to you both and I hope you're able to have some
6 restful time the rest of today because I'm sure this has
7 been quite a wearying, exhausting experience for you.
8 Thank you. I'm able to let you go.

9 (The witnesses withdrew)

10 LADY SMITH: And that completes QVS.

11 MR BROWN: And we begin Keil tomorrow.

12 LADY SMITH: Very well. I'll rise now until 10 o'clock
13 tomorrow morning. Thank you.

14 (1.12 pm)

15 (The Inquiry adjourned until 10.00 am
16 on Thursday, 28 October 2020)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

'Grant' (affirmed)	1
Questions from Mr Brown	2
Mr Donald Shaw (affirmed)	75
Colonel Clive Knightley (sworn)	76
Questions from Mr Brown	76

