

Thursday, 28 October 2021

(10.00 am)

LADY SMITH: Good morning. Today we turn to Keil School,
that's turning to the west of Scotland, and Mr Brown, we
have a witness ready?

MR BROWN: We do. The first witness is Neil Lightbody.

LADY SMITH: Thank you.

Neil Lightbody (affirmed)

LADY SMITH: First of all, help me with this. How would you
like me to address you? Mr Lightbody? Or use your
first name, Neil? I don't mind. Whatever works for you
will work for me.

A. Everybody calls me Neil, so I'm quite happy to be
addressed by my forename.

LADY SMITH: You're happy with that, thank you. Now, Neil,
there's a red folder in front of you that has your
statement in it. Mr Brown will no doubt ask you to look
at that in a moment.

A. I'm sorry, I'm not hearing you very well.

LADY SMITH: Right, okay. Can you hear me now?

A. I hear you better.

LADY SMITH: Mr Brown will take you to the red folder
shortly. You'll also see your statement coming up on
screen, and you might find that helpful if you want to
look at it there.

1 As you're giving your evidence, Neil, if you have
2 any questions or concerns, please let me know because
3 it's very important to me that we do whatever we can to
4 make things as comfortable for you as possible. I know
5 it's not easy giving evidence, but we'll do our best.

6 A. May I ask how to address you?

7 LADY SMITH: Lady Smith, my Lady, that's what
8 people normally call me.

9 A. Lady Chairman, is that all right?

10 LADY SMITH: No, just Lady Smith is fine.

11 A. All right.

12 LADY SMITH: And if you need a break at any time, we always
13 have a break somewhere around 11.30, but if you want
14 a break before then, just let me know, would you?

15 A. Yes.

16 LADY SMITH: Thank you. If you're ready, I'll hand you over
17 to Mr Brown and he'll take it from there.

18 Mr Brown.

19 Questions from Mr Brown

20 MR BROWN: My Lady, thank you.

21 Neil, good morning again.

22 A. Good morning.

23 Q. Her Ladyship referred to your statement in the red
24 folder. As a matter of formality, that statement has
25 a reference number, WIT-1-000000328, and I think, as you

1 know, it runs to 28 pages; is that right?

2 A. 28 pages.

3 Q. And the last page, obviously, contains your signature
4 and the date you signed it, which was 26 February last
5 year. And the final paragraph reads:

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

10 And, as we will hear, you are a lawyer, you will
11 have read the statement and been satisfied that it was
12 accurate?

13 A. I'm fairly satisfied with the accuracy.

14 Q. Yes. I think in addition to the statement you provided,
15 and we may touch on this, you helpfully provided to the
16 Inquiry a written document which is -- forgive the
17 reference numbers, they are, with an Inquiry, rather
18 long -- WIT.003.002.4386. This was a letter you sent to
19 the Inquiry back in 2019.

20 A. (Witness nods).

21 Q. With a four-page account that I think you had written in
22 2018 for your nieces because you felt it important that
23 in addition to what you can find on the internet by way
24 of birthday, deaths and baptisms and the like, you
25 wanted some record of your experience so they would

1 understand what you went through?

2 A. It was an extract from a much larger biographical note
3 which I have passed on to my nieces and certain other
4 people. I was careful to make sure that it was on
5 paper, because I have no confidence at all that memoirs
6 or the like that are recorded on the Cloud or on any
7 form of disk have any prospect of surviving for very
8 long.

9 Q. Okay, thank you. And in addition and as part of that
10 you attached an article which was in the press by
11 Ranulph Fiennes talking about his experience at another
12 school?

13 A. That is correct. I extracted that, I think, from
14 a magazine many years ago that was of particular
15 interest because Sir Ranulph Fiennes must be one of the
16 most stalwart and physically tough explorers which this
17 country has ever produced, and yet he says in that note
18 that his years at residential boarding school were ones
19 of absolute misery and that he was picked on and
20 persecuted.

21 This, of course, is a retort to the jibe that was
22 made in the 1960s that if you weren't able to take it,
23 then you were something less than a man.

24 Q. Thank you. And I think you found that article of
25 particular interest because it reflected your

1 experience, as we're about to hear?

2 A. Yes, very much so. The thing I found extraordinary
3 about it was that Sir Ranulph Fiennes, I think, seems to
4 have been picked upon because he had a very attractive
5 sort of appearance, physical appearance. He had a very
6 pleasant face and features, and no doubt was a very fine
7 physical specimen, and yet, strangely enough, somebody
8 like that could be picked on because of having these
9 attributes rather than something that might be regarded
10 as making the individual in some way peculiar or
11 unattractive.

12 Q. Yes. Is it also fair to say that you were, and correct
13 me if this word is the wrong choice, encouraged because
14 at times you have felt very isolated because of your
15 experience?

16 A. Very much so. I have never come across desolation and
17 isolation remotely comparable with the boarding school
18 experience. The extraordinary thing about it is that
19 there is absolutely or there was absolutely no privacy
20 of any kind whatever. There was nowhere you could go to
21 where there were not other people around. This
22 of course meant that if you were a picked-upon or
23 bullied, there was absolutely no refuge within the
24 school. Unlike children going to day schools or council
25 schools, you weren't going home in the afternoon or the

1 evening and you weren't going home at the weekend.

2 There was a general sort of consensus held amongst
3 the boys which was taken from the ethics and the scale
4 of values of the school, which, according to our ideas
5 nowadays, would be regarded as having an extremely and
6 profoundly reactionary aspect to it. Any form of
7 peculiarity or strangeness or otherness or difference
8 between the individual and the other boys or that seemed
9 to contravene some notion held by the school was just
10 a kind of open licence for a particular person who set
11 himself up as a bully and derived enjoyment from
12 inflicting misery on others.

13 Q. Thank you. Can we perhaps come back to --

14 A. Yes, yeah.

15 Q. -- the detail of that. Let's start talking about you
16 rather than society and other schools. The beauty of
17 your statement is it sets out a lot of detail that we
18 don't have to repeat because we can read it. It is in
19 evidence. You understand that?

20 A. (Witness nods).

21 Q. But I think, putting matters short, you were brought up
22 on the west coast where your father worked with
23 a company Metal Industries Salvage, based on the
24 Gareloch, which was a development of, I think, Cox and
25 Danks, who had first --

1 A. That's correct.

2 Q. -- raised the German fleet in Scapa Flow?

3 A. That's correct. They inherited activities from Cox and
4 Danks, who had been active in diving on the German High
5 Seas Fleet in Scapa Flow.

6 Q. And that's where your father worked, based at Faslane
7 where the nuclear deterrent is now based, and you lived
8 close by and were born close by?

9 A. Yes.

10 Q. [REDACTED]

11 [REDACTED] You went to the local state primary school in
12 Garelochhead, but then were moved to a fee-paying school
13 called Larchfield in Helensburgh, and from what you say,
14 that was a good little school and you were happy there;
15 is that correct?

16 A. Yes. As I say in my statement, rugby was played at
17 Larchfield, but there was a very tolerant and open
18 attitude. It was recognised, without anybody saying it,
19 that there were some boys who were physically not
20 sufficiently robust to enjoy playing rugby. You have to
21 remember that growing boys, although of the same age,
22 can be of greatly different heights and weights and all
23 the rest of it to an extent that you don't find in
24 adults, and they recognised that I and some other boys
25 just weren't into rugby at all. So, as I say in the

1 statement, there was no problem at all about just giving
2 us a few footballs or something and you could take it in
3 turns to try kicking the ball past the goalie or
4 something. In other words, this really intolerant --
5 I mean absolutely unbelievably intolerant attitude
6 towards non-participants in rugby that you found in Keil
7 was totally absent in Larchfield and it showed to me how
8 utterly unnecessary it was to actually freeze out boys
9 who didn't want to participate in that sport and to look
10 the other way while they were persecuted and bullied,
11 which is what went on in that school and why I was
12 picked on.

13 Q. Thank you. Again, if you bear with me, we will come to
14 that. But if we can just continue talking about the
15 move from Larchfield to Keil and the reasons behind it,
16 start with that, and we will return to the rugby and the
17 difficulties in due course, all right?

18 A. (Witness nods).

19 Q. You say, and this is a theme that is touched upon,
20 obviously, in your statement but also in the extract of
21 the piece you wrote for your family, that your mother's
22 impact seems to have been profound in you being sent to
23 Keil, and her view of what should be done to become, to
24 use your phrase, a real man. Is that a fair summary?

25 A. The image of a real man which was prevalent amongst you

1 might say the salaried and business and professional
2 people in Scotland was somebody who would be very, very
3 strongly disapproved of nowadays. You have to remember
4 that National Service, so-called, had only been
5 abolished a few years previously and that the state was
6 in the habit of conscripting young boys and sending them
7 out to colonies to assist in the suppression of national
8 liberation movements. And I have no doubt that the
9 government, and for that matter the army, found it
10 extremely useful if young boys had been broken in by the
11 cruel regime of a boarding school such as Keil.

12 Q. I think, as you say in paragraph 14, your mother had the
13 idea that a fee-paying boarding school would be
14 an enormous advantage to you in later life, as it would
15 make you tough and independent and a real man. Would
16 you accept that your parents, however flawed that view
17 might be now, at the time were reflecting society at
18 large for their salaried class, to use your words?

19 A. This is the thing that -- or one of the things that is
20 now so harrowing, because I had parents who I have no
21 doubt at all at all times intended the best for me, but
22 they had been susceptible to this sort of ideology that
23 it was a very good thing indeed for young boys to be
24 subjected to a very hard regime, such as offered by
25 a boarding school, and that this would give them a great

1 advantage in their future life.

2 I think it was -- I'm not -- it wasn't so much the
3 kind of thing that I might have expected with
4 prestigious sort of boarding schools like Loretto or
5 Fettes where there was always this feeling that people
6 who went there were destined for great careers. It was
7 more a matter of getting your child toughened up so that
8 he would be able to deal with all the harsh exigencies
9 and difficulties that he would encounter in later life.
10 I mean, they were right to that extent because, I mean,
11 quite honestly, as with Sir Ranulph Fiennes, I in my
12 subsequent life never encountered anything so hard to
13 live in and live with as Keil School. Everything else
14 I encountered later on was relatively easy.

15 Q. Yes.

16 A. You could not get any accommodation that was worse. You
17 couldn't get any food that was worse. You couldn't get
18 any treatment by your peers that was any worse. So in
19 a sense --

20 LADY SMITH: Neil, I don't want to interrupt, I'm really
21 interested in what you're saying. It probably fits,
22 I think, with where we'll get to in your evidence once
23 we're reflecting on the totality of your experience at
24 Keil. Do you think just now we could hear from you the
25 answers to the questions that I think Mr Brown's about

1 to ask regarding your early time at Keil and your
2 starting there when you were around 12 years old? That
3 would be useful for me if we could do that. Am
4 I guessing right about where you're going next,
5 Mr Brown.

6 MR BROWN: We're just about to come to Keil, yes.

7 LADY SMITH: It's not that I'm not interested in everything
8 you have to say, I am, very, I'm just trying to organise
9 the course of your evidence, selfishly, if you like, in
10 a way that it will most help me.

11 MR BROWN: You didn't want to go to Keil, we read from your
12 statement. You failed the exam to get in, but your
13 father pulled strings and you were in.

14 A. That was it.

15 Q. You were terrified, you say, of going. If we can focus
16 on this: what did you know of Keil before you went? Did
17 you have any sense of what you were walking into?

18 A. I did indeed. There were two or three boys who were
19 also living in Helensburgh, which is where my family
20 were living at the time, and they had been sent to Keil
21 and my mother was quite friendly with them. They
22 undoubtedly had an influence on my mother in encouraging
23 her to send me to that school. I think that --

24 Q. Sorry, can I just --

25 A. -- they had more influence over my mother than my sort

1 of reluctance as a 12-year-old boy. And you have to
2 remember that as a 12-year-old boy, it's very, very
3 difficult to mount a sort of rebellion against your
4 parents.

5 LADY SMITH: Oh, I can understand that, Neil. So far as
6 what you understood about Keil from these boys you knew
7 was concerned, what was it? What impression did these
8 boys give you of the school?

9 A. I'm sorry, I didn't catch what you said.

10 LADY SMITH: You've told us about two boys that lived in the
11 same town as you.

12 A. Yeah.

13 LADY SMITH: They were at Keil.

14 A. Yeah.

15 LADY SMITH: And they were people who had told you about
16 Keil, had they?

17 A. I didn't know them very well, but --

18 LADY SMITH: Had they told you anything about the school?

19 A. Sorry?

20 LADY SMITH: Had they told you anything about the school?

21 A. I think the information was mainly coming from their
22 respective mothers, because I only really knew the two
23 boys I'm talking about in the sense that I would
24 recognise them in the street, but I didn't sort of have
25 any particular involvement with them.

1 LADY SMITH: Okay.

2 A. Maybe if I had, I would have struggled more to stay out
3 of that particular educational establishment.

4 MR BROWN: Thank you.

5 LADY SMITH: All right, Mr Brown.

6 MR BROWN: Thank you.

7 A. Could I say, one of them was an interesting case --

8 Q. Neil, I'm sorry, we're interested in you.

9 A. Yeah.

10 Q. And your experience. So if we can just stick to your
11 experience for the moment.

12 A. Yeah.

13 Q. You arrive, as you say, at Helenslee House, and
14 presumably on first appearance it looks civilised and
15 welcoming just as a building?

16 A. No, the position is that my mother stayed away from the
17 school whenever she possibly could, not just when I was
18 taken there originally but subsequently, and what
19 happened on the day that I arrived there was that my
20 father took me in our car to the dormitory for the first
21 year boys who were 12 or 13. The dormitory was situated
22 above what had been old stables, and there was a line of
23 26 beds. Between each bed there was about a 5-foot high
24 locker, and I was taken by my father up to the bed to
25 which I was assigned and he assisted me unloading my

1 scanty belongings. And I remember him saying later --
2 this was after all my things had been delivered and
3 a bed had been identified -- we went down the stairs
4 because it was on this upper floor and I was, I think,
5 expected to leave this building, which was the first
6 year dormitory, for the main house Helenslee, and I had
7 to walk down this road. And I remember my father
8 later -- I should point out that he was a very, very
9 kind man in other respects, but he wanted to go along
10 with the wishes of my mother. I remember him saying
11 later that he had never seen anything that quite broke
12 his heart to the extent that it did when he saw me
13 walking down this tarmac road to the main school,
14 Helenslee House, on my own, like I was facing the entire
15 universe by myself, friendless and with no support.
16 I think later it actually bothered him considerably.

17 Q. Thank you. If we can talk about a few things that were
18 perhaps not bad, if I can use those words. The
19 education you got there, though in part at times
20 limited, obviously some teachers, you say, were good and
21 you then went on to university through, in part, perhaps
22 large part, your own hard work. Is that accurate?

23 A. I -- yes. I eventually was admitted to the law faculty
24 of Glasgow University to study for a Bachelor of Laws
25 degree. Things were very, very different in the early

1 to mid 1960s. What I mean is that university entrance
2 was very, very much more limited. Indeed, I remember
3 one of the professors saying that, "You're amongst the
4 5 per cent or something who would get university
5 admission". It was very much a reward for academic
6 prowess and for passing exams rather than a field of
7 study that you were wanting to take up for your own
8 purposes. Indeed, I remember the first year at Glasgow
9 University there was -- a considerable number of
10 students were pretty much expelled from the law faculty
11 for not coming up to the standard.

12 Q. Thank you. Again, Neil, please remember we're
13 interested in Keil primarily.

14 A. Anyway, you were talking about the subject studied.

15 Q. I'm not interested -- we know the subject studied. What
16 I was asking as a generality: the education was not bad?

17 A. There were good teachers there.

18 Q. Yes, thank you. But as distinct from the other two
19 schools you had been to, the regime, I think we read,
20 was fundamentally different in that this is a school
21 where there are teachers, some good, but really it is
22 the boys who run the school out of the classes. Is that
23 correct?

24 A. Yes. It was a situation similar to that described by
25 William Golding in his famous novel *Lord of the Flies*.

1 It was a world of boys, and teachers and members of
2 staff had nothing whatever to do with the community of
3 boys. And consequently it was almost like the boys set
4 up their own regime. I think that the teachers and
5 other staff members were told -- certainly they behaved
6 as if they had been told that their duties were confined
7 to the classroom or the rugby field or the cricket
8 field.

9 Q. Thank you. I think in that regard, going back to the
10 dormitory you're in with 26 beds, the theory, you say,
11 was there was a teacher in charge of the dormitory, but
12 you never saw them?

13 A. The teacher was nominally in charge, but in practice did
14 absolutely nothing.

15 Q. And would you ever see a teacher in the dormitory?

16 A. Sorry?

17 Q. Would you ever see a teacher in the dormitory?

18 A. There was one particular teacher who was rather famous
19 for wandering around various dormitories after lights
20 out. It may be he was just making sure that quiet was
21 observed, but nobody ever really knew what he was up to.
22 That was just one teacher. Apart from him, teachers
23 were almost never seen in dormitories, either by day or
24 by night.

25 Q. Thank you. And we understand from what you say that

1 there is a hierarchy within the school where what might
2 be known as prefects in other schools, they were the
3 chiefs?

4 A. Yes.

5 Q. And then there was a layer below them called deputies?

6 A. Yes.

7 Q. And a chief and a deputy were in charge of what was
8 known as a squad?

9 A. Yes.

10 Q. Which would be 10 to 12 boys?

11 A. Yes. There was a table -- an oblong or rectangular
12 table of normally 10 boys, it could be one or two more,
13 and you would have four boys down each long side and
14 a chief and a deputy at each end. And that was where
15 all meals were taken.

16 Q. And was that done in terms of -- forgetting the chief
17 and the deputy -- were the boys in the squad from the
18 same year or was it a mix?

19 A. It was a mix. Typically the chief would be from the
20 sixth year, the deputy from the fifth year, and you
21 would have boys from the first to the fourth year
22 arranged on either side so that at a single table you
23 would have a boys' representative of every year from the
24 first to the sixth.

25 Q. And I think in terms of the table, this is obviously the

1 school meal situation, we know that the food was not
2 good, from your statement. We don't need to go into the
3 details of that.

4 A. (Witness nods).

5 Q. And it never improved, I take it?

6 A. I would say that in the later years there was some
7 improvement.

8 Q. Okay.

9 A. But it still wasn't really very good at all.

10 Q. No. But we should understand that as well as the chief
11 and the deputy being the head and the foot of the table,
12 and presumably effecting some control potentially, that
13 that reflected the way your day at the school ran. Boys
14 woke you up, boys put you to bed?

15 A. Yeah. It meant that you actually met the other boys at
16 your table, in your squad, four times a day: breakfast,
17 lunch, evening meal, and then at that time there was
18 also an issue of one-third of a pint of milk, and you
19 had to -- this was paid for by the government and you
20 had to attend a fourth time in connection with partaking
21 of the milk.

22 In relation to the food, it was -- if it was hot it
23 was brought in on ashets or trays or large bowls and the
24 requisite number of plates were brought out at the same
25 time and the chief and the deputy, that was the prefect

1 or the subprefect, attended often to ladling it out,
2 although I think quite often the chief asked for the boy
3 on his left or on his right to attend to the
4 distribution of the food onto the different plates and
5 then it was passed down the table. This of course was
6 because it's inconvenient passing bowls of food for
7 everybody at the table up and down.

8 Q. Did anyone go short?

9 A. Generally speaking, I think that everybody did get
10 a share. I'm not aware of any situation where a boy was
11 just left with nothing.

12 Q. Thank you.

13 A. They always got something.

14 Q. Thank you. The other aspect, just on the domestic
15 front, is that, from your statement, all the cleaning in
16 the school was done by the squads, by the pupils; is
17 that correct?

18 A. That's correct.

19 Q. So would every day involve some aspect of cleaning as
20 directed by --

21 A. Yes.

22 Q. -- your chief and deputy?

23 A. Yes. The washing up of dirty utensils and plates was
24 dealt with on a squad, that's a table, basis. In
25 relation to other cleaning, that is the dormitories,

1 this was attended to by the boys in the dormitories, and
2 one boy would be given the responsibility for, say,
3 sweeping the floor, another for cleaning the toilets,
4 another cleaning the washing basins, another, say,
5 dusting the horizontal surfaces. Everybody had some
6 sort of job to do like that except possibly for the very
7 senior years, a fifth or a sixth year, where they tended
8 to be exempt and the more junior boys had to do that.

9 In actual fact, if you were a first year boy, you
10 were susceptible at any time to some chief figure
11 appearing on the scene and giving you -- ordering you to
12 do some household task or even some personal task for
13 them, and you just had to do it regardless of what it
14 was. There again, absolutely no recourse. You just had
15 to do what the chief told you to. And if you showed any
16 resistance or disinclination, it would be the worse for
17 you. Ultimately, everything depended on physical force.

18 Q. I'll come to that shortly. I think one point that you
19 do make, though, is in your second year -- and this is
20 paragraph 95 -- dysentery broke out so the school chose
21 to install an industrial dishwasher rather than having
22 the children washing the dishes. Presumably that was
23 a welcome change?

24 A. Yes. Yes, because when I started for the first year and
25 part of the second year, the washing of the school's

1 dishes after every meal was a major undertaking. It was
2 dealt with by squads, I think we were usually about 12
3 squads, as I say, with about 10 in each, and every week
4 a particular squad had to do the washing up. This was
5 initially done in sinks and I think was done very badly
6 because the plates and the cutlery were often visibly
7 dirty, they hadn't been properly washed and there wasn't
8 proper supervision, et cetera, et cetera.

9 In the second year, yes, a large number of the boys
10 went down with uncontrollable diarrhoea and sickness and
11 you had a situation where a previously unknown situation
12 had occurred of considerable numbers of boys being in
13 their dormitories during the day and they actually had
14 to call a nurse in from outside to assist. This led to
15 the wife of the new headmaster -- I think her name was
16 Audrey Jeffs -- I say she did this, what I really mean
17 is I heard that or it was rumoured that she had brought
18 pressure to the bring in a proper industrial dishwasher,
19 and after that the task of cleaning all the dishes and
20 cutlery and utensils, it could be done in a fraction of
21 the time and it was done hygienically.

22 Q. Indeed, and that's what happened?

23 A. That's what happened.

24 Q. Thank you. You touched on control by force there, so if
25 we could turn to discipline. If we can start with

1 discipline by teachers, the Inquiry has heard in
2 relation to other schools about corporal punishment
3 being issued by teachers. Was that common at Keil?

4 A. My recollection is that there was very little -- or
5 I witnessed very little corporal punishment on the part
6 of teachers or members of the school staff.

7 Q. Why was that, do you think?

8 A. I think that the reason is that the teachers generally
9 speaking had very little difficulty in maintaining
10 order.

11 Q. And was that because order was already maintained by the
12 boys?

13 A. Yes. Yes. I think that there was such an iron regime
14 amongst the boys that it took care of discipline for the
15 teachers.

16 Q. Let's look at the iron discipline, to use your words, of
17 the boys. If we go to paragraph 67 on page 9, you say:

18 "An inadequate system of discipline caused a lot of
19 trouble. It was conducive to uncontrolled bullying by
20 the chiefs and deputies towards younger boys."

21 And you make the point that there should have been
22 recording in a punishment book. I think we know from
23 broader reading about Keil that there was a thing called
24 Natural History, NH, where you did chores, as you say,
25 tidying or gardening, but from your experience, that

1 sort of formal recording and Natural History punishment
2 was not common?

3 A. I think it was a system which had been operated in the
4 past, but I think when I was there it had decayed and
5 become almost totally redundant and there was nothing
6 much to replace it. And this is something that caused
7 me a lot of trouble when I experienced bullying as
8 a subprefect, a deputy, there was absolutely no form of
9 discipline within the school short of physical violence.

10 Q. And fear?

11 A. Sorry?

12 Q. And the fear of violence?

13 A. Yes. It all really depended on the fear of violence.
14 Actual violence being inflicted was very uncommon.

15 Q. Right. In terms --

16 A. But you had to have street credibility, I think it is.

17 Q. We'll come onto that. But in terms of teacher
18 supervision, in theory there is a record to be kept of
19 punishments, which in theory would go, presumably, to
20 teachers for them to oversee. Was there in fact any
21 oversight of discipline by the teachers?

22 A. I never saw any. The system of NHs, that is compulsory
23 outdoor work, which as far as I could see hardly
24 existed, although it existed in theory, was something
25 you could threaten people with, but the threat couldn't

1 really be made good.

2 As far as I could see, the teachers and the school
3 management had nothing whatever to do with it and it was
4 under the supervision of this personality called the
5 senior chief who might well also have been the captain
6 of the First XV.

7 Q. Yes.

8 A. In other words, a figure with great authority in that
9 little world.

10 Q. Let's come onto that then. You've obviously touched
11 about Larchfield, the balance between education and
12 rugby in your view was sound.

13 A. Yes.

14 Q. Because rugby wasn't everything.

15 A. Yes.

16 Q. But I think from your statement, is it fair to say in
17 Keil that's exactly what it was? If you were in the
18 First XV, you were Godlike, if you were captain of the
19 First XV the likelihood was you were senior chief, and
20 in the pecking order of the boys, that was God and the
21 closer you were to playing rugby well, being in the
22 First XV, the higher up the pecking order you would be?

23 A. Oh yes.

24 Q. And then there was someone like you, who was physically
25 small?

1 A. A late developer.

2 Q. Not interested in rugby?

3 A. (Witness nods).

4 Q. Perhaps more academic?

5 A. (Witness nods).

6 Q. You were at the bottom of the pecking order?

7 A. That is so. Could I add something?

8 Q. Please.

9 A. There seemed to be the idea in that school that in your
10 squad, your table, every single person around that table
11 should be active in some rugby team or other. And
12 I wasn't in a rugby team so I was conspicuous. And
13 I was also apparently friendless because in a rugby team
14 there's a certain sort of camaraderie, a friendship,
15 people help each other out. If you weren't in a rugby
16 team, you might have difficulty in establishing
17 friendships. You might have difficulty in finding
18 somebody who would be sympathetic to speak to if you
19 were in difficulty. You might have difficulty in
20 finding somebody to help you if you were being
21 threatened, because a great deal of bullying is to pick
22 an individual who has nobody at his elbow to support
23 him.

24 Q. You pick on the weakest.

25 A. If you weren't in one of the rugby teams, you were

1 a target.

2 Q. Yes. And that was your experience?

3 A. That was my experience.

4 Q. But, and I alluded to [REDACTED] before, [REDACTED]

5 [REDACTED] in things

6 you've said, [REDACTED] was physically sturdy, played

7 rugby, so [REDACTED] experience was fundamentally different to

8 yours?

9 A. [REDACTED] I think, regards [REDACTED] had only --

10 I can't remember if it's two or three years. It's

11 either two or three years, so [REDACTED] was there for a shorter

12 time than myself. I was there for five years, but [REDACTED]

13 [REDACTED] seems to regard [REDACTED] time at Keil School as

14 quite an ordinary, typical sort of upbringing with

15 nothing very remarkable about it. Certainly nothing to

16 complain about [REDACTED]

17 Q. But from what you're saying, [REDACTED] fitted the Keil mould,

18 if I can put it that way. [REDACTED] was a rugby player, [REDACTED] had

19 the camaraderie, presumably, of teams?

20 A. [REDACTED] was a big prop forward in the scrum and looked as if

21 [REDACTED] had quite a future playing rugby if [REDACTED] had stayed.

22 So quite a popular figure.

23 Q. And it's that popularity that mattered in terms of how

24 you were treated; is that correct?

25 A. Very much so.

1 Q. Let's talk about the bullying you experienced, because
2 from what you say, you weren't fitting the mould. Was
3 this throughout the five years you spent?

4 A. It was concentrated in two particular years: my first
5 year and my last year, which was the fifth year. The
6 first year I was subject to all the unspeakable miseries
7 of being abandoned in a hostile place with no friends
8 and apparently other unfriendly young boys. And in
9 a situation where it was quite clear that my parents did
10 not want to hear anything about my difficulties in
11 trying to settle down in this alien and hostile
12 environment which had completely different rules and
13 seemed to operate on a basis that the bigger, stronger,
14 sturdier and taller you were, the higher your status
15 was. And of course somebody who is of a powerful
16 physique is at a great advantage on the rugby field.

17 Q. And presumably within the dorm or the school setting in
18 the absence of supervision anywhere?

19 A. Yes. A lot of the trouble, I think, was caused by the
20 attitude of certain of the teachers. I think they liked
21 this rugby fanaticism. I think they liked it a lot.
22 The finest performers on the rugby field were by
23 definition the biggest and the strongest, and they were
24 able to -- they had the credibility to maintain good
25 order. So if the teachers who were fanatical about

1 rugby and supervising it carried on as if the success of
2 the First and the Second XV was the greatest interest of
3 a school, these particular masters, while they might
4 have been very good at teaching, they were also
5 encouraging and spreading this cult of rugby almost as
6 a religion and of non-participants or poor participants
7 as being persons of no consequence at all.

8 Q. I think you say in the statement that the headmaster who
9 came in I think in your second year, Mr Jeffs --

10 A. Yes.

11 Q. -- was actually quite keen on the academic side.

12 A. Yes.

13 Q. And tried -- he brought in new teachers, but he was
14 fighting against the culture of the school?

15 A. I'm glad you raised that because in relation to
16 Alex Robertson, he was only there for my first year and
17 I think he must bear a very heavy responsibility for the
18 absolutely appalling state of that school when I joined.

19 Q. He was the headmaster in your first year?

20 A. He was the headmaster and he subsequently left to go to
21 Queen Victoria School. Now, somebody has to be
22 responsible for the sort of thuggish mentality which
23 prevailed in that school when I joined it and I don't
24 think the headmaster at the time can walk away from it.

25 But when Edwin Jeffs started, it was the beginning

1 of my second year, it didn't take long for one to
2 perceive that there were certain masters, certain
3 schoolteachers who were not up to the mark, and a way
4 was being made for them to disappear and be replaced by
5 better teachers. He was obviously much more interested
6 in the academic record and in the number of boys that
7 they were able to get into university. At that time,
8 there was a great deal of interest in getting the
9 maximum number of your boys, or I suppose girls, into
10 university just because it was difficult and you had to
11 be academically quite a high achiever to get in.

12 Q. Indeed, I think you've made that point --

13 A. And Jeffs, I think, was gradually trying to move the
14 school away from this obsession with rugby towards
15 academic achievement, but he was struggling against this
16 ludicrous in-built scale of values which regarded
17 examination results and academic achievement as
18 a secondary matter to the affairs of the First XV.

19 Q. Thank you. I think, returning to your first year, you
20 set out that that was the one perhaps and only time that
21 you spoke to your parents and your father in particular
22 about what you were experiencing and that didn't go well
23 for you because his advice was: fight back. One
24 individual, I think, was picking on you a lot.

25 A. (Witness nods).

1 Q. So you did what your father asked you to do and it went
2 badly.

3 A. Yes. I had been picked on in my first year by
4 a particular individual and the recurrent theme is
5 of course that if you've got a problem, there's nothing
6 you can do about it. There's nobody you can speak to
7 and nobody you can confide in. Your parents are
8 unsympathetic, et cetera, et cetera.

9 Yes, my father encouraged me to provoke a fight with
10 this person that I think was a bully and as a result of
11 it I was quite badly beaten. This actually affected my
12 relations -- I never said it to my father at all. In
13 other respects he was a very kindly man, one of the
14 kindest I've ever met, but in this particular matter
15 I think he was completely wrong in urging me to provoke
16 a fight, knowing that I had no training whatever in
17 pugilism and was one of the smallest boys in the year,
18 so I was badly battered.

19 This affected my future attitude towards my father
20 for the whole of the rest of his life, although
21 I never -- I never spoke to him about it. You have to
22 understand that with my parents, the subject of Keil
23 School was what you might call a danger area. Don't
24 start talking about Keil School to your parents because
25 they were in complete denial about the effect of putting

1 me into that dreadful school and what I suffered. So
2 I didn't discuss thereafter what went on in Keil School
3 very much at all, and I'm sorry to say this continued
4 after I had left because I realised that my parents just
5 didn't understand that the world had changed so greatly
6 from the time when they were young.

7 Q. Yes.

8 A. And it was pretty hopeless asking for their advice.

9 Q. Okay. I think we see that in relation to how your mum
10 responded to the battering you'd got. What I'm
11 interested in, as we see in paragraph 134, is you were
12 left, to use your words, with a nose buttered to a pulp,
13 two black eyes, a broken tooth, a thick ear and bruising
14 to your jaw, which would have been very visible and
15 obvious to anyone who saw you, and yet no teacher made
16 any comment?

17 A. This is -- yes, it's extremely revealing, because --
18 yes, I had these injuries which were really, really
19 obvious. I mean, you would see the damage done to my
20 face from the other side of the room. This was at the
21 weekend this fight took place and I was attending
22 classes all the following week in this state and there
23 was not so much as a word was passed.

24 It's fairly obvious that these would not be injuries
25 which were inflicted whilst playing rugby, and of course

1 as I understood the law then and probably still is the
2 law that if you sustain serious injury while playing
3 rugby, you're deemed to have consented to the injuries
4 by playing, and this was very much behind my resistance
5 to playing the game. I had seen awful injuries on a boy
6 at Larchfield and I wasn't going to go down that path.
7 But all these teachers just ignored these obvious
8 injuries that must have been derived from some sort of
9 a fight, in just the same way as they could not have
10 avoided seeing the torment and persecution that
11 I suffered in my fifth year.

12 Q. That's what I was coming onto.

13 A. Actual organised -- organised bullying.

14 Q. Yes. Because you said the worst years were the first
15 and the fifth, and I think we can see this -- and again,
16 please understand your statement is very full on this,
17 but there is, as you say, organised bullying by one
18 person in particular but with his acolytes, if I can put
19 it that way, who persecuted you throughout. And this is
20 primarily obvious to the rest of the world at the dining
21 tables?

22 A. Yes.

23 Q. Because I think, as we see at paragraph 142, which is up
24 on the screen:

25 "In fifth year, I was assigned to a squad as

1 a deputy so I was at one end of the table."

2 This is presumably because you're now at the top end
3 of the school so you're given some responsibility.

4 But there is a boy who is not good academically, has
5 been kept back a year, he's also at the table and he
6 starts to pick on you and others join in?

7 A. That's correct. And the chief, who was a classmate of
8 mine, pretends that he doesn't see anything, just lets
9 them get on with it.

10 Q. I think if we go over the page to page 20, you're saying
11 at 147:

12 "I had nobody on my side and nobody in the world
13 I could turn to. If I told the teachers then I would be
14 subjected to more bullying for being a clipe. It would
15 become unendurable."

16 Moving on to 148:

17 "The bullying and chants could easily be heard by
18 other tables, but nobody intervened."

19 That's obviously talking about pupils. It's the
20 next sentence that is perhaps of particular interest:

21 "The teachers sat on a raised platform in the dining
22 room, which was only a couple of feet away and about
23 a foot high."

24 A. Yeah.

25 Q. "They must have heard that something was going on, but

1 did nothing to intervene or stop it."

2 A. Yes. Yes.

3 Q. How did you feel as you sat watching the teachers, feet
4 away, and this was going on?

5 A. I felt a sort of anger. It seemed to just underline the
6 attitude of these teachers or these masters that if you
7 weren't proficient or at least enthusiastic on the rugby
8 field, you were of little interest to them, even though
9 you might have very good prospects of a university
10 entrance.

11 Q. That's what interests me, because you are one of the few
12 who goes to university.

13 A. That school had a real problem because the years before
14 mine, they got hardly anyone into any university at all.
15 They got one or two, but I think they were thrown out of
16 the university. The year I was in, I think, was the
17 first when there were about four or five boys who had
18 a very good chance of getting good higher results and
19 getting into a university.

20 And, you see, this obsession with rugby, it went
21 further than just my unhappiness. They were diverting
22 some of these boys who had a very good chance of
23 university entrance and hence increasing the prestige
24 and status of the school, they were getting them just
25 about every afternoon to go onto the rugby field because

1 that was far more important than studying for their
2 highers.

3 Q. Yes. So Mr Jeffs, who's trying to change things,
4 clearly is having no impact?

5 A. Sorry?

6 Q. He's not having impact because you weren't protected in
7 the dining hall.

8 A. No.

9 Q. One of the good students who may get good exam results,
10 but still the teachers do nothing.

11 A. The teachers never did anything in relation to the world
12 of the boys.

13 Could I mention something in relation to bullying.
14 You could say that the bullying was three different
15 kinds of persons. The victim, that's normally one
16 person. There's a bully, the leader of the bullies, who
17 will normally have several accomplices. And there's
18 everybody else. And everybody else doesn't see
19 anything, doesn't hear anything.

20 Now, if you, as a victim, having been selected as
21 a victim by a bully, were to complain to anybody outside
22 the group of boys, like to a member of staff, a teacher,
23 the headmaster or anybody like that, you would find
24 that, shall we say, the blind and deaf people who did
25 not participate in the bullying would take the bully's

1 side against you because everybody hates clipes. So
2 that's what the effect would have been if you'd tried to
3 speak to a teacher or the headmaster or somebody, you
4 would turn all the other boys who were not participating
5 against you because of this hatred of clipes. I thought
6 it was interesting that in that school there were many
7 slang words which seemed to have been derived from
8 prisons.

9 Q. What sort of words are you thinking of?

10 A. Like chit for bread, like joint for the school. There
11 were several others. Just some years later I was quite
12 intrigued when I was watching one or two movies about --
13 I think it was riots in American prisons and I noticed
14 these American convicts using words and expressions
15 which were familiar to me from Keil School. There was
16 this sense of confinement. There was a wall around the
17 grounds and you were only allowed out for a couple of
18 hours on Saturday to get necessities like soap or
19 toothpaste at the local shops.

20 Q. Or I think, as you say, in fairness, to go to the cinema
21 in Glasgow occasionally?

22 A. Very, very occasionally. You were allowed to do that
23 maybe about three or four times a year.

24 Q. At the time, not afterwards, but at the time did you
25 equate Keil School with confinement and prison?

1 A. Yes. You felt like you'd been imprisoned. And I think
2 I mention it that the first -- I remember the first time
3 we assembled in for a class, the class monitor pencilled
4 up on a blackboard -- I can't tell you how many days
5 there were in the first term, I'll say 108 days,
6 certainly it was over three months. So the class
7 monitor pencilled or chalked up on the top right-hand
8 corner of the blackboard something like 108 or however
9 many days it was, 108 DTG, which stood for 108 days to
10 go, which was like you were serving a sentence for
11 108 days.

12 Below it went something like -- again I can't
13 remember the exact number, but 86 days DTFD. That stood
14 for days to Founders' Day. About the only holiday we
15 had, apart from summer, Christmas and Easter, was this
16 single day called Founders' Day, which I think was at
17 the end of November, so it was worth putting up on the
18 blackboard.

19 But, I mean, this sort of thing only happens in
20 a place where people feel restricted, confined,
21 imprisoned, interned.

22 Q. Thank you. I think, though, moving on to your release,
23 if I can term it that way to keep the allusion going,
24 you managed to find, to quote your words, the endurance
25 and resolve within yourself to keep going and you

1 managed to get good results and get to university?

2 A. Yes.

3 Q. Despite all this?

4 A. Despite it.

5 Q. Yes. And, as we know, you then proceeded to a law
6 degree at Gilmorehill?

7 A. (Witness nods).

8 Q. And then a career, as you set out in your statement, in
9 the law?

10 A. Yes.

11 Q. But you talk, despite that successful background, about
12 the impact -- you're now 73 -- that Keil School has had
13 since you left and still has, is that fair?

14 A. Yes.

15 Q. Can we look at that?

16 A. I would say that almost everything about my experience
17 at Keil School pushed me into a solitary and friendless
18 existence. For several reasons. There were several
19 factors and they all operated together.

20 My family home was in Helensburgh and I was brought
21 up there [REDACTED] The alternative to
22 Keil School would have been the local council school,
23 Hermitage. If I'd gone there instead of to Keil,
24 I would have made friends and acquaintances amongst
25 a wide range of local boys. [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]. I made no friends

because I didn't go to the local council school.

Larchfield was a prep school, but that meant that the

pupils came from all over Scotland and beyond, so

I didn't really retain any friends from Larchfield.

In relation to Keil, well, I don't know if I would have wanted to retain any friends, if I could call them that, there.

At Keil, the boys that went there, generally speaking, came from a wide range of places in the Western Highlands and Islands. Almost none of them were local, except for one or two.

So what happened was I was unable to make any friendships at the school I went to first, Larchfield, because it was fee-paying and the boys came from all over Scotland and beyond. The children, the boys at Keil school, came from all over the Western Highlands and Islands, hardly any local. I had no opportunity through any school to make any friends at all.

Q. And presumably during the holidays you would go back home where you didn't have friends either?

A. During my holidays, I think there was only about one boy that I retained a friendship with that I'd known from

1 Larchfield and I gradually got out of contact with him
2 because the world of the boy at a council school and the
3 world of a boy at Keil School is like different planets.

4 Q. And I think that solitude continued at university?

5 A. Yes, it followed me into university because at that
6 time -- I'm talking I was at Glasgow University law
7 faculty from 1966, I think, till 1970, and at that time
8 for some reason there were very, very few women or
9 females that studied law. Just an absolute handful and
10 no more than that. And the result was that I had hardly
11 any contact at all with female persons when I was below
12 the age of 23. I still find that really strange and in
13 no way was it my fault at all. It seemed to be the way
14 that society was organised. Yes, it's sad that more
15 young women didn't study law. It's quite different
16 today, but we're talking about a different world. When
17 I took on a traineeship at Aberdeen County Council,
18 I found that the other law graduates, and there were
19 a few in Aberdeen County Council, were married off,
20 although, strangely enough, there were one or two who
21 weren't, who were also in this position of being sort of
22 completely on their own and finding it very difficult to
23 establish any friendships with females.

24 At Keil, there were never any social events were
25 ever organised with people outside the school and most

1 definitely not with female persons.

2 Q. So I think one of the things you would be keen to see is
3 mixed schools, is that fair, to address that difficulty?

4 A. It just seems to me to be an extremely unhealthy way to
5 bring people up.

6 Q. Yes. What other hopes would you have for change?

7 I appreciate this is now 60 years ago and the world has
8 moved on, but what would you still like to see change?

9 A. What would I still like to see in what respect?

10 Q. In relation to you -- we've been talking about your
11 experience at a boys' boarding school in the 1960s and
12 the world back then. Obviously the world 60 years on is
13 different, but are there still things that you would
14 like to see set in stone to ensure others don't have
15 your experience?

16 A. Well, my belief, based on my own experience, is that
17 there are -- there are a group of -- I can't speak about
18 girls or women or females, but there are undoubtedly
19 a proportion of young boys for whom it is absolutely
20 disastrous to send them to any kind of boarding school
21 at all. I say that whilst recognising that there are
22 some cases where this may be unavoidable, for example if
23 young boys have violent or recidivist parents or parents
24 who are abusing them in any sort of way, there may be
25 nothing else for it but a residential school.

1 But short of that, I really do not think that
2 parents should take the risk of sending their youngsters
3 to any kind of boarding school at all if their child can
4 be educated in some other way.

5 At the age of 12, it might be quite difficult for
6 parents to tell whether or not a child would prosper or
7 suffer at a boarding school. That might be difficult
8 for them, although I really think if they place the
9 happiness of their child above all other considerations,
10 they would be able to tell in advance that their little
11 boy should be kept away from boarding schools.

12 And of course there's this -- when I was there,
13 there's this sort of wall of secrecy right around them.

14 Q. Yes, and I think we see on the last page, and these are
15 the closing paragraphs of the statement, perhaps just to
16 close with them, we see at paragraphs 201 and 202 you
17 say:

18 "Where someone is unable to stop it, there should be
19 a procedure in place for the victim to report it.

20 Children should have an outside contact who they can
21 get in touch with to complain if the bullying has not
22 been dealt with properly by the school. This would put
23 the headmaster under threat of bad publicity, which
24 these fee-paying schools are terrified about, and will
25 ensure that they address bullying."

1 Shortly put, there has to be a way that a child can
2 speak out?

3 A. What I would envisage is that in the first school
4 assembly of the year, along with everything else that
5 the headmaster or headteacher addresses the school
6 about -- and I haven't been at school for over half
7 a century, but I assume that probably the headmaster or
8 the headteacher at the first school assembly probably
9 tells the entire school assembled children, pupils and
10 teachers or masters that it is the policy of the school,
11 for example, that any form of racial prejudice will not
12 be tolerated, any form of misogyny will not be
13 tolerated, any form of ill-treatment of the disabled
14 will not be tolerated. Surely they should be adding to
15 their list of intolerable behaviour that the school will
16 not allow any sort of bullying.

17 The entire school assembled should be told that if
18 they come across any bullying, they should try to deal
19 with it themselves. If they cannot deal with it
20 themselves, then they should refer it to a higher
21 figure, if necessary right up to the headmaster.

22 Now, if at the end of all that the tormented and
23 persecuted little boy has still not got proper
24 alleviation and in fact he really ought to get
25 apologies, if it is not dealt with then there should be

1 an ongoing procedure whereby this little boy can in
2 confidence complain to an outside individual person,
3 institution or body that he has been bullied, he has
4 complained to the school and the school authorities and
5 the school has not dealt with the problem.

6 This outside authority could then get on to the
7 headmaster and report what had happened and make it very
8 clear indeed that if the headmaster did not attend to
9 that matter, as a matter of importance, he might soon be
10 seeing publicity about it.

11 Q. From what --

12 A. It's essential, though, that the outside regulator or
13 controller or ombudsman or whatever you want to call
14 this person is utterly and completely independent from
15 the school and its governors and its teachers and is not
16 open to any form of pressure, because the world of
17 private boarding schools is a very small world and has
18 shown itself extremely proficient at avoiding dealing
19 with bullying in the past.

20 MR BROWN: Neil, thank you very much indeed. Is there
21 anything else you would wish to add?

22 A. Sorry?

23 MR BROWN: Is there anything else you would wish to add?

24 A. I don't think I have anything in particular to add.

25 MR BROWN: Thank you very much indeed. I have no further

1 questions.

2 LADY SMITH: Neil, can I add my thanks to Mr Brown's. Thank
3 you for engaging with us through your written statement,
4 which, as Mr Brown has explained, is also your evidence,
5 your signed evidence. I have studied it, I will
6 continue to study it along with the evidence that you've
7 given us orally today, which has made it come to life.
8 I'm absolutely clear regarding your views of Keil School
9 and the time that you had there and how hard it was.
10 I'm sure it won't have been easy for you to come along
11 and talk about that today but I'm grateful to you for
12 doing so because it really helps with the work that I'm
13 doing here.

14 Thank you for that, and I'm now able to let you go.

15 A. Would you like me to withdraw?

16 LADY SMITH: Yes, please.

17 (The witness withdrew)

18 MR BROWN: My Lady, that would be an appropriate time to
19 break. We have another live witness from the same era,
20 and then there'll be a read-in after lunch.

21 LADY SMITH: Thank you very much.

22 (11.27 am)

23 (A short break)

24 (11.51 am)

25 LADY SMITH: Mr Brown.

1 MR BROWN: My Lady, the next witness is 'John'.

2 LADY SMITH: Thank you.

3 'John' (sworn)

4 LADY SMITH: 'John', I think Mr Brown will be taking you to
5 that red folder in a moment or two. It has got your
6 statement in it. You'll also see your statement coming
7 up on the screen, so use either or neither, as works
8 best for you.

9 A. Mm-hmm.

10 LADY SMITH: If you have any queries or concerns during your
11 evidence, please don't hesitate to let me know, or if
12 you want a break at any time that's not a problem.
13 Whatever works for you will work for me.

14 A. Thank you.

15 LADY SMITH: Please do be aware of that. So if you don't
16 have any queries at the moment, if it's all right with
17 you, I'll hand over to Mr Brown and he'll take it from
18 there.

19 A. Thank you, my Lady.

20 LADY SMITH: Thank you. And thank you for using that
21 microphone. Quite apart from anything else, our
22 stenographers listen to you through the sound system, so
23 it's very important that you do use it.

24 Mr Brown.

25 Questions from Mr Brown

1 MR BROWN: My Lady, thank you.

2 'John', good morning again.

3 A. Good morning.

4 Q. As her Ladyship has touched upon, we have your statement
5 and for the record I'll read in its reference number,
6 which is WIT.001.001.8374. That aside, we can see that
7 this is a statement which runs to 14 pages, and on the
8 last page it confirms that you signed the statement on
9 23 April 2018.

10 A. Yes.

11 Q. Three and a half years ago. And in the final paragraph,
12 number 68, you said:

13 "I have no objection to my witness statement being
14 published as part of the evidence to the Inquiry.
15 I believe the facts stated in this witness statement are
16 true."

17 But I think it's fair to say that after having
18 signed it, you realised that there was one fundamental
19 error in the statement which you corrected and which
20 I formally recognised. Paragraph 58, it said you have
21 two sons. You have a son and a daughter?

22 A. That's correct.

23 Q. So that's been corrected and I take it that having been
24 done, you're content with the accuracy of the statement?

25 A. There's one thing in paragraph 67, which I think it's

1 probably right to change.

2 Q. Yes?

3 A. "I have returned to Keil School for a few dinner
4 reunions ..."

5 I read the statement last night in my hotel, this
6 morning rather. I wouldn't say that's completely
7 correct. I -- what did I say ... (Pause).

8 I think I said -- I would like to say that I had
9 just attended a few dinner reunions. They weren't
10 actually at the school. They were in Glasgow, if you
11 want to be absolutely granularly correct. That's what
12 I would suggest.

13 Q. I think as we know --

14 A. It doesn't get to the substance of the statement.

15 Q. No, indeed. I think we know, obviously, Keil School
16 closed in 2000.

17 A. Yes.

18 Q. And in fact the building that you remember is now
19 a burnt-out shell.

20 A. Yes.

21 Q. Have you visited --

22 A. I've seen it.

23 Q. -- in person?

24 A. Yes.

25 Q. What did you think when you saw it in that condition?

1 A. I probably felt a little sad to see the thing in that --
2 the building in that condition.

3 Q. It was a beautiful building.

4 A. It was. It was a lovely building, yes.

5 Q. What went on, less so, inside?

6 A. Indeed.

7 Q. We'll come to that. And in that regard, the Inquiry is
8 grateful and please understand, having confirmed your
9 statement is accurate, it is in evidence so we don't
10 need to rehearse all that is in it. There are chapters
11 I won't touch upon, as you will understand.

12 A. Mm-hmm.

13 Q. But recently, and I'm very grateful for this, you sent
14 a number of documents to the Inquiry to fill in perhaps
15 a little more colour to what you're going to talk about.
16 One was a photograph, and as you will see shortly in
17 relation to other items, I'm afraid with redaction,
18 photographs are rendered grotesque, so we have the
19 photograph and it was good to see it but I'm not going
20 to use it.

21 But you also sent a document entitled, "Corporal and
22 non-corporal punishment at Keil School", reflecting some
23 of your memories, and that's a document you had written,
24 I think, some years before?

25 A. Yes.

1 Q. In 2015?

2 A. Mm-hmm.

3 Q. Much of it is contained within the statement, but
4 understand we have that and it is understood.

5 A. (Witness nods).

6 Q. The other documents, and we'll come to those, are
7 a report card from 1962, which is perhaps of greater
8 historical interest to you than to us because we know
9 that despite some of the criticism of your academic
10 efforts in 1962 you went on to become a lawyer after
11 university, so you clearly succeeded.

12 But in particular or of particular moment is
13 a letter that you discovered to your mum and dad from
14 1961 and that's something we will look at.

15 A. Yes.

16 Q. Because it reflects, obviously, what you were thinking
17 at the time very clearly.

18 A. Yes. I'm quite happy for these to be received in
19 evidence.

20 Q. Yes, thank you.

21 LADY SMITH: Thank you for taking the trouble to look those
22 out and let us have them. It's good of you.

23 MR BROWN: Yes.

24 Could we just briefly look at a number of
25 photographs, and you'll see what I was meaning. This is

1 document LIT000000003. We can start with the first
2 photograph, which is the schoolhouse at Helenslee.
3 That's what you would remember of Keil School in its
4 prime, I take it?

5 A. That's correct.

6 Q. You can see even in that photograph three minute figures
7 have black boxes put on their heads.

8 A. Oh gosh.

9 Q. Steel yourself. If we go down the page, you can see
10 a picture of a rugby team, so you can understand there
11 would be little point in putting up your class
12 photograph.

13 A. Mm-hmm.

14 Q. But that's 1924/25, we can see from the rugby ball, so
15 well before your time. But we will come to a number of
16 photographs very shortly, so if we just leave it up.

17 You are now 75?

18 A. That's correct.

19 Q. And by way of background, your father was a professional
20 election agent and you moved around because of your
21 dad's job, living in Glasgow and then going to
22 Northumberland. You went to prep school in
23 Northumberland but your parents felt that at that stage
24 a Scottish education would be good for you; is that
25 correct?

1 A. That's correct, yes.

2 Q. They wanted to send you to a boarding school and the one
3 that you ended up in, as we see in paragraph 4, was Keil
4 School in Dumbarton, and your brother also went.

5 A. That's correct.

6 Q. We see you joined when you were 13 in 1959. You go into
7 second year, and your brother went into first year.

8 In terms of the school, we know it was run by the
9 Mackinnon-Mcneill Trust and had its origins in Kintyre
10 but had moved to the Helenslee site, I think, just
11 before the Second World War. In terms of the boys,
12 you're talking about 150 or so. Where did most of them
13 come from?

14 A. To get into the school, one had to have some connection
15 with the Highlands, and most of them came from Scotland,
16 somewhere in Scotland. I think they interpreted it
17 quite loosely, in fact. I was living in Northumberland
18 at the time and somehow my parents, because they had
19 a connection with Scotland with Argyllshire, my father
20 had run a hotel in [REDACTED] after the war,
21 and my mother came from Oban, and all this was factored
22 into getting me into Keil.

23 LADY SMITH: Did you say the hotel was in [REDACTED]?

24 A. No, sorry, [REDACTED] in [REDACTED]

25 LADY SMITH: Yes, thank you.

1 MR BROWN: So we understand a West Highland and Island
2 connection was part of the background?

3 A. Yes, that's exactly right.

4 Q. Were there any local pupils from closer to home or
5 closer to Keil, rather, that you remember?

6 A. Yes, there were people from Renfrewshire and from
7 Dumbartonshire, indeed, relatively local, yes.

8 Q. Before you went, two questions. Did you have any say in
9 the matter of going to Keil?

10 A. Not really. I didn't really have a say. They presented
11 this to me as an option, getting into Keil, and I just
12 went along with it.

13 Q. Second question. Before you went there, starting in the
14 second year, had you had a preliminary visit or did you
15 understand anything about the school prior to arriving
16 on day 1?

17 A. I knew nothing about the school. I can't remember that
18 I'd visited the school beforehand. I may have. I can't
19 remember. But it was all new to me when I arrived
20 in September 1959.

21 Q. Your prep school in Northumberland, was that a boarding
22 or a day --

23 A. No, that was a day school.

24 Q. All right, and had that been straightforward, from your
25 perspective?

1 A. Yes, that had been totally straightforward and
2 I actually did quite well at that school. It was
3 a private school, but I liked that school.

4 Q. Do you have happy memories of it?

5 A. Relatively, yes.

6 Q. So given what we know you are going to talk about, did
7 going to Keil come as a real culture shock for you?

8 A. Totally. It was a total culture shock arriving at the
9 age of 13. I was hopelessly homesick. My brother and
10 I were homesick, very homesick, but you just had to
11 pretend you were enjoying it. That was the culture at
12 the time. You just didn't show weakness.

13 Q. That culture of not showing weakness, would you say that
14 was part of society then? Was it from your parents? Or
15 was it just the school?

16 A. I think that was a society thing. I mean, we're talking
17 of when I went there, the war had only finished 14 years
18 before and it was very much all the adults in my company
19 were people who had fought in the war and gone through
20 the war and, you know, you just had to thole it, if you
21 like.

22 Q. Yes.

23 A. You just had to accept that it's the way it was. You
24 were told what to do and you just had to go and do it.

25 Q. When you arrived at the school on that first day, you

1 and your brother, were you welcomed in any way?

2 A. I can't remember being welcomed, no.

3 Q. Was there an assembly where new boys were spoken to by

4 the headmaster, for example?

5 A. I don't remember that. There was some sort of induction

6 by the senior chief. He made some introductory remarks,

7 but that's about it.

8 Q. We'll come onto the way the school operated, which

9 I think you describe as the Keil system.

10 A. Mm-hmm.

11 Q. Was that -- the Keil system is one, read short, where

12 senior pupils run everything, is that fair, bar the

13 education and presumably tuition in sport and the like?

14 A. The whole school was run and managed by the boys. The

15 masters had very little input to that system. They were

16 remote from the management of the school. They would

17 intervene in certain cases, you know, which came to

18 their attention, but generally it was left entirely to

19 the boys.

20 Q. We'll come back to that. Were you parents aware that

21 this is the way the school ran, do you think?

22 A. I don't think they were particularly aware or neither

23 were they interested.

24 Q. I see. It's simply from your statement their first

25 choice appears to have been Dollar?

1 A. Yes.

2 Q. But you didn't get into Dollar?

3 A. No.

4 Q. So you then go to Keil?

5 A. Yes. I think it's fair to say I was quite pleased to
6 get past the examination to get into Keil and the fact
7 that I got a half bursary, you know, I was quite proud
8 that I'd succeeded in that respect. But I wasn't
9 knowing what was coming in front of me.

10 Q. No. And in terms of your first day, I think you say at
11 paragraph 10 on page 3:

12 "I can still see in my mind's eye the taxi that
13 dropped [your brother and yourself] off pulling away in
14 a cloud of dust with my mother in it. There was no
15 welcoming ceremony or anything like that, we just went
16 into assembly and were assigned numbers and squads.
17 Everybody was called by their surname, even by other
18 boys."

19 A. Yes.

20 Q. So as soon as you arrive, your mother goes, you're
21 allocated to a squad.

22 A. Right.

23 Q. And we would understand a squad is a group of 10, 12
24 boys?

25 A. Yes, that's correct.

1 Q. With a chief?

2 A. Mm-hmm.

3 Q. And a deputy?

4 A. And a deputy, yes, that's correct.

5 Q. And the chief is presumably a senior boy?

6 A. (Witness nods).

7 Q. The deputy a senior boy too but perhaps a year younger;

8 is that correct?

9 A. That's correct generally, yes. I'm not sure if the

10 chief and the deputy came from the same year, it would

11 be fifth year, and I'm not even sure if there was in

12 fact a sixth year, but they were senior boys.

13 Q. Thank you. And do you remember how the allocation to

14 a particular squad was made?

15 A. No. That was completely arbitrary.

16 Q. And we understand it was a mix of ages?

17 A. Yes.

18 Q. From across all years of the school?

19 A. From across the various years. So you would have 12

20 boys in a squad, 12 or 13 boys including the chief and

21 the deputy.

22 Q. Would that impact where you stayed or was that done by

23 year, in terms of the dormitories?

24 A. No, my year all slept in the one dormitory.

25 Q. So dormitories --

1 A. The dormitories, but we would be split up when we went
2 to assembly. Everybody went to their allotted seat in
3 the assembly. Basically 12 or 13 rows of seats arranged
4 parallel in the assembly hall and you just went to your
5 squad and sat in the appropriate place.

6 LADY SMITH: Was your younger brother put in the same squad
7 as you?

8 A. No, he wasn't. He was in another squad.

9 LADY SMITH: Were brothers ever put in the same squad, do
10 you know?

11 A. Never. Not that I can recollect.

12 LADY SMITH: Thank you.

13 MR BROWN: Some more photographs from that document, 003.

14 If we could go to page 4, please, it will appear on the
15 screen in front of you.

16 A. Okay.

17 Q. Again with the inevitable black boxes. That's a picture
18 of a dormitory, we would understand, from around the
19 time you were there.

20 A. Yes.

21 Q. Is that familiar to you?

22 A. Completely. I can remember the lampshades being like
23 that, yes. That looks like my dormitory.

24 LADY SMITH: You realise what you refer to as lampshades are
25 to anonymise the boys from the photograph.

1 A. No, I'm talking of the actual lampshades in the room.
2 Is that actually a photograph of a dormitory at Keil
3 School?
4 MR BROWN: That is a dormitory in Mason House.
5 A. Right. Yes, I recognise that. Absolutely.
6 Q. I think when you're talking about lampshades, are you
7 looking at the lamps that are attached to the ceiling?
8 A. Yes, that's what I'm talking about.
9 LADY SMITH: Oh, I see.
10 A. I beg your pardon, my Lady.
11 MR BROWN: And just since we're on that page, if we go
12 down --
13 A. A lot of my time was spent lying on my bed staring at
14 lampshades.
15 LADY SMITH: I see.
16 MR BROWN: Again, this is a first year class, from the label
17 with the picture, in 1963, so I think four years after
18 your first year.
19 A. Yes.
20 Q. But that presumably reminds you of the classroom setup.
21 A. Well, vaguely, I suppose.
22 Q. And if we could go back to two further pictures and then
23 we'll stop. Page 3. This is morning assembly.
24 A. Yes.
25 Q. Does that trigger memories? The headmaster standing at

1 a lectern on the left and rows of boys, from what you're
2 saying, in their numbered seats by squad?

3 A. That's exactly right, yes. That's horribly familiar.

4 Q. And I think we see down the right-hand side there's
5 a row of seats and that's where the teachers sat? From
6 the photograph which I have without the redaction.

7 A. I cannot honestly remember the teachers being at
8 assembly.

9 Q. If we go down that page, we then see what is described
10 as the old dining hall in 1963.

11 A. Right.

12 Q. We see tables, and these presumably, from what you're
13 saying, are showing the squads, because there's ten boys
14 per table, it would appear roughly, four on either side
15 on the long arm with presumably a chief and a deputy
16 sitting at one end or the other?

17 A. Yes. That is totally familiar to me.

18 Q. I think, looking at the right-hand side of that picture,
19 again please take it from me the photograph I have is
20 without redaction, and the table on the right-hand side
21 beside the curtains is where the teachers seem to be
22 sitting.

23 A. That's absolutely correct. I recollect that intimately.

24 Q. So the teachers were dining, obviously, at their own
25 table but within feet of pupils?

1 A. Absolutely. In fact my squad sat just at the window
2 there. I can see where they would have sat.

3 Q. Is that at the back of the photograph as we look at it,
4 the centre?

5 A. The back of the photograph -- actually, the tables
6 weren't arranged in that horizontal way, they were
7 arranged in a different direction, so there would have
8 been, I think, two squads sitting in that window area.

9 Q. So that is a reminder. These are photographs,
10 obviously, a couple of years after you departed.

11 A. Yes.

12 Q. Looking at the way the teachers -- if we can start with
13 teacher input, we'll come back to the fact that this
14 was, as you said, a school essentially run by boys.
15 What did the teachers actually do other than teach?

16 A. There's very little that the teachers did in the way of
17 management of the school. They just did not get
18 involved. They just got on with their teaching and that
19 was it.

20 Q. We would understand that, as you've told us, dormitories
21 were by year. Was a teacher allocated to a dormitory,
22 for example?

23 A. No, there wasn't that -- I don't recollect -- no, there
24 was no supervision by a teacher of any particular
25 dormitory. In Mason House there was a teacher who lived

1 in the house or an annex to Mason House at one end of
2 Mason House, a Mr Bunton. He lived with his family in
3 that area, in that house, but I don't recollect -- he
4 didn't have a role in supervising Mason House at all.

5 Q. From other schools the Inquiry has looked at, the role
6 of housemaster seems to have been fundamental, but for
7 Keil did housemasters exist?

8 A. No, the concept of housemaster did not exist. I'd never
9 heard of housemaster until I heard much later from other
10 schools.

11 LADY SMITH: What about house tutors? By that I mean
12 teachers who would visit the house on a daily basis at
13 prep time, for example, to be there to supervise prep,
14 to help with any difficulties with the academic work,
15 that kind of thing, anything like that?

16 A. There was nothing like that, absolutely nothing.

17 MR BROWN: For example, was there prep in the evenings?

18 A. There was prep in the evenings, and that was supervised
19 by a chief or a deputy. And he would sit at the front
20 while the boys got on with their prep.

21 Q. All right. So from what you're saying, you were taught
22 by teachers in class, and what did you think of the
23 education level?

24 A. Not a lot. When I arrived from my pep school in England
25 I was fired up with education, but it just -- in the

1 three years that I was there, my interest just flagged,
2 just went away. There was no culture of excellence to
3 support interest in educational subjects. There just
4 wasn't. In my case, it was just a case of surviving the
5 school and getting by, if you like.

6 Q. We know that there was a change of headmaster, I think,
7 at the end of your second year; is that right?

8 A. That's -- wait a minute --

9 Q. Or am I wrong --

10 A. Actually it was in my third year. I started in fourth
11 year -- came in April -- would have been April 62,
12 Mr Jeffs.

13 Q. Yes, that's right, that's from your statement in
14 paragraph 7. How long did you remain in the school
15 after that?

16 A. I think I only remained another term.

17 Q. And did you get a sense that anything was likely to
18 change with him or was it -- did you simply not have
19 enough time to form a view?

20 A. I didn't have enough time to form a view.

21 Q. Thank you.

22 A. I made a good impression on him, though. Shall I tell
23 you the story?

24 Q. Please.

25 A. I was heading back to Northumberland and I was with my

1 friend [REDACTED] who lived in Northallerton, and we
2 were waiting in a crowded waiting room at Glasgow Queen
3 Street waiting to take our train south. I don't -- it's
4 probably a bit before your time, Andrew, but in those
5 days you would be in a railway waiting room and there
6 would be clouds of smoke and it was very grey and
7 horrible and one could never get a seat.

8 And a couple of people came in and I stood up and
9 offered my seat to a lady. After we got out of the
10 waiting room to take our train, [REDACTED] said to me,
11 "Do you know who that was?" I said, "No." "That's the
12 wife of the new headmaster."

13 So when I arrived back for the start of the next
14 term, the headmaster went out of his way to search me
15 out and thank me.

16 Q. Very good.

17 A. He even offered me a lift in his car, which was
18 incredible.

19 Q. That presumably might have given him an impression of
20 Keil --

21 A. Well, I was in my blazer and I just made the right
22 impression at the right time. I didn't know who these
23 people were. But [REDACTED] had seen them at the school
24 while Mr Jeffs was having an interview for the job. So
25 I made a good start there, but left it at that.

1 Q. And presumably that would have been, looking to
2 paragraph 17 of your statement, which seems to be
3 something that you remember, page 4, which was the
4 uniform: green blazer and short trousers.

5 A. Yes.

6 Q. Which seemed to trouble you because you had a set of
7 long trousers which you would change into.

8 A. Well, most of the boys had long trousers, but they just
9 kept them secret and put them under their beds, under
10 their mattress. They hid them. Even the senior boys
11 would sneak into Glasgow and they'd put their long
12 trousers on. They'd get on the train, get into the
13 toilet and change their clothes.

14 Q. Because shorts were the norm even to fifth year?

15 A. Yes. I'm calling them long shorts because these chaps
16 were -- for example, the First XV, they were all big
17 strapping lads with long thighs, so that's why I'm
18 calling them long shorts.

19 Q. Going back to --

20 A. They looked ridiculous walking about in long shorts.

21 Q. Yes. Going back to the teachers, though, presumably
22 they would also have a role in sport, coaching sport?

23 A. I can't -- there was a Mr Anderson, I think he had
24 a role in sport, the English teacher, but I can't really
25 recollect the involvement of the teachers in sport.

1 Q. What about teachers' involvement in discipline and
2 corporal punishment?

3 A. Their involvement was a very much light hand. They did
4 not get involved.

5 Q. Can you think --

6 A. Occasionally you might get strapped, right, by a teacher
7 for some misdemeanour in class, but otherwise they just
8 left everything to the chiefs and deputies.

9 Q. Was behaviour in class quite good in that context, do
10 you think?

11 A. Behaviour was good in the class, yes.

12 Q. Can you think why it was good? Was there a reason?

13 A. That's a good question. I think there was a respect for
14 the teachers. We never had any problem, I certainly
15 didn't have a problem with the teachers, you know, my
16 relationship with any of the teachers was good and
17 people -- these men had served their country, many of
18 them had served in the war and there was underlying
19 respect for them.

20 Q. I see, thank you. But moving away from the teachers,
21 and again sorry for the third time coming back to your
22 comment this was a school run by boys, on the practical
23 side we understand that getting up in the morning, going
24 to bed in the evening would be organised by boys?

25 A. That's correct.

1 Q. The chiefs, and presumably a senior chief who was the
2 head of the school on the pupil side?

3 A. It was left to the chiefs. The senior chief did not
4 need to get involved, as I recollect, in the individual
5 management of the boys. It was just simply left to the
6 chiefs who were around the school. For example, in
7 Mason House there were -- maybe a chief and a deputy
8 slept in one room at the end of the dormitory and they
9 managed Mason House.

10 Q. Can I take it the senior chief managed the chiefs and it
11 went down?

12 A. I don't know about that. They just all lived together.
13 The other chiefs just lived together in a dormitory
14 inside the main school, the main building.

15 Q. And the chief and the deputy would run their squads and
16 each squad would have tasks allocated to it? Is that
17 correct?

18 A. I don't think the allocation of orderly duty was
19 organised through the individual squads. It was just
20 organised on a different basis.

21 Q. I see. But orderly duty, you mean cleaning --

22 A. Yes.

23 Q. -- sweeping floors, preparing --

24 A. That's right.

25 Q. -- meal times, cleaning up after meals?

1 A. Yes, we washed the dishes as well. I mean, every squad
2 would have a chance -- would have a requirement to
3 assist with washing the dishes after meals. It was done
4 rotationally.

5 Q. Was anything, forgetting the teaching, not done by boys?

6 A. No.

7 Q. Everything was boy-driven?

8 A. Everything was boy-driven. There was a gardener who
9 looked after the grounds but he could be assisted by
10 boys working off NH.

11 Q. Natural History?

12 A. Yes. And there was a matron who would look after the
13 boys' health, you know, in certain situations.

14 Q. But otherwise boys --

15 A. It's all run by boys, yes.

16 Q. And that included -- you've talked about NH. Was NH
17 used as a means of discipline?

18 A. Absolutely.

19 Q. So a transgression you would be awarded Natural History,
20 which would mean working outside?

21 A. That's right. The thing -- in a sense it fossilised
22 into a system of, "Right, you've got an hour's NH", and
23 it would be written in the NH book and basically it
24 would be converted into a black mark against you, but
25 people did not work off these hours.

1 Q. They didn't?

2 A. The system was basically to harness bad behaviour into
3 doing productive work in and around the school, but
4 I don't recollect that people actually sought to work
5 off the hours that they'd been allocated.

6 Q. But it was in fact from your experience recorded, as
7 we'll come to --

8 A. Yeah.

9 Q. -- in a little while. What about physical punishment by
10 boys?

11 A. Well, that took place from time to time. This process
12 of getting a backside smacked with a gym shoe or
13 a plimsoll as they called them then. The peechee. You
14 must get the C-H pronounced.

15 MR BROWN: Peechee as in lochee?

16 A. I think the linguists call it a velar fricative.

17 Q. And that's P-E-E-C-H?

18 A. Yes.

19 Q. And that's what a blow from a plimsoll was known as,
20 a peechee?

21 A. Yes, "You'll get the peechee".

22 Q. Was that formal or informal punishment? In other words,
23 was there any noting of that sort of punishment as there
24 was with NH?

25 A. No, I don't think so, actually. No. The NH was noted

1 but not the peech.

2 Q. Was the peech --

3 A. Yes?

4 Q. -- known to be going on amongst the staff, do you think?

5 A. No, the staff never administered the peech.

6 Q. But were they aware that chiefs and deputies were
7 issuing peechs?

8 A. Issuing sounds terribly formal, Andrew. It was all
9 summary justice and that was it. You had to bend over
10 and take the peech.

11 Q. For what sort of things?

12 A. Oh, I can't remember. I honestly can't remember.

13 Q. Was it common?

14 A. It wasn't common as such. Occasionally people got the
15 peech.

16 Q. At the very outset of your statement, paragraph 9 on
17 page 2, you say:

18 "The best way that I can describe Keil School is
19 that it was an unkind environment. It was a brutal
20 existence being at a boys' boarding school."

21 Starting with the unkindness, what were you thinking
22 of when you said that?

23 A. Well, it just was -- the administration by the boys was
24 just -- it was just unkind. It was just not a friendly
25 place to be. I mean, actually inside your own year,

1 I didn't have any problems with my classmates. There
2 was some degree of cohesion. But otherwise the -- you
3 know, you couldn't demonstrate any feelings at all at
4 the school, you know, feelings of displeasure or being
5 homesick or having a problem would be -- just would not
6 be looked on kindly. It would be regarded as a sign of
7 weakness. So you had to bottle it and just get on with
8 it.

9 Q. You say at paragraph 51 on page 11:

10 "There was occasional bullying ..."

11 Although you were not bullied.

12 A. Yes.

13 Q. But there is, to use the cliché, a stiff upper lipped
14 mentality?

15 A. Totally. That sums it up.

16 Q. You say in paragraph 51:

17 "I wouldn't say that bullying was ingrained in the
18 school, but it did exist."

19 A. Yes.

20 Q. And then you talk about your experience in fourth year
21 when a fifth year who sat next to you would punch you
22 every time you sat at the dinner table.

23 A. That's correct, yes.

24 Q. You never flinched:

25 " ... I just took it because that was part of the

1 culture of the place."

2 A. That's correct.

3 Q. But it was something presumably you would come to
4 expect: it's dinner time, I'm about to get punched?

5 A. Yes.

6 Q. As we saw from that photograph, presumably that's
7 sitting at a table with teachers at a table a few feet
8 away?

9 A. Absolutely, yes. Literally a few feet away from the
10 teachers.

11 Q. And the teachers would do what?

12 A. Well, they just didn't notice it. And my chief never --
13 he didn't intervene. The chief -- I was actually --
14 that would have been in third year and this fellow that
15 punched me, he was in fourth year, so the chief would be
16 sitting here, the fellow would be here and I would be
17 here. (Indicating).

18 LADY SMITH: So you're demonstrating the chief would be how
19 many feet away from you, a couple of feet at the most?

20 A. He would be as distant as that, this end of this table.

21 MR BROWN: A matter of feet?

22 A. Yes. So he tolerated this.

23 LADY SMITH: Thank you.

24 A. And that fellow who punched me, I got relief in fourth
25 year because when I came back to fourth year, it was the

1 same squad and the fellow that would punch me, he had
2 become a deputy so he sat at the other end of the
3 refectory table, so that was me literally beside the
4 chief. I moved up one and the other boy was at the
5 other end of the table, so the punching stopped.

6 MR BROWN: Of you or did he punch the person next to him?

7 A. No, he didn't. He was sitting at the other end of the
8 table. He didn't punch anybody.

9 Q. Right.

10 A. He would sit at the other end of the table with the
11 junior boys.

12 Q. And that was something that you would just put up with
13 because otherwise would you be castigated for being weak
14 if you complained, for example?

15 A. Yes.

16 Q. I think we see in paragraph 42 you say:

17 "If a boy displayed any weakness whatsoever, they
18 would be labelled a 'Chivers'."

19 After the jelly?

20 A. Yes.

21 Q. Because you'd wobble?

22 A. Yes, exactly.

23 Q. That mentality, was there any change in the years you
24 spent --

25 A. No, there was no change at all to the mentality, the

1 culture of the place.

2 Q. I think you say the only time you remember
3 experiencing -- this is paragraph 43 on page 9:

4 " ... any kindness was in third year when the
5 history teacher asked me after class if I had any
6 problems.

7 A. Mm-hmm.

8 Q. And you said, perhaps inevitably, no.

9 A. That's correct, yes.

10 Q. "There was no love and there was nobody who could be
11 considered approachable. You were supposed to just
12 bottle any emotions you might have felt. Anybody that
13 didn't would be despised."

14 Did anyone suffer that, to use your word, being
15 despised because they didn't display a stiff upper lip?
16 What would happen to them?

17 A. Nobody -- nobody -- nobody broke down to this. They
18 just put up with it. Despise is quite a strong word,
19 actually. I can't recollect that that actually ever
20 happened to anybody.

21 Q. Did you talk amongst yourselves in the year group about
22 this? Was there any opening up to anyone?

23 A. There was no opening up at all.

24 Q. So in the privacy of the dormitory, you wouldn't say to
25 one another, you know, "This is intolerable"?

1 A. No, nothing like that.

2 Q. No. And in relation to trying to share things with your
3 parents, you went home, obviously. Did you ever
4 complain to them?

5 A. Well, we did -- my brother and I did say we were very
6 unhappy at the school, and that was -- that was about
7 it. They just never listened, my parents. Our parents.
8 You just had to get on with it. It was the whole
9 concept of being, quotes, manly. You have to be manly,
10 you have to keep a stiff upper lip and just get on with
11 it. If you look at the word "despise", that's quite
12 a strong word there, but my parents, or my father, who
13 had been an officer in the army in the last war, he
14 would have expected me to be manly about it and just get
15 on with it.

16 Q. I think in that regard we've heard in other schools of
17 people running away. Broadly, people didn't run away
18 from Keil, is that --

19 A. People generally did not run away. There were a couple
20 of instances of people who ran away. A boy who entered
21 into third year, I remember a fellow called [REDACTED] who
22 did run away, and he just disappeared, managed to get
23 down to London, find himself a job, lived in a Salvation
24 Army hostel, and then eventually the police picked him
25 up. He was picked upon because he had acne and he

1 didn't help matters by going into the woods around the
2 school and smoking cigarettes and -- or reading the
3 Bible in the dormitory. I think he arrived -- he
4 arrived when the pecking order inside the class had
5 already been established. He never really settled and
6 he ran away and he was taken out of the school
7 eventually because his parents were asked not to -- to
8 remove him.

9 Q. From what you're saying, did he, outwardly at least,
10 present as different to what was expected?

11 A. I beg your pardon?

12 Q. Did he present as being different, then, from the rest
13 of you because he --

14 A. Yes. He just stuck out as different.

15 Q. And he was picked on as a result?

16 A. Yes. The fact that he came later on -- by coming into
17 the third year instead of, say, first or second year,
18 you know, he was a stranger in our midst, if you like.

19 Q. So the difference again was how he got into the school
20 as well as how he behaved in the school?

21 A. Yes.

22 Q. But that difference counted against him?

23 A. He was -- I think he was picked on by older boys. He
24 wasn't picked on by people -- I don't think he was -- he
25 never really settled in our class, but he was picked

1 upon by older boys. If there was any bullying, it was
2 generally by older boys in other years picking on boys
3 below. That was my experience.

4 Q. And would they pick on people like him, who was
5 different?

6 A. Yes, different because he -- he would go into the woods
7 and smoke.

8 Q. And read the Bible?

9 A. That would be -- going into the woods and smoking would
10 be regarded by older boys as a bit of an impertinence,
11 if you like. They would probably think that that was
12 something that was reserved to them and not to junior
13 boys.

14 Q. We know that rugby was played with enthusiasm at Keil.
15 Is that your recollection also?

16 A. Yeah, that's correct.

17 Q. Was rugby, was sport important in the hierarchy of the
18 school?

19 A. Sport was really almost more important than the
20 educational aspects of the school. It was so important.

21 Q. And did that impact your position in the hierarchy, to
22 use your word, how good or otherwise you were at sport?

23 A. Well, if I had been great at sport, I probably would
24 have been well-respected. People who were good at sport
25 were well-respected, and the people that made it to the

1 First XV were given -- they wore special socks to
2 indicate that they were in the First XV. Andrew, if you
3 look at that photograph I sent you, you'll see that some
4 of the boys in the front row have got special socks on.

5 Q. Are these the socks with white tops?

6 A. Yes. That indicates -- and I only picked that up
7 recently. I looked at that photograph and I realised
8 good God, that's the First XV. They were members of the
9 First XV. And I think that was taken in third year,
10 that photograph.

11 Q. So, thinking of kudos, if you were in the First XV, you
12 would have kudos. If you weren't a successful
13 sportsman, you had no kudos, presumably?

14 A. That's probably generally true. I wouldn't have known
15 the word kudos at that age, though.

16 Q. No. It's clear, though, from what you say, that you
17 weren't bullied. I think, in fairness, there was some
18 scope at least for initiative, which you displayed,
19 I think, in your business acumen, as we see at
20 paragraph 30 on page 6. Because we see that you started
21 in your first year a [REDACTED] business.

22 A. Yes.

23 Q. We see you were buying [REDACTED] and then selling
24 them for a penny each.

25 A. Yes.

1 Q. So by Saturday night you had a pound and that carried on
2 until you were in fourth year and then you were spotted
3 for doing that.

4 A. Yes. In fact, it graduated beyond [REDACTED] and
5 a whole spread of goodies for the boys. I had the whole
6 school eating out of my hand, essentially. And people
7 tolerated that.

8 Q. Did that --

9 A. The chiefs and prefects -- the chiefs and deputies would
10 buy [REDACTED] from me. They were quite happy to
11 do that and pay a little markup.

12 Q. So there was some scope to be different?

13 A. Yes.

14 Q. And if it showed acumen and suited them, you would be
15 left alone?

16 A. Absolutely. I got through the school without any
17 trouble. And no debt either.

18 Q. No. But you were still, I think, as we know, thinking
19 it was an unkind atmosphere, and that demonstrated
20 itself, returning to the issue of NH; is that correct?

21 A. Yes.

22 Q. And this is the episode that I think perhaps brought you
23 to contact this Inquiry?

24 A. Yes.

25 Q. You talked about accruing hours of Natural History, NH,

1 not doing it, it just being marked in the book.

2 A. Yes.

3 Q. And they could see black marks against your name,
4 effectively. Did you carry out any of the hours of NH
5 that you recall?

6 A. I cannot recollect that I carried out any. If I ever
7 had carried out some NH, I would have -- it would have
8 been a few hours. But the whole concept kind of
9 fossilised into basically a black mark against you.

10 Q. But it got to the stage, as we see at paragraph 44 on
11 page 9, this is in your fourth year, so is this your
12 final year at the school?

13 A. That's right, yes.

14 Q. Would that be 1961 to 62?

15 A. That's correct.

16 Q. You had accrued 21 hours of NH:

17 "I'm not sure what I had done, I think it would most
18 likely have been insubordination. They must have been
19 giving me an hour a day on average."

20 And then you go on:

21 "After Sunday assembly, when there was a roll call
22 to make sure everybody was back in school ..."

23 You were told to go to the chiefs' dormitory.

24 A. Mm-hmm.

25 Q. Had you seen that happen before, people being summoned

1 to the chiefs' dormitory?

2 A. I'd never seen that before.

3 Q. But I think you knew, as you go on to say, that you were
4 in trouble?

5 A. I knew that something was afoot, yes.

6 Q. So would we understand you went with some trepidation to
7 the chiefs' dormitory?

8 A. Yes, indeed.

9 Q. What happened next?

10 A. Well, they just told me to go into the -- their own
11 dormitory from the common room. You entered the chiefs'
12 common room and then you -- they just told me to go into
13 their dormitory and wait for -- just wait, and then they
14 called me back out.

15 Q. Do you remember how long you had to wait for?

16 A. Just a few minutes in this dormitory.

17 Q. With growing unease?

18 A. Indeed.

19 Q. And you were called back in?

20 A. And then they just called me back in. I mean, there
21 wasn't any process, if you like. No due process.
22 I wouldn't have known what that would have been at that
23 stage, but that was it. They didn't even tell me what
24 it was about, they just told me to grab the lower rungs
25 of a chest of drawers.

1 Q. With the effect you were bending over?

2 A. Yeah. I knew it was going to be the peech.

3 Q. But in fact it was more than the peech. It was what you

4 later set out in the statement you understand as

5 a chiefs' peech?

6 A. A chiefs' peeching.

7 Q. Which meant that every chief --

8 A. Would have had a go, yeah.

9 Q. And there were 12 of them?

10 A. Yes.

11 Q. But I think, as you say, you struggled after six?

12 A. Yes.

13 Q. And you were being held down by them, they were trying

14 to stop you wriggling about?

15 A. Yes.

16 Q. But presumably you carried on wriggling?

17 A. Yes.

18 Q. So what did they do next?

19 A. My body just refused to go on with this process. I just

20 started wriggling and they couldn't -- they

21 couldn't administer all the blows. So they simply threw

22 me out of the common room. They opened the door and

23 literally threw me out. I flew through the air, all six

24 stones of me.

25 Q. Is that memory clear?

1 A. Pardon me?

2 Q. Is your memory of that clear?

3 A. As clear as yesterday.

4 Q. And --

5 A. I think the only thing I can remember after that was
6 that one of them told me to go and soak my backside in
7 cold water to -- to avoid the bruising.

8 Q. Did that --

9 A. I didn't do that. I just -- I didn't see the point.

10 Q. But I think, as we know from paragraph 49, you go on to
11 say:

12 "I was completely black and blue on my backside and
13 couldn't sit down without pain for about a week."

14 A. Yes.

15 Q. You didn't tell your parents, you go on, because that
16 would have been a betrayal of the school?

17 A. I did not tell my parents about this. And my brother
18 noticed when I was at Christmas, he noticed the
19 bruising. The bruising hadn't gone away by Christmas.
20 You see, the thing is, when these things happened,
21 I took it on myself. It was my fault, if you like.
22 I accepted the fault was mine, if you like, although
23 I didn't -- I just thought it was brutal, but that
24 I'd got myself into it.

25 Q. And is that redolent of the ethos you've been talking

1 about, where you simply bottled everything up?

2 A. Yes.

3 Q. Did you feel shame at not being able to take all 12

4 blows?

5 A. I did feel some degree of shame, yes. I don't --

6 I can't recollect how many blows I had, I lost count,

7 but part of the honour system, if you like, would -- my

8 own personal honour, would have been to take all the

9 blows.

10 Q. I think that final year, your fourth year, was also

11 difficult, as you tell us in the statement, because

12 another boy took it upon himself to prevent you from

13 eating.

14 A. Yes.

15 Q. And --

16 A. My chief, the chief in my squad denied me food for

17 several days. Which I think, actually, psychologically

18 was worse than the peeching in a way.

19 Q. Why?

20 A. Well, I was putting this front up that I could handle

21 this, and I couldn't. You know, it went on day after

22 day, where food was denied to me.

23 Q. Can you remember how many days?

24 A. It was -- maybe four or five days, which ended on

25 a Sunday night. My parents had actually come and --

1 come up from Northumberland and we went out on a Sunday
2 afternoon and I didn't tell them then, and they wanted
3 to walk about the Arrochar Alps, if you know that?

4 Q. Yes.

5 A. My father had this plan to climb The Cobbler, or up that
6 hill, and I didn't have any energy to do that because
7 I was so hungry. I had no energy. That I do recollect.

8 Q. I think you go on to say that you broke that evening at
9 school?

10 A. Yeah. I then went back into school and found that food
11 was still going to be denied at lunch -- at evening
12 dinner, and I think I had been softened up by the fact
13 I'd met my parents and I just couldn't take it any
14 longer. I just begged the chief to give me food. I can
15 remember that. I just said, "Please give me food", and
16 my eyes started to fill with tears. I didn't break down
17 or anything, I mean I just -- that would have been
18 a betrayal as well. I mean, I was sitting there in
19 these four days, had I -- I could have got up and gone
20 to report this to the masters, and I didn't do that.
21 They were just yards away. And the fellow that -- the
22 chief that was doing this to me, he knew that I would
23 not do this. He just knew that I would not clipe. So
24 you had to just get on with it. But when he saw that
25 I'd broken, he'd broken me, food was given.

1 Q. I think, looking at what you just described, the other
2 thing one might observe is the teachers are yards away
3 and they either didn't notice or did nothing?

4 A. Yes. I might add to you a little part. I was thrown
5 back on the experience of pilfering food from what they
6 call the jams cupboard and the boys had -- they could
7 keep their own cornflakes and stuff like that in the
8 jams cupboard and you could go into the jams cupboard
9 and take a small amount of cornflakes which would not be
10 noticed and you could find milk in the school kitchens,
11 so I would -- my chief actually caught me, he caught me
12 doing this, basically taking cornflakes and milk and
13 giving myself something to eat, and he -- he came in and
14 he found me doing this and gave me NH for deceit. And
15 I remember at the time wondering -- I wasn't quite sure,
16 the word "deceit" was just not in my vocabulary at all,
17 but he gave me NH for deceit which I thought was just
18 like a dagger.

19 Q. I think we can see words that were in your vocabulary
20 from a letter that you provided and referred to earlier.
21 This is WIP-3000001082, which will come up on the
22 screen. This is a letter to your parents from Keil
23 School, 11 October 1961, so this is your fourth year,
24 this is your final year.

25 A. Yes.

1 Q. And you begin by saying:

2 "I hope you have arrived safely at Brighton. I have
3 arrived safely at this concentration camp although
4 I wish I hadn't."

5 A. Yes.

6 Q. And then you say:

7 "Thanks for arranging for [your aunt] to meet me at
8 Waverley. I felt a bit letter after meeting her ...

9 Did you want them to meet me at Waverley just to
10 check that I was on the train? I think that is the
11 reason why you rang up."

12 Do you think your parents felt you might just not go
13 back?

14 A. Exactly that. They wanted to make sure that I was on my
15 way back because I'd run away from a home a few days
16 earlier and I think they were scared that I might do the
17 same thing, just disappear, so they sent my aunt and
18 uncle to meet me at Waverley just in transit, if you
19 like.

20 Q. So you'd run away from home?

21 A. I'd run away from a home that they'd put me in, a place
22 called Stannington, near Morpeth.

23 Q. Right.

24 A. That was me, I was actually trying to avoid going back
25 to the school by going to that home, but it didn't work

1 out well.

2 Q. So they couldn't but have known that you were unhappy at
3 Keil?

4 A. They knew I was unhappy at Keil.

5 Q. And I think, as we know from your statement, you were
6 asking your parents to do something about that, looking
7 at paragraph 53 on page 11, so they did take you out?

8 A. Yes. If you move to the next page of the letter, you
9 can see that I'm actually asking them to take me out.

10 Q. Yes. And you're saying:

11 "Please make this my last term."

12 A. Yes.

13 Q. I can just read this, we don't have to look at it:

14 "Please make this my last term at this place."

15 And was it your last term?

16 A. Well, that would have been October -- what was the date
17 there? October. That would have been -- I did two
18 further terms that year to take me to the end of my
19 fourth year. So that was the first term of the session
20 1961 to 62.

21 Q. Thank you. And I think we see in paragraph 55 you were
22 put in a small room with another boy.

23 A. Yes.

24 Q. Do you remember how that happened?

25 Go back to the statement.

1 A. Pardon me?

2 Q. I'm just speaking to the -- page 11, paragraph 55.

3 A. Yes.

4 Q. You were moved out of a dormitory into a smaller room?

5 A. What happened was, as you came out of -- you were in
6 a large dormitory of about 26 boys in the second and
7 third year in Mason House, and after you got to -- when
8 you went into fourth year, you moved into the main
9 school building where there were rooms, dormitories
10 scattered about, if you like. Rooms were taken up and
11 used as dormitories. And I was not put -- because
12 I arrived late in the school that term, the other boys
13 were put in dormitories and I was left in a room with
14 another boy, which actually was not a problem at all.
15 It was good to be able simply to share with another boy
16 rather than a whole lot of boys.

17 Q. That was perhaps kinder?

18 A. That was, definitely. I liked that.

19 Q. Yes. And I think we see over the page that you then, as
20 you confirmed, remained at Keil until the summer of 62,
21 but by that stage your parents had moved to Glasgow?

22 A. Yes.

23 Q. And they take you out?

24 A. Yes.

25 Q. Do you remember your feelings when you left Keil at the

1 end of the summer term in 1962?

2 A. I could only describe: elation.

3 Q. Did your parents ever recognise that their choice of
4 school was not ideal?

5 A. They never recognised that, no. They never admitted it.

6 Q. Was that something that you talked about or was it just
7 something that was locked away?

8 A. It was just locked away.

9 Q. But what we see thereafter is you went to Eastwood
10 senior secondary and did well and enjoyed it?

11 A. Absolutely.

12 Q. And then progressed on to university, a law degree, and
13 then a career in law?

14 A. Yes.

15 Q. If we can close with the impact that your experience at
16 Keil has had upon you, obviously the event of the
17 chiefs' peeching, as you say, is as clear as if it was
18 yesterday.

19 A. Yes.

20 Q. It has remained firmly in your head?

21 A. (Witness nods). I would probably say that when I got
22 out of Keil, I mean, I basically forgot about it, these
23 things, I just put them behind me. But in later years
24 it's surfaced, if you like, just the unfairness of it
25 and the unkindness of it just surfaced in my mind.

1 Q. As you say in paragraph 59:

2 "Since that day in the autumn of 1961, nobody has
3 meted out such physical pain to me and I am still
4 haunted by the memory of my experience ..."

5 Life after Keil was good?

6 A. Life after Keil was good, yes. I put it behind me and
7 I just got on with being at the other school, Eastwood
8 School.

9 Q. But I think you go on at paragraph 61 to talk about the
10 impact Keil had on you as a person.

11 A. Yes.

12 Q. You say:

13 "It brutalises you going to a boarding school like
14 Keil. I developed an emotional detachment and I wasn't
15 a nice person."

16 A. Yes.

17 Q. Was that at Keil or was that longer lasting?

18 A. I would say longer lasting. What happens, you have
19 to -- if you suppress your emotions, you become
20 detached, you form a sort of crust around yourself, and
21 it coarsened me, being at the school, it coarsened me in
22 the sense I became desensitised, emotionally
23 desensitised, and that would mean that I would not
24 recognise the feelings of other people. That's what
25 I feel.

1 Q. I think you also say at paragraph 62:
2 "I thought that the way parents had to deal with
3 children was how I had been treated at Keil."
4 So you smacked your children?
5 A. That's correct.
6 Q. You know now that they resented that and you are now
7 ashamed you did that?
8 A. Absolutely.
9 Q. When did that desensitisation stop? Or did it ever
10 stop?
11 A. Do you mean my own thing?
12 Q. Yes.
13 A. I've had to learn over the years to become sensitive to
14 other people.
15 Q. So the experience at Keil --
16 A. Absolutely. I've had to learn to take account of the
17 feelings of other people and that's been quite
18 difficult.
19 Q. But I think, given the reference to your children, the
20 effect of Keil certainly lasted, is it fair to say,
21 decades?
22 A. Yes.
23 Q. What about now?
24 A. You mean in relation to my children?
25 Q. No, I mean in relation to the impact of Keil upon you

1 now. You've reflected back about the chiefs' peeching,
2 it wasn't at the forefront of your mind but you've been
3 reflecting on it since.

4 A. Yes.

5 Q. And no doubt in terms of this Inquiry.

6 A. Yes.

7 Q. How has that been?

8 A. It's difficult to say. It's just something that is at
9 the back of my mind, the complete unfairness of the
10 system that I had gone through. The fact I wasn't --
11 I could not complain to anybody, I couldn't talk to
12 anybody about my feelings. And that went on for a long
13 time.

14 Q. And that, I think, is why you say under the paragraph,
15 "Lessons to be Learned" on page 13, paragraph 66:

16 "I think the fact that there was no support system
17 for the boys at school was wrong. That was the way it
18 was in Scotland, you just had to thole it, but there
19 should have been something."

20 Is that something that needs to be present to allow
21 children to speak?

22 A. Absolutely, yes. There was no -- the whole idea of
23 sending a child to boarding school is to get away from
24 the support system. You just didn't have it. You were
25 meant not to have a support system. It just was no part

1 of the ethos of the day. It was all about being manly
2 and being independent, you know, being able to deal with
3 things yourself emotionally.

4 Q. If we can close with paragraph 67, you talked about
5 going not back to Keil but reunions, dinners, presumably
6 in Glasgow?

7 A. Yes.

8 Q. And you're talking to people who were at Keil at the
9 same time as you?

10 A. I've not met any boys at these reunions that were in my
11 class. They're people who had been there, believe it or
12 not, in the 40s and '50s, but none of my class --
13 I haven't met any of my class who were at the school at
14 the same time.

15 Q. Your brother was there, obviously?

16 A. Yes.

17 Q. Is his recollection of Keil happy or unhappy?

18 A. Unhappy.

19 Q. Does it echo yours?

20 A. Pardon me?

21 Q. Does it echo yours?

22 A. Yes. But I don't -- he's harder than me, I think.

23 I don't think he's affected -- he just put it behind
24 him.

25 Q. He wasn't there for so long.

1 A. No. He had to repeat first year, understand.

2 Q. Right.

3 A. He actually went to the school, decided he didn't like
4 it, and he told me that he actually wanted -- he did not
5 want to succeed at this school in order that his parents
6 would remove him. Which was remarkable.

7 Q. And did they remove him?

8 A. Yes. But the fact that he was asthmatic helped in
9 a way, you know, the asthma, it took him away from the
10 school.

11 Q. 'John', is there anything else you would like to share
12 with the Inquiry?

13 A. I think one has to look at it in the context of the
14 ethos of the time, which was -- we were talking of just
15 after the Second World War and it was part of the ethos
16 of the time that you just got on with it. The concept
17 of emotional support or anything like that was just --
18 just it wasn't part of the psyche. It was all about
19 standing on your own feet, being emotionally independent
20 and putting up with harsh things. It's got to be
21 understood in that context, I feel.

22 MR BROWN: Thank you. My Lady, I have no further questions.

23 LADY SMITH: Thank you.

24 'John', there are no further questions for you.

25 A. Thank you, my Lady.

1 LADY SMITH: It just remains for me to thank you very much
2 for engaging with the Inquiry so helpfully as you have
3 done, both in terms of your written statement, which is
4 your evidence, and for coming here today to add to that
5 in answering questions that we have for you. I'm very
6 grateful and I hope you're able to move on from thinking
7 about these events, which must feel very sad to reflect
8 on.

9 A. Yes. Many thanks, my Lady.

10 LADY SMITH: Thank you for that, and I'm now able to let you
11 go.

12 A. Thank you.

13 LADY SMITH: Don't worry about the red folder, we'll look
14 after that.

15 A. Thank you.

16 (The witness withdrew)

17 LADY SMITH: We'll take the lunch break now, Mr Brown, and
18 sit again at about 2 o'clock.

19 MR BROWN: Thank you, my Lady.

20 (1.06 pm)

21 (The luncheon adjournment)

22 (2.00 pm)

23 MS BENNIE: Thank you, my Lady.

24 LADY SMITH: Ms Bennie.

25

1 'Jayden' (read)

2 MS BENNIE: The read-in bears the reference WIT.001.0017435.

3 This witness wishes to remain anonymous and he's adopted
4 the pseudonym of 'Jayden'.

5 "My name is 'Jayden'. My year of birthday is 1970.
6 My contact details are known to the Inquiry.

7 I was a day pupil at a school in Edinburgh from the
8 1970s to the 1980s. I lived with my parents and family.

9 I was asked to leave the day school just before my
10 15th birthday. I was in year 4, which was the year
11 I was due to sit my O Grade exams. They didn't expel
12 me. I was just asked to leave because of my behaviour.

13 My parents made enquiries with other schools and
14 decided to send me to Keil School in Dumbarton. I think
15 there was only a two-week period between my leaving the
16 day school in Edinburgh and starting at Keil.

17 I ended up as a boarder at Keil for one year.
18 I left around my 16th birthday."

19 My Lady, the witness in paragraphs 6 to 12 tells us
20 about his experience at his day school and I therefore
21 resume reading at paragraph 13:

22 "I think I joined fourth year about one month into
23 the term. I had just turned 15. Keil was my first
24 experience of being away from home for schooling.

25 I remember going for the interview at Keil about one

1 week before I started. I was introduced to SNR
2 SNR CGC who was this educationalist
3 and respected SNR from I remember
4 feeling welcome.

5 It was explained to my father at the interview that
6 there was a small element of corporal punishment at the
7 school. I remember it being noted by my dad, because
8 I can remember noting it myself. I wasn't really sure
9 what it meant. I knew what the cane was and I knew of
10 the tawse and belt, but there was never corporal
11 punishment at my school in Edinburgh, so I'd never been
12 hit.

13 My dad had begun to hit me when I was about eight or
14 nine, but it was more to shock than to hurt me. He
15 stopped that, which is interesting because he must have
16 made a value judgement based around violence and
17 stopped. My mum sometimes hit me in her frustration,
18 but again I don't feel that she abused me.

19 My mum just deleted what CGC had said at
20 the interview about corporal punishment. She didn't
21 respond when she heard it. My dad made some type of
22 non-verbal, disapproving, dubious look to CGC
23 It wasn't a collusive look.

24 Keil School was a grandiose kind of manor house,
25 which was situated on the outskirts of Dumbarton. It

1 was on a hillside on the edge of the River Clyde. There
2 were three boarding houses, two of which were for boys
3 aged between 13 to 18, and the other was for the junior
4 boys, aged about 11 or 12. Mason House was the junior
5 house and the other two were MacKinnon house and Islay
6 Kerr House. I was placed in Islay Kerr simply because
7 that is where they had space.

8 There were 200 boys and eight girls in the school.
9 My Edinburgh school had been completely co-educational,
10 so it was quite a different environment from what I was
11 used to.

12 The housemaster in Islay Kerr was called CDK
13 He had been at the school for about 20 years. He lived
14 in the house with his wife, I think his son also lived
15 there too. He was just beyond school age. I had been
16 introduced to CDK at the interview. He was
17 an [REDACTED] teacher. His nickname was CDK which had
18 something to do with his [REDACTED] accent. He was
19 about 5 foot 8 and was a wiry, grey-haired eccentric
20 looking man with glasses. He was in his late 40s or
21 50s. I wouldn't say he was dislikable in his front of
22 house persona. You could speak to him, but there was
23 another side to him.

24 The deputy housemaster was CFJ He was
25 also English. He taught [REDACTED] and lived alone in

1 a flat on the middle level of Islay Kerr. He was very
2 much on the periphery, like a lurker. That was my
3 impression of him when I was 15. At that stage of your
4 adolescence, people are looking at you sexually and you
5 become aware of that, even although I had no sexual
6 experience at that age. My instinct with **CFJ**
7 was that I knew that he was looking at me, and because
8 he was aware that I knew, I believe he was scared.

9 From about the age of 12, you become aware of people
10 sexualising you as your adolescence is emerging. I was
11 really tuned into this as a young adolescent male.

12 The teachers in Keil were called masters and you had
13 to address them as sir. I had never done that before.
14 This was proper old-school culture of power and
15 hierarchy. It was amusing to me. You couldn't be
16 cheeky, but there was a slight irony that you could use
17 subtly. I would get raised eyebrows for that."

18 My Lady, in paragraphs 23 to 35, the witness tells
19 us about the routine at Keil School and I resume reading
20 at paragraph 36:

21 "Bullying at Keil School. There was a lot of
22 bullying at Keil. There was bullying from masters to
23 boys, prefects to boys and boys to boys. Some of it was
24 accommodated by masters, but would be challenged if it
25 went too far.

1 In my first week you had to muster in the gym for
2 assembly in the morning after breakfast and muster again
3 before every meal. You'd arrive in the gym to this kind
4 of scene of boys everywhere all shouting and fighting.
5 It was really quite scary and shocking. Suddenly I was
6 in this environment of all these guys of different ages
7 going through this socialisation thing. You had to cope
8 with this high stress quite violent situation where guys
9 were kind of pushing your boundaries and trying to psych
10 you out. You had to command your space, stick up for
11 yourself, be assertive and also be nice at the same
12 time. This was the scene until they did a roll call and
13 we'd get into our lines of squads and traipse through to
14 the dinner hall.

15 After you'd played three matches for the rugby
16 First XV you got different socks, which had a solid
17 coloured bit round the top. The normal school socks
18 just had a little hoop around them. This was to
19 identify the First XV from the other rugby players. The
20 ceremony to get your socks involved taking a beating
21 from the whole school. I saw this happen in the first
22 week. The bravado of taking a beating meant that you
23 deserved your socks. You were supposed to command
24 respect if you had your socks. That was the culture.

25 The masters would go out when the beating was

1 happening. They knew it was happening. It was a school
2 ritual. You weren't supposed to break bones, but it
3 wouldn't be pleasant. There probably wouldn't be any
4 tears, but the boy taking the beating would get hurt.

5 A guy in my dorm was a very disturbed teenager. He
6 was the son of an oil baron. He was a white racist and
7 a really violent guy. He seemed to take pleasure in
8 hurting people. He tried to bully me but he realised
9 I was feisty and I would hit him back. He colluded with
10 a sixth former, who was one of the deputy chiefs. The
11 deputy chief tormented me for the two terms. He was
12 horrible to me all the time. I eventually reported him
13 because he punched me in the face one day. I told

14 **CGC** and the deputy chief left me alone from
15 then on. It was very difficult for me up until that
16 final confrontation.

17 Discipline at Keil School.

18 I was aware that there were different implements
19 that different masters used to punish boys. There were
20 some relics within the school teaching team who were
21 very practised in the administration of punishment. One
22 of the implements used was a leather strap with a piece
23 of metal sewn into it to make it heavier. This is like
24 getting into medieval torture implements when you look
25 at it in the cold light of day. They were designed

1 specifically to administer pain.

2 **CGC** said at my interview that there was
3 a small element of corporal punishment at the school.
4 I don't accept that. The threat of corporal punishment
5 was always present and how that punishment was used was
6 random, depending on who was choosing to use it. Some
7 masters didn't use it because of their values, and
8 others used it with pleasure. I think **CGC**
9 colluded in the excessive use of corporal punishment.

10 The discipline in Islay Kerr House was enforced by
11 the chiefs and the deputy chiefs. You were given
12 copies, which meant had you to write out a copy of the
13 school rules. This would get signed by the housemaster
14 and if you got three copies per week, you'd get beaten.

15 The housemaster would beat you. He had a reputation
16 for being a severe disciplinarian if you crossed him.
17 He used the tawse. He had a whole collection of them
18 lying around the room. A tawse is a leather
19 purpose-built implement designed to hurt people.
20 Lochgelly was the main manufacturer of tawses in the
21 '60s and '70s. They came in different weights.
22 Obviously the heavier it was, the more pain it would
23 inflict. The choice of tawse depended on how sadistic
24 the administrator was.

25 You would be summoned to see the housemaster and,

1 after being torn to shreds by him verbally, he
2 would administer corporal punishment to your hands. The
3 way in which he verbally demeaned you would depend on
4 why you were there. When he was ready to beat you, he
5 would say, 'Get them up'. You were required to present
6 your hands and then put them together. He'd then ask
7 you to put them higher, lower or whatever, which was all
8 about control.

9 There would be boys going to see him for a beating
10 once, twice or even three times a week. Beatings at
11 Islay Kerr weren't necessarily an everyday occurrence
12 but they certainly happened every week.

13 It wasn't uncommon to bump into someone who had just
14 been beaten and was severely distressed and crying. We
15 would talk amongst ourselves about the beatings. You
16 would talk within your dorm and your year group, and if
17 you were friends with boys in the year below, you would
18 talk to them too. We'd talk about the number and
19 severity of the strokes and what your hands looked like
20 after. This was a really threatening, painful and
21 unpleasant side to the school, so obviously we would
22 talk about it. I had never been exposed to corporal
23 punishment before, so I would ask the other boys what
24 the routine involved. It was distressing for everyone
25 when someone was beaten.

1 There were guidelines at the time on corporal
2 punishment in schools. I researched this and we talked
3 about it at the time but it was about survival. The
4 guidelines talked about reasonable chastisement and the
5 maximum strokes ever to be administered to a child was
6 supposed to be six, either on a clothed seat or on bare
7 hands.

8 I was beaten once by the housemaster for smoking.
9 It was my first term just before Christmas. I was
10 caught smoking with a boy in the year below. We were
11 summoned separately to the housemaster's room. The boy
12 got beaten and then I went in. He gave me ten strokes
13 of the tawse on my hand. Part of his routine was
14 a practice known as slipping. He'd say that he had
15 missed so it wouldn't count, but he didn't actually
16 miss, he would catch you across the side of your hand.
17 Being caught across the side of your hand by a really
18 thick tawse is excruciatingly painful. It's almost more
19 painful than being caught right on the hand. He knew he
20 could get away with 10, 11 or 12 strokes, as some
21 strokes didn't count because he'd missed. He got
22 pleasure from it. That's sadism.

23 Being beaten was like someone whacking a block of
24 wood really hard across your hands. It was absolutely
25 indescribable pain. It made your hand swell to twice

1 the normal size and it was black and blue for several
2 days. It was a serious injury he was administering.

3 The housemaster's wife had a reputation for
4 appearing at the door after you'd been beaten and she'd
5 then berate you and shame you. She wasn't a nice person
6 at all. She appeared when he beat me, but I've deleted
7 what she said to me. I was really distressed and in
8 a lot of pain at the time. I think I told the
9 housemaster to 'fuck off' and he just accommodated that.
10 I couldn't open the door as my hands were so sore, and
11 his wife appeared, opening it. That was the modus
12 operandi. She would listen at the door to boys being
13 beaten and would come in, excited from the whole thing.
14 She got off on hearing boys being beaten by her husband.
15 She had a reputation for that. At 15, you're switched
16 on and kind of know how humans are, so you knew that
17 that was perverse. But you wouldn't speak out, because
18 you just didn't know when you were 15.

19 Sometimes the beatings were done in secrecy.
20 Normally, as part of the punishment, you would have to
21 wait outside the housemaster's room so that the boys
22 going up and down the stairs saw you and knew that you
23 were in trouble. The door would then be left open when
24 you went in to add to the indignity of it. When it was
25 done covertly, the ritual of being forced to wait

1 outside before being summoned in and beaten was avoided.
2 You'd just go straight in. If the humiliation of being
3 forced to wait outside and having to worry was part of
4 the punishment, then why was that only for some boys and
5 not for others? There wasn't a standardised ritual for
6 every administration of corporal punishment. It changed
7 depending on who you were and that's when it got
8 sinister.

9 The only other occasion I got beaten was for mucking
10 around in prep and that was done professionally. It was
11 done within the Scottish educational guidelines on the
12 administration of corporal punishment. The teacher who
13 did it was okay. He just had to do it and took no
14 pleasure from it. He protected my wrists with a book,
15 which was in accordance with the guidelines. He took
16 care not to bruise my wrists and didn't use excessive
17 force. The indignity of the ritual was the punishment,
18 as opposed to the physical pain.

19 Pastoral care at Keil School.

20 I suppose you would have been expected to speak
21 about any concerns you had to the housemaster and his
22 wife. It wouldn't have been possible to have
23 discussions of any intimacy with the housemaster. It
24 would have been false. I think his wife took on
25 a pseudo-maternal role when it suited her, but she was

1 a vile person. It was all about gratification for her.

2 The matron would manage welfare issues. I know she
3 knew about the abuse in Islay Kerr House. I think she
4 did everything within her power to try and stop it. She
5 was on our side. She left after I did. It wouldn't
6 surprise me if she was sacked because she wasn't going
7 to collude with the abuse.

8 Abuse at Keil School.

9 The information I am providing to the Inquiry about
10 abuse at Keil School concerns mainly what I witnessed
11 happening to a boy who was in the year below me. The
12 boy is just one example, and it's the one that affected
13 me, and it's the one I know the most about.

14 I believe the boy was one of two or three boys who
15 were being repeatedly sexually abused by the [REDACTED]
16 teacher and deputy housemaster at Islay Kerr House.
17 I have said 'believe' because I never saw any of them
18 being raped. There were certain boys who were terrified
19 of the deputy housemaster and I could see that.

20 There's about six or seven different bits of
21 evidence that I can cite to qualify why I know the boy
22 was being physically and sexually abused. I think also
23 that the housemaster colluded in the abuse of the boy.
24 There were certain pupils in each year who were more
25 vulnerable and were picked on by certain teachers. The

1 housemaster had it in for the boy. That became apparent
2 from my first week in the school. The boy was 14 years
3 old and stood out because he was one of the more
4 handsome pupils in the school.

5 The boy was best friends with another boy. The two
6 shared a dorm in Islay Kerr with three others. There
7 were five or six of them in the dorm, which was upstairs
8 next to the deputy housemaster's flat. I was in a dorm
9 on the ground floor when I was in the fourth year.

10 I connected with the boy and with his best friend.
11 We had a good rapport. I mentioned before that there
12 was a Big Six being next to the boot room, which was my
13 orderly. Cleaning the Big Six was probably the most
14 punishing orderly, and this was the boys' orderly.
15 There were 40 boys in the house, so it really wasn't
16 a pleasant job.

17 The boy didn't just stand out because he was
18 handsome. He was also slightly introverted in a way
19 that wasn't really congruent with who he was. Within
20 the school it was like he was oppressed, but outside of
21 control or oppression, he was more kind of outgoing.
22 Something was oppressing him. He was reserved and quite
23 quiet, but he could also be very charming and endearing.

24 I remember walking across to breakfast one morning
25 and having a chat about the belt and the deputy

1 housemaster. This was the first time he had ever come
2 up in conversation. The boy said something like, 'He's
3 a bastard. He's an evil fucker', and something made me
4 say, 'What's happened? Does he bugger you?' I said it
5 jokingly, as you might do as a schoolboy without even
6 understanding the full implications of what you're
7 saying. The boys' look went silent for a microsecond
8 and there was a communication there. His best friend
9 then interrupted the conversation and took it over,
10 joking and laughing, as if to distract the conversation.

11 That was my first awareness that the deputy
12 housemaster wasn't right and that my initial instinct
13 with him were right. This is the kind of stuff that
14 just happens and you process it in the hours afterwards,
15 and then you just file it away in your unconscious mind.

16 In the first term before Christmas, I saw the boy
17 was very distressed sometimes. He would be doing his
18 orderly in the toilets and I'd be in the boot room.
19 I remember his best friend arriving one morning and
20 speaking to him in the toilets. They were speaking in
21 hushed tones, in coded language. He was checking out if
22 the boy was okay. I heard him say, 'Are you okay? What
23 is it? Is there any blood?' I was switched on to this
24 and was thinking it was weird, but it wasn't discussed
25 with me. The boy and his friend were very closed around

1 it. It was their conversation.

2 I was starting to become aware that things weren't
3 right with the deputy housemaster, who was this elusive
4 lurker who kept himself to himself. I had suspicions
5 through fourth year about what he was doing to the boy.

6 I witnessed the boy going to the sick bay and making
7 the matron insist that he stay in there. I think she
8 knew the boy was being abused and that she tried to
9 protect him. I have memories of her confronting the
10 housemaster on several occasions about the boy when he
11 was in the sick bay, and I've got memories of arguments
12 when he told her that the boy had to be back in Islay
13 Kerr House that night. I also have memories of her
14 confronting the deputy housemaster. She is someone who
15 had insight. I believe that she knew the boy was being
16 sexually abused and the physical abuse couldn't be
17 hidden.

18 The boy appeared one morning wearing shorts when
19 I was in the fourth year. We were allowed to wear
20 shorts to school, which was great because they were very
21 comfortable. The boy had purple tramline injuries all
22 the way down his thighs where he had been beaten.
23 I remember being shocked when I saw him. The tramlines
24 on his legs were like something you would see in
25 a documentary exhibition from a Syrian torture camp.

1 I think he wore his shorts that day because he was
2 trying to get help. His best friend was supporting and
3 encouraging him in this. By wearing shorts, the boy was
4 displaying the abuse.

5 The housemaster stopped the boy on the stairs and
6 went mental at him. He shouted, 'You go upstairs and
7 put your trousers on. I told you'. His friend
8 confronted the housemaster and said, 'Why is that, sir?
9 Why don't you want people to see what you've done to
10 him?' I was doing my orderly, so I had reason to be
11 hanging around and I witnessed this. The boy went into
12 shame and cursed his friend. He obviously thought that
13 his friend had got him into more trouble. He then went
14 upstairs and put on his trousers to hide the injuries.
15 I remember looking at the housemaster and thinking,
16 'That's not right, and why do you want him to hide it?'
17 If the beatings we received as punishment were
18 considered reasonable, why then tell him to put his
19 trousers on? Why couldn't he wear shorts? Everyone
20 else was wearing their shorts.

21 I don't think it was the housemaster that did that
22 to the boy's legs. I think it was the deputy
23 housemaster. I can work out the deputy housemaster's MO
24 because the boy described him as a horrible person and
25 used pretty violent language to describe him. I think

1 the deputy housemaster used the terror of excessive
2 physical abuse to terrify the boy into submission. The
3 boy was in regular contact with the deputy housemaster
4 from then on, and as far as I am aware, he didn't beat
5 the boy again. I think the boy submitted to the deputy
6 housemaster's control after he had been badly beaten.

7 I moved to the upstairs dorm across the hallway from
8 the boy and his friend when I went into fifth year. The
9 deputy housemaster's flat was in between our dorms. His
10 flat had a door into the boy and his best friend's dorm.
11 The door was locked, but the boys in the dorm were able
12 to see through the keyhole into his flat. The boys in
13 the dorm knew what was happening.

14 I saw more incidents when I moved to the upstairs
15 dorm. I witnessed confrontations between the boys.
16 They gave the boy a hard time. His best friend didn't,
17 as he was his best friend, but the other boys had
18 judgement towards the boy. They shamed him, as if the
19 abuse was his fault. They used coded language because
20 they didn't want me to hear. It was the inference.
21 They'd say things like, 'I saw you, you dirty fuck.
22 You're a sick fucker'. They made really snide little
23 jabbing remarks designed to shame him.

24 You weren't allowed to go into each other's dorms
25 but I used to be social so I'd go in and say hello.

1 I remember seeing one of the boys watching through the
2 keyhole one time and he was becoming aroused at what he
3 was seeing. He was also going into self-disgust at his
4 own responses to it. I'm emotionally intelligent and
5 I can read people's feelings. One of the boys was
6 saying to the boy's best friend, 'He's fucking doing it
7 again', and the boy's best friend was telling him to
8 keep watching. I don't know whether they were trying to
9 get evidence so that they could maybe tell somebody at
10 some point. I got told to 'fuck off' and I left the
11 room. This is just another memory I have.

12 I slept in a bed right next to the door in the
13 upstairs dorm. I have memories of seeing the boy going
14 into the deputy housemaster's flat covertly after lights
15 were out. About an hour later, I'd hear the door
16 opening and the boy would leave. I also have several
17 memories of the boy leaving distressed and being sick in
18 the toilet in the hallway. And I have a memory of
19 seeing him going into the flat and being sent back out
20 to use the toilet to evacuate himself, which he did, and
21 then went back in.

22 A few weeks before I left Keil, I had gone back to
23 the dorm at lunchtime to get something. The housemaster
24 was standing at his door speaking to the deputy
25 housemaster. They were talking in hushed tones, which

1 made me think that they were scheming or being covert.
2 I was going through a process of realisation at that
3 point. I heard the word 'tonight' being said and there
4 were little alpha male laughs. They became aware of me
5 and they went quiet. That evening, the boy was in the
6 deputy housemaster's room.

7 The next morning I was in the hall doing my orderly
8 and other people were finishing off their orderlies and
9 getting ready for breakfast. The boy appeared with his
10 friend in the background. The housemaster had been
11 hanging around waiting for him with his wife. The boy
12 came down the stairs and the housemaster said to him,
13 'So how did you enjoy that then? How are you this
14 morning? Was that good?' The boy went into deep shame
15 and told the housemaster to leave him alone. The
16 housemaster said something to him like, 'You liked that
17 bum boy, didn't you?' He made some kind of homophobic
18 remark, and his wife joined in, as she usually did in
19 her nasty, distorted way.

20 I knew what the housemaster and the deputy
21 housemaster had done. You can fill in the gaps. For
22 me, that is evidence that the housemaster was complicit
23 in the systemic abuse because they contrived that
24 together. The deputy housemaster had a young boy under
25 his control and had colluded with the housemaster, whose

1 responsibility it was to manage Islay Kerr House.

2 I don't believe the housemaster was a sexual abuser of
3 children. I don't think he was into boys. I never had
4 any evidence of that, and boys talk, but he hated the
5 boy for some reason. It has tormented me why a grown
6 man would treat a boy like that. I've spoken to
7 a couple of former pupils and one boy who was in my year
8 and attended the school for six years saw the whole
9 thing as well. He said it was because of the boy's
10 looks and the fact that the housemaster's own son wasn't
11 handsome in the same way. He said the housemaster took
12 a dislike to the boy the moment he joined the school.

13 I remember being told that the housemaster even
14 visited the boy's house in the holidays to beat him
15 severely for being cheeky to his parents. The boy had
16 a difficult relationship with his parents and the
17 housemaster was contacted and asked to come to their
18 house. Again that shows the type of control they had.
19 I remember seeing the boy's hands after he had been
20 beaten at school. His hands were so bruised it was like
21 he was wearing purple gloves.

22 Another incident happened a week before I left the
23 school. It was about 9.30 at night and we were in our
24 dorms. It was the last half hour before bed and this
25 scene suddenly erupted. I knew the boy was in with the

1 deputy housemaster again. The boy's dorm was agitated
2 because they were all concerned. They knew what was
3 going on and they cared.

4 I was in my room and I could hear a door being
5 banged repeatedly. The boy's friend was doing the
6 banging. He was going mental. He had lost control and
7 he was banging on the deputy housemaster's door
8 shouting, 'Fucking open this door, you bastard'.
9 I opened my door and the boy's friend said, 'Fuck off'.
10 My door got closed and then about 30 seconds later the
11 deputy housemaster's door opened and I went into the
12 hallway.

13 The boy's friend had totally lost control. He was
14 jumping up and down, shouting, screaming at the deputy
15 housemaster. The deputy housemaster was standing at the
16 door with this sycophantic grin on his face like
17 a cartoon character. He was aroused and drenched in
18 perspiration. The boy was standing in the doorway in
19 his pyjama bottoms. He looked like he had no oxygen in
20 his body. He was blue and kind of catatonic. It was
21 like he had completely shut down. I have never seen
22 a boy in that physical state ever since. I came out of
23 my dorm and just walked into this scene. The boy's
24 friend told me to 'fuck off' again and I went back into
25 my dorm. That's just another scene that I can remember.

1 I think it's really clear what had been happening,
2 because of the aroused state of the deputy housemaster
3 and the catatonic, disassociated state of the boy.
4 I believe that the deputy housemaster had been sexually
5 assaulting the boy and the boys in his dorm knew what he
6 was doing. The boy's friend had likely been unable to
7 endure it happening to his friend any more and had gone
8 mental to stop it. This was the peak of the abusive
9 behaviour before I left Keil School.

10 I believe that the boy was being sexually abused
11 during my fourth year and I believe it escalated in the
12 fifth year right up to the point where I left the
13 school.

14 I believe that a prefect was also sexually abusing
15 younger boys. The orderly system involved younger boys
16 doing orderlies for older ones. They would have called
17 this fagging 50 years ago. Your fag was your orderly.
18 The prefect chief was a sexual person. I know he was
19 sexually attracted to me, but I was not submissive and
20 he would have known that and wouldn't have tried it on
21 with me.

22 There was a certain profile of boy that the prefect
23 chief had doing his orderly. I know that he sexually
24 abused the boys he had doing his orderly for him because
25 of the type of people they were and because of their

1 relationship with him. When you see a boy leaving
2 an older boy's room distressed, crying and calling him
3 a fucking bastard or operating around that older boy in
4 a submissive, scared way and at times looking aroused,
5 I think it's fair to say there's an abuse of power
6 present in the relationship.

7 Leaving Keil School.

8 My behaviour started changing in my fifth year.
9 I became disaffected and less respectful. I was
10 becoming slightly contemptuous and was communicating
11 that. I got all of my O Grades in fourth year, which
12 was a miracle. I was supposed to be doing higher in my
13 fifth year but I just gave up on my work.

14 I was becoming more and more preoccupied by what
15 I was living in and my growing awareness of the reality
16 that men might actually behave like this. This was
17 a stereotypical story of a boarding school. Borstals
18 and boarding schools had a certain narrative that went
19 with them about how kids were treated, but I didn't
20 think it was actually true.

21 I remember one morning being horrified at the truth.
22 It might have been the morning of the 'bum boy' remark
23 on the stairs, or maybe the day after when I had put it
24 all together. I realised that I had just witnessed them
25 colluding to rape the boy and then they were shaming him

1 and calling him 'bent' as part of their punishment.

2 What a head fuck. I was living in that and I was
3 powerless. I remember thinking I can't deal with this
4 and that led to my behaviour deteriorating.

5 I was expelled from Keil School because of my
6 behaviour, which got me out of the situation I was in at
7 Keil, either consciously or unconsciously.

8 I was told by **CGC** in his office that I was
9 being expelled. This was about ten weeks into my fifth
10 year. The housemaster was there and he was sitting
11 looking very nervous whilst I was being interrogated by
12 **CGC** about my behaviour. He tried to defend me
13 when the decision was made to expel me. I believe the
14 housemaster stepped up to defend me because he was
15 terrified that I was going to tell what I knew about the
16 deputy housemaster and the boy. He knew I had witnessed
17 all those incidences.

18 I was sent across to my dorm to pack my things.
19 I couldn't go and face my mum because she had been so
20 upset at me leaving my school in Edinburgh. I took **█**
21 **█** I remember it vividly. The psychology process
22 is not something you forget. My memory after I left
23 school is kind of hazy.

24 The housemaster appeared in my dorm when I was
25 packing. He was trying to be my friend. He said, 'You

1 know, if you want a reference from me, that can be done.
2 References are really helpful for you at this stage, but
3 that very much depends on you, on what you do from now
4 on'. I think he was trying to exert control over me,
5 which probably worked. I hated him, so I was really
6 disrespectful and told him to fuck off without actually
7 saying the words. He then left.

8 With hindsight I would like to go back, as I now
9 know what I would say. I couldn't process back then why
10 the housemaster was defending me. I now know what he
11 was doing. He was trying to control me into not being
12 honest about what I'd experienced in his house. Right
13 to the very point when I got chucked out, the
14 housemaster was exerting control over me because he knew
15 my dad and he knew that if I told my dad the truth, he
16 would have had what is now called a safeguarding concern
17 raised and my dad would have done something about it.
18 This is the final piece of the jigsaw for me.

19 My dad came and got me at Keil and drove me back
20 home. I arrived home and I don't really remember going
21 to bed. My mum was very distressed. My dad was very
22 kind. That was the end of Keil School for me.

23 Contact with Keil School after leaving.

24 I spoke to the boy and his best friend on the
25 telephone a couple of times after leaving Keil. It was

1 smalltalk with the boy. The first time I spoke to the
2 boy's best friend, he said to me, 'Have you told
3 anyone?' and I said, 'About what?' He said, 'Fuck off,
4 you know what about', and when I said I hadn't, he said,
5 'Oh fuck off then'. Again it was coded language. We
6 wouldn't actually say it.

7 **CGC** contacted my dad about two or three
8 months after I'd left Keil. He wanted to know if
9 anything had happened at school that I wanted to tell
10 them about. He said if there was something, it might
11 make a difference and they might be prepared to consider
12 how they could help me with my educational needs. My
13 stealing behaviour was clearly an indication that things
14 were very wrong, but I had given no explanation for why
15 I had stolen. When **CGC** interrogated me before
16 deciding to expel me, I could give no explanation
17 because I wasn't conscious at the time of my motivation
18 for doing it.

19 I believe that **CGC** got in touch with my dad
20 around the time that the boy and the deputy housemaster
21 left Keil. They left at the same time. **CGC**
22 didn't tell my dad that. I learned through my own
23 inquiries that they'd both left. I'm filling in the
24 gaps, but I believe it came out about the deputy
25 housemaster and the boy over the following months after

1 I'd left. I remember seeing how terrible the boy looked
2 in the school photograph the year I left. He had lost
3 so much weight and he was a ghost of the person he'd
4 been.

5 The abuse was escalating, as demonstrated by the
6 night his friend intervened, and I think the boy had
7 stopped eating, probably as a way of communicating
8 something was wrong.

9 I think CGC was having a look see when he
10 contacted my dad. It wasn't a welfare call. He was
11 looking to find out if I had a story to tell. I think
12 something must have happened that got CGC
13 attention. Why else would the deputy housemaster leave
14 the school very quickly? He had taught at the school
15 for about 15 years. I don't know exactly what happened,
16 but my sense is that CGC had discovered
17 something around about the time he phoned my father.

18 I believe CGC had integrity, so I think
19 he was the type of man that, had he known there was
20 sexual abuse going on or that there were some other
21 motivating reason for my behaviour, he probably would
22 have wanted to put that right. He was a skilled
23 educationalist and a man of reputation as such.

24 My dad came to me really sensitively and he asked me
25 if anything had happened at Keil that I wanted to tell

1 him about, and I said no. I hadn't really pieced it all
2 together. I had moved on.

3 The deputy housemaster was allowed to continue
4 teaching for 15 years. He went to work at another
5 boarding school after Keil. I don't know what his job
6 title was there. I think he was some sort of senior
7 manager or teacher.

8 Reporting of abuse at Keil. I had a good
9 relationship with some masters, but there was never any
10 opportunity or permission to discuss abuse.

11 I spoke to my probation officer in the late '80s
12 about Keil, but again it was coded. It was unsaid. The
13 culture was such that you just didn't talk about that
14 stuff. There was nowhere to take it.

15 I have never spoken to my father about Keil School.
16 When I first reported to the police, I told him that
17 they might be in contact with him, but I don't talk to
18 him about my childhood.

19 I have discussed my experiences at Keil with my
20 mother. It's difficult for her, she's got her own guilt
21 about it. She knows that I have come to speak to the
22 Inquiry. I have also talked to other family.

23 I reported the abuse to police in Wales in 2014. It
24 was the Savile revelations and the subsequent Operation
25 Yewtree investigation that made me realise that people

1 had to be listened to and the police couldn't ignore it.
2 The police in Wales were very interested to take
3 a statement from me. They wanted to handle the
4 investigation, but Police Scotland insisted that they
5 should deal with it. They spoke to the boy's best
6 friend first and he said there was no abuse at Keil.

7 Then they asked the boy to come in to be interviewed
8 and he said the deputy housemaster never abused him. He
9 did say that there was sexual abuse by pupils. He said
10 the deputy housemaster had beaten him the evening that
11 his friend lost control and was banging on the door.
12 I know that the deputy housemaster had not beaten him
13 that night. If he had been beaten, he would have been
14 terrified and crying, not catatonic and in
15 a disassociated state.

16 The boy also said that he accepts the level of
17 discipline he received in Keil would be considered
18 excessive by today's standards but that he was a 'little
19 shit' and probably deserved it. The boy has chosen not
20 to disclose. I guess he and his friend came to
21 an agreement about how they were going to handle what
22 happened to them in the '80s and silence is their
23 choice.

24 The officer in the case told me that there was
25 nowhere else for him to go with it unless the boy

1 changed his statement, which he is welcome to do at any
2 time.

3 Things have changed for me since I spoke to the
4 police in Wales. The power of being heard and being
5 treated professionally by people is huge.

6 Life after Keil School.

7 Unfortunately for me, I left home within about six
8 months of being back home after Keil. I was living with
9 my mum and left home at 16. That should never have
10 happened, as I was 16 and way too young to be living in
11 a bedsit in the city. I began to have contact with the
12 criminal justice system and was exposed to a side of
13 culture that was alien to me and to people that I had
14 never had any contact with before. With hindsight
15 I know that the community actually protected me because
16 the friends I made could see that I was really
17 vulnerable. I am grateful for that.

18 In fact, I have had a huge issue with authority.
19 I loved alcohol. I'm Scottish, quite feisty and
20 assertive so I got into a lot of problems with the
21 police. If I hadn't had that experience with those men
22 at Keil, authority figures wouldn't have been
23 represented that way in my head.

24 There was a lot of abuse of power in Edinburgh in
25 the '80s within secure environments and I was exposed to

1 that. I was locked up quite a few times in police
2 stations because of my behaviour, either because of
3 dishonesty or drunkenness or drugs. I went to Saughton
4 Prison for about one week on remand when I was 22.
5 There young people were often getting beaten and
6 sexually abused, which just took me back to the 1980s in
7 Dumbarton. In my head it was all part of the same
8 culture, which was one of exploitation and abuse. The
9 abuse of power was a representation of Keil to me, so
10 I was very quickly a textbook disaffected and angry
11 young person.

12 I was very angry but not violent. I have never hit
13 someone in my life, but I can do violent behaviour if
14 you put me in a cell. I was very, very confrontational
15 and a bit of a nightmare to contain. I was just out of
16 control and I'd get arrested. That would lead me to two
17 or three other days of insanity before I'd get bail at
18 the sheriff court.

19 Various memories of Keil came back to me in my early
20 20s. I began to have flashbacks and nightmares. I can
21 remember one particular morning waking up in my flat
22 absolutely terrified, but also in total shock because
23 I think my brain had unconsciously put together what
24 happened at Keil. All the pieces of the jigsaw and
25 memories I deleted or generalised came back in a way

1 that I suddenly realised what I'd witnessed at Keil and
2 this began to torment me.

3 I would say that I would attribute the majority of
4 my problems as a young adult to my experiences at Keil
5 School. There has been no other issue in my life that
6 has caused me more distress, pain or hurt than those
7 12 months at Keil School.

8 My time in Keil is the most painful area in my life.
9 Keil School is the biggest emotional injury I carry.
10 The hurt is still there and this is 32 years later.

11 Treatment and support.

12 I tried to talk about my experiences in Keil to
13 a counsellor in 1999, because that's when the feelings
14 began to present without alcohol or drugs and it became
15 overwhelming. I was getting flashbacks and intrusive
16 thoughts, and I had a feeling of anger and hurt but
17 couldn't medicate them. I needed help, so I saw
18 a counsellor.

19 The counsellor gave me the standard '90s narrative
20 which was along the lines of: it's best left in the
21 past, he's probably got a family now, you want to try
22 and let go of these things. You cared about him and
23 I understand why you're hurt. I never spoke about it
24 again in a professional setting until I spoke to the
25 police in 2014.

1 Anyway, I am now able to talk about Keil and I have
2 to say that the value in giving someone a platform just
3 to be heard is absolutely massive. Just being able to
4 share your story is probably the single most beneficial,
5 healing part of the process.

6 Lessons to be learned.

7 I think a lot of the stuff that was possible in the
8 '80s isn't possible today to the same extent. It's
9 obscene the kind of stuff that people could get away
10 with then. When I look back on the '80s and the
11 environment at Keil, it's unreal to think that people
12 had such control and power over children. I think there
13 was a big culture of permissiveness. I think child
14 abuse is part of the same culture as sexual harassment.
15 It's just that children were part of the menu in certain
16 circles. Most areas of exploitation and safeguarding
17 concerns are now in the open. We're now talking about
18 how abuse of power can be exercised in care, in
19 politics, sport, secure environments and among
20 celebrities. Hopefully the learning from all these
21 different inquiries will inform future policy.

22 I think it's really obvious which young people are
23 vulnerable, and I think we know enough about how sexual
24 predators operate to be able to put safeguarding into
25 policy to minimise opportunities for exploitation and

1 abuse. If you've got a young person who is distressed
2 and is in any way vulnerable, on our scale of
3 vulnerableness, they're going to be a prime target for
4 predators. There needs to be joined-up working between
5 services, sharing information and challenging, to help
6 protect these obviously vulnerable young people.
7 Help-seeking behaviour should be promoted and there
8 should be neutral, independent ears that people can
9 speak to if they have concerns."

10 My Lady, this statement is signed by the witness and
11 it is dated 16 March 2018.

12 LADY SMITH: Thank you very much.

13 I take it that completes the evidence for today,
14 Mr Brown?

15 MR BROWN: It does, my Lady, and we will repeat the process
16 tomorrow with two live witnesses and a read-in.

17 LADY SMITH: Thank you very much. I'll rise now and sit
18 again at 10 o'clock tomorrow morning.

19 (2.53 pm)

20 (The Inquiry adjourned until 10.00 am
21 on Friday, 29 October 2021)

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