

Wednesday, 27 March 2024

1

2 (10.00 am)

3 LADY SMITH: We return to Chapter 4 of Phase 8 of our
4 evidence looking into this section of the Inquiry's case
5 studies. As we said last night, we're going to start
6 today with read-ins, and I'll invite Mr Peoples to
7 introduce the first one.

8 Mr Peoples, when you're ready.

9 MR PEOPLES: Good morning, my Lady, yes, the plan is to
10 start the read-ins until the break and see how far we
11 get and I will do some at this stage.

12 The first person whose statement will be referred to
13 is 'Sam', which is the name that he will be referred to
14 for the purposes of today, and his statement is
15 WIT-1-000001103.

16 LADY SMITH: Thank you.

17 'Sam' (read)

18 MR PEOPLES: 'Sam' was born in 1969, and he tells us about
19 his life before going into care between paragraphs 2 and
20 14. I'll just summarise what he tells us in that
21 section of his statement.

22 He tells us his father worked most of his life,
23 mostly in the shipyards. His mother worked until 'Sam'
24 was around nine, which would be 1978 or thereabouts, and
25 he has two older sisters and a younger brother. He grew

1 up in Port Glasgow, and the family lived in a tenement
2 flat.

3 As he describes it in paragraph 3 the family lived
4 just above the poverty line. He tells us that his
5 father was a heavy drinker, and his mother was also
6 a drinker, and that when drunk his father was very
7 violent and regularly was physically violent to 'Sam',
8 his mum, and his siblings.

9 'Sam' went to the local primary school and then on
10 to Port Glasgow High School before he ended up in care
11 for the first time.

12 Perhaps it's a familiar story, it starts at
13 paragraph 7, he got into trouble with the police. He
14 says he began sniffing glue in primary 7, when he would
15 be aged about 10 or 11. His parents were out drinking
16 and 'Sam' was very much left to his own devices. He
17 said that he would go around with older boys and would
18 steal for them, and he was skipping school.

19 He tells us that -- I think at paragraph 10 -- the
20 social services became involved with the family. 'Sam'
21 attended children's hearings, and he accepts, at
22 paragraph 10, that at that stage he was probably, in his
23 own words 'out of control'.

24 The first place he went to stay was Newfield
25 Assessment Centre in 1982 for six or eight weeks when he

1 was aged about 12, and he tells us about Newfield
2 between paragraphs 15 and 32. I don't plan to read much
3 of this out, but I would just note that at paragraph 28
4 he says he looks back on his time there as being
5 brilliant. He said:

6 'They had it all right there in terms of the way
7 they ran things.'

8 If I could just perhaps read what he said at
9 paragraph 29:

10 'All the staff were good and caring in Newfield.
11 They were good professionals. I remember them all
12 taking their time to talk to us. They made an effort to
13 teach you what was right and what was wrong. It was all
14 done by talking. That was a good experience because
15 before then, whenever I did anything wrong, I would get
16 hammered off of my father. There was nothing like that
17 there at all.'

18 Indeed, he tells us that there would be some degree
19 of challenging behaviour, but he said at no time did he
20 see staff members being violent, and there was nobody
21 being restrained or anything like that.

22 Then he goes on to tell us about his time at
23 Kerelaw, between paragraphs 33 and about 103, and
24 I think he perhaps has something more to say at 107. He
25 reckons he was in Kerelaw between [REDACTED] 1982 and [REDACTED]

1 ██████████ of 1984, between the ages of 12 and 14.

2 I'm going to come to some convictions, but the
3 period covered by them was ██████████ 1982 through to
4 ██████████ 1984, which would make him something between
5 13 and 15, I think, if I have my arithmetic right.

6 LADY SMITH: Yes.

7 MR PEOPLES: So he has broadly got his age right if the
8 indictment is a reflection of his likely period.

9 LADY SMITH: Yes. Because it all depends whether it falls
10 before or after his birthday in the year. So he's about
11 that stage of his life.

12 MR PEOPLES: Yes, it's not too far out from that.

13 Then he says at paragraph 33:

14 'During the two years I was there I ran away, was
15 caught, prosecuted for an offence I had committed whilst
16 on the run, and placed in Larchgrove for a period of
17 about two months.'

18 I'll come to that in due course.

19 As far as Kerelaw is concerned, he tells us at
20 paragraph 37 on page 11 that there were four units. So
21 I take it from that that he was -- he says he was placed
22 initially in Fleming. He would be in the open school if
23 that's correct. He calls one of the units 'Webster',
24 I think it in fact was 'Wilson', but we don't need to
25 worry too much about that.

1 Then in paragraph 38, he tells us about another
2 unit, not the one he was placed in, called Baird. And
3 he says:

4 'Baird is a unit that I don't know much about,
5 because I would avoid going up there. It was the unit
6 that was considered the worst unit to be in. That was
7 where they placed the very worst boys. All the boys in
8 that unit were feral or had mental issues.'

9 He says at the end of that paragraph:

10 'I think that placing all those boys together was
11 done deliberately. I can't see that as being
12 a coincidence.'

13 Then he tells us on page 12 a bit about staff and
14 structure and descriptions, and I'm not going to read
15 all of that out. But he does say at paragraph 41:

16 'The staff at Kerelaw were nothing like they were at
17 Newfield. I always thought that the members of staff
18 were trained social workers but I now know that they
19 weren't.'

20 Towards the end of that paragraph, he also says:

21 'Out of all the staff the women were particularly
22 good. I don't know whether that was because they had
23 a mother's instinct or something else. They would treat
24 you as if you were their own.'

25 Then he tells us at paragraph 42 that the headmaster

1 was a Mr Forrest. I think that's Mr Bob or
2 Robert Forrest that we've heard about before.

3 He mentions the names of various other members of
4 staff that he can recall.

5 At paragraph 44 on page 13 he mentions
6 a EUM [REDACTED], was a member of staff who worked
7 in the Fleming who was his key worker.

8 At the stage that he was in Kerelaw, as he tells us
9 at paragraph 46, it was an all-boys school, and just
10 towards the foot of page 13 he says:

11 'Every boy who had been sent there had either been
12 sent there by a court or a Children's Panel. It wasn't
13 a place where they placed boys for care and protection,
14 if you were there you had committed a crime, I would say
15 90 per cent of the boys there were also substance
16 abusers. A lot of the boys were tough boys from
17 Glasgow.'

18 Then he does, at paragraph 47, refer to one
19 particular boy who had facial hair and described as
20 'massive', who was aged about 15 or 16. He had
21 a nickname which was [REDACTED] and he said:

22 'That was how he was referred to by the staff and
23 all the other boys behind his back.'

24 Then he talks about the routine, or tells us about
25 the routine, starting at paragraph 48. I'll just pick

1 out one or two things that he says there. He said:

2 'I realised as soon as I arrived at Kerelaw that it
3 was nothing like Newfield.'

4 He says:

5 '... I couldn't believe the size of it.'

6 Just towards the end of that paragraph he says:

7 'I would have only been about four feet tall. I was
8 tiny for my age and everybody seemed so big to me.'

9 Then at 49 he goes on:

10 'A staff member took me aside and told me how
11 everything worked. They went through the routine and so
12 on. I was told that if I wanted to know anything then
13 I could ask some of the other boys. They were basically
14 saying, "Don't pester us, ask them". There was no
15 discussion about discipline or what would happen if you
16 misbehaved.'

17 Then going on to page 15 he says after he was
18 processed, as he put it, he was put into Fleming.

19 He said:

20 'That was the first time I properly saw all of the
21 boys I would be staying with. I could see that I was
22 a goldfish that had been placed into a tank with sharks.
23 I could see the height of the boys was different to me
24 but I could also see that their attitude was different
25 too. Most of them were from Glasgow and its reputation

1 left me thinking that they were all tough. Although the
2 other boys were probably 14 or 15, to me they looked
3 like they were 18 or 19. I was terrified. I wanted to
4 cry but I knew that I couldn't do that otherwise I would
5 get bullied.'

6 So this is a person, this is his first experience of
7 a care setting, but that's how he saw things at that
8 time.

9 LADY SMITH: This is him, as you say, in Fleming, in the
10 open side of Kerelaw.

11 MR PEOPLES: The open school. And, according to him, he
12 wasn't in the worst unit.

13 He goes on to tell us about the sleeping
14 arrangements at that time at paragraph 53. He says:

15 'I initially shared a dorm with three other boys.
16 Towards the end of my time in Kerelaw I was placed in
17 a single room at the top of the stairs.'

18 He says:

19 'The single rooms were like a perk if you did well.
20 Sometimes boys would bully boys in their dorms so they
21 would be pulled out of the dorm and placed into the
22 single rooms.'

23 He has a section on washing and bathing and at
24 paragraph 55, towards the end of that paragraph he says:

25 '... boys would use the toilets in the shower room

1 as a place to settle fights. I remember staff members
2 would sit at the desk in the staff room so they had
3 a clear line of sight into the shower area.'

4 Moving on to page 17, he talks about schooling, and
5 says:

6 'They tried to run the school as if it was a normal
7 school [with] classes of between 45 minutes and an hour
8 long.'

9 He says he's not sure how they divided it all up,
10 but there were boys from across the units in each class.
11 So clearly at that stage they were mixing boys from
12 different units.

13 LADY SMITH: Yes. Yes.

14 MR PEOPLES: He says:

15 'All the classes were held in the classrooms at
16 Kerelaw itself. There were lessons in English, maths,
17 geography, art, woodwork and metalwork.'

18 He says:

19 'Staff would encourage you to do things'.

20 He remembers making a table in the woodwork class.

21 He goes on to say:

22 'A lot of the boys there were illiterate so the
23 standard of teaching was at a primary school level.
24 There were still a lot of boys there who couldn't read
25 or write.'

1 He says he found it all very basic and easy because
2 he was already at a more senior level.

3 Then going on to page 18, at paragraph 62, he says:
4 'A lot of boys would smoke in Kerelaw.'

5 And we have had some evidence about the smoking
6 regime, if you like, the five cigarettes a day and so
7 forth --

8 LADY SMITH: Yes.

9 MR PEOPLES: -- and also the ones that weren't distributed
10 as well, I think.

11 LADY SMITH: Of course.

12 MR PEOPLES: He says this earlier:

13 'A lot of boys were substance abusers. Staff would
14 find glue hidden away in bags when boys came back from
15 running away. They would find it in their dorms and so
16 on. Some of the boys found ingenious places to hide
17 their glue. It was basically out of control. The boys
18 could hide the glue but they couldn't hide the smell of
19 it, so a lot of them got caught.'

20 LADY SMITH: Of course this man started sniffing glue before
21 he was about primary 7 or so.

22 MR PEOPLES: He did, yes. Yes, he said that, yes. So it
23 wasn't just something he -- a habit he acquired when he
24 went into care.

25 LADY SMITH: No.

1 MR PEOPLES: But I think that was said by the boy about
2 Livingston as well, about the community at the time.
3 LADY SMITH: Yes, that's right.
4 MR PEOPLES: Going on, he says, at 65:
5 'If you kept your head down and behaved the staff
6 did go out of their way to keep you occupied.'
7 He describes various activities. I think that's in
8 line with the general tenor of the evidence about
9 Kerelaw, there were activities, at least for the open
10 school. And he describes at the top of page 19 that the
11 trips were good that he went on.
12 Then, in fact, he tells us that the night watchman
13 of Fleming took him home one night to stay at his house
14 because he was the only one left in that unit. He says:
15 'He logged it and made sure everybody knew where he
16 was taking me. He made sure he did that so if anything
17 happened they would know where to find me. There were
18 no problems the night he took me out.'
19 He says you would get weekend leave if you did well
20 at school. I think there's this marking system that
21 I think was described by a witness yesterday as well --
22 LADY SMITH: Yes.
23 MR PEOPLES: -- and how you could --
24 LADY SMITH: How you behaved. It wasn't just how good your
25 school work was.

1 MR PEOPLES: No, it was a more general assessment, I think,
2 than that. But schoolwork was, perhaps, part of it.
3 Then he says, paragraph 68:
4 'During the summer holidays boys could get sent home
5 for four weeks and not have any contact with the home.'
6 I suppose in one sense it was being treated like
7 a normal school, to that extent.
8 At paragraph 70 he says:
9 'I wasn't really visited because I was getting
10 weekend leave.'
11 I think that's something, again, that others have
12 picked up, that they didn't have so many visitors coming
13 because they at least had the expectation that they
14 would be going home regularly for weekend leave.
15 At paragraph 71 he says:
16 'I never saw any senior social workers or senior
17 people from the council coming in. I don't remember
18 seeing any inspections or inspectors coming in. There
19 was nothing like that happened. In later life
20 I experienced preparing for inspections at prisons.
21 None of that sort of thing happened during my time at
22 Kerelaw.'
23 Then he talks about healthcare, and he says in
24 paragraph 74, about the middle of that paragraph, he
25 didn't have any medical issues:

1 'The only injuries I got were following being
2 assaulted by Matt George but I didn't get medical help.'
3 I'll come to that in due course.

4 LADY SMITH: Mm-hm.

5 MR PEOPLES: At paragraph 76 he says:

6 'Boys ran away quite a lot.'

7 Indeed, he has a recollection of one boy who was on
8 the run so much he says that he only saw him once
9 throughout his whole time at Kerelaw.

10 At paragraph 78, so far as his situation was
11 concerned, he says:

12 'I absconded between five and seven times. Most of
13 the times I was running away into the local area and it
14 was all spur of the moment.'

15 He says the police would be notified when boys ran
16 away. He says:

17 'Nine times out of ten boys who ran away were caught
18 in the arcades down at Saltcoats.'

19 He continues:

20 'The times I ran away were mostly because of peer
21 pressure and because it was spur of the moment.
22 However, the last couple of times was because of one
23 particular staff member, Matt George, and the way he was
24 treating me. He was making my life intolerable and
25 I needed to get away.'

1 Then if I could move on to page 22, he discusses
2 bed-wetting, which he says was an issue for some of the
3 boys, and recalls, as he puts it, 'A wee boy who would
4 get bullied because he wet the bed'. And he says:

5 'He was one of the boys who was quiet and looked
6 terrified. The other boys laughed at him and called him
7 names. I think the staff were fine about it when they
8 dealt with the boy wetting his bed.'

9 As for discipline, going on to paragraph 83 on
10 page 23, he says at the start of that paragraph:

11 'If you got into trouble they would discipline but
12 they wouldn't use force or hit you. You would be told
13 off and maybe have your weekend leave stopped but it
14 didn't go beyond that. Having your weekend leave
15 cancelled was really the worst punishment you could
16 get.'

17 That I think is a recurring theme, that they did see
18 that as quite a form of deprivation, whatever their home
19 circumstances.

20 LADY SMITH: Yes.

21 MR PEOPLES: Then at paragraph 84, he says:

22 'If you were misbehaving a lot you would be called
23 a "wee nyaff". I used to be called that a lot by staff.
24 It was a polite way of saying you were a wee scoundrel.
25 I think it got to the stage that I decided to keep my

1 head down and work. That really happened after the
2 hearing after I ran away and it had been explained to me
3 what parole was and how everything worked. I realised
4 that if I continued misbehaving I would be in Kerelaw
5 for a long time. I was also aware, because staff told
6 me, that I could end up in the secure unit if I carried
7 on misbehaving.'

8 So that seems to be a form of threat --

9 LADY SMITH: Yes.

10 MR PEOPLES: -- to go to the secure unit.

11 Indeed, it says everyone at least thought that that
12 was the place that was like a big bad jail, almost like
13 Barlinnie, and he says that was how the staff made it
14 out to be.

15 Then he has a section about abuse, starting at
16 paragraph 85, and says:

17 'There weren't any problems with staff or pupils at
18 any of the other places I was in. I don't have a bad
19 word to say about any of them. The only place that
20 I had problems was Kerelaw and that was really down to
21 one staff member. Only one staff member stands out to
22 me over my entire time in care.'

23 Then he tells us about that staff member starting at
24 paragraph 86. The member of staff was Matt George. He
25 says:

1 'He is the only member of staff in all the places
2 I was at that I consider abusive ... he just wasn't
3 a very nice man at all. I remember that during the
4 first two weeks of me being at Kerelaw there was
5 something that happened with Matt George. That was the
6 downfall that led to me having problems [over] the next
7 two years.'

8 Then he goes on:

9 'There was a staff versus boys football tournament.'

10 He remembers during the match someone passed him the
11 ball and he says:

12 'As soon as I got the ball I saw Matt George coming
13 towards me.'

14 I'll just continue with what he says:

15 'I was tiny and had this mad adult running at me at
16 about a hundred miles an hour. Out of instinct,
17 I kicked the ball just to get it away. Unfortunately,
18 the ball went right through Matt George's legs.
19 Everybody started cheering when that happened.
20 Matt George then turned to me and said something like
21 "You think that's fucking funny? You'll see what's
22 fucking funny later".'

23 He says after the match he went inside Fleming unit
24 to get showered and just reading halfway down that
25 paragraph he continues:

1 'Matt George came into the area where I was
2 showering carrying a golf club and told me to turn the
3 water off which I did. He still had his football kit
4 on. First of all he grabbed a mop that was leaning
5 against the wall by the sinks ... and set it aside. He
6 then picked up a mop bucket full of cold water and threw
7 it over me in the shower. When he did that I cowered in
8 the shower. I was tiny, pre-puberty, and embarrassed.

9 Matt George then used the handle of his golf club to
10 start poking and hitting me. He was poking my back, my
11 bum cheeks, poking my legs, and tapping me on my head
12 with the handle end of the club. It was sore. He was
13 saying things like, "Do you think you are fucking
14 smart?", "Do you think you are a fucking hard man?", and
15 "Do you think it's funny making a fool of me in front of
16 everybody?" Matt George then put the handle end of the
17 golf club into my backside, he was forceful with it, he
18 was a grown man and I was only a wee boy.'

19 Then he then says there wasn't blood but he does
20 have a memory of faeces coming out during this incident.

21 He adds:

22 'Matt George definitely knew what he was doing when
23 that happened, but I couldn't say whether he was doing
24 it in a sexual way.'

25 I think we will find out from the conviction what

1 others thought of that in a moment.

2 But carrying on with paragraph 89, he says:

3 'I kept on apologising to him and telling him that
4 I didn't mean what I had done but he carried on. When
5 he heard me call him Matt he said something like "Don't
6 you call me Matt, I'm fucking Mr George to you". He
7 then pulled away the golf club and told me to get out of
8 the showers, to get dried and to get ready. He then
9 left the room.'

10 I'll move on to paragraph 91 to continue with what
11 he tells us. He says at the start of that paragraph:

12 'There were definitely staff sitting in the office
13 when Matt George did what he did.'

14 LADY SMITH: This would be the office near the showers that
15 he referred to earlier where the staff could see what
16 was going on in the showers?

17 MR PEOPLES: Yes.

18 He says that's a place that -- he said:

19 'Those staff members would have been able to hear
20 what Matt George had been saying because he was
21 aggressive and loud when he was doing what he was doing.
22 They would have also been able to see what he was doing
23 if they were in the doorway to the staff room.'

24 Well, I'm not sure whether that was the only way you
25 could see from the other evidence, but certainly if it

1 was open, at least he's suggesting there was
2 an opportunity to see what was happening.

3 He certainly does think that there would have been
4 a clear line of sight. But obviously he hasn't -- he
5 says nothing happened, no one came to his rescue or
6 whatever.

7 At paragraph 92 he continues:

8 'There were a couple of boys who tried to get into
9 the shower room during the incident, because I remember
10 Matt George telling one of them to "fuck off" and the
11 other one to "fuck off and come back in a minute".'

12 But he doesn't know whether these boys -- who they
13 were and whether they would have seen anything.

14 He goes on:

15 'The incident in the shower room was the start of
16 things to come. It got worse from then on. Matt George
17 didn't have any time for me at all. He would do things
18 regularly right throughout my time at Kerelaw. Most of
19 the time he was just verbally aggressive towards me or
20 do things just to aggravate me. I remember times when
21 I was in his art class painting, he'd walk by and he
22 would nudge my water over, he'd then say, "Clean that
23 fucking mess up" afterwards. There would be times when
24 he would criticise what I was drawing during art classes
25 to make me feel bad.

1 Sometimes Matt George would be more physical.
2 I would actively cower away from him when he was around
3 me. It was as if I was walking on egg shells. I would
4 try to avoid him but I always had to go to his art
5 classes. There were times when he was just always going
6 to be about. I remember that he would grab and poke
7 pressure points around my neck, shoulders and ribs with
8 his fingers. It was really sore. He'd sometimes shout
9 "submit, submit". It was just like what would be
10 shouted by the wrestlers on television. He'd then tell
11 me to say sorry and I would. A lot of the time I hadn't
12 done anything to be sorry for. He must have done that
13 sort of thing to me hundreds of times so I can't really
14 point to specific times.

15 I saw him doing the same thing with pressure points
16 with other boys as well.'

17 He mentions one example.

18 He goes on halfway down paragraph 95 on page 26 to
19 say:

20 'Sometimes he would do it and other boys would kid
21 on that it was funny. I don't know whether that was
22 because he got them on their funny bones or something
23 like that. Sometimes other boys would laugh at your
24 expense whilst it was being done. I know that when
25 I was on the end of feeling what he was doing it wasn't

1 funny for me.'

2 Moving to paragraph 96 on page 27 he continues:

3 'There were times when I was getting bullied by some
4 of the other boys and it was all at Matt George's word.
5 He was a heavy-duty manipulator and would get other boys
6 to bully me. He would in particular get a boy called
7 [this is ██████████ who was referred to earlier] to
8 hit people and do things at his request. For me the
9 bullying involved boys urinating on my bed. I now know
10 Matt George was behind that because one of the boys that
11 did it told me that it was Matt George who had told him
12 to do it. He told me that in adult life when we were in
13 prison together. At the time I was just a wee boy and
14 didn't have a clue who it was.'

15 Then he says at paragraph 97, just about a third of
16 the way down:

17 'Matt George took me up to the boxing ring and put
18 a set of boxing gloves on me. They were massive on me
19 and were filled with straw. He put a much bigger boy in
20 against me. It was like putting a flyweight up against
21 a heavyweight. That was Matt George's way of getting
22 another boy to hurt you for him. I remember him pulling
23 us randomly away from other activities so he could make
24 that happen. I remember during the fight the boy
25 fighting me was going into me. When he was getting

1 close in he was apologising for what he was doing.
2 I remember him saying that Matt George would "do him in"
3 if he didn't fight me. It wasn't just me that
4 Matt George would set up bigger boys against.'

5 If I could move over to paragraph 99, he recalls
6 an occasion when Matt George was playing pool with 'Sam'
7 and some other boys, and 'Sam' was sitting watching at
8 the side at the time, and he says:

9 'There was no one else in the room.'

10 I suspect he means there was no other staff
11 member --

12 LADY SMITH: Yes.

13 MR PEOPLES: -- obviously there were other people:

14 'When Matt George missed a pool shot [he says
15 another boy, and 'Sam'] laughed at him. Matt George
16 then turned around asked me what I was laughing at. He
17 then roundhouse kicked me across the right-hand side of
18 my head and I fell into the wall beside me. I ended up
19 with a black eye and a cut to my face. I remember that
20 I was instantly bleeding. Matt George then turned and
21 got hold of [another boy]. I remember that he was still
22 holding the pool cue. He said to the other boy
23 something like, "When they come back say I caught you
24 and wee 'Sam' fighting and that's how he got his sore
25 face". Matt George also said to say to the staff and

1 the other boys that he was the one who had stopped the
2 fight.'

3 Then he said after that incident he did not see
4 a nurse, and he said he received no medical attention.
5 But he said he did grab some old towels, paper towels,
6 and held them to his face, and when he and one of the
7 other boys were asked what had happened by members of
8 staff, and other boys, he says:

9 'We did as Matt George had said and said that we had
10 got into a "dummy fight" and I'd hit my head off the
11 ground. I think we ended up losing a weekend leave
12 because of what we had to tell the staff.'

13 Then he goes on:

14 'I remember times when Matt George would take me and
15 other boys out whilst he was playing golf. He would use
16 us to carry his golf bag and to find his golf balls.'

17 He also says he remembers -- this is towards the
18 foot of paragraph 101 on page 28, he remembers another
19 time 'when he used us as labour at his house, he made us
20 clean up the grounds around his house'.

21 Then at paragraph 102, on page 29, he goes on:

22 'It was strange because Matt George wouldn't always
23 be having a go at me. There were times when he was the
24 best member of staff in the world and he would be good
25 to all of us. It was as if he wasn't the same guy.'

1 He gives examples of where he was nice to them, and:

2 'There would be no reason why he would suddenly
3 change. You just didn't know where you were with him.
4 I just don't know what was the matter with the guy.'

5 Then he says, on reporting:

6 'I tried to report Matt George during my time at
7 Kerelaw but it was all dismissed. I didn't go as far as
8 making a formal complaint but I did speak to staff
9 members.'

10 He said he approached the head of the unit that he
11 was in, Fleming, and his key worker to try and report
12 what Matt George was like. He told his key worker that
13 Matt George was grabbing him every time 'Sam' passed
14 him. 'Sam' told him that it was sore when he did that,
15 and that his key worker told him that he just needed to
16 calm down a bit, and said that that was just the way
17 that Matt George was and that 'Sam' needed to stop
18 annoying him. And he says nothing further happened
19 after both the occasions he reported Matt George.

20 Then he's got a section dealing with Larchgrove,
21 because he did tell us earlier that he spent a short
22 period --

23 LADY SMITH: It was about 10 weeks or so in the middle --

24 MR PEOPLES: Yes, it was pretty short.

25 LADY SMITH: -- of his time at Kerelaw.

1 MR PEOPLES: I think something had happened, obviously, at
2 Kerelaw, and this had led them to have a spell in
3 Larchgrove, and I think at paragraph 104 the background
4 is he was running away, and I think he got into trouble
5 when he was running away, appeared in court, started at
6 Larchgrove but then was sent back to Kerelaw, so not
7 an unfamiliar situation that we've heard about.

8 At paragraph 105, he just says:

9 '... I just got my head down and got on with it.
10 Larchgrove was all right.'

11 So he doesn't have any complaints.

12 He says of Larchgrove:

13 'Nearly all the boys were from Glasgow. I got on ok
14 with the staff and the boys there. I remember there was
15 another boy with me who had been in Kerelaw [who he
16 names] he looked out for me and got me in with the other
17 boys through telling them I had also been at Kerelaw.'

18 So to some extent that echoes what other people
19 said, that it was a bit of a status symbol, if you were
20 a first timer in Larchgrove you might be treated rather
21 differently to someone that has had prior experience at
22 somewhere like Kerelaw and, as he said, it had a bit of
23 a reputation, so other boys were interested in me in
24 that way. And he says he thinks the other boys thought
25 that if he could handle Kerelaw then he must be okay.

1 Then he tells us about leaving Kerelaw and moving to
2 St Mary's, Kenmure St Mary's -- sorry, life before going
3 to Kenmure St Mary's. He went to live with his sister
4 for a while, went back to high school in Port Glasgow,
5 and then within a short time his father passed away.

6 At 109 he goes on, then after two or three months
7 back with his sister he started dogging school and
8 staying at a friend's house during the day, and because
9 of his poor school attendance he ended up back in care,
10 and he tells us about Kenmure St Mary's, starting at
11 paragraph 110.

12 I'll just pick up a few things, but I'm not planning
13 to read it all. He says he was there, he thinks, around
14 ████████ 1984 or ████████ 1985, when he was aged 15, and
15 he thinks he got out in ████████ 1985, just after turning
16 16. He says:

17 'St Mary's was a good school.'

18 He says it was a large school but he remembers the
19 staff were all good, at 111. He describes them as 'kind
20 of "hippyish"' with strange nicknames, but he found that
21 they were a bit crazy but funny, in his recollection.
22 He said there was nothing that happened at St Mary's
23 that he considered was abusive.

24 Then he tells us what happened in life after care.
25 He moved back with his sister and continued with a youth

1 training scheme that he had previously embarked on. But
2 then he got a sentence in Polmont for opening a locked
3 fast premises. He said he was just 19 when he went to
4 Polmont, and was in jail again in 1991 for three years
5 after breaking into a house.

6 He said:

7 'By the time I came out of prison the second time
8 I had started taking drugs and was drinking more heavily
9 at the weekends. I later on got a sentence for eight
10 years for an incident I wasn't at fault for.'

11 Then at 114 he says the last time he came out of
12 jail was in 2006, and by that time he was addicted to
13 heroin, but decided he needed to make a change and moved
14 to Paisley, and he tells us he has a family and
15 grandchildren, and has worked in various places since
16 leaving prison.

17 At the time of the statement he had had a diagnosis
18 of epilepsy and said that he was unable to work due to
19 fits, and hadn't worked since the diagnosis.

20 On impact, he starts at paragraph 115, on page 33.

21 In a moment of reflection at 116 he says:

22 'I think back to the day when that football was
23 passed to me and wonder whether things would have been
24 different for me if it hadn't been.'

25 He says towards the end of that paragraph:

1 'I try to remind myself that Matt George isn't in my
2 life but he is. It's been worse since the police came
3 in contact. Things have been downhill since then.'

4 Then 118, and this is a familiar theme:

5 'I think my education suffered because of the
6 quality of education in Kerelaw.'

7 He says towards the end of his statement in 122 that
8 he was getting support at the time of the statement from
9 Future Pathways, and this was to help him both to give
10 evidence to this Inquiry but also to provide evidence,
11 I think, for the second trial of Matt George.

12 LADY SMITH: Mm.

13 MR PEOPLES: And he did provide a statement, and says that
14 he was to understand there was a trial, and I think at
15 this point I can confirm that there was obviously, as we
16 know, a trial. And that in the case of 'Sam' two
17 charges were found proved against Matt George, the first
18 one being an indecent assault on an occasion between
19 ██████████ 1982 and ██████████ 1984 at Kerelaw School,
20 when George struck 'Sam' on the body with a mop handle
21 or similar implement, forced him against a wall, and
22 penetrated his anus with the mop handle to his injury.

23 There is also a conviction for assault to injury on
24 various occasions between the same two dates at the
25 school, and the offence involved kicking 'Sam' on the

1 head, compelling him to eat soap, making derogatory and
2 sexual remarks about him, and striking golf balls
3 towards him, all to his injury.

4 So that kind of to some extent mirrors some of the
5 things he was telling us about in his statement before
6 this conviction, and a little more, perhaps.

7 LADY SMITH: Thank you.

8 MR PEOPLES: This is another, as some of the ones yesterday,
9 where we have been given the allegations and there's
10 been a subsequent trial and convictions.

11 Towards the end, for 'Lessons to be learned', he
12 just said there were a lot of people in his time who
13 slipped through the net and got jobs in the homes. It
14 would have made a difference to 'Sam' had the right
15 qualified people been at Kerelaw when he was there.

16 He says, on the final page of his statement:

17 'People are screened a lot more before they are
18 employed and I think that is a good thing.'

19 Looking back at his time he says:

20 '... there was no one I could have really gone up to
21 and spoken to openly.'

22 He says:

23 'When I reported things to [my key worker] ... he
24 should have taken what I was saying seriously and
25 confronted Matt George about his unacceptable

1 behaviour.'

2 He said:

3 'He should have gone and reported it and if the
4 headmaster wasn't listening he should have gone straight
5 to the police.

6 He says at 132:

7 'Children were in the sort of homes I was in because
8 life had dealt them a bad hand. I always think that if
9 I had remained in Newfield then I probably would have
10 had a better life.'

11 And says that if speaking to the Inquiry stops just
12 one person being hurt then that's good enough for 'Sam'.

13 He signed his statement on 17 October 2022.

14 LADY SMITH: Thank you.

15 There's something he said that chimes with what
16 we've heard from other people, and it was to the effect
17 that: well, you think it's your own fault, because it
18 was when he spoke to either the head or his key worker
19 about Matt George, he was told, 'He's just like that,
20 you have got to stop annoying him'.

21 MR PEOPLES: Yes, I suppose it also betrays a knowledge --

22 LADY SMITH: Yes.

23 MR PEOPLES: -- that they know exactly what he is like, but
24 their view of the way to deal with it is not to annoy
25 him, as he says. But he says he was capable of changing

1 from being nice to nasty in a second for no apparent
2 reason. So it would have been quite difficult advice to
3 follow.

4 LADY SMITH: You couldn't. But also you're just implanting
5 in the child's mind that it's the child who is getting
6 it wrong. The child is at fault.

7 MR PEOPLES: Yes. No doubt that does increase the sense of
8 guilt and feeling that 'I'm a bad boy', and 'It's all to
9 do with what I'm doing not what he was doing'.

10 LADY SMITH: This is a boy who knows he does do naughty
11 things, bad things, and gets himself into trouble, so he
12 doesn't start as a child from a clean slate.

13 MR PEOPLES: No, so he'd probably already got that sort of
14 mindset and knows he has done bad things, so he's not
15 entirely blaming it on the system.

16 So can I move on --

17 LADY SMITH: Yes, where now?

18 MR PEOPLES: -- then, if I may, to another person, who will
19 be referred to this morning as 'Connor'.

20 LADY SMITH: Thank you.

21 'Connor' (read)

22 MR PEOPLES: 'Connor's' signed statement is
23 WIT.001.002.5569.

24 'Connor' was born in 1971. He had one younger
25 brother, now deceased, and two sisters, older sisters.

1 He tells us about life before care starting -- well,
2 between paragraphs 3 and 5, and says that he went into
3 care because his dad beat him up. And he tells us that
4 social work records go back to when he was about
5 two years of age, and mention him running away, and at
6 some point he says his dad broke his nose and beat him
7 up with a knuckleduster.

8 He tells us, I think based on records, I think, that
9 he went to court as a witness when he was around five or
10 six to give evidence against his father, but he said he
11 just froze in the witness box and couldn't speak.

12 He says his dad was violent to 'Connor' and to his
13 mum, and he remembers that he even threatened the social
14 worker.

15 He says when he was eight years old, an uncle
16 sexually abused him several times until he was around
17 the age of nine, and he says that happened when the
18 uncle was visiting 'Connor's' grandparents, when he was
19 living there between children's homes, and this person
20 was also abusing other relatives, and he says that he
21 was charged by police but shortly before his trial he
22 committed suicide.

23 He says at paragraph 5 he believes he was in care
24 from the age of 8 up to 16, and he says he always
25 thought his first home was Larchgrove Assessment Centre,

1 but he says according to his records he was in a few
2 different homes first.

3 So he's a bit like one of the read-ins yesterday,
4 I think he was obviously in more places than he
5 remembered --

6 LADY SMITH: Yes.

7 MR PEOPLES: -- and Larchgrove wasn't his first experience
8 of residential care.

9 LADY SMITH: Yes, and some of them are quite short stints?

10 MR PEOPLES: Yes, they are often just taken away as
11 an emergency and then they seem to assess, but move on
12 to another children's unit perhaps because it's thought
13 to be more suitable or whatever, but often at some point
14 end up in an assessment centre like Larchgrove.

15 He says about Larchgrove, it starts at paragraph 6,
16 he says the first home he remembers was Larchgrove. He
17 says there:

18 'It was like a jail. I don't know what age I was,
19 but my records indicate that I was [there] some time
20 between the age of 13 and 15.'

21 That would have been 1984 to 1986, or thereabouts.

22 LADY SMITH: Yes.

23 MR PEOPLES: He lived in a dorm that he recalls had six
24 beds, and he describes a little bit about the routine.

25 He says at paragraph 8:

1 'I never went to school when I was there and you
2 were never forced to go. I think it was when I was in
3 Larchgrove that I started sniffing gas. I never got out
4 and there weren't any trips or days out or anything like
5 that ... I think I ran away maybe seven or eight times.'

6 He says when he was caught he would get taken back
7 and beaten up.

8 On page 3, paragraph 10, he tells us about his
9 social workers, and he says he only ever saw them when
10 he ran away because they would sometimes take him back.
11 He said he never told them anything about what was
12 happening to him in Larchgrove.

13 Then he has a section about abuse at Larchgrove, and
14 I'll just read some of that. He says:

15 'I think it was the second day I was in Larchgrove,
16 probably about 8 o'clock at night. Everyone else in my
17 dorm was told to leave and go to the recreation room.
18 A male member of staff held me down and a female member
19 of staff sexually abused me. She took my penis out and
20 started playing with me.'

21 He reckoned it lasted around 20 minutes. He said it
22 happened a couple of times, and he says he knows that
23 the same thing happened to another boy in his dorm
24 because they had talked about it, but he says that this
25 boy wouldn't come forward to speak to the Inquiry.

1 He says:

2 'I know that the same thing happened to other
3 children in there because they had things done to them
4 by the same couple.'

5 He said more generally that the staff would beat him
6 up for being loud. They would drag him by the hair and
7 severely beat him up with their hands or fists.

8 He said:

9 'It was usually to my legs or to my body. This
10 happened regularly and that is why I ran away. I was
11 mentally abused when I was in there too, they would call
12 me names and they would tell me that I was useless just
13 to keep my spirits down.'

14 As for reporting, he has already said he didn't say
15 anything to his social workers, and he also says:

16 '... I thought the staff were allowed to do what
17 they did.'

18 Which is not an unfamiliar response from some of our
19 applicants, and he says:

20 'There was no one else I could tell.'

21 He says:

22 'I could never figure out why I kept getting sent
23 back to my dad's house at weekends because the social
24 work knew that I was getting beaten up at home by my
25 dad.'

1 That's a point that was made about education as
2 well, that they are moved for a reason but it seems that
3 the reason is forgotten about in a sense, because either
4 they don't get the education that they were needing or
5 they don't -- or they go back to the abusive situation
6 that they were to be protected against.

7 Then he tells us that from Larchgrove he moved to
8 a children's home, and he tells us about that. Secondary Institu

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10 [Redacted]
11 [Redacted]
12 [Redacted]
13 [Redacted]
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22 He then has a spell in a hospital in the Glasgow
23 area. And he seems to have been about aged 14 at that
24 stage, Secondary Institutions - to be published later

25 [Redacted]
[Redacted]

1 Then from there he moves to another children's home
2 in the Glasgow area, and this is on page 6 **Secondary Institutions -**

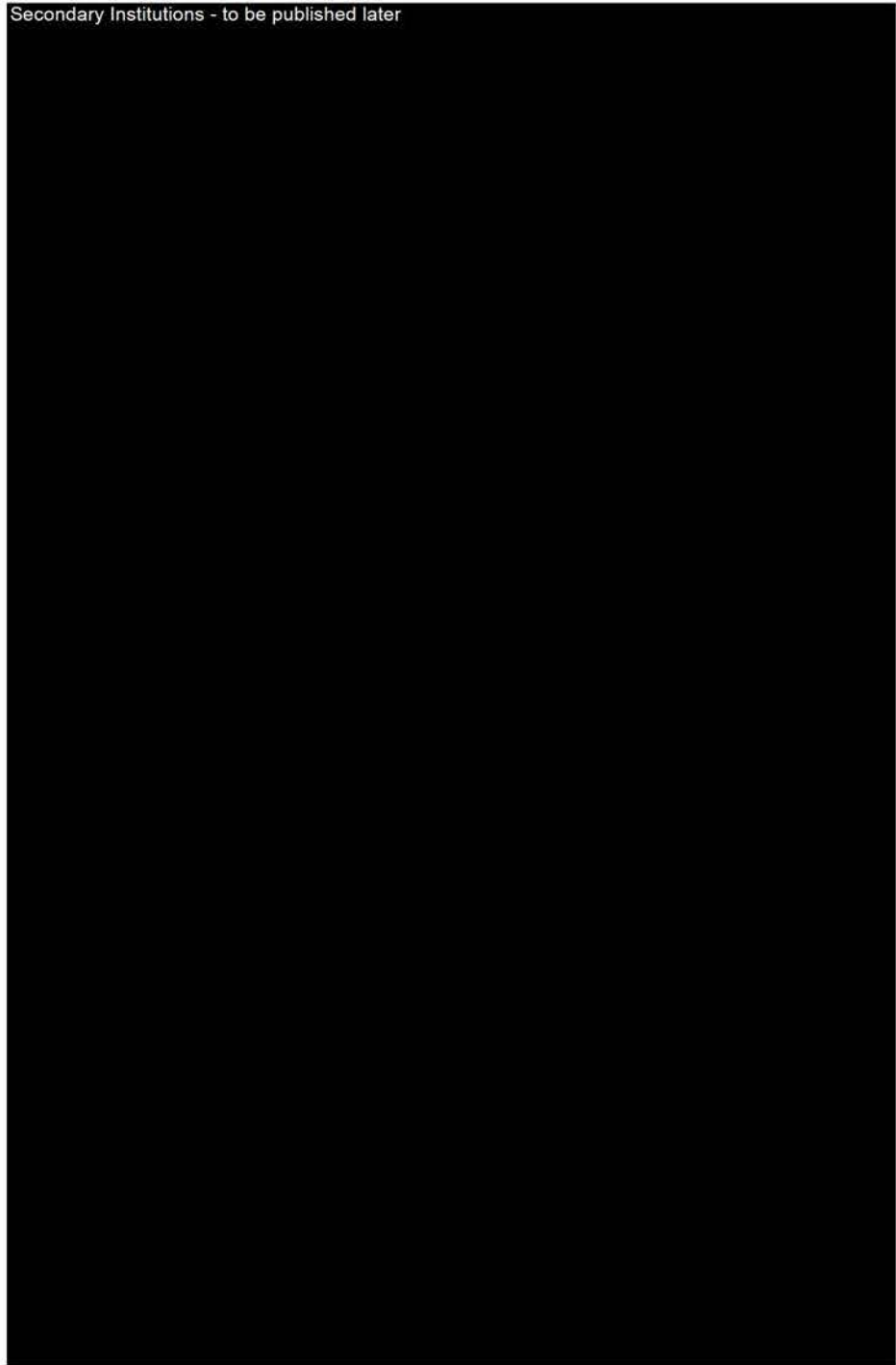
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10 Then from there he moves to another children's home
11 in Dunbartonshire, **Secondary Institutions - to be published later**

12 **Secondary Institutions - to be published later** But he
13 seems to be constantly moving from home to home, because
14 he then tells us that he moves on to another children's
15 home in South Lanarkshire, and says he just doesn't
16 remember anything about the place, good or bad.

17 **Secondary Institutions - to be published later**
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Secondary Institutions - to be published later

1 Secondary Institutions - to be published later

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7 So he moved from a List G to a List D School.

8 He talks about Kerelaw between paragraphs 48 and 69,
9 starting on page 11. Because of convictions I think
10 I can say that the period covered by the conviction that
11 I'll mention -- or convictions, I'm sorry, more than
12 one. The period covered by the libel was between
13 [REDACTED] 1986, which would be when he was aged 15,
14 and [REDACTED] 1987, when he would be nearly 16.

15 LADY SMITH: Thank you.

16 MR PEOPLES: He tells us at paragraph 48 that he was in one
17 of the four units. So he was in the open school,
18 according to his recollection. And there were only boys
19 in the open school at that time, which I think would
20 accord with what we understand was the position so far
21 as the open school was concerned.

22 He does say he thinks he was there for a year and
23 got out just before his 16th birthday.

24 He tells us something about the routine, and that's
25 something we can obviously read, but what he does say at

1 paragraph 55 on page 12 is:

2 'I would be at Kerelaw most weekends so if
3 Matt George was there that weekend I would run away just
4 to avoid him because I knew what would happen. When
5 I ran away I was taken back and John Muldoon would
6 batter me.'

7 He has a section headed 'Abuse at Kerelaw' and I'll
8 just read some of that.

9 Paragraph 58, he says:

10 'There was a member of staff, John Muldoon, who used
11 to get a couple of the older boys to beat us up ... he
12 stayed in our block.'

13 I take it that John Muldoon was the unit manager.

14 LADY SMITH: Yes, by that time.

15 MR PEOPLES: By that time, or deputy unit manager, perhaps.

16 LADY SMITH: Mm-hm. As you say, we're well into the second
17 half of the 1980s now?

18 MR PEOPLES: Yes. Because he did start in a lower position
19 as a sessional worker.

20 LADY SMITH: Yes.

21 MR PEOPLES: He goes on at paragraph 58:

22 'He would tell them what to do, [this is the older
23 boys] and he would watch when they did it.'

24 He says the older boys would beat the younger boys
25 up.

1 He says:

2 'John Muldoon used to beat us up as well, it was
3 just the same kind of beating that an adult would give
4 me. When I ran away and was taken back John would
5 batter me.'

6 He says he was taken out from time to time by
7 John Muldoon, but he doesn't say anything happened on
8 these occasions.

9 He goes on, he returns to Matt George at
10 paragraph 60, who was the art teacher. He says:

11 'The first time he did anything was in the classroom
12 ... he took me into the store cupboard and he made me
13 touch him. The class was full of other children and
14 they would have been aware what was going on. I have
15 seen him coming out this store room with others and they
16 told me later on that Matt had abused them. After that
17 he caught me in the shower and got me to touch him down
18 below. This happened a few times in the shower. Every
19 time before he made me do things he would hit me in the
20 stomach with his open hand first so it took the wind out
21 of you, and it was his way of saying you better do what
22 I tell you. He did karate so knew what he was doing.
23 We always used to check the staff rota and if we say he
24 was on we used to run away.

25 Another time one night we were playing football in

1 the gym and Matt came in and made us all stand in a row.
2 He then made us strip completely naked and then started
3 hitting golf balls at us. He did it for about ten
4 minutes and then started kicking green cloth footballs
5 at us. He just liked to control us.

6 A few times Matt George took me to his house ... one
7 time when he took me there he took a video camera out
8 and Matt filmed me doing sex acts on three men who were
9 on the couch. At one point I was made to suck one man's
10 member while another was anally raping me. They all
11 took turns and it went on for hours ... Matt didn't
12 abuse me that day. I had never seen these three men
13 before.'

14 He says they were probably in their 40s or between
15 40s and late 50s:

16 'Matt George gave me a teddy bear for that.'

17 At paragraph 62:

18 'There was one time I saw ...'

19 This LYY [REDACTED]

20 LADY SMITH: Yes.

21 MR PEOPLES: '... arriving at Kerelaw in the minibus [REDACTED]

22 [REDACTED] He was outside and was
23 speaking to Matt George and I wondered LYY [REDACTED] would be
24 there and why they would be speaking to each other.

25 Matt George came in and told me I was to go with LYY [REDACTED]

1 the minibus. LYY took me out in the minibus to some
2 country roads and he abused me. He "bummed" me.
3 Matt George and John [I think it is John Muldoon, it
4 says "John", it doesn't give his surname, but I think
5 from what it said earlier it's John Muldoon] were very
6 close too but John never did anything sexual with me.'

7 Of course we know he did with others.

8 LADY SMITH: Yes.

9 MR PEOPLES: He said:

10 'Others would have been aware of me going out in the
11 minibus with LYY

12 And he goes on, and he says:

13 'There was another member of staff [who he names]
14 who was a ... teacher.'

15 He said one time he took him out to a church and
16 sexually abused him on the stage there, and at page 14
17 he continues and he said:

18 'He made me suck his member and anally raped me.'

19 He said about four times this teacher took him to
20 his house, he says his wife would walk about naked, that
21 the teacher would '... play with himself and pleasure
22 himself and made me do things to his wife, like lick
23 her'.

24 He then says:

25 '[the same teacher] took some of us on holiday.'

1 He said he recalls being given vodka and made to do
2 a sex act in a tent. He says the teacher made him suck
3 his member and anally raped him, and he said he did that
4 to another boy as well.

5 He says as regards reporting of abuse that he went
6 to the headmaster at Kerelaw and told him about being
7 beaten and all about the sexual abuse. He says:

8 'He just said that I was telling lies. I asked him
9 if he was going to do anything about what I had told
10 him. I said that I had had enough and couldn't handle
11 it any more. He said "no". I gave up trying to tell
12 anyone else about it. The abuse continued after I told
13 him.'

14 He then says:

15 'I tried telling the social work for 16 years from
16 when I was 16 years old about what had gone on with me
17 in care but they just said that they didn't believe me.'

18 He says towards the end of that paragraph:

19 'They said I had a mental illness.'

20 He feels he didn't really get much help when he got
21 out of care from social work either, and he tells us
22 that at 68.

23 He says that he left Kerelaw shortly before his 16th
24 birthday at paragraph 69. He says:

25 'I got dropped off in Glasgow city centre and just

1 left there. I was homeless. I didn't know where to go
2 and had no social worker or anything. I had nothing.
3 I went to the Social Work Department ... and told them
4 I had just been put out of the home and asked if they
5 would help me. They said no.'

6 Then he describes being able to find some
7 accommodation at that stage.

8 If I could just move on to page 16, 'Reporting to
9 the police', and he just says around 15 years ago, now
10 that would make it around 2004, he says:

11 '... the police came to my house out of the blue and
12 they asked me if I had been in Kerelaw. They asked me
13 if I had been sexually abused in there but I said no
14 because my kids were sleeping upstairs. I gave them
15 a statement. The police contacted me about six months
16 ago and I have given another statement.'

17 That would be in 2018 I think, or thereabouts and he
18 says he told them everything that went on with
19 Matt George, and he also told them about some other
20 abusers as well.

21 As we know, there has been a trial and progress,
22 a trial in 2022 however.

23 LADY SMITH: Yes.

24 MR PEOPLES: In this case, 'Connor', there were three
25 charges found proved against Matt George in relation to

1 'Connor'.

2 The first being a conviction for indecent assault on
3 various occasions between [REDACTED] 1986 and
4 [REDACTED] 1987 at Kerelaw and a house in Largs or
5 elsewhere to the prosecutor unknown. It's said that
6 Matt George was convicted of exposing his penis to
7 'Connor', compelling 'Connor' to masturbate him,
8 penetrating 'Connor's' mouth with his penis, compelling
9 'Connor' to perform oral sex on him, and penetrating
10 'Connor's' anus with his penis.

11 So that was one of the convictions.

12 There was also a further conviction between the same
13 two dates --

14 LADY SMITH: Yes.

15 MR PEOPLES: -- whilst acting with three men to the
16 prosecutor unknown at a property in Largs, or elsewhere
17 to the prosecutor unknown. The conviction was for
18 compelling 'Connor' to perform oral sex on the three
19 men, and inducing the three men to penetrate his mouth
20 and anus with their penises, and that he recorded these
21 sexual activities while they were going on.

22 Also there was a third conviction, which was
23 an assault on various occasions between the two dates at
24 the school, which involved punching 'Connor' on the
25 body. So there are three different charges, two of

1 indecent assault, the other of assault.

2 LADY SMITH: Thank you. Yes.

3 MR PEOPLES: He tells us about life after care, and he says
4 when he left he did sleep rough for a couple of years,
5 but he met his wife when he was 17, and she helped
6 straighten him out. But he struggled to deal with
7 matters and lost the house. But they've had two
8 children. He says he has tried to work but has had
9 problems keeping a job for health reasons.

10 Then he goes on at impact at paragraph 82 to say:

11 'In my time at Larchgrove I always thought that it
12 was because I was bad and that all the stuff they did to
13 me they were allowed to do to me. I didn't know any
14 better back then. I was quite disruptive when I was
15 there.'

16 He says at 84 what has happened to him has affected
17 his own parenting, and 'Connor' says he only started
18 cuddling his children when he was 38 years of age,
19 because he just didn't know how to. He says:

20 'I still feel guilty for letting these things happen
21 to me but those who abused me, they were the authority.'

22 He tells us he has tried to take his own life
23 several times. He says at 88:

24 'I have no friends because, it is probably just me,
25 but I don't think anyone likes me.'

1 He says up until getting some change of medication
2 he stayed in his room because he felt safe. He says:

3 'I try to go out of the house but sometimes I can't.
4 I get paranoid because I think people are staring at me
5 and I feel they know what happened to me. Even though
6 I'm an adult I still feel very vulnerable and worried
7 that someone could take advantage of me.'

8 He tells us on page 19 he has suffered from
9 depression and has had nightmares about being sexually
10 assaulted.

11 He tells us about obviously the court process
12 involving his uncle in paragraph 90, and he says that
13 the fiscal told him that he should go for criminal
14 injuries compensation and said he did, and when he got
15 it, he said it devastated him because he said it felt
16 like he was getting paid for sex. He said he has
17 received money on two occasions through criminal
18 injuries compensation, one for what his uncle did when
19 he was eight, and the second was for what Matt George
20 did at Kerelaw. He says:

21 'I gave some of that money away because it felt like
22 dirty money.'

23 LADY SMITH: Dirty money.

24 MR PEOPLES: Yes, and he says he has never managed to hold
25 down a job, partly because of mental health problems and

1 partly because of a lack of education.

2 He says towards the end of that section on impact,
3 in 92:

4 'I'm not a survivor yet and won't think of myself as
5 one until I feel like I am in a good place. I sometimes
6 still feel like I want to die.'

7 At 94 he says:

8 'Everyone wants justice and I do too, but I just
9 want this out of my head. I have wanted to tell my
10 story since I was 16 years old. This is my opportunity
11 to do it and I want people to listen to me.'

12 He says at 96:

13 'I was put in a children's home because I was
14 getting beaten up by my dad. There were other children
15 in there because they were criminals. It would have
16 been better for me if I had been put into a home where
17 there were other children who had come from a disrupted
18 family life.'

19 Then in paragraph 97 he says:

20 'I don't think one-to-one counselling with community
21 psychiatric nurses is any good, I think it is far better
22 for there to be groups like ...'.

23 He mentions 'Voice Within', which is a group where
24 people get to sit and talk about their experiences when
25 they are ready.'

1 He says:

2 'It is far better to speak to other people who have
3 experienced similar things and know what they're talking
4 about.'

5 He mentions in 108 on the final page that he is part
6 of that group, which I think he appears to have set up
7 himself --

8 LADY SMITH: Yes.

9 MR PEOPLES: -- and they meet on a regular basis and he
10 appears to benefit from that particular group meeting.

11 He signed his statement on 30 April 2019.

12 LADY SMITH: Thank you.

13 Thank you.

14 MR PEOPLES: Can I move on to a third read-in?

15 LADY SMITH: Yes, thank you.

16 MR PEOPLES: If I can fit it in.

17 The third read-in, the individual will be referred
18 to today as 'Charlotte'.

19 LADY SMITH: Thank you.

20 'Charlotte' (read)

21 MR PEOPLES: Her statement is WIT-1-000001257.

22 LADY SMITH: Thank you.

23 MR PEOPLES: 'Charlotte' was born in 1975 in Glasgow, and
24 lived at home with her mother and brother, and she tells
25 us she has never known her dad.

1 She went to the local primary school and then
2 a secondary school for a while, but she tells us that
3 when that got knocked down she had to move to another
4 school, but tells us she got on well at school, was
5 academic, and was top set in all her classes.

6 However, life at home was difficult. This she tells
7 us at paragraph 4. Her mum had mental health issues and
8 she says, looking back, it was probably schizophrenia,
9 though she didn't know that at the time. She says her
10 mum liked to blame her for everything, she would shout
11 at her and say she wished she'd never had 'Charlotte'.
12 She said she would try to escape this by staying at
13 friends' regularly.

14 At page 2 she said:

15 'All people saw was me acting out. No one ever
16 asked the child what was wrong back then.'

17 So it's again familiar --

18 LADY SMITH: Yes.

19 MR PEOPLES: -- that no one was asking why the young person
20 was behaving in a particular way.

21 She said:

22 'I lashed out by doing the usual stuff, truanting
23 from school, going out with my friends, and doing silly
24 things. My friends would shoplift boxes of chocolates.
25 I didn't shoplift. I couldn't do that. I couldn't

1 steal anything. But I was with them when they did and
2 I got tarred with the same brush.'

3 She says when she was about 13 years of age, which
4 would be 1988 or thereabouts.

5 LADY SMITH: Mm-hm.

6 MR PEOPLES: Social work became involved and everything
7 happened quickly, she said, and she went before a number
8 of panels, Children's Panels.

9 At the third panel she recalls at paragraph 7 she
10 was removed from her mother's care and sent to Newfield
11 Assessment Centre when she was 13 in 1988, and she tells
12 us about that, starting at paragraph 8.

13 I'll just pick out a few things from what she says
14 in her statement.

15 At paragraph 11, under a section dealing with
16 routine, she says:

17 'I don't think there was much focus on education.'

18 In paragraph 12:

19 'During the day, it was quite chaotic ... there was
20 a lot of fighting, arguments, and people kicking off.'

21 At paragraph 18 on page 4, she said:

22 'A social worker visited me now and again ... she
23 never asked how I was getting on or how I was feeling.'

24 Then she has a section headed 'Abuse ...' at
25 Newfield, and she says at paragraph 20 on page 5:

1 'The general feeling in the assessment centre was
2 one of intimidation. I found it intimidating that the
3 staff were mostly men. We couldn't lock our bedroom
4 doors from the inside so they would come into our rooms
5 at night. There was one male staff member in particular
6 who came into my room a few times when I was in bed. He
7 was maybe in his 40s ... I found him really creepy. He
8 was the reason I tried to run away for the first time.
9 I was terrified and wanted to get away from him ...'

10 Then she says at paragraph 21:

11 'The carers in there were always rough. I only have
12 memories of the male staff. They would batter you,
13 punch you, kick you, pull you about, and lock you in
14 cupboards. It was really bad. They were always pinning
15 you down and putting your arms up your back. It wasn't
16 restraining. They were trying to hurt you. These types
17 of things were a daily occurrence in there. It didn't
18 just happen to me though. It happened to everyone.'

19 I think that's describing, at least in part,
20 a restraint situation, but although she says it clearly
21 wasn't, in her view.

22 LADY SMITH: Mm-hm.

23 MR PEOPLES: Then she talks about running away. At
24 paragraph 25 she says:

25 'The police never ... asked why I'd run away. They

1 were just as bad as the staff in there. They were very
2 heavy handed. I remember once, the police came to get
3 me at my mum's. Two male officers pinned me to the
4 living room floor with my arm up my back, hit me, then
5 threw me in the van. It wasn't just a one off though.'

6 She says at the end of that paragraph:

7 'I would be screaming that I didn't want to go back,
8 but no one did anything about it.'

9 She goes on:

10 'All the staff in the assessment centre knew what
11 was going on, you would hear them making jokes, laughing
12 about it, and making fun of you. It was really terrible
13 and I didn't want to be there, it was just constant
14 intimidation, threats, and fear.'

15 Then she talks about leaving the assessment centre
16 after a panel hearing, and that the decision was made
17 that she should go to Kerelaw, and it says that at the
18 hearing her home life was never mentioned. Incidents at
19 Johnstone were brought up, but not what the staff did to
20 her, only her behaviour.

21 She says:

22 'It was always like I was just this bad child for no
23 reason. They were never interested in why.'

24 Then she speaks about or tells us about Kerelaw,
25 starting at paragraph 28.

1 If I go to paragraph 30, she says:

2 'When I was at the assessment centre in Johnstone,
3 [this is Newfield] the names of other places were
4 mentioned. Kerelaw was one of them, but I didn't know
5 anything about it. I heard some horror stories from
6 other kids though. Apparently, it was the worst of the
7 ones that had been mentioned. It sounded like
8 a prison.'

9 Then at 32 she says that she used to see a guy in
10 a suit walking around. She thought he was in charge of
11 the full place, but she can't remember his name. She
12 said:

13 'Most of the staff in the girls' unit were male.'

14 She refers to her key worker who was called EUM
15 and she remembers the art teacher being Matt George.
16 Then she says:

17 'There was a guy called John Muldoon who worked in
18 the boys' unit but came to the girls' unit a lot.'

19 She goes on to tell us about routine, and at
20 paragraph 37, I will just pick up one point that's said
21 in that section:

22 'There was no privacy where we got dried and
23 dressed.'

24 This is in the shower area:

25 'The staff, including the male staff, would just

1 wander about the shower room constantly. You could be
2 just out the shower, in a towel, and a male member of
3 staff would walk in. They just walked into our bedrooms
4 when we were changing too. I always felt it was really
5 inappropriate.'

6 Then as for schooling, 'Charlotte' tells us at
7 paragraph 41:

8 'The school, if you could call it that, was on the
9 grounds of Kerelaw. The boys and girls mixed at school.
10 I really didn't get any education at all while I was
11 there. It was nuts. That's the only way I can describe
12 it. I was quite academic, but you couldn't do any work
13 in class, even if you wanted to. There was no way you
14 could concentrate. There was always a radio on and
15 people jumping about. Most of the teachers didn't even
16 try. They used to just stand about smoking while the
17 kids smoked hash in class. It was a free for all.'

18 She says:

19 'We did the most work in art with the art teacher,
20 Matt George.'

21 But she said most of the teachers didn't care about
22 teaching, and this is paragraph 42:

23 'It wasn't an education, it was a joke.'

24 Although she said she did manage to get some
25 standard grades despite all of that.

1 When it comes to, if we go to page 47 on page 10,
2 she says:

3 'My social worker [the same one she had at the
4 assessment centre] came to visit now and again. Just
5 like before, it was just a tick-box exercise for her.
6 I also went to Children's Panel hearings every so often.
7 My mum and the social worker would be there. The panels
8 were always the same. They weren't interested in how
9 things were. They thought I was a bad child, and that
10 was that.'

11 Then she says at paragraph 48 she does remember
12 having one inspection, she says:

13 'All the rooms were cleaned and we all had to be on
14 our best behaviour. No one spoke to us one on one.'

15 Then in paragraph 51, in a section dealing with
16 leave, she said:

17 'When I did go home for a night, I wouldn't go back
18 when I was supposed to. The police would get called and
19 I'd try to run, but they'd grab me, put me on the
20 ground, kick and punch me, then throw me in the van.
21 I'd usually get a dig in the ribs as they threw me in
22 the van to be taken to the police station and then back
23 to Kerelaw.'

24 As for discipline, she said, at paragraph 53 she
25 says:

1 'The staff were always threatening us by saying we'd
2 be sent to the secure unit.'

3 Then she has a section on abuse at Kerelaw, and she
4 said at 54:

5 'There was always something going on in Kerelaw
6 whether it was arguing or fighting between the girls or
7 violence from the staff. I feel like I experienced more
8 violence in the assessment centre in Johnstone
9 [Newfield, that is] ...'

10 LADY SMITH: Yes.

11 Q. '... but there was definitely a constant threat of
12 violence in Kerelaw too. I think it felt less because
13 I got to know more of the staff in Kerelaw, so there
14 wasn't as much violence directed at me. The night shift
15 staff were more violent than the day shift staff,
16 because we never got to know them as well. More of the
17 day shift staff came across as friendly, but there were
18 a few creeps as well.

19 John Muldoon worked in the boys' unit but he would
20 come into the girls' unit regularly. By reputation, we
21 knew how bad he was. Everyone was shit scared of him.
22 He put the fear of God in people because he would just
23 batter you for no reason.'

24 She then says:

25 'Matt George, the art teacher, always tried to be

1 really touchy feely. He would come up behind me in
2 class and get uncomfortably close. I used to move away
3 and make an excuse. I remember once when I was in the
4 TV room in the unit I had a migraine and he wanted to
5 massage me. There was no one else in the room and he
6 gave me a head massage. As he was massaging my head his
7 hands moved down and he tried to touch my breasts.
8 That's when I kicked off and a female member of staff
9 walked in, so he stopped. He was really creepy.
10 I don't know if he did martial arts or something like
11 that, but he knew about pressure points, that's what he
12 used to threaten us with.

13 He also used to take us to his house ... I've been
14 in his house loads of times. He would take two to six
15 of us there on the premise that he had to pick something
16 up from home.'

17 Then she says that his family were never there when
18 she was. She continues:

19 'When we were in his house he would ask girls
20 individually to come into another room with him, they
21 were never away very long. I made sure that I always
22 stayed in the living room with the other girls. It felt
23 off, but I never had any girls tell me that he touched
24 them or anything.'

25 There was another member of staff, whom she names,

1 and she says that he made her feel uncomfortable and she
2 says she knows for a fact that he was sleeping with some
3 of the resident girls. She puts this person in his 20s
4 by age. She said that she would say that she was
5 physically abused at least once a month:

6 'There would be male staff pinning you to the floor,
7 lying on top of you, hitting, kicking, and punching you.
8 There was also a constant feeling of being threatened
9 with sexual abuse as well. That would make me lash out.
10 Whenever I felt threatened, I kicked off. I had to.
11 The violence happened so often that it became normalised
12 and I can't really remember any specific incidents.

13 It's hard to describe how Kerelaw was. Sometimes it
14 was all right. Other times, things would kick off and
15 there would be a riot. Staff would run in from other
16 units and that's when they would grab you and you'd get
17 hit. There was never a quiet space, it was just full on
18 with totally wild characters. It was constant put downs
19 and emotional abuse too. Some of the staff spoke to us
20 like a piece of dirt on their shoe.'

21 She says in relation to reporting she told her mum
22 about the abuse each time she ran away. She told the
23 police, but no one did anything about it.

24 She says at paragraph 63:

25 'All the staff at Kerelaw knew what was going on.

1 The staff who weren't abusive were just the best of
2 a bad bunch. I got on ok with some of them and even
3 though they weren't abusive themselves, they knew what
4 was happening and did nothing to stop it. They didn't
5 even try to protect us.'

6 She told us that she left Kerelaw when she was 16,
7 that would be about 1991, I think.

8 LADY SMITH: Yes.

9 MR PEOPLES: She had a boyfriend, she says, who had passed
10 away by the time of the statement, they started
11 a relationship, she fell pregnant six or eight months
12 later, and she tells us about what happened after that
13 and she had to learn skills, she said, and she was put
14 on a programme called 'independent living', although she
15 still appeared to stay at Kerelaw for a time while that
16 was happening.

17 She does say at paragraph 67 not long after she got
18 into a fight with a girl, who she says was sleeping with
19 one of the staff. The staff member got involved and she
20 was kicked out of Kerelaw, but that staff did arrange
21 that she could go to a Local Authority flat.

22 As for life after care, she tells us that she moved
23 into a flat which had no flooring or furniture but was
24 given a grant and she thinks that a social worker came
25 to visit her a couple of times, but that was all, she

1 said. As she put it:

2 'I was 16, pregnant, and on my own.'

3 And had to rely on a friend's mum and dad to help
4 her do up the flat.

5 She says that her boyfriend was very controlling and
6 eventually she got rid of him, she said, when their
7 daughter was about two or three.

8 She then says that in her early 20s someone who
9 worked in a shop next to her place stayed overnight in
10 her flat and he sexually assaulted her when she was in
11 her own bed.

12 She had a son when she was 24 by, I think,
13 a different person. But that person was a drinker and
14 gambler and that relationship broke down.

15 She said she ended up working at one point with
16 three jobs to look after her children.

17 She then met her husband and they moved out of
18 Glasgow and she tells us at the date of the statement
19 they'd been together for 18 years and have a son of
20 their own. She went to college to do an access to
21 nursing course, and went on to study nursing at
22 university, graduated with a distinction, and did
23 district nursing for a while.

24 After that she went on to do a health visiting
25 course at masters level and had been working as a health

1 visitor for the six years before giving the statement.

2 Then on impact, she says that:

3 'As an adult, I've always sought out care, but not
4 always in a positive way. I've found myself in abusive
5 relationships and I've put up with the abuse for longer
6 than I should have done. I tend to overcompensate,
7 especially when it comes to my kids.'

8 She talks about her relationship with her family,
9 she says she has an okay relationship with her brother,
10 but not with her mother. She says about education she
11 does think about the lack of education she had in third
12 and fourth year of secondary, she said:

13 'I was bright and despite truanting, was doing well
14 academically before I went into care. I don't
15 understand why they didn't just send me to a local
16 school. If they had I could have got into a good job
17 much earlier than I did. In fact, I almost didn't get
18 onto the nursing course at college because of my
19 juvenile convictions. I don't think that's right.
20 I definitely feel minor juvenile convictions should be
21 wiped. It almost stopped me from moving on with my
22 life.'

23 She's quite honest in saying there are daily
24 triggers in her job as a health visitor when she is
25 dealing with police and social workers. She says rather

1 frankly:

2 'I can't stand them, which is obviously challenging.
3 I know they're not all the same and there are good ones
4 and bad ones.'

5 She says she has never officially reported the abuse
6 she suffered in care. She has told some friends, but
7 that's it.

8 So far as lessons are concerned on her final page
9 she says at paragraph 79:

10 'I think there are lessons to be learned before kids
11 get to the stage of being put in care. The process
12 needs to be stripped right back. If a kid is acting
13 out, questions need to be asked why they are acting out.
14 There might be a very good reason. No one ever looked
15 at my mum and asked if she was part of the problem, and
16 for me she was the problem.

17 I also think there needs to be more training put in
18 place, not just for those working in institutions, but
19 for those sitting on the Children's Panel too. From my
20 experience people prey on vulnerability. I was in
21 a situation, as a vulnerable child, where most of my
22 carers were male. That was intimidating. There needs
23 to be more female carers looking after young females.'

24 She says, finally:

25 'I hope that the work the Inquiry is doing stops

1 similar situations happening to anyone else. It
2 certainly gives people like me a voice.'

3 She has the usual declaration and she signed her
4 statement on 26 May 2023.

5 LADY SMITH: Thank you very much, Mr Peoples.

6 I'll stop there for the morning break, and hopefully
7 by about 11.45 am the next witness will be here and
8 ready to give evidence in person.

9 MR PEOPLES: Ms Forbes will take the next witness.

10 LADY SMITH: Thank you.

11 Before I rise, for the sake of caution, we have used
12 a nickname that was applied to one boy when he was in
13 Kerelaw, I think by Matt George, the name [REDACTED].
14 That might enable him to be identified by some people,
15 but that nickname is not to be used outside this room
16 because he has the protection of my General Restriction
17 Order.

18 Thank you.

19 (11.32 am)

20 (A short break)

21 (11.50 am)

22 LADY SMITH: Ms Forbes.

23 MS FORBES: My Lady, we're ready for a live witness, and

24 I would call Allan Weaver.

25 LADY SMITH: Thank you.

1 Allan Weaver (affirmed)

2 LADY SMITH: How would you like me to address you? Your
3 first name, or Mr Weaver?

4 A. First name is fine.

5 LADY SMITH: Thank you for that, Allan.

6 The red folder -- which I see you have already found
7 there on the desk -- has your statement in it, so that
8 will be available for you when you are giving evidence.
9 We'll also bring it up on the screen, the particular
10 parts that we would like to explore with you in a bit
11 more detail.

12 Firstly, my thanks to you for coming here today to
13 help us with important evidence in this chapter of the
14 particular case study that we're doing at the moment.

15 If at any time, Allan, there's anything I can do to
16 help you give your evidence more comfortably, whether
17 it's a break or explaining something better, or
18 something else that I hadn't anticipated --

19 A. Sure.

20 LADY SMITH: -- please don't hesitate to let me know.

21 A. Right, thank you.

22 LADY SMITH: That's what we want to achieve, and so that you
23 go away not too exhausted and hopefully not too
24 distressed at having to trawl back in your memory to
25 another period of your life, which I can see from your

1 statement has ups and downs in it to say the least.

2 I do understand that, and I do understand that what
3 we're asking you to do isn't easy. So bear that in
4 mind.

5 If you're ready, I'll hand over to Ms Forbes and
6 she'll take it from there. Is that okay?

7 A. Thank you.

8 LADY SMITH: Thank you.

9 Ms Forbes.

10 Questions from Ms Forbes

11 MS FORBES: Thank you, my Lady.

12 Allan, the statement that you gave the Inquiry is in
13 the red folder in front of you, it has a reference
14 number for our purposes, so I am just going to read that
15 out into the transcript. It's WIT-1-000001161.

16 If you could go to the last page of your statement,
17 every paragraph has a number, and on the very last page
18 I think there's a paragraph 308.

19 A. 308, ah-ha.

20 Q. Yes. This is where you make a declaration there saying
21 that you have no objection to your witness statement
22 being published as part of the evidence to the Inquiry,
23 and you believe the facts stated in the witness
24 statement are true.

25 A. Ah-ha.

1 Q. You've signed that and it's dated 21 December 2022.

2 A. Ah-ha.

3 Q. Is that still the position?

4 A. Yes.

5 Q. Yes. You can go back to the beginning of your statement
6 now, if you want, or put it to one side.

7 Allan, you tell us you were born in 1961, is that
8 right?

9 A. Yes, ah-ha.

10 Q. And you were born and brought up in Saltcoats.

11 A. Yes. I had to think about it there, but yes, yes,
12 I was.

13 Q. Are you able to see, is the screen now on?

14 A. Yes, I've got it.

15 Q. Okay, great. I think you tell us you were the fourth
16 youngest in a family of six?

17 A. Ah-ha.

18 Q. You initially lived with your siblings and your parents?

19 A. Yes.

20 Q. You've described, about paragraph 3 there, of your life,
21 your early life, as having a relatively normal childhood
22 to begin with?

23 A. Yes.

24 Q. You say your dad was a qualified bricklayer and didn't
25 work much though; is that right?

1 A. Ah-ha, yes.

2 Q. Then you tell us, though, by the time you got to the age
3 of about nine or ten you became aware of your father
4 drinking quite heavily.

5 A. Ah-ha.

6 Q. You were also aware of violence towards your mother from
7 your father?

8 A. Ah-ha.

9 Q. Which you had to witness?

10 A. Ah-ha.

11 Q. You describe that in your statement as 'heavy-duty
12 violence'?

13 A. Yes.

14 Q. And you would sometimes become involved in trying to
15 protect your mum; is that right?

16 A. Yes.

17 Q. And to get him off of her?

18 A. Ah-ha.

19 Q. I think you say that that was just horrendous?

20 A. Yes.

21 Q. You tell us about this sort of dual role of trying to
22 protect your mother, but also trying to protect your
23 younger brothers as well?

24 A. My two older sisters -- I was trying to think there, who
25 would have been, obviously they would have been 14, 15,

1 around about that age, and my older brother, they seemed
2 to be away doing other things. I don't know what they
3 were doing but they never seemed to be there half as
4 much. So I was kind of left, and I was kind of oldest,
5 and I was always particularly close to my wee brothers.
6 Even though I got in a lot of trouble I tried to steer
7 them away from trouble.

8 And it was the same when my father was violent.
9 I was trying to protect them. I would try and get them
10 to go upstairs to their bed so they didn't witness it,
11 and that would leave me physically trying to intervene
12 to protect my mum and as in jump in and try to wrestle
13 with my father when he was being violent. But given my
14 young age, that was -- you know, I was just swatted to
15 the side, it didn't make much of an impact.

16 Q. This, you have said, is from about nine or ten, is that
17 right?

18 A. Nine or ten. It's also worth stating, sorry, and
19 I don't think I put it in there as well, that the police
20 were aware of this level of violence and aggression by
21 my father towards my mother. They were involved.
22 They'd actually been up and involved a couple of times,
23 and then reprimanded my mum for her shouting, for crying
24 so loud. I don't know, if I think she was meant to weep
25 quietly, I don't know.

1 But they were aware of this, and they actually did,
2 I would say 'intervene' inasmuch as being present, and
3 tell my mum to try -- you know, just try to keep her
4 voice down a bit. So they were there.

5 I just wanted to say that, because I'm not sure if
6 I'd put that in the body of the statement as well.

7 Q. So the police seemed to be aware of violence happening?

8 A. Aye. It's not that they did seem to be aware; they were
9 aware. They were aware.

10 Q. But they didn't do anything about it other than tell
11 your mum --

12 A. Other than reprimand my mother.

13 And I remember one instance, and I don't know if
14 this is the purpose of me doing this, but my mother was
15 locked in a small shoe cupboard and she was chapping the
16 door, and I was standing there, my father was standing
17 there, two police officers standing, and my mother's
18 scraping the door, saying that she couldnae breathe and
19 they was telling her, 'Look, can you just pipe down
20 a bit here, we're trying to talk to [REDACTED]', as in my
21 father, so that was the kind of role that they played
22 during that period.

23 LADY SMITH: Well, Allan, that was the era where it was not
24 uncommon for the attitude of the police to a disturbance
25 within the home as being 'just a domestic'.

1 A. Absolutely.

2 LADY SMITH: Not for them to get involved with, really.

3 A. Absolutely.

4 MS FORBES: Certainly there wasn't any help provided to you
5 in relation to --

6 A. No.

7 Q. -- what was going on.

8 I think you tell us, Allan, that there came a time
9 when you started to hang about with local gangs in the
10 housing scheme?

11 A. Ah-ha.

12 Q. And there would be some criminality involved, breaking
13 into houses and shops to get money and the like?

14 A. Yes. But I think just the way you mention it there, and
15 I think you're right to mention it that way, because
16 that's the way that I have mentioned it, as hanging
17 about gangs and things. I've done these guys
18 a disservice by saying 'gang'. They weren't like
19 a recognised gang, they were children like me, and we
20 were therefore described by others as a gang. But we
21 weren't really a gang. We were like a collective of
22 children. Do you know what I'm saying by that. You
23 know, we weren't like a recognised street gang and
24 everything that goes along with that. We were just kind
25 of bonded together by our age, circumstances, where we

1 lived, and also what we were experiencing. Because they
2 experienced fairly similar things as well.

3 So I just wanted to correct that. But you're right
4 to bring that up, but that was my terminology. But
5 I think that's the wrong terminology. I don't like
6 that, I must say.

7 Q. Okay. I think you say that these were sort of pals, and
8 they had a level of dysfunction also in their households
9 and you just all sort of knitted together. Is that
10 a better way to see it?

11 A. Yes. Yes, aye.

12 Q. These were people that you thought you could trust and
13 they depended on each other?

14 A. They were people that I did trust, aye. They were
15 trustworthy.

16 Q. Then as you got older, I think you describe there was
17 more serious things happening, more serious offending,
18 some violence, becoming involved in things, and then you
19 started to come to the attention of the criminal justice
20 system?

21 A. Yes.

22 Q. That was about -- by the time you say you were 12 or 13
23 you had been to quite a lot of children's hearings?

24 A. Yes, aye.

25 Q. I think you also say that you had a social worker, and

1 you name her, Margaret Clark?

2 A. Yes.

3 Q. She was someone that stayed with you, and we'll talk

4 about her later, she was someone that was a figure

5 throughout --

6 A. A constant, yes.

7 Q. A constant figure throughout your whole life.

8 A. Mm-hm.

9 Q. I think you saw her as being somebody who was really

10 good --

11 A. Absolutely.

12 Q. -- and kept in contact with you, and you respected her?

13 A. Yes.

14 Q. I think you tell us the first contact maybe with her was

15 when you were about 14?

16 A. Aye, if I remember right my initial contact with

17 Margaret was on a voluntary basis, like voluntary --

18 I went to the panel, or the hearing, but it was

19 voluntary supervision. I didn't -- when I was that age

20 I wasn't quite sure what that meant, but to me it was

21 still on supervision and it was only as I got older

22 I started to make of it, but my initial contact, it was

23 through a voluntary supervision order.

24 Q. I think you tell us that you thought she was somebody

25 who was genuinely concerned about what you were getting

1 up to?

2 A. Oh absolutely.

3 Q. And she just always treated you with kindness and
4 respect?

5 A. Yes, and my mum with kindness and family members that
6 she came into contact with. She was just a -- just
7 a lovely person.

8 Q. I think you also say she was involved in setting up
9 a football team of some kind for you --

10 A. Yes.

11 Q. -- and some of your friends; is that right?

12 A. Yes.

13 Q. In fact that team would play Kerelaw?

14 A. Yes.

15 Q. But I think you say that it wasn't really what you would
16 expect football to be, there were fights, chasing each
17 other with bricks and bottles sometimes?

18 A. Yes.

19 Q. Okay.

20 A. Aye. I think it's worth stressing as well, because
21 I never stressed this a bit, and again this is my words
22 understanding, Margaret's wee football team. By the way
23 this was a unique approach to working with children and
24 children of our kind of background. This was something
25 that never happened.

1 It was okay for the likes of Kerelaw in terms of
2 a football team, because they are a residential
3 establishment. But I mean Margaret didn't even like
4 football, she hated it. But the very fact is she done
5 this. Her practice was phenomenal. It was only -- you
6 know again, in later years and particularly when
7 I became a qualified social worker, I'd think back, 'My
8 God, how did she manage that?' And it annoys me at times
9 that she never got the praise or recognition that she
10 deserved. But she did organise games, we did play other
11 children's units. The games against Kerelaw didn't
12 always end the way they should have ended. In fact it
13 was mayhem at times. But that was just part and parcel
14 of the game then.

15 Q. I think you tell us, Allan, that you were about 14 and
16 you were out playing football one time and you ended up
17 breaking into the local pub, a milk lorry was then
18 stolen, and you filled that up with alcohol.

19 A. Ah-ha.

20 Q. And then hid the lorry in the local housing scheme?

21 A. Aye.

22 Q. But it was quite quickly found by the police.

23 A. Yes.

24 Q. And you were picked up?

25 A. Yes.

1 Q. Was that then what led to the sort of emergency
2 Children's Panel that was then set up?

3 A. Yes.

4 Q. At that you were then sent to an assessment centre?

5 A. Ah-ha.

6 Q. It was to be for three or four weeks, you say?

7 A. Yes.

8 Q. I think, Allan, you then go on to tell us about the time
9 at that assessment centre, and at this time you would
10 have been still 14, is that right?

11 A. Yes. Aye.

12 Secondary Institutions - to be published later

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11 Q. After about three or four weeks you returned home, but
12 this was really just you back in the same environment?

13 A. Yes.

14 Q. Same problems?

15 A. Aye.

16 Q. I think you say that you felt though that your status
17 had maybe been elevated because you had been to
18 an assessment centre?

19 A. Yes.

20 Q. Was that out within your friend group?

21 A. Probably beyond that. You know, other children at
22 school. But definitely within our friend group, but
23 I would say probably locally and other kind of weans in
24 the kind of neighbourhood.

25 Q. So it was known that you were the boy who had been to

1 an assessment centre?

2 A. Yes.

3 Q. You tell us, Allan, later, this is at paragraph 33, that
4 you went back then, you were expected to go back to the
5 high school in Saltcoats, but they didn't really want
6 you there. They weren't very welcoming?

7 A. No, they never -- they never wanted me there.

8 Q. I think you say that there were a couple of teachers
9 there who would physically assault you regularly?

10 A. Yes.

11 Q. The comment you make at that paragraph, Allan, is that
12 some teachers there were [REDACTED] aggressive and abusive
13 [REDACTED] Secondary Institutions - to be published later
14 [REDACTED] Secor

15 A. Absolutely.

16 Q. You describe being battered a couple of times by the
17 teachers?

18 A. Ah-ha.

19 Q. I think you then say that -- well, I was going to ask,
20 Allan, what did that mean for you then for going to
21 school? Did it mean you just stayed away?

22 A. Mostly. I mean me and my pals were, when I remember
23 back, I think we were rarely there, we never went, we
24 just went away and done our own thing. Well, that meant
25 offending in some capacity. And that became we were at

1 school less and less frequent, and nobody really asked
2 any questions. So we just kind of fell in that pattern
3 of convenience for everybody.

4 Q. So you didn't want to go and, from your impression, they
5 didn't really want you there?

6 A. No, they didnae want me there, or some of my friends,
7 they didn't want any of us there.

8 Q. I think at paragraph 35, Allan, you then say that you
9 were quickly getting involved in crime again and
10 anti-social behaviour, and there was then a time after
11 a party where a number of your friends and you ended up
12 breaking into the school and caused damage to the
13 school.

14 A. Mm-hm.

15 Q. I think you say it was quite an extensive --

16 A. Yes. Aye.

17 Q. -- amount of damage?

18 A. Aye.

19 Q. The next day then you were arrested. I think there were
20 four of you, you tell us, is that right? And you were
21 put on an unruly certificate?

22 A. Ah-ha.

23 Q. Then you appeared in court, and that was the first time
24 up until that point that you had appeared in court.
25 Before it had just been Children's Panels; is that

1 right?

2 A. Yes, aye.

3 Q. You were told that you were going to be remanded at
4 Longriggend for a week, but you had to spend a night in
5 Barlinnie before that?

6 A. Ah-ha.

7 Q. Allan, you then go on to tell us about Barlinnie, and
8 this is from paragraph 37 of your statement. You say
9 the police took great pleasure when they dropped you off
10 there telling you that that was you in with the big boys
11 now.

12 A. Ah-ha.

13 Q. You say that you and your pals were all terrified?

14 A. Aye, yes.

15 Q. But you didn't show that to each other?

16 A. No, not at all. Not at all. We just kind of swaggered
17 our way through it.

18 Q. You tell us about how you were processed, and we have
19 that there. You were put into the young offenders'
20 section, handcuffed. At this time, how old would you
21 have been, Allan?

22 A. 15.

23 Q. 15. And you were put in a dog box to wait?

24 A. Yes.

25 Q. You've described that. We've heard some evidence about

1 the dog boxes, you say that it wasn't much bigger than
2 a phone box?

3 A. Aye.

4 Q. But I think you tell us sometimes there would be about
5 four or five lads in it?

6 A. Aye, absolutely.

7 Q. So you wouldn't just be in there on your own, even in
8 that small space?

9 A. No, you felt people's breath on the back of your neck,
10 while you were right -- I mean, you were crammed into
11 these places, yes, absolutely.

12 Q. [REDACTED]
13 you say you were checked for lice?

14 A. Ah-ha.

15 Q. This is at paragraph 39, and you were told to drop your
16 pants and checked by a doctor?

17 A. Ah-ha. Or a man in a white coat.

18 Q. Yes. I think you tell us the room was mobbed, you say,
19 and it was humiliating?

20 A. Yes, aye.

21 Q. Would that be with other inmates, or other boys or young
22 offenders?

23 A. Yes, aye.

24 Q. You tell us a little bit about Barlinnie and you say
25 that it was a place that was full of older guys who had

1 obviously drank all their lives?

2 A. Aye.

3 Q. You were put in a dark cell that night and you say you
4 were terrified?

5 A. Aye.

6 Q. I think one of the things you say at paragraph 40,
7 Allan, is you say:

8 'Despite my young age, I could feel, sense, hear,
9 and almost touch the pain in the screams from those
10 guys.'

11 A. Aye.

12 Q. Was this the other men that were in --

13 A. Yes, what they used to do, they used to call D Hall in
14 Barlinnie 'the Jakey Hall', and when they say 'Jakey'
15 that was old guys that they referred to who were all
16 sorts of alcohol problems and used to beg in the street
17 and used this behaviour and every now and again they
18 would get rounded up.

19 But these guys were severe, like absolutely severe
20 problems, and I always remember it by lying in Barlinnie
21 that night as well. And you could almost taste the
22 pain. And even though I was the age I was. You
23 couldnae deny it, you couldnae -- it was there, it was
24 really, really upsetting, and I remember thinking
25 there's nobody helping these old guys. But that was

1 an accepted part of the whole process with their
2 dealings with us, old guys like that went to 'the Jakey
3 Hall', they never went to hospital, they never received
4 any sort of assessments or support. They went to the
5 Jakey Hall and that was it, and that was while you are
6 waiting to go to Longriggend, or whatever it had to be,
7 young offenders would also be located in D Hall and
8 that's why we always had a kind of close proximity. We
9 were kept in the Jakey Hall.

10 Q. That was only one night you spent there?

11 A. One night that time.

12 Q. But that's something that stays with you?

13 A. Oh, absolutely, absolutely. It's haunting, haunting.

14 Q. You tell us, Allan, the next morning you were taken on
15 a bus to Longriggend and you were to be kept there for
16 a week, and Longriggend was a place that you had heard
17 of --

18 A. Aye.

19 Q. -- through its reputation?

20 A. Yes.

21 Q. I take it that wasn't a positive reputation?

22 A. No.

23 Q. So fair to say you weren't looking forward to going
24 there?

25 A. No, not at all.

1 Q. You tell us about Longriggend from paragraph 42 and you
2 say that this was in November 1976.

3 A. Ah-ha.

4 Q. You describe the kind of journey there, and crossing the
5 moors --

6 A. Aye.

7 Q. -- and it being a bleak and dark morning on your way
8 there.

9 You tell us about the admissions process, and that
10 was the same as Barlinnie, this being stripped naked and
11 deloused --

12 A. Aye.

13 Q. -- getting your hair checked, and I think you said you
14 were particularly worried about getting your hair shaved
15 and people knowing that you had lice, but luckily that
16 didn't happen to you and you were clear?

17 A. Yes.

18 Q. And they checked your testicles and things like that?

19 A. Aye.

20 Q. But you say this whole process was another dehumanising
21 experience?

22 A. Absolutely.

23 Q. You tell us at paragraph 46, Allan, about the fact that
24 you were given a uniform.

25 A. Ah-ha.

1 Q. But was this a uniform for adult males?

2 A. Well, it's certainly -- I mean, that's a fair enough
3 question. It was certainly wasn't for children, and
4 I'm presuming it probably was for adult males. It
5 didn't affect any of us and I happened to be the
6 smallest, unfortunately, so I looked more like 'Coco the
7 Clown' than anybody else with these oversized shoes on
8 and this ill-fitting uniform.

9 But I think -- I mean you're probably right, they
10 probably were initially for adult males.

11 Q. By this time you're still 15; is that right?

12 A. Mm-hm.

13 Q. You're there because of this unruly certificate and
14 being remanded?

15 A. Yes.

16 Q. You're still with your pals at this point; is that
17 right?

18 A. Yes.

19 Q. So were they a similar age to you?

20 A. Yes.

21 Q. Were you aware of whether they were all on an unruly
22 certificate or did you --

23 A. We were all the same.

24 Q. All the same?

25 A. We were on it.

1 Q. I think you tell us you were all sent to this schoolboy
2 section?

3 A. Ah-ha.

4 Q. But you comment there was no school there in that part.

5 A. There was a school. There were classrooms there. But
6 we were never -- we were never in as part of the
7 educating system, but they did have a ... I am saying
8 'classroom', what looked like a classroom they had.

9 Q. I think you tell us that your days were spent, this is
10 at paragraph 48, locked up for most of the day, and you
11 had to use a pot for the toilet and take it out at
12 regular times to empty it.

13 A. Ah-ha.

14 Q. I think you tell us at paragraph 51, Allan, about having
15 to play this game -- we've heard some evidence about
16 this -- murder ball in the gym, and you say that this
17 was one boy having to try and hit others by throwing
18 a ball at everyone?

19 A. Aye, ah-ha.

20 Q. Forcefully?

21 A. Yes.

22 Q. But I think you describe it as being just violence,
23 though?

24 A. It was a form of abuse by the staff who encouraged the
25 boys to take it that bit further, because probably

1 legally, or professionally, they couldn't take it as far
2 as they would want. But it was an abusive act. It was
3 an act of violence from start to finish, and it was
4 organised by the staff in Longriggend. It was awful.

5 And again, as well, me and my pals, we were fairly
6 at ourselves. There were some boys we could fight to
7 protect ourselves. Some boys we couldn't, but probably
8 most we could. But there was boys far less able than us
9 in there, and even as an adult I used to think back to
10 what those boys went through, and it was absolutely
11 awful.

12 And by going through this in front of staff members,
13 and not even staff members witnessing it, this was staff
14 members who had actually organised it, and found the
15 whole process extremely entertaining. You know, it's --

16 LADY SMITH: Allan, what type of ball did you use?

17 A. It was like a heavy -- it wasn't as heavy as a medicine
18 ball, but it was a weighty ball, a weighty leather ball.

19 LADY SMITH: Thank you.

20 A. It wasn't like a normal football. It was, again,
21 enhancing the entertainment value.

22 MS FORBES: You say, Allan, about discipline there, that it
23 was strict, and the way that the prison officers would
24 communicate was really just to bark orders.

25 A. Aye.

1 Q. I think you describe them as bullies?

2 A. Oh, absolutely. At best they were bullies.

3 Q. I think you go on to tell us that they were aggressive
4 and violent?

5 A. Ah-ha.

6 Q. And there were physical assaults by staff members?

7 A. Having said that -- I probably should have said, sorry,
8 and I don't know if I have, this wasn't every single
9 staff member, maybe a core group within the institution.
10 But when you're that age and you experience that type of
11 violence you tend to think that everybody's -- not every
12 single staff member was violent and aggressive, but
13 there was a significant, or certainly what felt to me
14 a significant number of staff members at the time that
15 did engage in this kind of behaviour, a significant
16 number.

17 Q. You say that you saw prison officers punch boys on the
18 side of the head for talking or for carrying on. They
19 would ridicule people, lash out, punch them or kick
20 them --

21 A. Aye.

22 Q. -- things like that?

23 That's something you witnessed on a regular daily
24 basis?

25 A. Yes.

1 Q. But I think you make the point that it didn't happen to
2 you, yourself.

3 A. No, it didnae, no.

4 Q. You do talk at paragraph 55, Allan, about the fact that
5 there was a hierarchy and a violence amongst the boys.

6 A. Probably. Can I -- sorry, just another wee point as
7 well, I'm sorry to keep in at you, and it didn't happen
8 to me, but it didn't happen to me through any decency of
9 the staff. That was because I was able and wise enough
10 to live on my wits, to ensure that I didn't put myself
11 in that situation. So that was through my efforts to
12 avoid that. It certainly wasn't through the efforts of
13 the staff and the institution. There's a big
14 difference.

15 Q. You were essentially wise enough to keep your head down?

16 A. Absolutely.

17 Q. And keep out of the line of fire?

18 A. Absolutely.

19 Q. We were just talking there, Allan, about this hierarchy
20 and the violence amongst the boys. So within the group
21 of boys who were in there there was also issues of
22 violence?

23 A. Yes.

24 Q. You tell us that it wasn't uncommon to see guys -- were
25 these guys or were these boys under 18, with their faces

1 ripped open, you say?

2 A. Well, technically they were -- aye, I mean in

3 Longriggend technically they were under 21.

4 Q. Right. Okay. This was, you say, from having been

5 slashed by someone else?

6 A. Yes.

7 Q. You talk about the fact that homemade weapons was

8 something that was rife there?

9 A. Yes.

10 Q. These were like toothbrushes with razors stuck to them?

11 A. Ah-ha.

12 Q. As we have said, you told us that you kind of kept to

13 yourself and kept your head down?

14 A. Ah-ha.

15 Q. But I think you comment that that was a point when you

16 realised that maybe you weren't as hard as you thought

17 you were?

18 A. Yes, aye.

19 Q. Because you'd started to learn how to survive in

20 an institutional setting?

21 A. Ah-ha.

22 Q. You say there was one fight that you were involved in

23 when you were at Longriggend. That was in the dining

24 hall, is that right?

25 A. Yes, ah-ha.

1 Q. I think you tell us that was in relation to somebody
2 saying something and you had to say something back and
3 you knew that if you didn't take action you were going
4 to be a target?

5 A. Ah-ha.

6 Q. Was this involved -- would this involve a metal tray; is
7 that right?

8 A. Yes.

9 Q. So you were hit with a metal tray and you decided to
10 fight back.

11 A. Ah-ha.

12 Q. But I think you explained that it was sort of tactical,
13 because it happened in front of one of the prison
14 officers --

15 A. Ah-ha.

16 Q. -- and you knew that would mean it would be split up
17 quickly?

18 A. Aye.

19 Q. So was that a way to sort of assert yourself, fight
20 back, but without perhaps having the consequences that
21 might come --

22 A. Absolutely.

23 Q. You say that this was just a week that you were in
24 Longriggend that time, is that right, and you went back
25 to court, but you were given bail but there was

1 a fiscal's appeal and that meant you had to go back to
2 Longriggend until the appeal was dealt with --

3 A. Yes.

4 Q. -- so it was another few days before you actually were
5 released. But all four of you got back out?

6 A. Yes.

7 Q. So you're back home after that, you tell us, and you
8 continue to be involved with the criminal justice
9 system, continued coming to the attention of the police.

10 A. Ah-ha.

11 Q. At that time the school wouldn't take you back because
12 of what had happened --

13 A. Yes.

14 Q. -- in relation to the damage --

15 A. Aye.

16 Q. -- and then the social worker found you a place at
17 St Andrew's Approved School?

18 A. Ah-ha.

19 Q. Was this something at the time that you sort of agreed
20 to?

21 A. I didn't have any say in the matter. And I think then
22 as well, and it certainly seemed to be with our circles,
23 it wasn't that big a deal because everybody went to, you
24 know, St Ninian's or Geilsland or St Andrew's or
25 St John's, it was almost like children in mainstream

1 schooling would describe going into fourth year or fifth
2 year or sixth. To us it was approved school. So I just
3 happened to be -- I knew I was going to an approved
4 school and I remember Margaret discussed that with me
5 and said that we were just waiting on a vacancy, and
6 then at this time it just happened to be St Andrew's.

7 But just that was a kind of way of life for us then.
8 We all knew we were probably going to go at some point
9 to one of these places.

10 Q. I think you say that it was a Children's Panel, but
11 essentially they just rubber stamped it because it had
12 been decided?

13 A. Aye, but I knew I was going so I just had to get through
14 the process.

15 Q. You talk about St Andrew's School in your statement,
16 Allan, from paragraph 67, you were 15 still at that
17 point?

18 A. Ah-ha.

19 Q. I think you tell us you were there for about five or six
20 months.

21 A. Ah-ha.

22 Q. You tell us a little bit about the sort of routine.
23 There was work squads after breakfast and you were
24 involved in trying to learn bricklaying, I think, is
25 that right?

1 A. Ah-ha.

2 Q. But there was no education at St Andrew's?

3 A. No. No, not that I recall.

4 Q. Initially you didn't get any home leave, but that
5 started after about six weeks?

6 A. Yes.

7 Q. I think you tell us about some of the staff, but there
8 weren't people that you had issues with specifically?

9 A. No.

10 Q. You tell us at paragraph 79 that it was an issue when
11 you got home on leave where you were stabbed; is that
12 right?

13 A. Ah-ha.

14 Q. You went back to St Andrew's and you say that you
15 remember the house mistress there making a fuss of
16 you --

17 A. Ah-ha.

18 Q. -- because you were injured. I think you say that you
19 never ran away from there, but boys often did.

20 At paragraph 82, Allan, you make a comment:
21 'Some kids ran away in order not to be returned
22 home.'

23 A. Ah-ha.

24 Q. Did you just become aware that some boys' home life was
25 bad --

1 A. Aye.

2 Q. -- and they just didn't want to go home?

3 A. Aye, it was terrible, aye, really bad.

4 Q. You tell us about SNR [REDACTED] there, that he was
5 a decent guy and you liked him, and what you saw of
6 corporal punishment there seemed to be appropriate but
7 it wasn't something you ever received?

8 A. No.

9 Q. Because, again, was this you toeing the line and keeping
10 your head down?

11 A. Yes, aye.

12 Q. However you do say, Allan, that there was bullying
13 there, and it was, I think the way you describe it at
14 paragraph 84, it was far more prevalent there than it
15 had been at any other place?

16 A. Ah-ha.

17 Q. This was somewhere where there was a clear hierarchy
18 amongst the boys?

19 A. Aye.

20 Q. There was regular fighting?

21 A. Aye.

22 Q. And there were often boys crying and in distress?

23 A. Yes.

24 Q. From that, you think that the staff must have known
25 about the bullying because it was out in the open?

1 A. Yes.

2 Q. You do tell us about a time where there was an issue
3 where you had been assaulted by someone and his mates,
4 and I don't know if this is at paragraph 86, just to
5 clarify, I think you talk at paragraph 86 about within
6 the first couple of nights when you were there a boy and
7 his mates coming into your room during the night and one
8 of them hitting you with a lump of wood on your head?

9 A. Ah-ha.

10 Q. I think you tell us the paragraph before that that there
11 was an issue that you were then involved in assaulting
12 someone with a dart?

13 A. Ah-ha.

14 Q. Were those two incidents linked?

15 A. Yes.

16 Q. Is that what happened after you were hit with the wood?

17 A. Aye, ah-ha.

18 Q. I think you say that this was something you had to do
19 because you had been battered.

20 A. Yes.

21 Q. You had to then retaliate?

22 A. You were forced into behaving like that. That's what
23 you were forced into as part of protecting yourself.

24 Q. You say, at paragraph 87:
25 'St Andrew's was such a violent place ...'

1 And that really was your introduction?

2 A. Ah-ha.

3 Q. Again, you're saying you had to live on your wits, and
4 after you had this fight with the main boy, if you like,
5 you got some respite from the bullying. Is that right?

6 And if you hadn't acted like that, I think you tell
7 us that you would have been one of the victimised boys?

8 A. Absolutely.

9 Q. You talk about, Allan, the fact that the main guy -- is
10 this the one that you had a fight with?

11 A. Ah-ha.

12 Q. Used to pour boiling tea down the back of boys' necks?

13 A. Ah-ha.

14 Q. And just claim it had been an accident.

15 A. Aye.

16 Q. And nothing was done by the staff?

17 A. No, nothing.

18 Q. You never saw staff intervening when anything would be
19 happening?

20 A. I mean staff would come to the table with the neck
21 boiling incident, so they would attend the table. But
22 I don't particularly recall him getting dragged away or
23 the boy getting taken out to go and get medical help, it
24 was just a case of 'what's happening here?' That's
25 probably as far as I remember it going. I don't

1 remember any significant staff intervention to protect
2 another boy, or anything like that. Any sort of
3 restraining or -- I don't remember any of that.

4 Q. So they would just not intervene, that was the failing
5 that you saw, they were not intervening in these
6 incidents?

7 A. No, they did not intervene, no, absolutely not. And
8 they knew it went on.

9 It's probably hard for me to say, because -- and
10 I don't know whether it's maybe quite bizarre in some
11 sense. There was some of the staff at St Andrew's,
12 I liked them. And it's funny how, because I was
13 thinking not that long ago, maybe after this statement,
14 Mrs McNeill and Ms McCallum, and it just kind of came to
15 my mind, I thought I tend to remember all the people who
16 were kind to me as opposed to who were unkind to me and
17 violent and aggressive for some reason.

18 So there's obviously something in that. But, aye,
19 as a social worker I would look back there and say:

20 'By the way, your practice was appalling. I mean it
21 really was, it's unacceptable.'

22 But then at the time, being there, being as a child,
23 I could -- I experienced kindness from these people and
24 appreciated it, they were decent people, and I just
25 don't think they were qualified to -- you know, and this

1 we've probably seen in the later years in other
2 institutions, they're getting people in these jobs who
3 by the way just cannot cope with these jobs. They're
4 not able, they are not qualified, they don't know how to
5 cope with it, because I'm kind of loathe to criticise
6 the staff here in some sense, because I thought a lot of
7 them were really decent individuals. I liked them,
8 I was fond of them, I can still remember them. There's
9 still some conversations in my life that crop up and
10 I'll say to whoever I'm talking to about these
11 individuals.

12 And they never done anything overly remarkable, if
13 you know what I mean, it wasn't like Margaret Clark.
14 But they were decent people.

15 But I just don't think, looking back, probably, with
16 my professional head on, I'd be saying:

17 'These people, you know, who is interviewing people
18 for these kinds of jobs?'

19 You know.

20 Q. So maybe they weren't right, they weren't the right
21 people for the jobs, maybe they weren't qualified?

22 A. I would say maybe -- I doubt if they were, because they
23 were decent people, but they just didn't know how to
24 cope with it.

25 Q. And they probably weren't trained either?

1 A. No. By the way again, sorry, if I can just say, the
2 likes of the approved school I was in as a child, and
3 then I was in as a student, and then I was in as
4 an actual worker, by the way that's the hardest job I've
5 ever done in my life. It's a hard, hard job. And
6 I don't want to go off on a tangent here, but certainly
7 when I did work in these places and when I was
8 a student, people were, or they certainly seemed to me
9 to have the same access to training and qualifications
10 in the mid-1990s as they probably did then in the
11 mid-1970s, which my understanding it was by the way
12 virtually nil, nothing.

13 So, you know, it was as if you've got this period of
14 time here, but who is hiring these guys, who is bringing
15 these people into such a high-powered demanding --
16 a job, by the way, that can impact on young people, as
17 you know, I don't need to tell you, by the way for the
18 rest of their lives. Who is recruiting here?

19 As I say, I don't mean to go off on a tangent but
20 it's just again I felt obliged to say that because we
21 are talking about staff group at St Andrew's.

22 Q. That's useful to know, Allan, and I think you do talk
23 about it a bit later in your statement as well, about
24 looking back at your time after you became qualified
25 yourself, so I'll maybe come back to that a little bit.

1 I think you do say that the staff there, although
2 you never saw them assaulting anybody, you say you
3 didn't see them being bad to anyone --

4 A. No.

5 Q. -- but they let these things go on?

6 A. No, there was corporal punishment, you got the belt, but
7 then you got the belt in mainstream schooling at that
8 particular time. And Mr FQH SNR he
9 would use one of these. If you were to visualise and
10 draw who you thought would be SNR of
11 an approved school you would draw Mr FQH Really
12 a disciplinarian, I don't know if he was, but I am
13 assuming he was ex-army, the way he used to march about
14 and he would pull the belt out.

15 But do you know what, thinking back, I don't think
16 any of that was done in an abusive way. I liked that
17 guy as well, by the way, he was fair. If you stepped
18 out of line you got it, but if you didn't, you were
19 sorted, you were okay, there was no hassle. Fair enough
20 guy.

21 Q. I think your time, though, there came to an end I think
22 you tell us about May 1976.

23 A. Mm-hm.

24 Q. Just before you were 16.

25 A. Ah-ha.

1 Q. You knew, I think, that you were going to get borstal or
2 detention, and that was because of what happened at the
3 school, is that right?

4 A. Yes.

5 Q. The borstal report that was prepared, as far as you're
6 aware, recommended that you go back to St Andrew's?

7 A. Yes.

8 Q. But the Sheriff didn't agree with that and you were
9 sentenced, I think, to two years' borstal training?

10 A. Ah-ha.

11 Q. You were in the dock, at that time, you tell us, with
12 your three friend who had been involved, but they were
13 still only 15, so they all went to Approved Schools?

14 A. Ah-ha.

15 Q. You were taken again straight from court to Barlinnie
16 and again this was the stop-off before you went anywhere
17 else. I think you described it the same as the last
18 time, but the last time you were there with your friends
19 and this time you were there on your own.

20 A. Ah-ha.

21 Q. I think you say there was a comfort from being with your
22 pals the first time?

23 A. Absolutely. Aye.

24 Q. You didn't have that then.

25 You then went to Polmont. So was it just, again,

1 one night in Barlinnie, or thereabouts?

2 A. Yes.

3 Q. You tell us about Polmont from paragraph 95. You make
4 a comment there, Allan, that the deeper you got into the
5 criminal justice system the worse it got and Polmont was
6 your apprenticeship. Looking back, is that how you kind
7 of see it now?

8 A. Aye. Yes, aye.

9 Q. You say:

10 'Just when you think things can't get any worse,
11 they get more severe, more harrowing, and more
12 traumatic.'

13 A. Yes.

14 Q. You describe being in the 'Alicali', the allocation wing
15 first, and this was the sort of short, sharp shock
16 treatment and you were there for about six to eight
17 weeks whilst they assessed you and decided where you
18 would go.

19 Was that then either to somewhere else within
20 Polmont or to a semi-open place like Castle Huntly or to
21 somewhere like Noranside, which was an open prison?

22 A. Yes, aye.

23 Q. Again you describe, Allan, the same delousing, testicles
24 check, but this time you describe having to bend over
25 and have to part the cheeks of your backside?

1 A. Aye.

2 Q. Again you say that the prison officers here were barking
3 things at people?

4 A. Ah-ha.

5 Q. They were aggressive in the way they communicated.

6 You tell us, Allan, about an incident that happened
7 when you were there at paragraph 100, you say that this
8 was when you first got into Polmont, because you never
9 said 'sir'?

10 A. Aye.

11 Q. What happened as a result of that?

12 A. I remember going down this part of the admission process
13 and I think everyone was taken into to see the governor.
14 I can't remember what the purpose of that was, to be
15 quite honest with you. They would probably remind you
16 the rules or whatever, I don't know, and I'd answered.

17 And then I just remember this prison officer hit me
18 full force, and I remember falling back onto the --
19 there was a kind of filing cabinets, and it was a big
20 shock, and even though I'd experienced the things that
21 I'd experienced up to then I was still really shocked.
22 I didn't expect this, it just came right out the blue.
23 And then obviously I discovered in the course of later
24 communication it was because I hadn't said 'sir' to one
25 of the questions asked by the governor.

1 But that was all part of the -- that was almost like
2 a rehearsed -- it was like a game, that was like part of
3 the process. That was to remind us all, by the way,
4 this is where you are now, this is who we are, and this
5 is the respect that you will show us, whether we deserve
6 it. It was just part and parcel. We all got it.
7 Different ways.

8 But that was mine, that was my introduction.

9 Q. At this time you're really only a few days after turning
10 16?

11 A. I didn't even shave. And I was actually the youngest.
12 In fact, I think I went right through a full borstal
13 being the actual youngest person, because I think the
14 boys who came in at the back of me were 17. I was still
15 16 when I left borstal, so I was certainly the youngest,
16 and I was one of them, by the way, who was 16 but looked
17 about 10. How could I not shave. For the life of me
18 I tried to encourage it along but it just didn't happen,
19 you know. It didn't help me any.

20 Q. So that was your introduction then --

21 A. Yes.

22 Q. -- to Polmont. I think you tell us that this guy who
23 did that to you was 6-foot 2, you thought, and felt like
24 it was --

25 A. Aye, he was massive, the guy.

1 Q. -- full force?

2 A. It felt to me like full force. It flung me back against
3 the filing cabinet, two or three feet away from where
4 I was standing.

5 Q. You make the comment, Allan, that at that point you
6 wondered how you were going to survive two or three
7 years.

8 A. Absolutely.

9 Q. You then go on to tell us about the routine and the
10 regimented sort of army-like rules, marching, drills,
11 there was this mile-long corridor where you would have
12 to scrub the floors, and you were back to the slopping
13 out four times a day?

14 A. Ah-ha.

15 Q. At paragraph 112, Allan, you tell us a little bit about
16 the attitudes of the prison officers towards you, and
17 you say that assaults were common.

18 A. Mm-hm.

19 Q. And that was punches, kicks, and being beaten, you say?

20 A. Aye.

21 Q. I think you say that you were slapped across the face by
22 a prison officer for not being quiet when you'd been
23 told to.

24 A. Aye.

25 Q. And you saw other guys get terrible beatings from

1 officers?

2 A. Yes. Savage beatings, by the way. I'm talking really
3 beating someone up. It wasn't a punch or a kick or
4 a slap. It was down on the deck and kicking and
5 punching them repeatedly. It was awful. Absolutely
6 awful.

7 Q. You mentioned in St Andrew's, Allan, that not all the
8 staff -- sorry, you mentioned from before that not all
9 the staff in places would be people who would assault
10 you. But what was it like in Polmont? Was it everyone,
11 all the prison officers --

12 A. No, it wouldn't have been everyone. It felt to me as if
13 it was everyone, but thinking back, no, it was a bit
14 like the other place that I described as well, not every
15 single adult was going to engage in that kind of
16 behaviour.

17 But, again, thinking back, and I did think back over
18 the years as well, by the way a fair number,
19 a significant number.

20 But this was also done in front of the ones then who
21 were seen as not being recognised as being violent and
22 abusive. But they witnessed every single thing, and
23 they still played their part within that violent regime.
24 And they're seeing children, by the way, because it was
25 children. It was maybe young adults in some cases, but

1 there were a lot of -- so they were actually witnessing,
2 although they didn't do it themselves, they were
3 witnessing children being beaten up on a regular basis.

4 Q. And they were standing by while that happened?

5 A. Yes, absolutely.

6 Q. You tell us that after about six or eight weeks you were
7 told that you would be going to Castle Huntly?

8 A. Yes.

9 Q. Then you tell us about that happening. You went to
10 Castle Huntly, which you say from paragraph 115 was
11 a slightly more relaxed atmosphere.

12 A. Ah-ha.

13 Q. And you did some engineering there, which you didn't
14 really enjoy, and there was punishment cells you were
15 aware of but you were never in there?

16 A. No.

17 Q. In relation to the staff behaviour, you tell us at
18 paragraph 142 of your statement, Allan, that there was
19 quite a lot of instances of aggression from staff
20 towards prisoners.

21 A. Ah-ha.

22 Q. The way you describe it there is you say they were
23 brutal, although perhaps not as brutal as Polmont. So
24 it was maybe a step down?

25 A. Yes, aye.

1 Q. But still violence?

2 A. Still violence, but not as violent as Polmont.

3 Q. You describe a particular incident where you saw a you
4 say a wee guy from Greenock who was beaten viciously by
5 a prison officer?

6 A. Ah-ha.

7 Q. This was in the dining hall?

8 A. Yes.

9 Q. That's something that stayed with you?

10 A. By the way that still bothers me to this day. Two
11 things about Castle Huntly in particular, in terms of
12 staff violence, and that's certainly one of them.

13 And I've given, and I probably still give myself
14 a hard time as well, how many of us were in that hall,
15 I don't know off the top of my head, 100, what were we
16 doing sitting -- but we were just like the staff then.
17 We should have done something to help that boy. That
18 was awful. And I -- I still think about that to this
19 day and it doesnae rest easy with me. And then also I
20 go on to think, what happened to [REDACTED], I wonder what
21 happened to him in life. But it does. I still think of
22 him and it still bothers me.

23 Q. Your description of that, Allan, is of a vicious attack?

24 A. Aye, yes.

25 Q. I think you say that in relation to you, that you were

1 assaulted the night before home leave on one occasion,
2 and that's where a prison officer twisted your nose.

3 A. Ah-ha.

4 Q. What were the circumstances surrounding that?

5 A. By the way that was the other thing that I still think
6 about as well.

7 Now, see if you are sitting down and telling people
8 about this they would laugh it off and they would
9 wonder: why does that upset you? That was just slightly
10 less upsetting than ██████ assault, because what they
11 used to do is they used to get guys who were due on
12 either home leave or they were due to be released. So
13 when he was on shift he would know who was going out and
14 he would grab them in this playful way and made sure
15 that everybody went out with a blue nose.

16 And even, sorry, as trivial as that might sound to
17 some people, and it will sound trivial to a lot of
18 people. Again, that was one of the things that really
19 annoyed me the more I thought about that over the years.
20 And I thought, 'No, he knew exactly what he was doing
21 that guy', and he couldn't just let a young person walk
22 out of prison and join his family. It was like
23 a process of humiliation. So he would walk out with
24 this clown-like nose. There was just something really
25 sinister about that that I always felt.

1 So I was subjected to the same treatment, I was
2 given weekend leave he bounced on me, it's playful, jack
3 the lad, tweaking your nose, and so I went out to that
4 with my family. Like a lot of other young people.

5 Q. I think you also say there was something from SNR
6 SNR in relation to you, and that's at
7 paragraph 148, you tell us about one occasion, and this
8 is when your cell was getting checked --

9 A. Yes.

10 Q. -- and you had to lift your mattress up to check for
11 dust?

12 A. Aye.

13 Q. But I think you describe the fact that you knew that
14 that was about to happen and so you'd cleaned it?

15 A. It wasn't actually my mattress. You know what it was,
16 it was like a bed, and you'd four legs, and I could hear
17 him coming down and I could hear him shouting and
18 I could hear him moaning, 'Look at that, you've got dust
19 under ...'

20 By the way, dust, he's checking under your bed legs
21 for dust.

22 LADY SMITH: So that was the bed frame --

23 A. Yes, the bed frame and it was the sole of the legs, so
24 while these boys were being reprimanded for that,
25 physically I could hear him shouting at them, 'You

1 filthy being'.

2 So we are all standing by the door but I've got
3 a damp hanky, because I always like to go over things
4 quickly, just before he comes and then I have heard him
5 saying that and I just thought I was the bees knees and
6 I thought I'm going to do this, and I quietly dusted it
7 on, I was feeling really proud of myself, I thought, you
8 know, I have won this wee victory, but I suffered for
9 that because he was absolutely raging, because nobody
10 got recreation that night. For some reason we weren't
11 going to recreation, and this was a way that would
12 ensure that nobody got recreation, apart from me. So
13 I was the only person that got recreation that night.

14 So that annoyed him. That really annoyed him and
15 that upset him, and it wasn't worth the hassle, believe
16 me.

17 MS FORBES: I think you say he did something to you as well
18 when he discovered that you were dust free?

19 A. Aye.

20 Q. What was that?

21 A. He grabbed me by the throat and pinned me up by the
22 wall. Again, big guy. By the way I can see his face,
23 I could pick him out of a line up right now. He pinned
24 me right up and it's almost like a game and all, because
25 they know what they are doing here and I feel as if I'm

1 at the point of blackout, I cannot breathe, I am getting
2 me breath and then he kind of lets you go, and then he
3 has got you right up so you have to go on your tiptoes,
4 so you feel as if your toes are breaking, in order not
5 to choke. So that's what I got for being smart and
6 dusting under my bed legs.

7 Q. At that time again you're still just 16?

8 A. Aye.

9 Q. And he is a fully grown man.

10 A. Aye.

11 Q. I think you say there was another run in with that

12 **SNR** and that was at the time you'd come
13 back from visiting your parents in England and you had
14 Jimmy Boyle's book with you?

15 A. Yes.

16 Q. What happened in relation to that?

17 A. Just the same again, I was in the reception area and had
18 come back at the time and the book was there, and he
19 just come down and he has seen it took offence to me
20 having that book and started kind of shouting and
21 screaming: "is this your hero?" And all this kind of
22 nonsense, and then it was the same. He was a throaty
23 guy. He liked a throaty thing, that was his thing, and
24 he liked to kind of pin you up and you had to go on your
25 toes and he would take you to the point where he knew he

1 could take you, one of these ones.

2 This is again a big powerful -- again, I was only --
3 I was small, obviously, I don't know, was I just
4 5-foot-4 or something, I was only small. I was like,
5 that there was nothing of me at all. But this was a big
6 towering man, and men, fully grown men, adults.

7 Q. You say, Allan, that nobody, as far as you could tell,
8 ever required hospital treatment after being assaulted
9 by a prison officer there but there were still hefty
10 beatings that were measured out?

11 A. Aye. But then the thing is these guys are good at that.
12 They know what to do to avoid -- thinking back,
13 I'm assuming because if not people would be hospitalised
14 every week, so practice makes perfect, I suppose.

15 Q. The way you describe it is that it was a very measured
16 and controlled level of violence?

17 A. Ah-ha.

18 Q. Again, you talk about the hierarchy, and that this was
19 the same sort of in every place --

20 A. Aye.

21 Q. -- and there was fights amongst the inmates there.
22 There was always something bubbling away in the
23 background.

24 A. Aye.

25 Q. Again, this issue of the younger or the weaker boys, you

1 say that you saw some boys targeted from start to
2 finish?

3 A. Aye.

4 Q. That was usually the first offenders, who didn't know
5 what the dynamics were?

6 A. Aye.

7 Q. And all of your time there -- I think you tell us that
8 you did ten months and three weeks?

9 A. Yes.

10 Q. Then after that you went down to Hartlepool to live with
11 your parents?

12 A. Ah-ha.

13 Q. But there was nothing really there for you at the time?

14 A. No, nothing at all.

15 Q. One of your friends came to visit, is that right, down
16 from Saltcoats, but I think you were into a bit of
17 trouble and had some drink with him once he arrived.
18 Then did he stay down with you and get into more bother?

19 A. He stayed short term with me, aye.

20 Q. There were some issues with breaking into houses and you
21 were at Juvenile Court for that?

22 A. Aye.

23 Q. You were given a borstal recall and you think you had to
24 go back for about four months or so?

25 A. Yes.

1 Q. By this time you were coming up to your 17th birthday.

2 A. Ah-ha.

3 Q. You tell us you were taken to Strangeways and you were
4 there for about six weeks before you went to Hatfield?

5 A. Ah-ha.

6 Q. Then you tell us about your time in Strangeways. I just
7 want to highlight one or two things that you say about
8 that, Allan, at paragraphs 161 and 163. You say in 161
9 with Strangeways, with the reputation it had as one of
10 the hardest prisons in Britain, it was more acceptable
11 than the experiences that you had had in Scotland?

12 A. Yes, aye. I stand by that. I mean, it did have
13 a terrible reputation, at times, Strangeways. And
14 I think was the riot just before I was there or just
15 after that, infamous prison rooftop riot. But it had
16 a terrible reputation before that anyway obviously.

17 But even at that you were subjected to -- it was
18 a regime that was hard, kind of thinking back. You
19 didn't have that -- it's not like getting unlocked and
20 then getting down for your dinner where you're
21 constantly on watch, who is going to set about you, is
22 it going to be the staff, is it going to be -- you know
23 constantly living in fear, living on edge.

24 The only thing that you had to beat in Strangeways
25 was the day-to-day regime. That mundane regime, because

1 you weren't allowed you to sit in your chair. So that
2 was far easier to cope with, I felt, than an experience
3 in Scotland. It's totally just -- it's like 24-hour
4 violence and aggression.

5 Q. Having that comparison you were able to see those
6 differences between Scotland and your time down there?

7 A. Aye.

8 Q. You were then moved to the open borstal, which was
9 Hatfield, and I think you comment there that that was
10 far less brutal, less punitive regime than Scotland, and
11 you comment that possibly it's to do with the Scottish
12 penal culture, where brutality is embedded. That's what
13 you say in your statement, but you don't know why that
14 is?

15 A. No, I don't -- no, I could guess, but I'm not sure why
16 it is.

17 Q. You comment, Allan, that the staff in Scotland were far
18 more violent than in Hatfield. There was still this
19 distance of a sort of us and them down there, but the
20 staff were more approachable?

21 A. Aye. I mean, it was a couple of staff members in
22 Hatfield that I really liked, I got on well with. They
23 were decent guys. They treated people decently.
24 Whereas I can't remember borstal up here. I don't even
25 know anyone's name in borstal up here that I remember,

1 any staff members. But down there I remember, there
2 were a couple.

3 Q. There was a couple that made an impression and that
4 stayed with you?

5 A. Aye. Aye.

6 Q. You say, Allan, by the time you were released your
7 parents had moved back to Scotland, to Saltcoats, and
8 when you were released you went back to Saltcoats.

9 Before we go into your time, your professional life
10 that I want to ask you about, just have a look at what
11 you tell us about your life after being in care. This
12 is from paragraph 169. You say that you went back to
13 Saltcoats and you stayed between your siblings' houses,
14 but effectively you were homeless for a while?

15 A. Ah-ha.

16 Q. But then you started a relationship with your first
17 wife, who you had known from before, and you got married
18 quite quickly. By that time you were 18, and you
19 started a life together, but you still had the same pals
20 and you were still getting into bother?

21 A. Yes.

22 Q. You were drinking, and things were becoming a bit
23 violent. And you were struggling to get work because of
24 your criminal record.

25 A. Ah-ha.

1 Q. I think you tell us, Allan, at paragraph 172, you say
2 part of you enjoyed the reputation for violence that you
3 had and you weren't known for anything else and the way
4 you saw it you weren't good at anything else.

5 A. No.

6 Q. At that time that's the kind of feeling that you had?

7 A. Yes, aye, that was hard currency. That was
8 a sought-after feeling within the area and within the
9 kind of culture, within the background. That was --
10 that was at the time, within that context, that was
11 good. That was good. That was sought after.

12 Q. Did that give you a status?

13 A. Yes, absolutely, and a status that you wouldn't have got
14 anywhere else from anybody else. So very much a status.

15 Q. I think you tell us that over the years following, there
16 was issues being arrested, you got probation. There was
17 some work but your friends were kind of pulling you back
18 into this life that you had been used to?

19 A. Aye.

20 Q. At 21 you were convicted of a number of offences and you
21 were sentenced to a total of three years' imprisonment.

22 A. Ah-ha.

23 Q. You were at Barlinnie for about 18 months that time?

24 A. Yes.

25 Q. You say your pals were all in Barlinnie at the same

1 time?

2 A. Aye.

3 Q. And to you it wasn't a massive deal being back in there?

4 A. No.

5 Q. You knew a lot of people and you knew the system?

6 A. Aye.

7 Q. I think you comment at paragraph, I think it's 175, you
8 say you were -- looking back, you were sinking into that
9 whole culture, is that the kind of criminal culture --

10 A. Yes, aye.

11 Q. -- the kind of revolving door?

12 A. The whole criminal lifestyle.

13 Q. You then went from Barlinnie to Dungavel and finished
14 your sentence there?

15 A. Ah-ha.

16 Q. But whilst there you met a life prisoner, who made
17 an impression on you?

18 A. Yes.

19 Q. He was someone, I think you describe him that he had
20 that status --

21 A. Yes.

22 Q. -- he had been involved in a lot of gang violence and
23 crime --

24 A. Aye.

25 Q. -- but you got friendly with him. Is he someone that

1 gave you a sort of different outlook on what the future
2 might hold?

3 A. Absolutely. Absolutely.

4 Q. Because I think you comment, Allan, that he represented
5 what you were trying to become.

6 A. Yes.

7 Q. While actually he was someone who was able to make you
8 see that there was a different way?

9 A. Aye. He was the kind of person that I at one point
10 wanted to become. Running alongside that he also
11 represented the reality of that person, or that
12 lifestyle. And he knew how to play that. He was
13 a really intelligent guy. I had a lot of time for him,
14 obviously.

15 And that's where he caught me. It caught me, and
16 I think I mentioned -- this guy was credible, he's done
17 it all. He's well quoted within the prison, even the
18 prison staff wouldrae go near him. You know, it would
19 be like talk to him by request. He was really quoted
20 within prison. So this guy had credibility. But the
21 unique thing for me was the humanity this guy had. And
22 I couldn't work it out. I'd think: but you're this guy,
23 and I just couldn't work that out. And we became really
24 close, we were really good friends in prison. So it was
25 like I went through this whole kind of education

1 process, a really intelligent guy, but I think his
2 strength was, or his quality, certainly for me, was how
3 he managed to disentangle that. You know, right, this
4 is the life, but this is what this entails, and in a few
5 years you are stuck in this life. It was just so
6 educational for me, I suppose is the word. So I really
7 do, I love that man.

8 Q. Was he the one that planted this seed that you could
9 change?

10 A. Aye. Absolutely.

11 Q. I think you say that you then enrolled in an English
12 class in the prison?

13 A. Ah-ha.

14 Q. You got a taste for education?

15 A. Yes.

16 Q. Separate from that there was also some other things
17 going on in your personal life, your son was born?

18 A. Mm-hm.

19 Q. I think you then say that your last sentence was in
20 Barlinnie, and that was for three months.

21 A. Ah-ha.

22 Q. By that point you knew that you had to move from
23 Saltcoats --

24 A. Aye.

25 Q. -- and get away from that life?

1 A. Ah-ha.

2 Q. I think you also tell us, Allan, that there was
3 an incident whereby you were caught up in a fight not
4 long before you were released and your face was slashed
5 with a razor.

6 A. Mm-hm.

7 Q. You say you knew it was a bad one as soon as it
8 happened?

9 A. Aye.

10 Q. But you got out, and you decided to go to London to get
11 away from everything, and down there you were able to
12 work?

13 A. Yes.

14 Q. In the construction industry; is that right?

15 A. Yes.

16 Q. That helped to get you away from this mindset of
17 criminality that you were in at the time; is that ...?

18 A. Aye, it was the kind of start of that journey, aye.

19 Q. You tell us, Allan, that you stayed there for a couple
20 of years?

21 A. Ah-ha.

22 Q. And then your second son was born?

23 A. Yes.

24 Q. And you moved out to Basildon, you were there for
25 a couple of years, and then moved back to Scotland?

1 A. Ah-ha.

2 Q. To Saltcoats?

3 A. Yes.

4 Q. That is when you reconnected with your social worker
5 from your youth; is that right?

6 A. Yes.

7 Q. That's Margaret Clark?

8 A. Aye.

9 Q. Is this the point where you are still on licence, is
10 that right, from your last sentence?

11 A. Yes.

12 Q. And she asks you if you will get involved with a young
13 offenders' programme?

14 A. Yes.

15 Q. I think you tell us you were reluctant about that at
16 first, but you agreed?

17 A. Absolutely, but I done it -- because it was Margaret,
18 I done it.

19 Q. I think you go on to say back then there wasn't the same
20 sort of risk assessments as would happen now and
21 Margaret got some grief putting you forward --

22 A. Yes.

23 Q. -- but she did it?

24 A. Ah-ha.

25 Q. And you went along there and were involved in sort of

1 mentoring some of the boys?

2 A. Yes. Aye.

3 Q. Were these boys in Saltcoats?

4 A. Were they from Saltcoats?

5 Q. Yes.

6 A. Saltcoats and Ardrossan, a neighbouring town, and
7 sometimes Stevenson, so close like that, three towns.

8 Q. Had these boys sort of been involved in a similar
9 lifestyle that you were?

10 A. Not dissimilar.

11 Q. I think you tell us about your involvement with those
12 boys, and we have that in your statement and we've read
13 it, and I think that then made you think that you could
14 take to social work, and it would be something -- it was
15 something you were interested in?

16 A. Aye, mm-hm.

17 Q. Even though at that time you had a job, this was as
18 a steel fixer, is that right?

19 A. Aye.

20 Q. So you were earning quite good money.

21 A. Aye.

22 Q. And you had the two boys with your wife --

23 A. Aye.

24 Q. -- going to study to become a social worker was going to
25 mean that financially you were going to take a hit for

1 the family?

2 A. Aye.

3 Q. But you'd agreed that was what would happen?

4 A. Aye.

5 Q. I think that leads us to kind of then start talking
6 about your further education and your time as a social
7 worker.

8 LADY SMITH: I think we should stop there for the lunch
9 break.

10 I normally start the lunch break at about this time
11 Allan. Is that okay for you?

12 A. Yes, aye, perfect.

13 LADY SMITH: Let's do that then.

14 I will sit again at 2 o'clock.

15 (1.00 pm)

16 (The short adjournment)

17 (2.02 pm)

18 LADY SMITH: Are you ready for us to carry on, Allan?

19 A. Yes.

20 LADY SMITH: Thank you very much.

21 Ms Forbes, when you are ready.

22 MS FORBES: Thank you, my Lady.

23 Good afternoon, Allan.

24 A. Hi.

25 Q. I think we had reached the point just before lunch where

1 you and your first wife had talked about the prospect of
2 you going to get some education?
3 A. Yes.
4 Q. I think you tell us, then, that that's what you did.
5 You went to secondary school --
6 A. Yes.
7 Q. -- in the next town.
8 A. Ah-ha.
9 Q. This was to do some highers?
10 A. Yes.
11 Q. That was in 1992 and 1993?
12 A. That would have been, yes.
13 Q. So you would have been about, what, 31, 32?
14 A. Aye, early 30s.
15 Q. This is you in a secondary school with younger people
16 having to sit your highers?
17 A. With the children.
18 Q. With children, yes, so quite a step to take?
19 A. Absolutely.
20 Q. At that time you're still volunteering with Margaret?
21 A. Aye.
22 Q. With the youth, is that right?
23 A. Yes.
24 Q. That you passed those highers and then you applied,
25 I think you tell us, for a social work course at

1 Strathclyde?

2 A. Ah-ha.

3 Q. You tell us about that at paragraph 191. Was that
4 an easy process to go through?

5 A. Applying for the social work course? No, it wasnae
6 particularly easy. They were obviously asking me about
7 my offending behaviour, so I was put -- not put on the
8 spot, but I mean perhaps rightly held to account for
9 that. So that was difficult, trying to explain that and
10 trying to get them to understand what has happened in
11 a particular context. So that was quite -- that was
12 a difficult part of the kind of whole process.

13 Other than that, I can't remember it being overly
14 difficult. I think the biggest problem, if you could
15 call it a problem, was I put myself under a lot of
16 pressure. I just so much wanted this. I seen this as
17 something that I wanted to do in life, but I needed
18 something like this as well to take me to the next stage
19 of my life away from everything else.

20 So there was a lot of internal pressure. And
21 I think, as I highlighted earlier, I wasn't successful
22 in getting on the course initially, and I didn't give up
23 on it, so I done an HNC course, and it was only after
24 a short period of time -- I can't remember, was it
25 a couple of weeks -- and then somebody dropped out.

1 Which happens. Apparently this happens on a regular
2 basis, there would be two, three or four people drop out
3 for various reasons. So I was in reserve and I managed
4 to get one of their places and then that was me on the
5 course.

6 Q. I think that was at Jordanhill ultimately, was it?

7 A. Yes.

8 Q. You tell us a bit about your journey through the course
9 in your statement, and I think one of the things that
10 you highlight is you often used to wonder when you would
11 get found out?

12 A. Absolutely. That's probably -- well, maybe I've got
13 a few regrets, but that's certainly one of my regrets.
14 Is that I never enjoyed that course the way that
15 I should have. I always felt I didn't belong and I did
16 always feel I was going to get a chap at the door and,
17 'Oh look, we never knew this, we never...'

18 By the way, I was feeling that way within my social
19 work career as well, so that kind of always plagued me.
20 And I never used to go to, you know, like Christmas
21 nights out or somebody's birthday. I never went to all
22 that kind of stuff. So I kind of missed out on a lot.
23 Most of them were brand new, they were nice people. But
24 I did always have that, 'I'm going to get caught'
25 complex, I shouldn't be here. And that's one of my

1 regrets right through the course. Because the stuff
2 that we were actually studying I found immensely
3 interesting, it challenged me, I used to enjoy,
4 bizarrely, researching for my assignments, gaining that
5 kind of knowledge. So I liked that kind of process as
6 well.

7 But as I say, just that other aspect of -- no,
8 I don't think I enjoyed it for that reason.

9 Q. Just the worry that perhaps your past might come and
10 haunt you there?

11 A. Yes, that I was kind of cheating. I didnae belong there
12 because I just felt -- I always used to think, by the
13 way it wasn't that long ago I was slopping out in
14 Barlinnie, and now we are talking about how do we tease
15 out the issue round about somebody's offending behaviour
16 and thinking I hope nobody is looking in my direction,
17 that kind of --

18 LADY SMITH: But of course, Allan, at that time you didn't
19 know that many people who seemed sorted and probably
20 from a very stable secure background aren't sorted and
21 from a stable secure background at all.

22 A. Aye, I felt, but that didn't feel the case at the time,
23 aye.

24 LADY SMITH: Nor would you know how you seemed to other
25 people.

1 A. Aye. Aye.

2 LADY SMITH: Who might not be thinking what you thought they
3 were thinking about you at all.

4 A. Yes, absolutely.

5 MS FORBES: So it was a kind of inferiority complex?

6 A. Yes, aye, I think safe to say.

7 Q. I think you comment though, Allan, that there was
8 a woman that you sometimes would travel up to university
9 with, who was quite middle class, and in different ways
10 from yourself you thought she wasn't actually dissimilar
11 to you, because she seemed like a bit of an outsider or
12 someone who didn't really fit in, just like yourself?

13 A. Yes.

14 Q. Or that's how you felt, anyway, at the time?

15 A. Aye, it was -- aye. She was very -- very posh, no other
16 way of putting it, in the kind of high end of the middle
17 class, and that came across in her manner, her language,
18 her dress, everything. And she always got -- by the way
19 I thought she was brand new, she was great, and we used
20 to travel up together and we used to have great laughs
21 on the way up. But she had a hard time because she
22 didn't fit into that kind of initial group, you know,
23 and that used to annoy me as well. So for different
24 reasons we were -- and we both knew it, we were like
25 a pair of outsiders.

1 Q. I think you say, though, that you got your diploma in
2 1995 and in 1996 you graduated with your BA, and then
3 you got employment as a criminal justice social worker
4 in Irvine?

5 A. Ah-ha.

6 Q. In that role you tell us you were supervising people on
7 parole and probation and visiting prisons for the parole
8 board?

9 A. Yes.

10 Q. So, like you said before, you were thinking it wasn't
11 that long ago that you were in Barlinnie --

12 A. No.

13 Q. -- but this is you now visiting prisons and seeing
14 people within them?

15 A. And the very first time that I'd done a prison visit,
16 and I think they were revamping part of the visiting
17 area, so you had to walk through like the staff dressing
18 room, and this was the very, very first time.

19 I remember I walked through the dressing room and staff
20 were mingling about and getting ready for their shift
21 and, 'Oi, Weaver', and I thought, 'Oh my God', and it
22 happened to be a prison officer, I was actually at
23 school with the guy and then he went into the prison
24 service. And he recognised me going through, he didn't
25 recognise me as a prisoner but, again, I didn't know

1 that at the time, and I thought, 'Oh God, here we go,
2 I'm going to get taken out in handcuffs on my first
3 visit', but it ended up okay.

4 Q. I think you did further studies and you graduated with
5 a masters in advanced social work studies in 1998.

6 A. Mm-hm.

7 Q. Then the social work teachers course in 1999, and that
8 allowed you then to begin supervising and teaching
9 students?

10 A. Yes.

11 Q. Then in 2002 you tell us you're promoted to the post of
12 senior social worker?

13 A. Ah-ha.

14 Q. I think you tell us a little bit more after that about
15 what happened in your life, and we might come back to
16 that later, but we're at the position now where you've
17 retired, is that right?

18 A. Ah-ha.

19 Q. But you spent the rest of your working life in social
20 work?

21 A. Yes.

22 Q. One of the things I think you wanted to tell us about in
23 your statement was your original social work placement
24 that you did, is this when you were a trainee social
25 worker?

1 A. Student social worker.

2 Q. Student social worker, sorry. That was between 1994 and
3 1995?

4 A. Mm-hm.

5 Q. So at that stage, still early 30s, you would be?

6 A. Yes.

7 Q. You tell us about that from paragraphs 201, and this
8 placement was at Kerelaw.

9 A. Ah-ha.

10 Q. Do you say at Kerelaw, or do you pronounce it
11 a different way?

12 A. 'Kerelaw', 'Kerelaw'.

13 Q. So a lot of people, I think you tell us, went to field
14 offices, but you went to Kerelaw. I think at paragraph
15 201 you set out how you felt about that at the
16 beginning?

17 A. Ah-ha.

18 Q. What was that? How did you feel?

19 A. I didnae want a residential placement for a number of
20 reasons, but one of the reasons as well was that I think
21 it was more -- I was probably more social. I was going
22 to say social worky, but probably more professional
23 going to field office and it was almost like
24 a residential setting, was almost like a -- and it was
25 perceived within the uni as well as almost like a poor

1 relative in terms of the social work placement world.

2 The field offices, field work offices, were the
3 place to be, and you felt like that's where you were
4 going to be challenged. Residential settings, whether
5 it was Kerelaw, a unit for elderly or whatever, it was
6 not quite seen ... so I was a wee bit disappointed from
7 that respect.

8 Q. Separate from that, did it concern you at all about the
9 fact that you had had experience being in residential
10 care yourself?

11 A. Yes. Aye, absolutely.

12 Q. I think, though, in addition to being there as a student
13 social worker, you also had this arrangement, you tell
14 us, where you could be a sessional worker?

15 A. Yes.

16 Q. Which you were working then as a part-time residential
17 shift worker.

18 A. Yes.

19 Q. And you would be paid for that?

20 A. Aye.

21 Q. And that helped you, I think you say, top up your grant?

22 A. After my placement was finished, I'd done that.

23 Q. You weren't doing both things at the same time?

24 A. No. No, no.

25 Q. You finished your placement and then you did some

1 sessional work?

2 A. Aye, you couldn't have done them both at the same time

3 anyway.

4 Q. This was, I think you tell us, mainly at the weekends?

5 A. Mainly.

6 Q. Because you would still officially be on your course at

7 that point?

8 A. Yes, aye.

9 Q. You tell us it was about a year that you worked in

10 Kerelaw?

11 A. Roughly, maybe just under a year.

12 Q. Is that together both with your placement and with the

13 sessional work, taking them both together it was about

14 a year?

15 A. Yes.

16 Q. You give us some impressions you had of Kerelaw at

17 paragraph 203, and you say that it was a massive

18 factory-like place?

19 A. Yes.

20 Q. Is that how you sort of saw it?

21 A. Ah-ha.

22 Q. You think it was a place where disturbed children could

23 be sent and housed in one environment?

24 A. Ah-ha.

25 Q. You sort of saw it as a last resort for children?

1 A. That was a last resort in my mind. There was nowhere
2 after Kerelaw, unless you went into the prison system.
3 Which a lot of them did.

4 Q. Yes.

5 I think you go on to comment that you think the idea
6 was to try and get those children who to you seemed
7 disturbed off the streets and put somewhere?

8 A. Yes.

9 Q. But it didn't really matter, then, what happened to
10 them. If they were off the streets, then that was the
11 plan working?

12 A. Yes. That's what I thought. Yes. And I stand by that.

13 Q. Is that because you didn't see Kerelaw as being able to
14 do anything for these children?

15 A. No, it's because -- well, partly that, but also because
16 I've seen the practice and I also experienced the
17 practice as a child, so I knew the way these
18 institutions functioned, and there was very little
19 change over that. What would it have been, 30-year
20 period, that I could see. Certainly in terms of any
21 sort of therapeutic intervention with children, any sort
22 of -- I was going to say 'rehabilitation', that's
23 probably the wrong word, so I'll stand by therapeutic
24 interventions.

25 Q. So it was like a holding place?

1 A. Yes. In my opinion they were child prisons. That's
2 what these places were. And particularly Kerelaw, given
3 the size of it as well.

4 Q. At the time you were there you tell us that Bob Forrest
5 was the headmaster of Kerelaw?

6 A. Yes.

7 Q. He was overall in charge of both the secure unit and the
8 open unit there?

9 A. Yes.

10 Q. And there was LEF [REDACTED] who SNR [REDACTED] the secure
11 unit?

12 A. Yes.

13 Q. Then you mentioned KAB [REDACTED] who was a female, she
14 was LEF [REDACTED] SNR [REDACTED] the open unit. And your
15 time there was in the open unit; is that right?

16 A. Yes.

17 Q. You were never in the secure unit?

18 A. No.

19 Q. It was the girls' part of the open unit that you were
20 in?

21 A. Yes.

22 Q. That was called Wilson?

23 A. Yes.

24 Q. I think you tell us a little bit about KAB [REDACTED]
25 I think you saw her as someone who was trying to change

1 the culture at Kerelaw in some ways?

2 A. Yes.

3 Q. How did you see her do that?

4 A. I thought **KAB** was a remarkable individual and I tried
5 to practise a lot of my future social practice on
6 a similar model, on **KAB**. I just thought she
7 was great, she put herself, she put her right in firing
8 line. She became a target of ridicule within the school
9 because of the changes she were trying to implement.
10 What she brought in was trying to encourage and support
11 people to be more child-centred in their approach.
12 Consider the child, consider the context, consider where
13 they came from. So how can we start to do some sort of
14 therapeutic intervention with these kids?

15 Now, to come in and start to try and introduce that
16 at somewhere like Kerelaw, that's a big ask. That's
17 a big ask. But it never put her off. If anything it
18 made her more determined.

19 Q. From what you could see was there a lot of resistance to
20 her approach?

21 A. Yes, absolutely.

22 Q. Was that from the staff?

23 A. Aye, it was from some of the staff. Not every single
24 staff member, but a significant number of staff members.

25 Q. From what you could see, were they the staff who had

1 been there for quite a while?

2 A. Mostly quite a while. Some newer workers as well that
3 had been recruited, but mostly from the kind of
4 long-standing staff group.

5 LADY SMITH: Was **KAB** younger, what generation was
6 she, was she the younger end of the staff?

7 A. What do you mean, sorry?

8 LADY SMITH: Well, I'm just trying to work out whether she
9 was, if you like, a fresh new broom, somebody who was
10 younger, with new ideas.

11 A. She wasn't really if you are talking about in terms of
12 actual age kind of period.

13 LADY SMITH: Ah-ha.

14 A. No, I would say if anything she was older than the
15 majority of staff. But her ideas were certainly younger
16 and fresher and newer.

17 LADY SMITH: Was she newer to social work?

18 A. No, she was long standing. She was well known, she had
19 a reputation within social work. She frightened people.
20 Seriously, so people were really wary of her because of
21 her approach. And by the way it was no nonsense.

22 But she was kind of like old school. This isn't
23 like somebody just coming into, you know, the setting
24 and trying to make changes. She was well known.

25 LADY SMITH: Thank you.

1 MS FORBES: By the time you got there, was she new to
2 Kerelaw?

3 A. I think she was fairly new. I don't think she'd been
4 there that long.

5 Q. So you are sort of seeing her attempts to change things
6 at an early stage?

7 A. Yes.

8 Q. I think you tell us, Allan, that she tried to bring in
9 a lot of new initiatives and that they didn't sit well
10 with some of the staff group, but she pushed on
11 regardless.

12 A. Ah-ha.

13 Q. And that changes were happening while you were there?

14 A. Ah-ha.

15 Q. And she was increasingly starting to bring some of the
16 staff along with her?

17 A. Yes.

18 Q. But there was still this make up of staff who resisted
19 the changes.

20 A. Yes.

21 Q. I think you tell us that there were, at that time in
22 these types of institutions, very few qualified social
23 workers within the actual place itself?

24 A. Aye, yes.

25 Q. So most of the people there would have been residential

1 care workers or residential workers?

2 A. Yes.

3 Q. And they didn't have the same qualifications as social
4 workers?

5 A. No.

6 Q. And wouldn't have necessarily had the same sort of
7 thinking or experience?

8 A. No.

9 Q. And probably wouldn't have been paid the same either?

10 A. No. Far from it. And people have been saying why would
11 they have the same thinking, if they're not qualified,
12 they're not paid for it. You know, so you get what you
13 pay for in a lot of ways, and Kerelaw got it.

14 Q. You tell us a little bit about staff and your view of
15 the staff recruitment at paragraph 210, and I think you
16 comment that it seemed like the school did their
17 recruiting in the local pub?

18 A. Aye, yes, it genuinely did feel like that. Because they
19 brought in -- again, this isn't everybody, there were
20 some great staff members in Kerelaw. But certainly some
21 who I probably wouldn't have let walk my dogs, to be
22 quite honest with you, being perfectly honest. And it
23 was -- and I am saying guys, because it was men
24 I'm talking about in particular, who I didn't know
25 personally but I knew of them. You know, it was this

1 kind of -- it was like ... just to try and explain, it
2 was like being in a pub and you know there's a loud
3 obnoxious misogynist, you can hear, it was that kind of
4 guy.

5 Now, I'm not saying this is like a guy who like
6 myself is involved in offending behaviour, or repeated
7 offender behaviour, but you just knew the guy, you heard
8 the guy. So that wasn't -- I'd seen a few guys who
9 I would describe like that who were working in Kerelaw.
10 And even then I'm thinking: who, who recruits these
11 guys? How do these guys get a job? I don't know.
12 I'm not aware of the recruitment process.

13 And hence the -- and, again, I stand by that, to me
14 it felt like you go down at the pub at shutting time to
15 see who needs a shift on Monday morning, that is what it
16 felt like at times.

17 Q. What was your impression of whether the staff there sort
18 of knew each other outside of work?

19 A. The majority of them did. Because I think there was
20 obviously something in the recruiting process where you
21 could get somebody a start. It was like the building
22 sites back in the day, where if you're short of work,
23 that's the impression I got.

24 Q. There's maybe a lot of connections between people
25 outside of work?

1 A. Yes. A lot. Yes.

2 Q. I think you tell us, Allan, about some of the staff
3 relationships, as you saw it, with the children at
4 Kerelaw. This is at paragraph 211, you say:
5 'There were staff who were really child-centred and
6 you could tell that they cared about the children ...'
7 But you say, in fairness, it's an exhausting job and
8 they just didn't have the training or the support
9 sometimes to deal with the children that were there.

10 A. Aye.

11 Q. So there was that type of staff member who had a good
12 heart and was trying their best --

13 A. Yes, absolutely.

14 Q. -- but maybe didn't have the training, maybe didn't have
15 the qualifications, maybe didn't have the ability?

16 A. Aye, and it's a case by the way of not only not getting
17 the support, but it was almost like subject to ridicule,
18 like, 'Go and say to so and so and he'll give you this,
19 or he'll give you that'. Or, 'You know what he's like,
20 you can take him for a ride'.

21 So it was like that. And a lot of times a gentle
22 ridicule, but there was a strong message being conveyed
23 as well.

24 So that's hard, by the way, particularly for
25 an inexperienced worker, to cope within that

1 environment, if that is the culture, the predominant
2 culture, the unchallenged culture in a lot of ways prior
3 to someone like KAB coming in. But that was
4 unchallenged culture by the way for a long, long time.

5 So that shows you how difficult it is by the way,
6 the most well-intended person would find it extremely
7 difficult, extremely challenging.

8 Q. I think you also say, Allan, there was a different type
9 of staff, and that was the ones who resisted KAB
10 changes.

11 A. Ah-ha.

12 Q. You name some of those people at 212, and you've named
13 there John Muldoon, who was, you say, the guy in charge
14 of Wilson unit. So that was in the open side of
15 Kerelaw, is that right, the open unit?

16 A. Mm-hm.

17 Q. One other was Matt George, who was a teacher there.

18 A. Mm-hm.

19 Q. So John Muldoon is in the sort of residential worker
20 side, but in charge of a unit?

21 A. Ah-ha.

22 Q. Whereas Matt George is a teacher there, not
23 a residential care worker, if you like, but a teacher?

24 A. But what would happen is Matt George would come down and
25 do residential shifts, if they were short staffed or

1 whatever. So there was quite a few times he would be
2 working on the unit as a residential worker, providing
3 cover.

4 Q. Much like you did some sessional work after your social
5 work placement, that's the kind of thing Matt George was
6 doing: picking up shifts as a residential care worker?

7 A. Maybe for different reasons. You know, I do think he
8 was providing staff cover. Well, I suppose I was as
9 well, right enough.

10 But it wasn't that uncommon to see him on shift over
11 a weekend or mid-week. Mid-week evenings as well.

12 Q. If the Inquiry has heard about him being there as
13 a teacher, he did have more than one role there at
14 times?

15 A. Yes.

16 Q. I think you say that both of those individuals had been
17 at Kerelaw for decades, and the way you have put it is
18 they were 'old school'?

19 A. Aye, to my knowledge they'd been there for a long, long
20 time, that was the kind of talk, so well established
21 within the school.

22 Q. From what you saw, did they carry a lot of weight --

23 A. Yes.

24 Q. -- in Kerelaw?

25 A. Well, John Muldoon was a unit manager and Matt George

1 was -- I think he was the self-appointed font of all
2 knowledge and wisdom within the children and staff
3 group.

4 So a prominent figure within the place.

5 Q. In relation to those two, did they have a friendship or
6 a relationship that you could see?

7 A. I couldnae -- I don't really know, to be quite honest
8 with you. You know, because if you're in the unit
9 office, there might be, I don't know, four five staff
10 members, but in the course of the night or in the course
11 of a meeting, people come and go. So it was kind of
12 hard to -- I couldnae kind of sit and say they were
13 really best of friends. I couldn't answer that, I am
14 not sure, I don't know.

15 Certainly well known to each other.

16 Q. When Matt George worked doing his residential care
17 worker shifts, was he in the same unit with
18 John Muldoon?

19 A. I think, thinking back, I think he done spells in
20 wherever he was required, which stretched him across the
21 four units, but certainly spent time in Wilson Unit
22 because of that. Because that's where I was. So I seen
23 him there. I worked with him.

24 Q. When you say the four units, Allan, are they all within
25 the open side?

1 A. Yes, two boys' units and two girls' units.

2 Q. I think you say that they are the ones who used to
3 question KAB changes?

4 A. Yes.

5 Q. The comment I think you make there at paragraph 212 is:
6 'They would say that the weans needed discipline
7 instead.'

8 Is that as opposed to this therapeutic sort of
9 intervention that you have talked about with KAB ?

10 A. I would call as opposed to there being a more
11 child-centred practice and if a child acts out or plays
12 up, you know, there's a reason they do that. Which is
13 the way it should be. That should have been the
14 thinking.

15 As opposed to right, they've acted up or played up,
16 so they will be to be punished accordingly, and that
17 example would be set to every other person in the unit.

18 You know that kind of mentality, there are two ways
19 of looking at it.

20 Q. How did you become aware of their views? Was this in
21 meetings or was it just generally?

22 A. You just pick up -- most of it's picked up informally.
23 You know, it's the way that -- it's the way that, you
24 know, things are said, to whom, when. The manner in
25 which they're said.

1 I mean, nobody, by the way, challenged any of
2 **KAB** ideas or concepts or practices formally. None
3 of that was challenged formally, it would never be
4 challenged formally. That would never be questioned
5 formally.

6 The challenging and the questioning then would come
7 out and almost like the underlying kind of dynamics and
8 underlying language. That type of thing. Do you know
9 what I mean?

10 Q. Mm-hm. So there might have been sort of ideas put
11 forward by **KAB** as to how things should be done, but in
12 practice perhaps these two individuals in particular
13 weren't following them?

14 A. I would say in practice there was a level of -- to
15 varying degrees, right enough, but a level of
16 resistance. They were old school. They didn't want to
17 know about child-centred practice. That's not the way
18 they practised. That's not the way it happened back in
19 the day in the 1970s and 1980s, it was like that kind of
20 mentality, 'By the way, we know best, because we know
21 what these weans need, we know exactly what they need'.

22 Do you know, it was that kind of mentality. But it
23 was nothing -- nothing was ever -- you know it wasn't
24 a case of I'm sending an email here to question that
25 decision or a phone call or whatever. Nothing was

1 challenged formally to my knowledge. It was just all
2 underhand stuff.

3 LADY SMITH: It sounds, Allan, as though what you're telling
4 me is that their fundamental attitudes just were not
5 consistent with **KAB** objectives and her
6 approach to work with children.

7 A. Absolutely. 100 per cent. They didn't belong there,
8 and what **KAB** was trying to achieve within the school.

9 LADY SMITH: So did it really fit with what would work for
10 them and what they wanted in terms of not just punishing
11 but suppressing the children?

12 A. Aye, controlling it. Aye, absolutely.

13 LADY SMITH: Thank you.

14 MS FORBES: You go on to say, Allan, that John Muldoon had
15 two or three favourites amongst the girls in Wilson
16 Unit?

17 A. Aye.

18 Q. And that that created a hierarchy amongst the girls?

19 A. Yes.

20 Q. And this was something that he encouraged --

21 A. Yes.

22 Q. -- you say, and played into it?

23 A. Ah-ha.

24 Q. In particular you talk about the fact that he would tell
25 his favourites to come into the office and have

1 a cigarette with him?

2 A. Ah-ha.

3 Q. So that's something that you saw?

4 A. Yes. And other kind of ways -- even just the way he
5 kind of spoke to the girls informally in the corridor,
6 they way he would -- you could tell there was
7 a relationship there. Now I'm not suggesting anything
8 was going on within that relationship.

9 For me, looking back, and even then, the purpose of
10 that relationship was to ensure that this particular
11 girl assisted in controlling and keeping the unit
12 orderly. Again, nothing was specifically put in
13 an email formally, in writing or whatever, but it was
14 just like this, this was an understanding here, this was
15 the way -- and he's right, because that was the way
16 institutions worked. If that was the way you wanted to
17 work an institution and have a measure of control over
18 it, you're doing the right thing because that's the way
19 you do it. And that's what he done. You know, again it
20 was nothing formal, it was all kind of underhand. It
21 was just that underlying kind of dynamic, and everybody
22 kind of knew the relationship between him and her, you
23 know.

24 But the staff knew it. The staff must have knew it.
25 I mean, I knew it. I had seen it as soon as I was in

1 the door.

2 Q. You say that that was used to sort of control the other
3 girls, what do you mean by that? In what way were they
4 able to be controlled?

5 A. Well, there was a couple of times where the girls were
6 either arguing or acting out, smashing things within the
7 unit, and John Muldoon would say things like:

8 'By the way, every girl is going to suffer because
9 you've just smashed A, B and C. In fact, I will be
10 telling ██████████ about that then, you can talk to
11 ██████████ to explain to her why that's been smashed.'

12 That wasn't particularly unusual or uncommon. So
13 that's -- that's the kind of way it was operated.

14 Q. You mentioned a girl's name there, but if that girl's
15 name was mentioned, was that somebody that other girls
16 were afraid of?

17 A. Yes.

18 Q. I think you say, in the next paragraph, that
19 John Muldoon was all about containment and control.

20 A. I thought so, mm-hm.

21 Q. How did that manifest itself to you? What did you see
22 that made you think that?

23 A. I think it was just keeping a quiet unit, an orderly
24 unit, a unit you could manage. And if anybody stepped
25 out of line, like the example I gave you earlier about

1 the girl smashing stuff within the unit, it's just about
2 maintaining that kind of order within a unit, you know.
3 The fighting went down to a minimum, or the kind of
4 arguing or that type of thing. It just meant an easier
5 life, basically.

6 Q. I think you say that the staff struggled with some of
7 the issues that they had with the young people in there,
8 but they tried to handle them as best they could.

9 A. Ah-ha.

10 Q. Is that because of the type of young people that were in
11 there?

12 A. Because of the nature of the work. By the way, Kerelaw
13 housed some of the most troublesome and troubled weans
14 across the country. I mean I think it says there, and
15 I think I'm right in saying, by the way, that Kerelaw
16 was one of the biggest residential schools in Western
17 Europe at the time. By the way, this was it. That's
18 why I say as well that about all the jobs that I have
19 been in as well, by far, by the way, by far, that's the
20 hardest job that I've ever done.

21 You're going in there in the morning at 7.30 if you
22 are on the early shift, and the weans, any weans that
23 are awake, or start to awake, or whatever. That's you.
24 That could be you at 3 o'clock, you're on your toes,
25 you're trying to kind of separate girls, trying to stop

1 them fighting, they're running away. That was a really,
2 really difficult job.

3 And I don't want to keep coming back to it, but
4 I think it's important because not only then is that
5 what is required of you, but you also don't know how to
6 deal with it, because you've not been taught, you've not
7 been trained, you've not got the money to deal with it.
8 So like the kind of poorest staff group in terms of
9 training/in terms of experience with the highest demand
10 in terms of troubled children. It's a mix, it's
11 a recipe for a disaster right away.

12 Q. So there's a real --

13 A. And so it proved.

14 Q. -- there's a real gap between the level and experience
15 and training that you would need to have to deal with
16 some of these children --

17 A. Yes.

18 Q. -- and what was the reality?

19 A. Aye. But I've got to make it clear as well, right
20 enough, still within this dynamic, in the staff group,
21 there was still experienced members of staff there who,
22 by the way, were excellent. Who were very good. This
23 wasn't across the board, obviously. But a fair number.
24 But there were still some great staff members there as
25 well. And by the way you knew they were there to put

1 the shift in for the right reasons, and even if it
2 didn't work out and even if what they were doing wasn't
3 particularly the way it should have been done, you knew
4 they were doing it with a good heart, they were trying.

5 Likewise there were some new workers -- not
6 everybody was recruited out of the pub, as I say. There
7 were some new workers that came in there by the way and
8 they were fantastic, were great workers. But they
9 struggled within that.

10 But not only just in terms of inexperience and
11 underqualified, but also in terms of working within
12 a culture, a specific -- by the way, a strong culture.
13 A really strong culture. It was a really difficult
14 place to work if you're right minded. And I dare say
15 a lot of people, and you go with the flow, you go with
16 the culture, you're fine, you're sorted. Good money.

17 Q. One of the comments you made is really these staff were
18 being let down, because there wasn't good line
19 management there --

20 A. Absolutely.

21 Q. And they weren't getting the type of support that they
22 would need to turn them into effective residential
23 workers?

24 A. No, again I can see **KAB** trying that and I'd seen
25 workers up there by the way and I'd detected within

1 a short period of time I could see a shift in them,
2 I could see a change in them in terms of practice, in
3 terms of even the way they spoke, so you could see them
4 becoming more confident.

5 So there was movements afoot. But then **KAB** can't
6 do that across Kerelaw, but **KAB** is limited in what she
7 can -- in who she can come up, and who she can actually
8 support, and who she can line manage. But there were
9 changes within it. There were staff members willing to
10 change and try and move forward.

11 Q. I think you say there was limited or no opportunities
12 for staff to go and get appropriate qualifications which
13 might help them in their daily job?

14 A. Aye. Well, in my opinion they shouldn't have been in
15 the job if they weren't trained social workers. They
16 shouldn't have been near Kerelaw as a worker.

17 And I think there was one -- I think there was one
18 staff member who left and done the -- you know, the
19 formal social work qualification, I think it was one
20 staff member out of, I don't know how many people worked
21 there. You might have that number. But it's quite
22 a large number. But to my knowledge it was only one
23 staff member -- in fact, I'm telling a lie, it was two
24 staff members out of the large staff group. But my view
25 is that should be a bog-standard requirement to work in

1 a place like Kerelaw.

2 Q. So most of the people that worked there, I think as you
3 have mentioned, were residential care workers, there
4 were hardly any people with social work qualifications?

5 A. Aye.

6 Q. But your view, Allan, is really the majority of people
7 who work in a place like that should have social work
8 qualifications?

9 A. At the very least. That should be the minimum
10 qualification. The minimum.

11 Q. Is that because of the nature of the young people that
12 you're dealing with?

13 A. Absolutely. You will never work with more troubled
14 children, or rarely work with more troubled children in
15 the country, but in addition to that, it's about
16 bringing them together. I don't know who the hell
17 thinks that's a recipe for success in any way, shape or
18 form.

19 Q. You not only have children with complex needs, but you
20 have a lot of children with complex needs in the same
21 place?

22 A. Yes. Absolutely. With the same problems and the
23 same -- and I know it's maybe a different matter and
24 I don't want to go off too much on a tangent, but it
25 does kind of prove something of a point, because when

1 I was working as a social worker by the way the amount
2 of young people then that I knew had come through the
3 system. You know, that was them always served their
4 apprenticeship in Kerelaw and that was them in the adult
5 system, by the way almost overnight, it would break your
6 heart. Because I was reviewing court reports for --
7 I was going to say young men and young women, I don't
8 know if I should say that, for children. By the way,
9 I knew that was the start of their journey, I remember
10 doing the reports thinking, by the way, you are going to
11 have another six, seven, eight custodial sentences
12 before, even if that penny drops. You've started this
13 journey it's going to be a long, hard journey for you
14 and I've proved the case. I was there long enough to
15 see them bouncing back in and out and in and out. It
16 was awful, awful to see.

17 Q. Even in relation to bad practices, I think you comment
18 that there was little or no opportunity for staff to
19 feel that they could highlight things within that in
20 Kerelaw?

21 A. No. Not formally. I don't know if someone was --
22 I would suspect there was some informal arrangement made
23 between **KAB** and staff members where they felt they
24 could feed things back. I would have -- I'm guessing.
25 I don't know. But I would have thought something like

1 that would have been in place. But, no, I don't
2 think -- there was not any sort of formal mechanism.

3 Q. I think one of the things you comment, Allan, a little
4 bit later at paragraph 221, is that you say that later
5 on, when you were working as a social worker, you were
6 not in a residential care setting, but when you're on
7 shift at a place like Kerelaw and something happens, you
8 can't just leave and go for a walk and get your head
9 together. You have to stay there?

10 A. Aye.

11 Q. So it's a very demanding role?

12 A. Aye, absolutely. By the way and I stand by that as
13 well, because the amount of times in my job as a social
14 worker, when I've had to say to staff in the office, 'By
15 the way I will back in half an hour, I need to get out
16 of here', a walk, clear your head, you know, you've just
17 had a really bad interview or a bad experience. I had
18 a difficult experience, challenging experience, so you
19 can get yourself out. By the way you cannot do that in
20 residential, you can't do that in a unit the size of
21 Kerelaw where you're needed. You know there is no
22 escape, there is nothing. Your toilet breaks, no you've
23 got to time your toilet breaks. When the weans are
24 going from A to B by the way somebody might have
25 a chance of being in the toilet for two and a half

1 minutes. Seriously. That's how hard it is.

2 Q. Just moving on, Allan, just to what you talked about in
3 your statement about punishments. I think you say that
4 when you were there the type of punishment that you saw
5 happening was removal of sort of privileges, like not
6 getting cigarettes, no TV, or getting to go swimming,
7 that kind of thing?

8 A. Aye.

9 Q. There was no physical chastisement at the time that you
10 were working there?

11 A. No.

12 Q. There certainly was no corporal punishment at that time?

13 A. No, that was done away with then.

14 Q. Then I think you tell us a bit about restraint
15 techniques?

16 A. Ah-ha.

17 Q. Because at that time then the only thing that you would
18 be able to do if somebody was, we've heard the term
19 'kicking off' or whatever, would be if it was necessary,
20 and it came to that, would be to restrain them?

21 A. Me are you talking about?

22 Q. No.

23 A. Just in general?

24 Q. Just in general. So this was residential care workers
25 who would be involved in doing that, is that right?

1 A. Yes.

2 Q. It's not something that you would be involved in as
3 a trainee social worker/student social worker?

4 A. No.

5 Q. What about when you were doing the sessional work, was
6 that something that you were asked to be involved in or
7 expected to be --

8 A. No, I wasn't, but I don't know if part of that was --
9 again, I am guessing here, I don't know, because
10 I wasn't just a student there, I was **KAB** student.
11 So people were going to be really wary around about me,
12 which by the way I didn't mind in the slightest.

13 So people, certainly in terms of practices,
14 certainly maybe in terms of restraints, that they
15 would be exercising restraint, I'm guessing. Plus, they
16 knew that I liked and respected and supported **KAB** so
17 there was that element round about me as well. And
18 I always knew that was there, I was always conscious of
19 that.

20 But, no, I did see weans getting restrained. I did
21 see opportunities -- not opportunities, I did see they
22 had a need when weans were fighting to go in and
23 separate them. I didn't take part in any restraints.
24 I wouldn't have done because I wouldnae trained. No,
25 I think it's maybe all right for me saying I wouldn't

1 have done it anyway and that's maybe -- who knows
2 because somebody could come back to me and say what if
3 two weans were fighting, what would you have done? And
4 that would have been a fair enough question.

5 At the time I ran the boys -- without going off too
6 much on a tangent -- at the time I ran a boys' football
7 team, and I ran it for years. It was a lot of boys at
8 the scheme, the weans who didn't get a game anywhere
9 else. But they they'd fight like hell, you know, we
10 would go to training nights. And what I would used to
11 do was the two that were fighting, I would grab the
12 collar, 'Right, yous', and that would be it.

13 And probably if I was really required and I had no
14 choice, that was the way I would have dealt with it in
15 Kerelaw, and somebody could have moaned or took me to
16 task, because that is not the way that children should
17 have been restrained, I don't know.

18 Q. When you were there you didn't get involved in any
19 restraint yourself?

20 A. No, there was no requirement, there was no need for me
21 to do that.

22 Q. And you weren't trained?

23 A. No, I wasn't trained.

24 Q. Were you aware of any training for restraint at the
25 time?

1 A. Aye, because it's got a name and I can't remember the
2 name it's some sort of restraint, but it was always
3 like, 'Are you trained in ...' It was almost like
4 a badge of honour.

5 Q. So you were aware of the fact that there was training at
6 that time that you were there.

7 A. Yes, for restraining children, aye, restraining
8 techniques.

9 Q. What was your impression of the way that restraint was
10 carried out at Kerelaw?

11 A. Probably -- whether I was trained or whether I wasn't
12 trained, it's not the way I would have done it.
13 I thought it was a wee bit heavy. It's a wee bit --
14 I couldn't have sat down here and said, 'By the way
15 you've just abused that wean', or you've done -- I don't
16 think it was the same as that, to be perfectly honest.
17 Because a couple of times if you are getting a wean to
18 the ground there's a way of doing that I would imagine.
19 Now I've just explained I'm being honest that's the way
20 I've done it two collars, two of yous get back from each
21 other. I've seen weans getting dragged from the neck,
22 down quite quickly. By the way, and I can see what the
23 person's trying to do, they're trying to get them down,
24 to calm them down. To me I just thought it was a wee
25 bit too forceful, it's not the way I'd have done it. It

1 would have been a wee bit sore on the wean, it could
2 have hurt them or it could have injured his neck or
3 anything.

4 But having said that, I'd like to stress to you as
5 well that there's a wee part of me sitting here saying,
6 'That's okay, that's easy for me to say, because
7 I wasn't forced to do that, there was no requirement on
8 me to do that', and I don't want to be therefore too
9 critical of people who did do it, and who maybe were
10 a wee bit more forceful than they should have been, but
11 that wasn't the intention. You know, it was kind of one
12 of them ones.

13 Q. So your view is it maybe was sometimes a bit more heavy
14 handed than it could have been?

15 A. I would have thought -- I thought so. It is nothing --
16 I wouldn't have done it in that manner.

17 Q. What was your view about whether or not it was
18 appropriate at that time, as opposed to trying to use
19 another means of deescalating the matter?

20 A. Again, a kind of difficult one because there were times
21 when it happened where I thought, by the way, you have
22 not even spoke to the wean, you've not even tried to sit
23 them down and speak to them, to kind of talk them down.

24 But then at times I witnessed -- you've got a lot of
25 times where people did try to talk to the wean down,

1 where that did come in, that, you know, look, and that
2 was almost used like a last resort. At times it wasn't
3 used like a last resort, it was always a first resort.

4 Q. Would that just depend on the staff member who was
5 involved?

6 A. It would depend on the staff member, but it would depend
7 on the situation as well, probably, and who was involved
8 and what wean was involved. Because there were a lot of
9 weans there as well where you think one way or another
10 we need to get this wean under control, you know, this
11 place, the roof's going to blow off here. And whether
12 that's a legal and formal restraint method or whether
13 it's trying to talk the wean down. Either way whatever
14 you are going to do here, whatever you think is going to
15 work, you need to put it in practice right away. I mean
16 it's a pressure cooker, it's a heavy-duty environment to
17 operate in and to make the quick decisions.

18 But, no, I didn't want to say -- nobody had done it
19 where I thought: oh, that's not, you shouldn't have
20 done -- again, I've never seen that. But again, as
21 I says to you, people knew who I was and who was my
22 practice teacher. So maybe there was something in that
23 as well.

24 Q. Yes. But there were times you saw restraint on young
25 people where there wasn't an attempt to talk them down

1 first?

2 A. Aye, well I thought there wasn't an attempt.

3 Q. And there perhaps could have been?

4 A. Yes.

5 Q. I think you go on to explain, Allan, like you've said,
6 that there were some situations that required immediate
7 physical intervention, if there was a fight, for
8 example, but there were other situations that you tell
9 us about where if someone was kicking off they would be
10 taken to their room. I think you say that occasionally
11 you would go and they would be sitting with the girl
12 trying to reason with her?

13 A. Mm-hm.

14 Q. Just moving on, Allan, to the question of abuse at
15 Kerelaw, and I think you were asked about that when you
16 were giving your statement. You tell us at
17 paragraph 230 that you never witnessed anything you
18 considered to be a crime --

19 A. No.

20 Q. -- during your time at Kerelaw.

21 A. No.

22 Q. And you never saw any child being brutalised or
23 assaulted?

24 A. No.

25 Q. And you weren't aware of anything, you say, overly

1 untoward. But, like you've explained, you were KAB
2 social work student, so --

3 A. Yes.

4 Q. -- people maybe were wary around you and what happened?

5 A. Yes, that's my thinking. And when I'm saying, sorry,
6 just overly untoward, because I realise that some people
7 would say, what does that mean? It's quite kind of
8 loaded or it could be loaded. It's not meant to be.
9 I suppose I say overly untoward, I'm talking about the
10 restraining techniques that I have just mentioned, when
11 I am thinking, 'Hold on a minute, that's a bit unfair,
12 that's not what I would have done', that's what I meant
13 by that, you know. But, no, I didnae witness anything
14 first hand at Kerelaw.

15 Q. I think you also mentioned earlier that John Muldoon
16 would have people going into his office, these girls,
17 his favourites, to have a cigarette with him?

18 A. But that was not uncommon, because other girls were
19 going in at other times, but they would also go into
20 other staff members as well. There was nothing --
21 I don't think anything untoward with that --

22 Q. Nothing untoward about that?

23 A. -- other than the objective that I -- I thought he was
24 trying to achieve, like I said to you earlier.

25 Q. Which was this hierarchy --

1 A. Yes.

2 Q. -- and keeping people in line?

3 A. Aye.

4 Q. I think you say that you are aware John Muldoon and
5 Matt George were both convicted and are serving
6 sentences for offences they committed whilst in Kerelaw,
7 but you make the point that you didn't witness either of
8 them committing any offences whilst you were there?

9 A. No, not at all.

10 Q. You say that you left Kerelaw in 1995 after your
11 placement ended and you weren't able to do the sessional
12 work any more because of your university workload?

13 A. Yes.

14 Q. So that was the end of your time there?

15 A. Aye.

16 Q. You never went back; is that right?

17 A. Yes. No, I didn't go back.

18 Q. Then later on your second placement was with offender
19 services.

20 A. Mm-hm.

21 Q. Then you later, I think, applied for a job in justice
22 services, I think as it changed to?

23 A. Yes.

24 Q. That's where you spent the rest of your career?

25 A. Yes.

1 Q. That was doing what we talked about earlier, which was
2 supervising people on probation orders, on parole, and
3 writing reports for the court. In that capacity you
4 didn't work with children in that later period, but you
5 worked with a lot of young people, you said?

6 A. Well, in that capacity we worked with what was called
7 'young offenders'. So that was technically then --
8 I don't know technically, legally once somebody got to
9 the age of 16 they were through the adult system.

10 Q. So 16 to 21 they were sort of young offender --

11 A. Yes, so we would work with people classed as young
12 offenders. Court reports and supervision.

13 Q. You comment, Allan, at paragraph 234, that those young
14 offenders that you worked with became into the adult
15 system when they turned 16. You say that that's how it
16 was with really you. You went to bed one night at 15
17 and the next day you woke up as an adult as far as the
18 criminal justice system was concerned, and that was you
19 at Barlinnie?

20 A. Ah-ha.

21 Q. Whereas your three friends were off to an approved
22 school --

23 A. Yes --

24 Q. Because they were still 15?

25 A. -- aye.

1 Q. You comment as well, and it wasn't uncommon for the
2 people you dealt with as adults to have been through the
3 care system as children, and proportionally you felt it
4 was fairly high?

5 A. Yes. Absolutely.

6 Q. So the offenders you're seeing that you're involved in,
7 as a social worker, as an adult, were predominantly
8 people who had been through the whole care system?

9 A. I wouldn't say predominantly through the care system,
10 but a significant number through the care system.
11 I think it's more unusual for weans through a place like
12 Kerelaw not to come through the adult system than it is
13 to come through it. That's my feeling.

14 Q. That's your impression from your experience and your
15 career?

16 A. Aye.

17 Q. I think you also go on, Allan, to tell us that you
18 published a book about your life, is that right? You've
19 then also been involved in a documentary, I think was it
20 narrating a documentary, is that right?

21 A. Ah-ha.

22 Q. One of the things that you make a comment about is that
23 when you were involved in social work, some people would
24 say 'a leopard never changes its spots', that phrase
25 we've all heard. Is that something that you felt

1 affected you after people became aware of your past with
2 the publication of your book?

3 A. I don't know if it affected me -- I don't know if that
4 came out because of the book. I think people -- I think
5 people who thought I was an offender, or me with my
6 background, I think they kind of suspected I had
7 a background like that as well anyway.

8 And then I think the book came out, it was probably
9 more -- I was quite graphic in terms of, you know, what
10 happened in fights and all that type of thing. Because
11 I remember just before it came out thinking, 'Should
12 I have written that?' And I think some people, including
13 people that I worked -- not many right enough, but there
14 were some there, and I was kind of heavily criticised
15 for that, thinking why was he allowed to be a social
16 worker, why can you do that? You know, it was all that
17 kind of stuff. So that was disappointing for me.

18 Probably personally, but also from a professional
19 point of view I found it more upsetting, because I am
20 thinking well if you don't think people can change, why
21 are you occupying that seat? You know. You're meant to
22 be -- and the business has changed, the process has
23 changed. And if you think that I cannae change after
24 30 years, what chance does Joe or Jane Bloggs got in
25 front of you? What you doing here? So it was a kind of

1 personal and professional kind of dilemma -- not
2 a dilemma, a difficulty I had.

3 Q. I think you also say there were people that you worked
4 with who were very positive about the kind of journey
5 that you had had, and very encouraging.

6 A. Yes.

7 Q. And you would sometimes be asked to do talks?

8 A. Aye.

9 Q. Even though you're not comfortable with that. It was
10 not your thing?

11 A. Aye, I hated that. No, there was a lot of people.
12 I know I was well supported, eventually, I think. I was
13 going to be cynical there, but I'm not going to say it.

14 I was going to say I think some people sat on the
15 fence and think is this going to be hassle or is this
16 going to be welcomed professionally. And it was
17 welcomed professionally, so I was all right. But having
18 said that, there were a lot of people who supported me
19 in fairness, who really supported me and helped me
20 through that. Because that was the whole identity thing
21 again for me. You know, it's quite hard. It's quite
22 hard knowing that I've exposed my personal life, my
23 family's as well.

24 Q. Just looking forward, I think you say at paragraph 263
25 that when you're thinking about things, that what works

1 for each person should be tailored to individual need.
2 But you say there's key themes, and I think you
3 mentioned this earlier, Allan. You say that the
4 personal and professional relationships need to be
5 there, and you comment that in your case you had your
6 mother as a steady influence who would visit you and was
7 there. But you also need a professional relationship in
8 your opinion too, and that for you was the social
9 worker, and that was someone who could see something in
10 you and see your potential?

11 A. Yes. Aye.

12 By the way, without a doubt. I think if you're
13 looking for somebody to change, and by the way I kind
14 of -- and you rightly brought it up earlier, and I hope
15 you got a real sense of it, about when I left that
16 background to get an education and it was that whole: do
17 you know what, it was that whole identity crisis. I was
18 changing my whole identity. I was changing -- and
19 that's something I don't think social work -- I think
20 social work have missed the boat, have missed the point.
21 Because even as a professional and a social work
22 practitioner who was supervised and chooses and I was
23 saying to them right so you're asking somebody to
24 change, so what do you want to be changed into? What do
25 you want to change them from? And do you know what it

1 means to ask a person to change, because you are then
2 asking him to give up everything that he's ever heard in
3 his life. You're asking him a lot of times to give up
4 his family, the only friends he has ever had in life.
5 By the way, I'm saying that's a big ask, so by the way
6 you need to be clear where you're going to ask him, if
7 you're going to ask him to change, not only you but we
8 as a profession then need to say, 'Do you know what,
9 aye, we do want to change that, and here's a credible
10 alternative you can pursue, and we'll help you pursue
11 that'.

12 But we never, ever done. I don't know ... I was
13 quite a critique -- although I loved my job, I did love
14 my job with a passion, I was always critical of the
15 organisation, because I kept thinking ... I always
16 thought by the way we're not anywhere near as good as we
17 think we are. We think we're top of the division, you
18 know, the Real Madrid of social work. Well, no, we're
19 not as good as we could be and we're not as good as we
20 should be. I could go on all day on that subject, but
21 I just thought we could have been better right enough,
22 and a lot of that I draw on my own personal experience
23 as well, because I know, I can talk about -- well,
24 certainly for me and a lot of my friends. I know what
25 worked for us. I know what didn't work for us. I know

1 what we felt horrendously difficult.

2 Then I know this is an opportunity, if you want me
3 to move on and help me move on, you need to build that
4 trust and you need to give me something to cling onto
5 and give me some decent credible opportunities.

6 Q. I think you give an example, Allan, a little bit later
7 in your statement, this is at paragraph 280. You say
8 there was a guy who hadn't been charged for three years
9 and in the social work meeting there was pats on the
10 back about the fact that he hadn't offended, so that was
11 a success.

12 However, you saw him out in society and whilst he
13 wasn't committing offences, he was still living in the
14 same squalor, no friends, no family support, and he was
15 on and off drugs.

16 A. Aye.

17 Q. So from his point of view, whilst he wasn't offending,
18 he was in a worse situation, I think is the way you put
19 it, it was probably worse.

20 A. Aye. Absolutely. Aye, absolutely. That was I say --
21 and I remember the review distinctly, and I can see it
22 visually, because I spoke about it for a while after
23 that and in certain circumstances and the social workers
24 were moonwalking and high fiving and thinking by the way
25 he has not committed an offence for about three years at

1 the time, I'm sure and we genuinely thought, by the way,
2 'How good are we, look what we've done, we're some team,
3 aren't we? Look what we've managed to achieve where
4 others have failed'.

5 Then when you bump into the guy, the guy is actually
6 worse off. The guy would actually be better in
7 Barlinnie. His lifestyle and everything else. We've
8 achieved nothing but failed the guy.

9 But because the criteria for success was that this
10 guy doesn't get hauled through the courts on Monday
11 morning, we're a success. And my opinion has always
12 been nominal, because that shouldn't just be the measure
13 of success. Let's look at the quality of a guy's life.
14 We've intervened in his life in a lot of ways, we've
15 imposed a lot of controls over his life, so what have we
16 done to develop that or improve that or help the guy
17 move on?

18 Q. I think you made the comment as well later, Allan, at
19 paragraph 284:

20 'Unless levels of poverty, disadvantage, exclusion,
21 and deprivation are addressed in a meaningful way, we're
22 always going to have the same client going through the
23 doors as children and as adults.'

24 So there's a lot of problems, root problems, that
25 need to change before their life, their quality of life

1 can change?

2 A. But that's a client group that will continue to keep
3 social work and prisons open, and whatever the
4 alternative to Kerelaw is going to be, and we all know
5 that. We know that right now.

6 And I would say by the way levels of poverty,
7 disadvantage, deprivation, I would say they're worse now
8 for young people and young families now than they were
9 in the 1970s, and I would also go as far as saying that
10 I'm not convinced that a lot of people really care
11 whether that's the case or not.

12 Q. Again, looking at what happens when a child goes away
13 from these places, you say at paragraph 299:

14 'If a child is to go back into a family environment
15 ...'

16 You have to ensure that the family is adequately
17 supported, because essentially you're just putting them
18 back where they came from, with the same problems and no
19 support?

20 A. Absolutely.

21 Q. I think you say that the key thing for you that
22 underpins your process --

23 A. Sorry, can I just say, sorry, before you move on from
24 that, as you speak, there's already moves afoot to cut
25 back the Throughcare services and Throughcare services

1 is where there's support that would provide support to
2 these families. So as we speak these services are being
3 cut, services that we need to support these families.

4 Q. Yes. You say that the key theme that underpinned your
5 change was the relationship you had with your social
6 worker.

7 In relation to that, I think she was someone you
8 maintained contact with right from being a boy into
9 adulthood --

10 A. Yes.

11 Q. -- as you've said, and you even spoke at her funeral,
12 read her eulogy.

13 In relation to hopes for the Inquiry, we have what
14 you've said there, so I'm not going to go through that
15 in detail. We've read it, and we can read it again.
16 But I think you say that there's got to be better help
17 and acknowledgment for those youngsters and their
18 traumas, and people living on the margins of society has
19 gone on long enough.

20 I think, just on a positive note, Allan, you said
21 your second wife and you have been married for some
22 years now, is that right? And you've got grown-up sons
23 that you involve yourself with, and whilst you're
24 retired now, I think you say that you're fortunate in
25 a position that you have been able to succeed in making

1 a good life for yourself and have had a loving family.
2 And you're able to spend time with your grandchildren
3 and keeping yourself occupied, yes?

4 A. Yes. My grandchildren tire me terribly, but, yes, I do.
5 I have got a good life, I do.

6 And I've got to say as well by the way, I was going
7 to say my first wife, I sound like one of these old
8 country and western singers with ten wives. But my
9 first wife was extremely supportive as well in that
10 whole process in our relationship and I have had a lot
11 of love and support as well. I could never have done it
12 without the support I have had. Which again proves what
13 can happen, what somebody can achieve with the right
14 support. I've been very fortunate to get that. Very
15 fortunate, and I know that.

16 MS FORBES: Allan, thank you very much for answering my
17 questions, that's all the questions I have for you, so
18 thank you very much for taking the time to come today.

19 A. Thank you.

20 MS FORBES: Unless there's anything else you want to say,
21 that's all from me.

22 A. No, I'm fine with that, thank you.

23 LADY SMITH: Allan, can I add my thanks to you for agreeing
24 to engage with us the way you have done, for all you
25 have shared so openly and frankly, and for teaching us

1 as much as you have taught us today.

2 A. Thank you, that's kind.

3 LADY SMITH: We have been listening, I promise.

4 Thank you very much. You are free to go.

5 A. Thank you.

6 (The witness withdrew)

7 LADY SMITH: I'll rise now for the afternoon break and then

8 we'll have time to do some more read-in work afterwards,

9 I think.

10 MS FORBES: Yes.

11 LADY SMITH: Thank you.

12 (3.07 pm)

13 (A short break)

14 (3.17 pm)

15 LADY SMITH: Ms Forbes, where next?

16 MS FORBES: My Lady, the next read-in is a statement from

17 an applicant who is anonymous and is known as 'James'.

18 The reference for his statement is WIT-1-000001197.

19 LADY SMITH: Thank you.

20 'James' (read)

21 MS FORBES: 'James' was born in 1967 in Burnside in Glasgow

22 and he stayed with his mum, his dad, and his two older

23 sisters for a time, but his parents split up when he was

24 very young, his mum left the family home for a while and

25 he lived with his dad. But then he and his sisters went

1 to stay with his mum in Castlemilk. He went to primary
2 school, and until primary 7 he was in a particular
3 school and then he moved to high school.

4 At that point his mum moved to another area from
5 Castlemilk to Downcraig, and that was an area where
6 people around them didn't have anything.

7 Once he was 14 he started getting in trouble with
8 the police for things like stealing from the school,
9 childish things, he started fighting with the people who
10 he had actually been going around with before he'd moved
11 to where he'd moved to. He started dogging school and
12 as a result of that he ended up being put in an approved
13 school.

14 He was never involved with the social work at that
15 point, but ended up in front of the Children's Panel and
16 that's because he and two friends had broken into the
17 school.

18 He was taken by the police to court, but then they
19 went to the panel and he was sent to Larchgrove for
20 three weeks, and after that they let him go home, but
21 his two friends were sent to a List D School.

22 After his behaviour hadn't changed within a week or
23 so he ended back in front of the panel and he was sent
24 back to Larchgrove for another three weeks, although he
25 stayed there for about six weeks, and he was about

1 14-15 years old for both of his stays at Larchgrove.

2 It was a big shock to him to go to Larchgrove and he
3 talks about Larchgrove from paragraph 8 onwards.

4 At paragraph 31 he says that the second time he was
5 at Larchgrove he ran away after a teacher hit him. The
6 police came and took him back to Larchgrove and he got
7 the belt from the headmaster for running away.

8 The incident where the teacher hit him is set out at
9 paragraph 34. He says that he must have been acting
10 gallus, so the teacher there backhanded him, bursting
11 his mouth, and he remembers spitting the blood from his
12 mouth on the floor and the teacher grabbing his head and
13 rubbing his face into it. Everyone saw what had been
14 done to him, and he ran down the stairs just as the
15 headmaster was coming out of her office, and told her
16 what had happened.

17 He thinks the teacher there taught maths or art, and
18 he thinks he could have been really cheeky at the time,
19 but thinks that teachers there would have got that quite
20 a lot from boys, and all he remembers is that -- he just
21 thinks he must have been carrying on for whatever
22 reason, though he thinks it could have been dealt with
23 without him being hit.

24 Other than the headmaster, though, he didn't tell
25 anyone else, and he went back to the Children's Panel

1 after that second stay, and outcomes were discussed. It
2 was decided that he would be going to a List D School,
3 and he was moved to Kerelaw.

4 I think he thinks he was meant to be going to
5 a place called St Philip's, but because of his religion,
6 being Protestant, he was told that they wouldn't take
7 him.

8 He talks about Kerelaw between paragraphs 41 and,
9 I think, 88 of his statement. He was in Kerelaw for
10 just over a year to a year and a half, and he was around
11 14 and a half when he went there, and he was there until
12 his 16th birthday.

13 In relation to Kerelaw, he says at paragraph 69 that
14 they weren't locked up, so it was easy for him to run
15 away when he wanted, and he would do that about three
16 times a week and always went back home. It was normally
17 the police who would come and take him back to school,
18 and he would be handed over to SNR [REDACTED], but he
19 doesn't know his name.

20 He does say that there [REDACTED] SNR [REDACTED] when
21 he was there, but he doesn't remember that guy's name
22 either.

23 At paragraph 70 he says:

24 'I ran away so often because I hated Kerelaw and
25 I hated the way I was being treated.'

1 Then if we could go to paragraph 75, he says:

2 'The first time I got a healthy doing from staff was
3 from the night watchmen.'

4 He describes a situation where they were all
5 carrying on running in and out of their bedrooms, and
6 the 'watchies' came round, and they lined about five of
7 them up and battered them. He says that he just curled
8 up into a ball and they booted and punched him over the
9 head and body. He said that he could smell the booze
10 off them when that was happening, and that this sort of
11 thing happened once every month or once every two
12 months.

13 At paragraph 76 'James' says he remembers a member
14 of staff called Matt George, who started picking on him
15 shortly after arriving at Kerelaw. He says the first
16 time he got a doing during the day was when Matt George
17 had grabbed him and said something like, and he says:

18 '... "you were the wee bastard that got such and
19 such suspended in Larchgrove for hitting you. We all
20 stick together so you can go and tell who the fuck you
21 want and nothing will happen. We will lock you up here
22 forever".'

23 He then took him to the staff office and slapped him
24 about, he punched him about the body, pulled his hair,
25 and slapped him on the face. 'James' says:

1 'It was never really heavy punches like a man's
2 punch, but they were punches all the same and you felt
3 it. Matt George battered me many times in that office.
4 I can't say how many times, but it was a lot.'

5 At paragraph 78 'James' says there was a couple of
6 other staff who would batter him, and he says he
7 remembers a wee Mrs KAM [REDACTED], who was one of them who
8 would hit him, she was a senior member of staff,
9 Matt George, Mrs KAM [REDACTED], and other staff would hit him
10 in front of other staff. He says:

11 'Only once did Matt George give me a doing in front
12 of another staff member, although I don't remember who
13 that was.'

14 He goes on to say:

15 'They would slap me in front of the other boys, but
16 I would never get a doing in front of them. You would
17 be shouted on to go down to the tea room and you would
18 know then what was going to happen in there, and that
19 was where we would get battered. It would happen to
20 other boys too.'

21 'James' talks about FSR [REDACTED] he says he was
22 a footballer but worked in the gym:

23 'It wasn't doings that you got from him, it was just
24 if you were naughty he would slap you on the head and
25 tell you to stop it.'

1 At paragraph 80 'James' says if there was a falling
2 out with another boy they would make a boxing match out
3 of it, and this wasn't something that would be organised
4 for another week or two weeks, so you had to wait and
5 had the build up to deal with. They organised it for
6 you whether you wanted to box the other boy or not and
7 the full school, including all the staff, would be there
8 to watch.

9 'James' says at paragraph 80:

10 'They would make a wee showpiece out of it, so there
11 would be posters made advertising that one boy was
12 fighting another in the ring.'

13 He says that he had to do it twice, and he had the
14 fear in him, and he knew that he would have to go and
15 try and knock the hell out of a boy, '... because if you
16 got beat you would be degraded by staff and pupils'.

17 'James' also said that sometimes they would bring
18 people from boxing clubs in to fight, like a tournament.

19 At paragraph 81 'James' says:

20 'There was a cell next to the headmaster's office
21 ...'

22 That is where he would be put every time he returned
23 after running away. This was a bare cell with no bed,
24 just a cement block instead, and it was SNR that
25 would put him in the cell and slap him about or give him

1 the belt for running away.

2 Normally the belt would be across the hands, but
3 sometimes he would belt him across the body, all over
4 the body, depending how angry he was.

5 'James' goes on to say:

6 'Then he would take my clothes so I was completely
7 naked, strip search me before leaving me with an itchy
8 blanket.'

9 He then says he would be freezing.

10 At paragraph 82 'James' says that depending on what
11 time he came back, if it was the middle of the night,
12 the "watchy" would slap him about for first wasting his
13 sleeping time and then would lock him in the cell with
14 the itchy blanket, having had to strip naked. Then the
15 next day SNR [REDACTED] would come in and either give him
16 the belt or a couple of rapid punches in the ribs.

17 'James' says at paragraph 83:

18 'They would be slapping you mainly about the head,
19 as if to say don't do that again.'

20 And that he was always kept in the cell until the
21 next day, no matter what time he got back.

22 At paragraph 84 'James' says:

23 'SNR [REDACTED] ... was a bit more lenient [and]
24 he wouldn't batter you all the time so it would depend
25 what mood he was in ...'

1 Then paragraph 84 he says:

2 'Sometimes they would slap you about a bit more. It
3 was never any punches or anything like that.'

4 Paragraph 85, 'James' says:

5 '... even after SNR ██████████ dealt with [him] for
6 running away the staff ... would also have a go. They
7 didn't generally batter you in front of others, but they
8 would give you the odd slap if other people were around
9 and they would give me a backhander with the back of
10 their hand slapping my face.'

11 He comments at paragraph 86:

12 'The staff had only one way to reprimand you, and
13 that was by hitting.'

14 Paragraph 87 he says he was assaulted quite a lot.
15 It happened every time he ran away, and that was two or
16 three times a week most weeks. It wouldn't always be
17 like a doing, but after the belt got banned that was
18 when there was a lot more slapping.

19 He then says that on his 16th birthday they put him
20 before the panel and released him. This was completely
21 out of the blue, and he wasn't equipped for the outside
22 world and had no experience.

23 He comments at paragraph 93 that they basically
24 threw him out the door and that was it.

25 After that his life was a cycle of going to jail and

1 getting back out, and he talks about that from 95
2 onwards. That was read in on 13 December 2023, Day 398.

3 He went to Longriggend, he was abused many times in
4 Longriggend:

5 'Prison officers would get a good few digs in at
6 you.'

7 He stopped being sent to Longriggend when he was 21.

8 He talks about life after being in care from
9 paragraph 106. He says he has been in and out of jail.
10 14 months was the longest he was out, when he got
11 married at 19 and had a child. The marriage didn't last
12 long, maybe two years, and they had two daughters, and
13 those daughters are older now and have settled in and
14 are working.

15 The petty crime that 'James' was involved in became
16 more serious as he got older and he ended up with a drug
17 habit. He started robbing places and when he got caught
18 he had to do the time.

19 At the time of giving this statement 'James' was in
20 jail and was hoping to get out.

21 In relation to impact, he talks about that from
22 paragraph 109 onwards, and he says that it's only
23 recently that he's realised a lot of the things that
24 happened to him were abusive. Not just the hitting, but
25 being locked in a cell naked.

1 Paragraph 110, 'James' says that he thinks being in
2 jail most of his life is an impact from his time in
3 care. He says:

4 'I don't think I would have had a life in jail if
5 I hadn't been in Larchgrove but more so Kerelaw. It
6 gave me no fear of the police.'

7 He started taking drugs in jail but never had
8 a habit until he was outside.

9 At paragraph 112 'James' says he has thought about
10 his team in Kerelaw more so lately than through the
11 years, and later on in that paragraph he says:

12 'Up to now, I had the feeling if I got skelped
13 across the head then I must have done something wrong.'

14 In paragraph 116 'James' says:

15 'What they should have done in Larchgrove and
16 Kerelaw was show me the way to be free, get a job and
17 how to move out of there able to cope in the real
18 world.'

19 At paragraph 117 'James' says:

20 'I have heard of the term institutionalised and
21 I definitely think that fits with me. I think places
22 like Larchgrove and Kerelaw institutionalised me, so it
23 probably was no surprise that I ended up in the prison
24 system. It wasn't just me. I met a lot of the boys
25 I had been in care with in the jail. I believe that

1 getting sent away to these schools was a case of we were
2 forgotten, like they locked us up and threw away the
3 key. No one cared after that.'

4 In relation to lessons to be learned, 'James' says
5 that anyone involved with a child in care should be able
6 to sit down and talk to them at a level a kid can
7 understand. He talks about kids in care should be given
8 a good education to help improve their options for jobs,
9 and as part of that education they should be taught
10 skills.

11 In relation to other information, 'James' says as
12 paragraph 124:

13 'I just hope by speaking with the Inquiry that the
14 next generation of kids in care get treated better.
15 I hope they don't get abused. You don't need to hurt
16 a wean to let them know that they have done wrong.'

17 Then at the end of that paragraph he says:

18 'If, by speaking to the Inquiry, I can help one
19 person then that is good. I will feel that I have done
20 something right in my life. That is not something I can
21 say often.'

22 'James' has made the usual declaration at
23 paragraph 125 and he has signed that, it's dated
24 14 February 2023.

25 LADY SMITH: Thank you.

1 MS FORBES: The next statement, my Lady, is from
2 an applicant who is anonymous and is known as 'Jake'.
3 His reference is WIT-1-000000938.
4 'Jake' (read)
5 MS FORBES: 'Jake' talks about his life before going into
6 care from paragraphs 2 to 6. He was born in 1973,
7 initially brought up in Blackhill in Glasgow with
8 a brother and a sister. His mother and dad were both
9 working initially, and there was a time that things
10 changed when he was about 6, when they moved to
11 Ruchazie.
12 I don't know if I'm saying that right.
13 LADY SMITH: I know where you mean. It may be like the
14 pronunciation of 'Kerelaw' and 'Kerelaw', and
15 'Geilsland' and 'Geilsland'.
16 All of them are right.
17 MS FORBES: He says that when he moved there he started at
18 a primary school, but because he started after everyone
19 else he was given a hard time of being a new boy.
20 Then he said he turned a bit feral and started to
21 become violent and lashing out at people and was always
22 fighting. He was getting into trouble, mostly for
23 fighting and smoking, and he started running away from
24 home. He had a social worker, and then he went to the
25 first Children's Panel at about eight or nine, because

1 he was running away, and they decided to send him to
2 a children's home.

3 He's not sure of the order of the first two homes he
4 was in but he was about eight or nine when he went in
5 the first one, and in there he was there for a while
6 before being sent back home to his mum and dad's. **Secondary**

7 **Secondary Institutions - to be published later**

8 **Secondary Institutions - to be published later** when he went home he was
9 still running away and getting into trouble so he was
10 sent to another children's home.

11 **Secondary Institutions - to be published later**

12
13 **Secondary Institut** he was told that he was going to Larchgrove
14 to be assessed. He went straight from a Children's
15 Panel to there.

16 He talks about Larchgrove between 16 and 22 of his
17 statement, and he says he was about 10 or 11 when he
18 started there, and he was just about to go to secondary
19 school.

20 He says that he continued to run away whilst there.
21 When he was caught he would be taken back and he got
22 a slap on the head, sometimes from a member of staff
23 called **HUB**, he called him that because **_____**

24 **_____**

25 'Jake' says:

1 'I probably deserved these slaps and wasn't too
2 bothered about it.'

3 He says that at paragraph 18.

4 Again, he was running away and he was supposed to be
5 in Larchgrove for three weeks, but ended up being six or
6 seven weeks because of that.

7 Then the decision was made that he would be sent to
8 St Philip's List D School.

9 There was no issues whilst he was in St Philip's and
10 he was there for about 18 months and during that time he
11 became a day boy, and he was allowed then after that to
12 go back full time to live with his parents.

13 Back home with his parents, at paragraph 26, he was
14 still mixing with the wrong people and started skipping
15 school. He was getting into trouble with the police,
16 hanging about with older people, and about six months
17 after he went home another Children's Panel took place
18 and he was sent to Cardross Assessment Centre. He was
19 there for six to eight weeks. He doesn't have any
20 issues whilst he was there. He says he ran away once
21 but he never went far.

22 It was decided that he would go to St John's List D
23 School. He talks about that between paragraphs 29 and
24 33. He said he was about 13 when he went there and was
25 there for about eight months. He had a good time there

1 and the staff were good. However, he would run away,
2 again, and he was getting involved in unsavoury things,
3 involving weapons. One time he was on the run for about
4 three or four weeks before being caught and then he was
5 taken to the Sheriff Court because of offences he was
6 involved in to do with violence and fighting. Then he
7 went to the Children's Panel and he was sent to Kerelaw.

8 The police took him to Kerelaw and he was still 14
9 at that point.

10 He talks about Kerelaw between paragraphs 34 and 63,
11 and he says that first of all he was in the open unit.
12 He talks about, at paragraph 35, members of staff.
13 There was a member of staff called John Muldoon, and one
14 of two brothers who worked there, one was in his unit,
15 and the other was in the secure unit, and their names
16 were zHWV-HWW He can't remember which one
17 was which, but it was the younger one which was in his
18 unit, which was, he says, Morriston. The one that was
19 in the secure unit was older and had buck teeth. There
20 was another member of staff in Morriston called HUF so
21 there were two but he can't remember his last name.

22 He talks about the routine then at Kerelaw and he
23 says at the beginning he was not given any shoes to try
24 and stop him from running away, and he says he was the
25 only one dressed like that at the time.

1 He talks about meal times, paragraph 38, and 'Jake'
2 says that at meal times there were certain things he
3 didn't like, but was forced to eat them by John Muldoon.
4 But if John Muldoon wasn't on duty the rest of the staff
5 were fine and it was okay just to leave something if he
6 didn't want to eat it.

7 At paragraph 40 'Jake' says after he had been there
8 a week he was given his own clothes back and got
9 trainers back too.

10 Later in his statement, at paragraph 49, he says
11 that he received pocket money when he was at Kerelaw,
12 and also his mum and dad used to send him money, which
13 was all recorded in a book. However, John Muldoon and
14 the other two male staff used to tell him they were
15 skint and asked for a loan, and they would get him to
16 sign £20 out and they would take it and he would never
17 see it again.

18 Paragraph 50, 'Jake' says that he wet the bed when
19 he was at Kerelaw and he was punished. Other boys wet
20 their beds and were punished too. When his parents came
21 to visit, usually on a Saturday, there was no private
22 room or privacy and there were two chairs just placed
23 right outside the staff office in the unit.

24 'Jake' ran away. Even though they had confiscated
25 his shoes and clothes he borrowed a pair of trainers

1 from another boy, and after he got his clothes back he
2 continued to run away. Police usually caught him and
3 took him back to Kerelaw and an emergency social worker
4 would be contacted.

5 He talks about abuse at Kerelaw from paragraph 53,
6 and he goes back to this issue with John Muldoon. He
7 says that if you didn't like the food or didn't eat it,
8 John Muldoon would force feed you:

9 'One time I refused to eat the porridge so he rammed
10 my face into the bowl. He then pulled my head back and
11 rammed a sausage into my mouth. This happened almost
12 every day with him.

13 I wet the bed when I was at Kerelaw. Sometimes
14 I got my face pushed into the wet sheets in the morning.
15 I was scared because I couldn't breathe. My face was
16 pushed right into the wetness and it was going into my
17 mouth and I was inhaling my urine. This happened to me
18 regularly. Staff, including John Muldoon, often made me
19 sleep with the same sheets the next night.'

20 'Jake' says at paragraph 55 that all the abuse was
21 by the three men who were supposed to be looking after
22 him, John Muldoon, HWW or HWV and the other boy
23 called HUF but John Muldoon was the ringleader and the
24 others copied him. All three of them used to 'leather'
25 him for nothing. They would punch and kick him to the

1 head and body. They would sometimes lift him up and
2 drop him so that his spine landed on their knee, and
3 this was a popular wrestling move at the time. They
4 would practice all the wrestling moves on him, twisting
5 his arms up his back, and things like that, and he saw
6 them doing this to other boys too.

7 Paragraph 56, 'Jake' says that when he's on a hill
8 walking trip, John Muldoon zHWV-HWW HUF were drunk
9 from the night before and burned the breakfast so he
10 refused to eat it, and Muldoon zHWV-HWW rammed the
11 burnt food into his mouth. He goes on to say:

12 'They then put me into my sleeping bag and grabbed
13 the top end and spun me round and round then let go.
14 The three of them then trampled over me in the sleeping
15 bag. They did this to the other boys too. They were
16 animals.'

17 They made him fight with another boy from Ayrshire
18 who was in the unit, and he couldn't refuse, he says, or
19 they would have battered him. The person that lost the
20 fight got a beating from the staff. The loser would be
21 the person who gave in first.

22 Paragraph 58, 'Jake' says:

23 'Sometimes when they were playing pool one of them
24 would pin my hand to the table so my fingers were
25 hanging into the pocket. They would then hit the balls

1 hard so that my fingers got hit by the ball. They would
2 take shots at it. My fingers were broken but I never
3 got any treatment. Another time I was pinned to the
4 floor and they rammed the pool cue up my backside after
5 they pulled my tracksuit bottoms down. All the time
6 they were saying that I wanted it and that I would enjoy
7 it. zHWV-HWW was holding me down and Muldoon was ramming
8 the pool cue into me. I don't know if it went inside me
9 or not.

10 I can't remember when it was, but John Muldoon had
11 me lying on the ground pulling my legs apart and he was
12 standing on my balls.'

13 And he says that Muldoon would do whatever he wanted
14 to him and he couldn't stop him. Sometimes he would be
15 in the showers and he would hit him in the balls with
16 a stick, and if he tried to cover himself up with his
17 hands, he would hit him on the head with the stick. He
18 would then drag him up and down the shower room. 'Jake'
19 comments:

20 'He was brutal.'

21 At paragraph 61 'Jake' talks about the fact that he
22 bought a steak knife when he was out on leave in
23 Glasgow, took it back to the unit and put it under his
24 pillow. He was going to stab John Muldoon. But the
25 staff must have searched his bed space and found it, and

1 he was shouted to the office and they told him they had
2 found the knife and he got a couple of slaps across the
3 head. He was then taken upstairs to the dorm and got
4 a further beating from the staff.

5 At paragraph 61 he says:

6 'My legs and head were hit with pool cues and I got
7 a slap to my back. My mattress was put on top of me
8 lying on the ground and they all jumped on it.'

9 He doesn't remember who did that to him.

10 'Jake' says that he smashed up HUF car, not one of
11 the brothers, but the other HUF and that this person
12 had battered him regularly so he damaged his car and got
13 a beating for doing that too. He smashed John Muldoon's
14 car up too, and they knew it was him and he got
15 a beating from them.

16 He also says at paragraph 63 that they tied one boy
17 to his bed to stop him from running away. They tied him
18 with bed sheets. And another thing they did was tie
19 boys to their bed then turn the bed upside down so they
20 were facing the floor, and this was just for their
21 entertainment.

22 He then talks about Kerelaw secure unit, and says
23 that about two weeks after the steak knife was found
24 he was on weekend leave back in Glasgow and got slashed.
25 He ended up in hospital and then was allowed to go home

1 to recover. He still would have been about 14 or 15.
2 He went home for a week and then had to go back to
3 Kerelaw, but when he got back he was beaten again by
4 John Muldoon. And then as soon as he could run away he
5 did, and when he was caught and taken back he was put
6 into the secure unit.

7 He was in the secure unit for about a year. 'Jake'
8 comments the staff there were far better. And at
9 paragraph 66 he says that after a while they were told
10 that John Muldoon was coming to work at the secure unit
11 so he and another boy barricaded themselves in a room.

12 He then talks about abuse in the secure unit, and he
13 says that when John Muldoon arrived there he continued
14 to batter him, but always did it when there was no other
15 staff there.

16 At paragraph 69 he talks about a trip to Arran when
17 he was in the secure unit. Two boys there stole a car.
18 They were caught and sent back, and the trip was cut
19 short. But when the boys got back, they were leathered
20 by SNR [REDACTED] from, he says, 'the main jail' whose
21 name was LEF [REDACTED]. He was English. 'Jake' says he didn't
22 see those boys getting beaten but he heard it.

23 He also says that after they got back from Arran he
24 was caught smoking and was dragged back upstairs by his
25 collar to the bedrooms where 'he hit me with his

1 fist' -- I think he's talking about LEF , SNR

2 SNR

3 'He hit me with his fist in a back hand and he burst
4 my nose. He then punched me in the face and burst
5 a tooth.'

6 And as a result he had to go to a dentist.

7 'Jake' comments that he didn't tell his parents what
8 was happening but he told his social worker about
9 John Muldoon, and he just called him a liar. And he
10 also told the brother of the member of staff, zHVV-HVV
11 that his brother had battered him when he was in the
12 residential unit, and he told him he was a liar and
13 slapped him a couple of times.

14 'Jake' says at paragraph 73:

15 'All the other staff at Kerelaw knew what was going
16 on but did nothing about it. I told the other members
17 of staff at the secure unit what Muldoon was doing but
18 they said they never saw it and there was nothing they
19 could do.'

20 And he comments further in that paragraph:

21 'They just turned a blind eye.'

22 'Jake' then says that he was doing better towards
23 the end of his time in the secure unit and it was
24 decided that he should go back to St John's List D
25 School. He was 15 then when he left Kerelaw and he went

1 back to St John's. He talks about that from
2 paragraph 75.

3 He says when he went back there he wasn't eating
4 solid food, only eating soup, because of being force-fed
5 at Kerelaw, and the staff there accommodated him.
6 Everything was okay there and he was there for about
7 a year. He only ran away a couple of times. And after
8 about eight months he became a day boy and he got to
9 sleep at home.

10 He then got a job whilst he was there working in
11 a hotel, and some City of Guilds certificates came
12 through for landscaping, and he got a job for
13 a landscaping firm.

14 'Jake' comments at paragraph 79:

15 'No one ever taught me, before I left St John's, how
16 to cook, how to pay bills or generally how to look after
17 myself. No one even helped me try to find a place to
18 stay when I left.'

19 After St John's 'Jake' stayed with his mum for
20 a short period and then sofa-surfed, but was getting
21 into trouble with police. He was still involved in gang
22 fighting and was involved with football casuals, and
23 then was appearing in court and was remanded and let out
24 and was given community service.

25 He was sent to Longriggend when he was 16. He's not

1 sure what he'd done. He ended up being there for six
2 weeks, and he was in and out of Longriggend a few times
3 until he was 21.

4 He talks about life after care from paragraph 82
5 onwards, and says that he was in and out of prison from
6 the time he left St John's when he was 16. He worked
7 for a landscaping firm and they took him back each time
8 he was released. When he was 20 he was sentenced to
9 a 15-year custodial sentence for robbery. He served ten
10 and a half years of that before being released. In
11 between sentences he did various jobs.

12 He comments at paragraph 84 that his life has been
13 a life of violence and crime.

14 'Most of my convictions are for violence. I was
15 married for about 14 years but we divorced.'

16 In relation to impact, he talks about that from
17 paragraph 85 onwards. At paragraph 92 he comments that
18 food and food smells are very triggering to him because
19 of what happened in Kerelaw.

20 At 93 he says he started taking illegal drugs to
21 block out his memories. Sometimes he would need to feel
22 up, sometimes to feel down, and he started taking them
23 when he was in the secure unit at Kerelaw. Because of
24 drugs he has had difficulty holding down jobs, and
25 he says at paragraph 95 because of what happened to him

1 in care he doesn't trust authority. 'Everyone in
2 Kerelaw knew what was happening and no one did anything
3 about it'. But he says he can't blame being in care for
4 him becoming involved in crime. That was the way he was
5 heading anyway.

6 And at 96 he says:

7 'Every time I read in the paper or see something on
8 the television about children in care being abused,
9 I think back to my time in care, especially in Kerelaw.
10 I think how unhappy I was and how what went on was so
11 wrong. I can't believe that they got away with it when
12 everyone knew.'

13 He did report some abuse, and talks about that at
14 paragraph 99, and in relation to lessons to be learned,
15 he says at paragraph 102:

16 'Staff shouldn't work permanently in the one unit.
17 As soon as John Muldoon and the other two were put
18 together they became like a gang. They socialised
19 together and worked together.'

20 He makes the usual declaration at paragraph 106 and
21 has then signed that, and it's dated, I think, 19 March
22 2022.

23 LADY SMITH: A date in March 2022, isn't it? It's hard to
24 tell which.

25 MS FORBES: Yes.

1 My Lady, I'm not sure if I could get through the
2 next one in the time, but I could try.

3 LADY SMITH: I think we should probably leave it.

4 MS FORBES: Okay.

5 LADY SMITH: We may have read-in time tomorrow.

6 MS FORBES: Yes.

7 LADY SMITH: If not, we've got next week.

8 MS FORBES: Yes.

9 LADY SMITH: Very well, thanks very much, Ms Forbes.

10 Names of people who are not to be identified outside
11 this room. We have had reference to **FSR** and
12 Mrs **KAM** again. **HWW** **HWV** and another
13 man called **HUF** Please bear in mind they have the
14 protection of my General Restriction Order so far as
15 their identification is concerned.

16 I'll rise now and sit at 10 o'clock tomorrow
17 morning.

18 (3.54 pm)

19 (The Inquiry adjourned until 10.00 am the following day)

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