Scottish Child Abuse Inquiry

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IKQ

Support person present: No.

1. My name is IKQ My date of birth is a 1952. My contact details are known to the Inquiry.

Background

- I was born and brought up in Glasgow. I went to school at Hyndland Senior Secondary School in Glasgow. I left school with no qualifications. My first job was just as I left school as an apprentice plumber but I went on to do several other jobs after that.
- 3. My dad died when I was eighteen. I had two younger brothers and I was then seen as the man of the house so I had to go out and find a job and do something. I joined the fire service but I couldn't hack the discipline at that point so I left after a short time. I feel I was too young and just wasn't ready for that kind of discipline.
- 4. I went on to do all sorts of things. I worked in a wholesale warehouse, I was a warehouse manager and I did sales rep work. I also had a spell of about two years, shortly after I was married in 1982 when my mum died, when I wasn't working.
- 5. I went on to work on the Disabled Persons Project in Glasgow interviewing people who had disabilities. I worked my way from an interviewer up to managing the project for central Glasgow. I then got a job at St. Andrew's School in Shandon, out by Helensburgh. I went from St. Andrew's to Rossie Farm School in Montrose, which is where I did my training and I went from there to Oakbank Children's Home.

6. I suppose the first reason I went into that kind of work was just that it was a job. I wanted a job and I saw it as that. There was also the offer of a house there, as it was a live in job. Everybody lived on campus at St. Andrew's. When I started they actually didn't have any houses available so we had to live in a one bedroom flat.

It was just me, my wife and my son who was about six months old then. Eventually a house did become available but I was only at St. Andrew's for about a year.

Experiences at St. Andrew's School, Shandon, Helensburgh

- 7. I was in my early thirties when I got the job of residential worker at St. Andrew's. I went for an interview and met a lot of the boys and staff, and about a fortnight later I got a letter saying I'd been successful. I remember when I started, one of the boys came up to me and told me he knew I'd get the job, because I actually spoke to the children.
- 8. St. Andrew's was all boys, aged from about thirteen to sixteen. There were three units with between twenty-four and thirty kids in total. The boys were there for lots of different reasons, getting into trouble with the law, problems at home, the usual problems that always seem to be around for kids.
- 9. As a residential worker, I would help get the kids up in the morning and ensure they all did the daily jobs they had to do. In those days, all the boys had jobs to do. They would polish floors and clean things, all that sort of stuff. It was all automatic for them, they knew what to do, so for me, it was just a case of getting them out their beds.
- I would also assist at breakfast and then all the boys went to an assembly and off to their classes. They came back to the unit for their lunch.
- 11. St. Andrew's was owned by the Catholic Church and was all closed down and sold for housing after I'd been there about a year, so I had to move on.

- 12. When I started at St. Andrew's, I had no experience, training or qualifications relating to working with children. All I had was experience working with people in the campaigns that I did within the community programme. I would imagine they would have contacted my references but I can't remember. The routine was all in place for the boys though. I would say most people could have gone in and done the job I did at that time.
- 13. I worked early and late shifts and I did love it. I loved working with the kids. As the years went on I've always enjoyed working with kids. I'm not sure why that is but it did keep me young. I always tried to do my utter best for them.
- 14. What I did pick up from my time at St. Andrew's was all from watching other people and listening to what they said. I also got advice from other staff and some had been involved in childcare for a long time. I got a lot of advice on how to look after the kids but sometimes I was thrown in at the deep end. I was only there three weeks when I was left on my own to get all the boys up and ready for breakfast in the mornings. That could happen quite a lot and, of course, it was very wrong.
- 15. What did help for the future was just learning to talk to the children. That is a great ability. When kids have problems they're always looking to find some sort of answer to that problem. I'm not saying they'll come and tell you everything but if you go about it the right way, they will talk to you and they will give you little snippets of information that you can then use as building blocks to try and build a relationship. That's really what it's all about because if you don't have a relationship with the children you can forget about working with them.

Experiences at Rossie Farm School, Montrose

My shift leader at St. Andrew's School knew the headmaster at Rossie School, John Coltart, and said he would give me a reference and ask if there were any vacancies. I went for an interview for the job of shift leader. Mr Coltart and, I think, one of his unit managers interviewed me and I got the job. I started at Rossie in 1986.

- 17. That was a big move for us, going from Glasgow up to Montrose, so I talked it over with my wife and we decided to move to Montrose when I got the job. I was at Rossie for six years and that's where I did all my training.
- 18. It was quite an experience working at Rossie. It was very different to St. Andrew's and what I'd been used to previously. They had locked rooms so kids could be locked in their rooms if they weren't behaving. It was a much stricter regime to what I was used to, for example, if a youngster left the unit to do something they would always have a member of staff with them.
- 19. There was education at Rossie, everything was there all together. It did give me a lot of experience working with children who had done some terrible things. It was boys and girls at Rossie and they were all aged between twelve and sixteen.
- 20. Rossie was all secure units when I started there but by the time I left there was three secure units and one open unit. I worked in all three secure units, Tay, Dalhousie and Lunan during my time there and I was the shift leader in Lunan for about two years.
- 21. I qualified as a social worker while I was working at Rossie. I was living in a residential block and working, while also doing my Certificate in Social Service. I also received training in restraints but I can't remember if that was CALM training (Crisis Aggression Limitation Management training) or not. It was more placing kids in rooms and locking the doors to let them calm down and let off steam, rather than lots and lots of restraints.
- 22. The only thing that ever caused me any concern at Rossie was an incident where a couple of boys caused a bit of a riot and ended up being arrested by the police and taken away. Other than that isolated incident there was never anything that worried me at Rossie.
- 23. On completing my social work qualification, which was after about six years at Rossie, the qualifications authority advised Rossie that it would be good idea for them to take me on as a child protection worker. It was because of all the work I'd done but

- unfortunately that was denied. It was a management group decision as it would have affected them in a lot of ways. I then left Rossie to become a social worker.
- 24. I worked as a field social worker for Tayside Social Work Department in Dundee and Arbroath for about four years, until 1996, when I got the job at Oakbank. I also did my child protection training at Dundee Central College when I was with Tayside social work.
- 25. I can't compare Rossie to Oakbank, they were two very different establishments, accommodating very different young people. For Rossie most of the young people had committed serious crimes and for Oakbank it was kids who just had chaotic lifestyles.

Experiences at Oakbank School, Aberdeen

My role and recruitment at Oakbank

- 26. I worked at Oakbank from 199 to 200. My brother worked there and when a residential post came up, he said to them that I might be interested. They contacted me and I went for an interview. I was interviewed by SNR Mr HMY SNR there at that time, Mr LIG and LIL who was SNR I did provide references for the job as well.
- 27. I started as a worker then I became a shift leader around 2001 or 2002, and in 2005 I was a unit manager. I was then the Practice Development Officer, I think from around November 2007 until August 2008 when the school closed.
- 28. As Practice Development Officer for the school my role was to work with the school management teams to facilitate the continuous improvement of practice and to promote professional development across the school. The main tasks were to be a resource for staff by offering support for their individual development by the giving of time and energy. It was to facilitate staff, enabling them to be independent and mature professionals, continually seeking improvement. Also to be confident in establishing

and maintaining the mutual trust, confidentiality and regard considered necessary for risk taking and professional growth. To be seen as an advocate for the customer, the profession and the professional, to be a reflective practitioner seeking continuous growth and to act as a situational leader who can seize teachable moments and create growth opportunities for individuals. I was responsible to the principal of the school in that role.

- 29. I liaised with SVQ, I arranged staff training and I supervised staff that were on training courses. Basically all staff undergoing any kind of training would have to come to me. It was more of a supervisory role than I had previously. I was out of the units from that point on and didn't return to the units.
- 30. I don't think there was specific induction training when I first started at Oakbank. I seem to remember shadowing somebody for a couple of weeks or a month and learning how things worked. I did have experience from St. Andrew's and Rossie, where I had learned how to communicate with the children and, especially at Rossie, had developed some really good relationships with lots of the young people.
- 31. Initially at Oakbank, a lot of my learning did just come from being 'on the job.' I don't remember any official training programmes at that point.
- 32. Induction training did come in though. As a unit manager I was responsible for the induction training of new staff. That training involved all realms of what staff would be doing as a worker in a unit. That ranged from raising the kids in the morning and putting them to bed at night, to all the care plan issues, and just generally looking after the children.
- 33. When I went on to become a unit manager at Oakbank my role was to manage a unit of eight young people who displayed varying degrees of emotional and/or behavioural difficulties. I was also responsible for the management and supervision of a staff group of thirteen. I had the responsibility of the running of the school on a rotational basis with other managers. I had to oversee the assessment of young people ensuring that

their care plans and risk assessments were living documents, and ensuring the quality of care on offer was of a good standard.

- 34. I worked with my team to develop positive working relationships between the staff team and the young people. The young people are always encouraged to become involved in the individual care planning, risk assessing and all other relevant aspects of their daily routines. This creates a spirit of ownership and accountability in their daily lives. That was the philosophy to which I worked throughout all my time as a unit manager at Oakbank School.
- 35. By then people could go on and do an HNC in childcare and things like that. Shortly after 2005, it was brought in that people working in residential care should have a qualification of some sort. I think an HNC was the basic recognised qualification at that time.
- 36. I did go on to do further training at Oakbank. Quite a lot of young people came to us with a level of autism so when the opportunity came up, I did my Certificate in Managing the Support of Individuals with Autistic Spectrum Disorders. It's an SCQF Level 8 qualification and it was awarded to me in 2008. I did that for two days a week for about six weeks.

Layout and Structure

- 37. When I went to Oakbank there were two units in the main school building called Rosemount and Ashgrove. They housed around twenty to twenty-four children between them. Then there was a separate unit called Oakhill, which housed eight young people. I worked mostly in Oakhill Unit during my time at Oakbank but I did work at the other units. I moved about a bit, particularly during my induction.
- 38. The Oakhill Unit building had two entrance doors, one at each end. As you went in each of those doors there were stairs leading up to the bedroom area on the first floor, which was the only floor. On the ground floor there was the main office for the unit, a sitting room, the quiet room and the kitchen and dining area.

- 39. Later in time, the headmaster's house became a unit and there was a unit at each end of Oakhill but they weren't units when I started. The other unit names were Dee and Esk but I can't remember the sixth one. There were six units eventually.
- 40. There was no reason for a young person to be sent to any particular unit it was just random and down to availability.

The Institution and culture

- 41. I had a very committed staff group who wanted to do all the things I was trying to do but eventually, over time, they were all split up and moved on to other units. That was to try and bring the other units up but, as we know from putting bad tenants into good tenant's flats, it doesn't work. It didn't work but we continued to try with the staff that we got.
- 42. We had weekly staff team meetings at Oakhill. We would discuss any specific issues relating to the children. It could be to do with children that were running away or anything that arose from their behaviour. Not all staff members were at these meetings because having a meeting like that for the whole of Oakbank would have been quite difficult because of the children. Someone had to be with them and even when they were at school, members of staff had to be there and available to assist the teachers. It would have been very difficult to arrange something like that on a regular basis.
- 43. There was a sharing of information between all the unit managers when they met on a weekly basis. Those meetings included the social work managers as well so any information about your unit or specific people in your unit that might affect another units would be relayed and discussed. That could be about a boy and a girl from different units seeing one another or something like that. There was definitely that kind of information flow.
- 44. Staff from the different units would also talk informally to one another. They would see one another at mealtimes and they would share information then as well.

45. The units did become quite independent of one another. The children could go to the other units, and they did, but it didn't happen very often. They weren't always that welcome. It would depend on the mix within the other units.

Staff structure

- When I started at Oakbank SNR was Mr HMY and SNR was LIL

 LIL There was also SNR , Mr LIG . There was LIM

 LIM , who was the principal unit manager, who also ran Ashgrove Unit for a while when I started, LIR , who ran Oakhill and KFJ who ran Rosemount Unit.
- 47. When Mr HMY retired, became became some around 200 but I can't remember exactly. That would have been a teacher at Oakbank, then left and returned as SNR.
- 48. There were a lot of people who worked at Oakbank during my time there. I couldn't name them all. They worked in different units and on different shifts. There were male and female staff, quite a number of females, both before and after I worked there.
- 49. When I started, there would have been about three staff to each unit so six staff to twenty four boys in Rosemount and Ashgrove. Oakhill had less boys and maybe two or three staff. It did change as more boys and staff came but that would be an approximate number. When I first started those numbers could be less during the evening. There were specific night care officers who only did nights and sometimes there could be only two of them per unit.
- 50. When I started, my line manager was actually my brother who was the manager at Oakhill.
- 51. During my last few years I can only remember a few staff I worked with. There was Peter and Sharon Kelby. I forget her maiden name but they met at Oakbank and

married. There was Suzanne Sinclair who was my depute at one point and went on to become a senior social worker. Craig Stenhouse was a member of staff during my time at Oakhill, perhaps not at the end of my time but definitely during my time as a unit manager. I also remember a Catriona McDonald, who was a residential worker and Bruce Lawrie, who became a depute, he worked in a close support unit previously. I'm struggling to think of anybody else, I've been away for so long now.

52. I don't remember there being any volunteer staff at Oakbank, certainly not when I started.

Recruitment of staff

- 53. I may have been involved in interviewing in certain circumstances but I don't remember doing an actual interview. What generally happened when someone was being interviewed for a job was that they would come round the units and meet the people in the unit, the children, the staff and the manager.
- 54. I had nothing to do with obtaining or checking references. That was all done by the management group. I did become part of the management group later on but I still didn't have any involvement in recruitment interviews.

Supervision

- 55. I lived in Montrose when I worked at Oakbank and travelled in every day. When I was doing my senior duty I stayed locally, so it was easy to contact me if there was any need. I was on call all through the night when I was on duty and I could be at Oakbank within fifteen minutes.
- 56. Young kids would sometimes be running about the school or might get out of windows and try and cause difficulties with other units, things like that. There could be a lot happening and you would get called in for things like that.
- 57. We ended up with latches on the windows because one of the young girls jumped out a window and broke her ankle. That prevented the young people from opening the

windows beyond a certain distance and climbing out. They could still let air in but there were no bars or anything like that.

Policy

- There were policies in place at Oakbank but I couldn't tell you what they all were now. There were quite a lot. There was a certain change to policies over time and certainly when came along, there was a certain step change to doing things. The old regime had kind of done its thing and we were in a new regime where people viewed things very differently. Children were viewed as children, not young adults, who were shaped by their upbringing and things like that.
- 59. There were child protection policies in place when I started at Oakbank. When I was in a manger's role, we tried to inform the staff what they had to do if a child came to them and told them something had happened to them.
- 60. The staff were told to listen to what was being said, try to make a note of it and not to intervene, and bring that to a senior member of staff. That would be a unit manager or upwards and they would then take on that complaint and talk to the social work.
- 61. There was a complaint's procedure for everyone if they wanted to make a complaint.

 A child could make a complaint to any member of staff, to their keyworker or to their social worker. That complaint could then be brought up with the manager of the unit or with senior management at the school.
- 62. I'm sure there would have been a discipline policy. Punishment was never really a word that I used at all. There could be a loss of privileges but I would never have said a punishment. Someone would maybe lose the ability to go on a trip to the pictures or something like that, but that was very rare.
- 63. There was a lot of record keeping. I'm not sure if there was a policy but we had case notes for every child and we had care plans to update as and when they were needed. Each member of staff had one or sometimes two key children but that did change once the staff groups became fuller and we could have one child to one key worker.

- 64. Every day you would write up the case notes for your key child. We had to record how they got on within the unit that day and how their education was that day. Did they have a good day or a bad day? What activities did they do? What did the teachers say about their day? Every shift did the same, so the evening shift would take over and write up the case notes for their shift, and the night care officers did the same.
- 65. I wouldn't say the record keeping changed that much over time. It was mostly the same sort of things we were recording.

Strategic Planning

66. My understanding of Oakbank's purpose was that it was a place for children who had lots of difficulties at home and who were also getting into lots of trouble in the community. It was seen as a place of safety for them. It was there to educate and rehabilitate and to try and give those children and young people some sort of substance in life. It was also for them to take some ownership of their lives, to be able to do things and to then go on and do other things.

Children / Routine at Oakbank

- 67. There were probably about forty young people staying at Oakbank and they were probably all in the age range of thirteen to sixteen. I think there was one girl there when I first started but more girls came over time. The boys and girls were all mixed into the units but obviously had separate rooms.
- 68. In some instances children could be at Oakbank from when they came in until they turned sixteen, because there were very few other places for them to go. In most instances they couldn't go home as that's where they'd come from. They might start to get home at weekends but it might be deemed, by the social work, that the young person couldn't go home on a permanent basis and therefore they would have to remain at Oakbank.

69. The children would have their situations reviewed every year at a Children's Panel.

That was all driven by the social work, not by us, and we couldn't intervene when it came to deciding whether a child could go home or not.

Mealtimes / Food

- 70. There was a chef who worked in the main building at Oakbank who also came in to Oakhill Unit and prepared our food. When he was there we always had lunch and tea in the unit. Once he retired then everybody in Oakhill had to go to the main Oakbank school building for all their meals.
- 71. The staff and the children all ate the same food. It was all good quality food. I would never have said it was bad in any way. I ate it all the time I was there and the quality was just the same, whether we ate in the unit or in the main building.
- 72. If a child didn't like something, the staff would see what they could do. They would try and get them something back at the unit as there was always something to eat. They could generally help themselves and make things if they wanted to. It would be supervised because cooking can be dangerous but there was always something for them to eat if they wanted it.
- 73. Once we started taking our kids down to the main school building, the social work manager, John McNally, asked me why it was that our kids talked to the staff at school. None of the other kids talked to any of the staff but in my unit our kids sat with and talked to the staff throughout dinner. I had to tell him it was because that was the philosophy we were trying to build in our unit; the staff to be part of the kids and the kids to be part of the staff. That is what we were trying to do.

Sleeping Arrangements

- 74. All the children had their own rooms, there was no sharing. They could decorate their rooms and put up posters and things like that. They could keep cuddly toys if they wanted to, they had all those sorts of things.
- 75. They couldn't lock their rooms and there was a policy about going into other peoples' rooms. If a child ever wanted to go into another child's room there would, or should always have been, a member of staff up there keeping an eye on things. The door of the room would need to be wide open as well, they were not allowed to close the door. That should always have been done as there was always enough members of staff on duty to do that. Boys and girls were never allowed in the same room.
- 76. The rooms were all on the same floor. They were all off the one corridor and there was a staff office at one end, where the night staff would be. If staff were supervising children in rooms, then they would probably have a chair they would sit on in the corridor. I can't see children being in their rooms without staff supervision outside the rooms, certainly not at Oakhill Unit.
- 77. If a child came to us with allegations about a boy's behaviour in a room then the staff would have taken a note of things and it would have been reported to a social worker. If necessary, it would have been reported to the police and there would have been a child protection investigation.

Washing and Bathing

78. There was a shower room and toilets upstairs at Oakhill. I think they were cubicle showers and not open. They would usually shower in the morning when they got up but the children could shower whenever they wanted to, that would be fine, although they would need someone supervising them.

Leisure time / trips

- 79. The children had plenty leisure time. When they came back from school they would have a wee chat with their keyworker and then it was leisure time for them until bedtime.
- 80. We had a pool table, there were board games, a TV room, there was certainly plenty for them to do. There might not have been loads of them but there were some organised trips. There was limited transport within the school. I think there were just two minibuses so all the units would have to compete for them if they were organising anything. The units did act quite separately when it came to things like that.
- 81. We went on trips to the beach if it was a nice day, we went up to the hills for walks, we would take them shopping, bowling, things like that but they were irregular. We couldn't always get the minibus for the young people at Oakhill and the other units were bigger with more kids to keep occupied. Staff did sometimes take children to things in their own cars but they wouldn't take them to their own homes. That was something we did at Rossie, boys would sometimes help staff out with some gardening or something like that.
- 82. I wasn't involved in any overnight trips other than a trip I organised to Disneyland Paris. I took a group of six children plus staff, away for a week when I was unit manager at Oakhill. It was basically just people that wanted to go so two of the eight kids at Oakhill must have had other plans. That was brilliant and the young people we took were great and very appreciative of what we did for them. The staff that went with us on that trip were Peter and Sharon Kelby, Craig Stenhouse and Catriona McDonald.

Schooling

83. The children attended school within the main Oakbank building during the day. That would be from about 9am until 4pm. They would generally all be at school but if they weren't, for any reason, a member of staff would always be up in the corridor if any children were in their rooms. They might be sitting on a chair but they would certainly be situated as close as possible to the room, so they could see everything was okay.

84. I would say the education was fair and as good as the education you would get in a normal school. The teachers were all employed by the school and they were all qualified. The children did the same subjects they would have done at a normal school.

Chores

- 85. We had cleaners so I don't think there was any need for the children to do any chores. They would make their own beds, which was just something that was expected, and we would try not to go into their rooms unless they invited us in.
- 86. We might go into a room and have a quick search of a room if we thought there was contraband or something that might cause someone damage but it was nothing like what you might see in a prison. Everything was always put back in place.

Visitors

- 87. Social workers visited the children on a regular basis, certainly once monthly. They could see them in a room in the units if they wanted privacy, or they could chat to them in the open part of the unit or take them out, which did happen in some instances. That was all arranged by the social work.
- 88. Parents visited their children as well. They could basically see them whenever they wanted to come in and visit them. They could come in and see their own kids in the quiet room or sit with all the kids. A brother or sister or a family member could also visit but I wouldn't say friends were allowed to visit, perhaps a very close friend, but we would be checking that out.
- 89. We would know at Oakbank if visitors were coming in. The social work would have told us that parents were coming in or if a social work visit was scheduled. We always knew about visits as they all had to be approved by the social work. No one could arrive unannounced, no one could just walk in off the street or anything like that.

Review of care/placement

- 90. We did have quite a few inspections as far as I remember. We had planned inspections and we had unannounced inspections when we never knew anybody was coming.
- 91. When we had inspections the staff were interviewed, management were interviewed and the children were interviewed. The children were interviewed on their own and had the opportunity to say whatever they wanted. We would see the results of those inspections through feedback. It was the general feedback that was given to the school and it would be published and be available on websites and things like that.
- 92. There were always suggestions for improvement, everybody can improve, nobody can say they can't improve. I can't remember any specific recommendations but there must have been things said about CALM and things like that. I can't remember any specifics about that.
- 93. It was the social work and the Children's Panel that made the decision when it came to a child leaving Oakbank. A member of staff, usually the child's keyworker from Oakbank, would attend that panel with them. The panel would listen to the recommendations from the social worker and decide on the outcome.
- 94. The decision could be to go on to independent or supported living, to go back to their family or it could be to return to Oakbank.
- 95. We had an Independent Living Unit. At one time I was the manager there, I can't remember exactly when but it was before I went to Oakhill Unit. We provided support for up to three young people at any one time. It was actually to prepare them for going on to live independently. We had staff there who would help them with cooking and all sorts of things. They would take them out and do all the things you would need to do if you were living on your own. We didn't have that for very long as it was taken over by one of the Close Support Units.
- 96. The young people that came into that unit would have been about fifteen or fifteen and a half, and still with us but when they turned sixteen they would be leaving Oakbank

and going on to an independent living unit outwith the school. The social work department dealt with that. I think there were quite a few in Aberdeen.

Discipline and punishment

- 97. It wasn't a discipline and punishment kind of regime. We tried to work with the kids, not discipline them. There would be some discipline, obviously, in the way that you operated with young people and children. There was a loss of privileges, that was what was used at Oakbank but it wasn't discipline in the sense that they have to do as we say, and that's it. That's not the way we operated. We would always try and discuss things and work things through.
- 98. We would never stop anyone from going home. Even if we stopped someone going on a trip it had to be for quite extreme behaviour. They could have been looking forward to that for some time so that's not something we'd have wanted to do either. It would need to be quite an extreme situation like running away or upsetting other people, something like that. A decision like that would be made by the depute manager or whoever was on duty and in charge on the night the person misbehaved.
- 99. We did have a quiet room. It was used for visits and staff meetings and training and it was also a room where young people could go in certain instances if they wanted to be on their own and quiet. They maybe wanted to get away from some of the other kids. When kids are in a group they can be quite annoying to other kids.
- 100. If things went too far and we had to use restraints then the quiet room would also be where we would take the young person involved to calm them down. We could talk to them privately in the quiet room, in a more peaceful environment and give them time to calm down.
- 101. Kids did find bits of glass out in the grounds when they were out and about and they would bring them back. Some did self-harm and things like that. That would be dealt with as a child protection issue and self-harming issue. It would be reported to a senior member of staff and there would be a referral to the children's mental health team. It

would be the young person's keyworker that would make those referrals. I don't remember doing anything like that.

Restraint

- 102. We only ever restrained somebody if they were in danger or if a member of staff was in danger. That was only after CALM came in, which was the method of restraint that was approved and that we were trained to use.
- 103. I'm not sure exactly when that came in but it was in use before I was unit manager in 2005. Someone came in and trained all the staff. That was regular training, it was a one day course but they would maybe do a few days training, perhaps one unit at a time over a week period. People came in to do that. We then had a refresher every six months or something like that. I'm not entirely sure. Some of the staff were also trained to carry out the refresher training.
- 104. Before we had the CALM training, there was restraining of young people but it wasn't something that went on regularly. It happened, yes, but only when a child was out of control and in danger of harming themselves or someone else. We would perhaps go with instinct but I think people had an idea of what to do, of how to take hold of a young person. I presume it came from seeing other staff take a hold of someone. I'm not sure.
- 105. I can't remember if there were rules about how many staff should be involved in restraining anyone, I think there was with CALM, but it was always a last resort, there were other methods that could be employed. Sometimes there weren't many staff available in the early days so there wasn't always a lot of ability to restrain people. Sometimes the only available people would be senior management, who wouldn't always be available in the evening.
- 106. We also found that when young people got really upset, they tended to run off. That was the main thing that happened, the child would abscond.

- 107. Staff recorded all uses of restraints. If it was before CALM it should always have been recorded on the young person's case notes and if it was after CALM then staff should have completed an incident form and it should have been recorded in their case notes for that day as well. If it was not recorded and the child made a complaint that they had been retrained then the members of staff would be questioned as to why the restraint was not recorded. It certainly wasn't a daily occurrence and a lot of the young people just didn't get involved. We had some groups of young people that never misbehaved.
- 108. A lot depended on the young person, but the staff as well, because it was all about establishing relationships and trying to give the young people some ownership for the unit. It wasn't about the staff taking control and disciplining the young people, it was about the young people self-disciplining and having self-control. There was no way we went out of our way to entice kids into doing things so we could get a kick out of restraining them or anything like that. That just did not happen.
- 109. We always tried to talk to any young person after the use of restraint. Not necessarily immediately after but at some point we would try and get the young person to come back into the quiet room and try and talk things through with them. We would talk about how it was they got themselves into that position, could we have avoided it and what would have been a better answer for them, instead of the staff feeling they had to restrain them. We would always talk that through and try to help them to find a way to avoid that in the future.
- 110. I do know that things were different before I was working at Oakbank. I think there were more restraints and things like that in those days. I don't think people put any thought into it, whereas with CALM you had to put some thought into it. I think that in the olden days, people just got grabbed but there was no regular form of restraint then.

Concerns about the institution

111. I can't remember there being any concerns about Oakbank from any external bodies.
When the inspectors came in they would do their thing then put out their report

recommending what needed to change or should change for the better, but I don't remember anything more formal than that.

- 112. I never received any complaints of abuse from a child and I never received any complaints from any staff at Oakbank about the way things were run there. There was an episode when a temporary member of staff, who worked in the main school, was getting too close to a young girl. I think he was sacked. I can't remember who he was but staff started to notice that a young girl kept going to him and was developing a crush on him. Concerns were raised as he didn't discourage the girl, as you would expect. John McNally and the head teacher were informed about it and the staff member was sacked. It was all dealt with correctly as far as I'm aware.
- 113. If I'd had any concerns about Oakbank or any staff at Oakbank, I would have been able to speak to the social work manager, John McNally. I imagine he would then relay it to
- 114. If I was a senior on duty and someone came to me with a complaint or concern then I would speak to the member of staff but I would also tell them that I was reporting it to the manager.

Reporting of complaints/concerns

- 115. The police were phoned, quite regularly in some instances, mostly for boys. The school made a decision at one point that if a member of staff was assaulted, the child was to be charged.
- 116. If the police attended, the outcome would depend on the circumstances. Sometimes charges were made and the young person could even be taken away by the police or moved to another unit, and sometimes it would be resolved.
- 117. I was once duty manager when a young person was taken away by the police. It was a particularly brutal situation and the young person was taken away by the police with restraints on his legs. I do think that same lad came back to stay with us though.

118. I was also in a situation once, when myself and another member of staff were just sitting discussing things with a young man when he turned round and punched the other member of staff in the face, splitting his nose. Other staff came and assisted and he was taken away to his room. I actually don't think he was taken away by the police as the staff saw that he was really quite apologetic when he realised what he'd done. These sorts of things happened.

Trusted adult/confidante

- 119. If a child wanted to speak to someone, as a trusted person or confidente, that would be their key worker or if they wanted they could choose someone else. They were at liberty to do that. It didn't have to be their key worker. They could speak to myself or to any other member of staff about any subject they wanted to.
- 120. Staff had people they could talk to as well. There was their team leader, their depute unit manager and their unit manager. Staff could go to other members of staff within the school as well, not necessarily within their own unit.

Abuse

- 121. I think we did have a definition of abuse at Oakbank. There was abuse at all levels, emotional, physical and sexual but I can't remember what the exact definitions were.
- 122. Emotional abuse is when people are using or treating you in ways that cause harm to you as a person. Not necessarily by hitting you, perhaps through mind games or telling you that you're hopeless, bad, or useless, a scab on society. I know there's so much more to it than that, but that's what's in my memory.
- 123. Physical abuse is somebody physically hitting you or, in other ways, harming you. It could be pinching you, nipping you, or sticking cigarettes on you. That was something some of our kids did to themselves, or they would get others to do it to them as well.

- 124. Sexual abuse is the terrible things people do to other people in a sexual manner and without consent. All of the abuse is without consent really.
- 125. Abuse would be taken very seriously. If a child or young person ever brought up the fact that anything like that was happening then it would have been dealt with, by whatever means. Any abuse that was disclosed would be taken back to their social worker. It was very important for them to know about these things as well, because sometimes they might not know that a child had been emotionally abused. Emotional abuse can be just as damaging, especially to young children.
- 126. What you find with physical abuse is that people can sometimes get used to it, so they won't inform the police or report things when they're happening. It can be that they expect it or think there's something wrong with them and it's their fault.
- 127. Abuse would all have been involved in the induction programme. Staff had to know about it, especially new staff, because the children would go up and speak to new staff. They would want to speak to them and know about the new staff not the same old staff that are there all the time.
- 128. When I first started at Oakbank I don't think awareness of abuse was as prominent because a lot of the young people that were there weren't seen to have been victims of abuse. As time went on, and people like myself and others came in, who were qualified in child protection, we started to realise there were other things going on in the background with young people.
- 129. A lot of kids started coming in that were being abused at home, by all sorts of people. Staff had to have some awareness about it so that you didn't deal with it the wrong way. If a child or young person decided they wanted to tell you about abuse you had to be able to approach it the right way so you didn't put them off. If you don't do it the right way you could put that child off forever or for a long time.
- 130. The right way is being able to listen to what they are saying and not to show terrible emotion. To listen and then to try, at some point, to take a note of what they are saying.

You can then go to your senior to tell them. It would go from the senior to the child's social worker, the social work manager and the head of the school, everybody would have to be informed that needs to be informed.

131. I honestly believe that if a child was being abused or ill-treated at Oakbank then it would have come to light. I would find it very difficult to believe there could have been anything like that happening and staff not having some awareness.

Child protection arrangements

- 132. If a child made a disclosure about something that amounted to a criminal offence to a member of staff at Oakbank, maybe abuse at home, then that would be reported immediately. What was being reported would be recorded in the child's case notes and on a child protection note. It would then be reported to the social work manager and principal, if required, as well as the social work and police. Everyone knew that process and there would be no excuse not to know it.
- 133. The course of action would also depend on whether it happened before entrance to Oakbank or after Oakbank. If it was before they came to Oakbank it would have been the responsibility of their social worker and if it had been once they were at Oakbank, it would have the responsibility of Oakbank staff and managers.
- 134. If a young person made such a disclosure to a member of staff at Oakbank then that information would definitely be passed on to the social work by the staff member. It might be it's something the social work know about, but it would be for them to then progress things.
- 135. We did have a handbook with all the information and that handbook was in the office of every unit. The handbook contained everything about what you should do if a child reported anything of significance that you felt needed to be passed on. Whether you felt it or not though, you still passed it on, that was the main theme. It wasn't about an individual's personal thoughts on it.

- 136. If a child reported having been abused or if a member of staff reported they had been abused by another member of staff then it would be recorded somewhere and it would be reported. The handbook was introduced to all staff during the induction process.
- 137. I don't remember there being any training in relation to acceptable terms to be used or how to deal with homosexuality, trans or race relations. Anyone that would have blurted out anything that was offensive or abusive would definitely have been pulled up. There was no tolerance of that kind of behaviour. That wouldn't have been acceptable.

Investigations into abuse – personal involvement

138. I've never had any personal involvement in any investigations into abuse at Oakbank.

That would be done by the social work manager.

Reports of abuse and civil claims

139. I have never been involved in any civil claims.

Police investigations/criminal proceedings

140. I'm not aware of any police investigations into abuse at Oakbank.

Convicted abusers

141. I don't know of any person I have ever worked with at Oakbank that was convicted of abuse.

Other Staff

- became a manager of one of the close support units at Oakbank. She also worked at Rossie Farm and I had worked with her there. She actually lived then. She was very staid and not very flexible. What I mean by that is that you did what she said or not, that was it, but she was an okay person.
- was about ten years younger than me. She started at Oakbank about three or four years after I did and was there until it closed. She was generally quite good with the children. In my opinion she sometimes gave in too much to some of them but in other situations she was okay. She was a friend of which perhaps gave her an elevated opinion, but that's just my opinion.
- 144. I didn't see or hear of her being responsible for abusing any children. She was in a different unit from me so I wouldn't know anything like that. I didn't ever see her discipline any children either, I wouldn't see that.

LAK

- 145. I worked with LAK for about the same amount of time as LAJ , possibly from a bit earlier. He was a member of staff and was at Oakbank until it closed. LAK was a lot younger. He'll be in his mid-thirties now, but I might be miles out with that.
- 146. I think he worked in Ashgrove Unit, but I can't remember for definite. LAK was good with the young people, as far as I remember. I didn't work with him every day but he had a good way with the kids. He was young and quite able and fit so he could play football with the boys, things like that.
- 147. I never saw or heard anything untoward as far as LAK was concerned and I never saw him discipline a child.

LIM

- 148. I knew he was working at Oakbank when I started and was there until it closed. He was the principal unit manager so he worked at Ashgrove Unit but was also responsible for anything we might be concerned about, that we brought to him, before he would take it to John McNally.
- was a few years younger than me. I didn't see with children, although I know that he went abroad with a group of children from Oakbank before my time. I would be in my unit during the day and we didn't work the same duties at night. I would just see him in meetings and things like that.
- 150. I didn't ever see or hear anything about that might give me any concern.

ION

151. I remember a ON I think it was, but I didn't have much contact with him. He worked in one of the other units.

Allegations that have been made to the Inquiry about me

IKO

- has given a statement to the Inquiry making an allegation against me. I have racked my brain and I have no knowledge of that lady at all. It's not a name that I can remember. I'm very sorry about that. It's not like me to disregard children in that sense but she is not one I can remember. I would say that if she had been behaving in the way she has described in her statement, I am certain I would have remembered her. I'm certain she would have stood out.
- 153. At paragraph 73 of KO 's statement she says, "On one particular occasion I was being restrained in the quiet room by the manager of the unit KO there were I think two other female staff members in the room."

legs, I'm not sure what restraint was used but he was hurting me to the point I was crying and begging him to move himself off my legs. He continued to sit on my legs for some time whilst I was shouting and crying for him to get off and the two female staff members watched on. He eventually got off me. I don't remember much of what happened after that, but I remember feeling extremely wary of KQ after that incident. I wanted to stay away from him."

- 154. I would never have restrained a child on their own, with two members of staff looking on. If that had been me I would have utilised the two members of staff in a proper restraint, using CALM. I would not have sat on anyone's legs. I would have held their legs together, hooking my arms around both legs at their ankles. That was what we had to do to stop a young person from kicking up at us. There were occasions when children who were being restrained hurt their legs but it wasn't from somebody laying across them, it would be from the technique I've just described. They would be held until they calmed down. Once they were calm, they would be lifted or raised back up and helped on to the couch in the quiet room. Gradually the hold on them would be worked down until they could be let go. That was all part of the CALM routine. No staff would have done what she is describing.
- 155. A twelve year old girl with my weight on her, there is absolutely no way I would do that.

 That's the honest to God truth. I could not have done that on my own.
- 156. I understand the Inquiry has documentation that shows I was unit manager at Oakhill in February 2007. This would have been before I moved on to become the Practice Development Manager. As I recall I moved on to that role later in 2007, possibly November.
- 157. I also understand the Inquiry has documentation that shows Bruce Lawrie and myself took [KO] into the quiet room on 17th December 2006. I have no memory of that whatsoever. I remember Bruce Lawrie, he came into Oakhill from a Close Support Unit but as I've said I have no memory of [KO]. I was at Oakhill Unit for approximately ten years and was probably in the quiet room with dozens of children

for so many different reasons, I just cannot remember anything about that specific incident, I'm sorry.

Allegations that have been made to the Inquiry relating to Oakbank

- also made comment in her statement about the food being terrible. The staff all ate the same food as the children and there was nothing wrong with the quality of the food.
- 159. At paragraph 57 in her statement says, "I did not like having to queue up to get my food due to being youngest in the school and felt really intimidated, especially when the canteen was full, usually with around 100 young people maybe more".
- 160. There was never a hundred young people at Oakbank. There was eight in my unit, about twenty between the two units in the main school and a further fifteen, including staff, so about forty-three, maximum.
- 161. When everyone first went into the dining room all the children and staff sat at their tables, they had unit tables. You would then go up one unit at a time and get your meals.
- 162. At paragraph 68 in her statement goes on to say, "I was never taken to the hospital or to see a doctor for my self-harming. I now have many significant scars on my arms. The staff did not, as far as I'm aware, send a referral to any psychologist where I might have been given some help or support in order to address my clearly deteriorating mental state."
- 163. I find that hard to believe. Staff would talk to her about it because, over the years, we had a number of young people who would do that. We always spoke with them about it. We always tried to talk to them but if there was an injury that needed medical

- treatment, they would be taken to the A&E at Aberdeen Royal Infirmary, it was only a few hundred yards away.
- 164. I dealt with a girl, who unfortunately is now deceased, who was with us at Oakbank for quite a while. She self-harmed quite badly at times and her key worker and myself had many conversations with her about it. She never needed hospital treatment, it was always superficial wounds, but we spent time talking to her and she was referred to child psychiatry, where she did get help.
- At paragraph 70 in her statement IKO 165. says, "In Oakbank if I did not comply with what the staff wanted me to do I would be asked or if reluctant made to sit in the quiet room until the staff decided that they had gained complacency. There would be staff sitting in the room while I was there. If I tried to leave the quiet room, then I would be restrained. If my behaviour deteriorated whilst being in the quiet room due to me feeling confined and cornered and again being triggered into a fight or flight state, it would end up with me being restrained, more often than not it was the prone restraint with staff members holding my face to the floor, leaving me with carpet burns. If I lashed out at staff they would press charges. I could be sat in the quiet room for days on some occasions only being let out to go to the toilet and shower. I was not the only one it happened to ... and pretty much any other young person who wasn't seen to be complying. Other than seats there wasn't anything in the room and the curtains were supposed to be closed at all times. Trying to open the curtains would result in me being restrained."
- 166. At the beginning of paragraph 73 goes on to say, "The culture within Oakbank surrounding restraints at that time was in my opinion abusive. Restraints were normalised and used as a first resort in order to gain compliance from young people. Prone restraints were used the vast majority of the time, resulting in carpet burns to the chin and neck and knees, these were seen as the norm. Other young people had carpet burns too, in the same places for the same reasons. Our needs were never taken into account, before, during or after the restraints.

- 167. What she has said about staff rubbing children's faces into carpets is wrong. No staff would have rubbed a child's face into a carpet. We realised that when young people were being restrained in the prone position, which was rare, some of them were actually rubbing their faces and noses into the carpet deliberately. It was a cord carpet and if they did that it could give them a burn mark. I'm not saying everyone did that but some did rub their head and chin into the carpet to give themselves burns. They would then show the other kids the burn marks and tell them the staff had done that to them. When we realised what they were doing we would lift their head and place a cushion under it and turn their head to the side. They weren't face down into the cushion and they couldn't give themselves any burn marks. That's what we did in our unit. I can't speak for any of the other units.
- 168. Restraining young people was so seldom though and I can't remember it ever being with girls. What she has said there could not have been the case and it couldn't have gone undetected. It was a restraint so somebody would have noticed it. Somebody would have said something if she'd come up with her head all carpet burns.
- 169. What she says about the quiet room isn't right either. The quiet room was used when children were possibly being restrained but they weren't restrained further in the quiet room. They would be restrained wherever the thing was happening or asked to move to another room. We never wanted to be restraining young people in front of lots of other people.
- 170. If a child was restrained and taken to the quiet room, they would never ever be put in the prone position, not as a first resort, unless it was a very violent incident. Prone is face down and I can't remember ever doing that with any girls. It was used with boys who would get themselves into that position but it seldom happened. Unfortunately, it did happen. There were occasions when it had to be used, when you might have two boys having a right good go at each other and in those cases you have to take control. Normally they would be held by each arm, by two members of staff, and walked through to the quiet room where they would sit on a couch. The staff might hold on to their arm until the young person calmed down. A lot would depend on how willing the

- young person was to then talk to the staff about the problem or incident. They may talk or they may not talk.
- 171. There is absolutely no way that girl was left in the quiet room for days. That was never ever something that could be done. How could we even do that? It would be two staff minimum needed to stay with her. We couldn't leave one member of staff in the quiet room with someone who'd been restrained. It couldn't happen. It's not something I've ever seen done. It just doesn't make sense.
- 172. The curtains might have been drawn if someone was being restrained but that was mainly to stop other young people noticing and banging on the windows and inciting things. There were two couches and coffee tables in the quiet room. We also had visitors and meetings in there so there was always some furniture there.
- 173. She says restraining was a daily occurrence but in our unit we didn't have anywhere near a restraint a day. We just did not have those kinds of levels of restraint. I can't imagine there being as many restraints as that a day, in a school of forty or fifty kids, let alone in one unit. The head teacher would have to be informed about every restraint and there's no way she wouldn't have said something about numbers like that.
- 174. At certain times, certain young people would get themselves into a situation where they would need to be restrained, that happened, but it was not often and it was not constant, not in any form or manner.
- 175. At paragraphs 74 to 77 of KO says, "There were three separate occasions when I was subjected to sexual exploitation during my stay at Oakhill in Oakbank. The first occasion was with one of the residents ... He would have been fifteen at the time and I would still be about twelve. I was in his bedroom along with a girl called ... She left and when she was out of the room he exposed himself to me. I immediately left the room as well.
- 176. On another day, when I was still twelve, I ended up running away with ... and another boy called ... I am not sure of his surname. I am not sure why we were running away

this time, but probably because of me wanting cigarettes. We were just walking away and looking for somewhere to get out of the snow. We ended up in a doorway or entrance to some flats. When we were standing there ... repeatedly tried to insert his penis in me. I was so young he couldn't and it was hurting. When he was doing this ... was keeping watch from further down the stair hallway. He eventually stopped and we made our way back to Oakbank.

- 177. ... was in a relationship with one of the other female residents. They had an argument when we were back in the home and they split up because when we had ran away and I was with them. ... then decided to report what had happened with ... The staff reported the matter to the police. When the police spoke to me the first time I denied that anything had happened. When I spoke with them again I told them what actually happened. I told them I had not talked about it the first time as I did not want to talk about it with anyone. The file on the case was then closed with no action taken. The staff moved ... to a different unit which was just for boys.
- 178. In relation to this incident, I later submitted a SAR to the police, and it was shown that it was filed as an offence of unlawful sexual intercourse with a minor under the age of thirteen. It shows that no further action was taken."
- 179. I don't remember this incident. I don't remember anything about her so how can I remember the incident? I don't remember any such incident, honestly not. I have absolutely no idea about that. I don't remember the police attending at Oakbank and investigating any sexual abuse or activity. There was nothing like that I remember. The police would investigate things the boys were up to and I would occasionally sit in on police interviews and things like that but I never had anything like that with a girl. It would usually be a social worker and/or the member of staff that the young person had reported whatever it was to, that would sit in on police interviews. There wasn't ever anything sexual reported that I am aware of.
- 180. There was a place, a flat somewhere in Aberdeen, that some of the girls did run away and end up in. They never told us where that flat was but there were people that seemed to be willing to take them in. The girls would then come back and they wouldn't

tell us anything about what they'd been up to. I'm not saying that's what happened with the but there was never any allegation that I know of, of boys within the unit trying to have sexual intercourse with a girl of twelve.

- 181. At paragraph 80 of Ko statement, she goes on to say, "In addition to the two reported incidents there was also occasions of sexual exploitation which were not reported. This again happened in Oakhill and was with an older boy called ... in the home, he was quite a quiet lad, followed the rules, was well liked by staff members. Like me he enjoyed playing pool. At Christmas it was just me and him that were in the unit, the rest had been allowed home leave. We were in the living room and on the couch. He asked me to sit on his knee and was moving me up and down on his lap. It stopped when he realised the staff would be aware if he continued. It happened on a second occasion with him but this time it was in his bedroom. No one found out about this, and I did not tell the staff. I've since found out that he did this to another girl within the unit as well as myself."
- 182. I just cannot see how that could happen at Oakhill, not in the living room as staff were there all the time. It was the one big room in the unit so you would always have somebody sitting out there. The whole idea was that Oakhill was a semi close support unit and because of that there were many staff, so you wouldn't allow something like that to happen.
- 183. Even at Christmas, it was full staff working, so if there were only two children staying at Oakhill there would still be four staff. There was the staff office but all the staff wouldn't be in the office at the same time. The staff would only be in there if they were phoning somebody or writing something. There were always staff out in the unit keeping an eye on things, even if it was just two children. As a unit manager I would be absolutely raging if I had known or seen anything like that or had any inkling of anything like that. It would not have happened on my watch.
- 184. I don't ever remember there only being two children in Oakhill at Christmas but there could have been. I might have been off or on holiday at that time as well.

185. Upstairs in the room should not have been able to happen either. I can't say that it didn't, but I would say that it should not have happened because staff were always absolutely made aware that when kids are upstairs the staff also need to be there and the room needs to be kept open. I wasn't there so I can't be absolutely sure, but what she described just should not have been allowed to happen.

Convictions

186. I have no convictions.

Leaving Oakbank

- 187. I left Oakbank in 2008 because the school closed. I was looking for a job before I left and saw the advert for a social worker with Barnardo's working with foster children, doing placements and that sort of thing. I applied for that, got the job and I was with them right up until I retired.
- 188. I had a reference supplied by Suzanne Sinclair, who was my deputy manager at Oakbank and became a senior social worker with the local authority. She highly recommended me for the Barnardo's social work job.

Helping the Inquiry

- 189. Oakbank had its faults like any other residential establishment but it wasn't a bad place. Certainly not that I saw. It wasn't ideal in lots of ways because that's maybe not the best thing for young people.
- 190. As a social worker I always thought 'why on earth do we take children into care?' Why do we not fix them in the home and fix the parents with them? We never ever got the ability to do that and, therefore, places like Oakbank Children's Home and Rossie all exist. I believe it's because there's a lack of willingness to put the money into families

and children at the point where it's actually all gone wrong. I do think there's an understanding now, that that's where it should all happen. Unfortunately there will always be a need for institutions like Oakbank, to take up the slack when that doesn't happen. It's not ideal but it was something that was there at the time.

- 191. It's hard to say what could have been done better at the time, particularly when it's an establishment like Oakbank. It would be better to have a much more family orientated way of doing things but by the time we got most of the children that came to Oakbank, they were very damaged. Most of that was from within their own homes and communities and it's very difficult to iron that out of their system. I suppose that's how I would put it.
- 192. We had a boy who had stuck a fork in a member of staff at Peterhead, so we really did have some very damaged children coming to Oakbank. We did try, some of us tried really hard, to make it a better place for the children than from where they had come.
- 193. I'm not making excuses for how things were or weren't but I think there were enough people at Oakbank to try their hardest to turn things around for some young people, who really wanted to turn things around. The others, you tried your best but it didn't always work.
- 194. Most of the staff at Oakbank had a heart that really wanted to help and we tried and tried. I tried my hardest for the twelve years I was there and in all the other institutions I've worked in. It was the same with social work and foster care. I always tried my best.
- 195. If I've failed then I've failed but I don't feel that because there's enough kids still contact me to say thanks for what I did for them. I don't need money for that, that's the best reward for me.
- 196. I don't feel bad about anything I've done because I don't feel I ever did anything bad.

Other information

- 197. I always wanted to be part of the Scottish Child Abuse Inquiry because I always felt I had a lot of information that I could tell you. I hope what I've told the Inquiry goes some way to helping get some better decisions for the future.
- 198. I have no objection to my witness statement being published as part of the evidence to the Inquiry. I believe the facts stated in this witness statement are true.

	IKQ		
Signed			
Dated	19/09/	24	