

Scottish Child Abuse Inquiry

Witness Statement of

LUZ

Support person present: No

1. My name is LUZ. My date of birth is 1959. My contact details are known to the Inquiry.

Qualifications and career

2. In 1981, I graduated with a MA (Honours) in Modern History from the University of St. Andrews. Subsequently, in 1987, I gained a CQSW (Diploma in Social Work) from the University of Stirling; a M.Ed. from the University of Edinburgh in 1991; a PQ Cert. in Child Protection Studies from the University of Dundee in 1991; a PG Cert in Advanced Studies, from the University of Strathclyde in 2001; a PG Cert in Social Services Leadership from Aberdeen Business School in 2005; and a PhD by research publication from the University of Edinburgh in 2013.
3. I also have the following professional awards: CCETSW, Practice teacher; and of .
4. After graduating from St Andrews in 1981, I was a Residential Social Worker at St Joseph's School, Tranent, until 1985. Between 1987 and 1990, I was a Team Leader at St Joseph's School, after which I took up the position of Assistant Head at Wellington School, Penicuik. In 1991 I became SNR at Howdenhall Centre, Edinburgh and between 199 and 199 I was Unit Manager at Pentland View Close Support Unit, Edinburgh. Between 199 and 200 I was initially SNR at St Katharine's Centre, Edinburgh, before of SNR SNR Edinburgh in 1996, still based at St Katharine's.

5. I left practice for [REDACTED] in 200[REDACTED], when I became a [REDACTED] at [REDACTED]
[REDACTED]. Between 2005 and 2013, I was a [REDACTED] and [REDACTED] at [REDACTED]
[REDACTED], before becoming [REDACTED] there. I remained in
that position until 2017, when I became [REDACTED] for [REDACTED]
[REDACTED], a position I presently occupy.

Background

6. I have already provided a statement to the Scottish Child Abuse Inquiry, pertaining to my employment at St Joseph's School, Tranent. Further to that statement, I have been asked to comment on the following establishments: Wellington School; Howdenhall; St Katharine's and Edinburgh Secure Services. I understand that the Inquiry wishes to know the relationship between the different establishments.
7. Wellington was a List D school and was not directly related to the other three establishments other than sharing the same line management for a few years. I have therefore detailed my involvement with Wellington separately.
8. Howdenhall, on the south side of Edinburgh, was built as the assessment centre for, I presume, the City of Edinburgh and subsequently Lothian Regional Council. I think it was probably built in the 1960s. Its function when I first knew it was to provide short-term placements for children, both boys and girls, who were the subject, I presume, of twenty-one-day place of safety orders from the children's hearings system. Those short-term placements were made with a view to carrying out an assessment of their needs and to make recommendations as to future placement, which was often to a List D School.
9. With the introduction of the secure accommodation regulations in 1983/85, Howdenhall was refitted and changed its function to provide secure accommodation in its upstairs Braid Unit. The downstairs section, Calton, functioned as an open unit to allow children to transition out of secure accommodation. Braid accommodated up to five children, both boys and girls, and Calton around eight or nine.

10. The building was never fit for this purpose and was only intended as a stopgap while Lothian Region decided on whether to build its own purpose-built secure unit. This took a while. St Katharine's was commissioned around 1992 and opened in September 1994, on a site adjacent to Howdenhall. It was purpose built, comprising a secure unit with six or seven beds, an education unit and a gym. The secure unit was built around a small outdoor area and two open units housing four or five children, both boys and girls. The units were named after Victorian social reformers, Guthrie, Chalmers and Alison.
11. The original intention was that St Katharine's would be a direct replacement for Howdenhall and that the latter would close. However, demand for places was such that both units ran in tandem. A new build Howdenhall was commissioned around 1999 and was built under a public private partnership arrangement. Building started after I left practice.
12. I was SNR [REDACTED] at Howdenhall, seconded from Wellington School, for around [REDACTED], although I was off sick for around three of these with a herniated disc, between October/November 1991 to around September 199[REDACTED].
13. Andrew McCracken, who had been headmaster at Wellington, took over as Principal of Howdenhall with a remit to oversee the development of secure and close support services for the Region. Gerry O'Hara was external manager.
14. I moved from Wellington to open Pentland View Close Support Unit around September 199[REDACTED] and I was [REDACTED] SNR [REDACTED] of St Katharine's in September 199[REDACTED]. Gerry O'Hara moved on, probably within about a year. Andrew McCracken remained as overall Principal of secure and close support services until sometime in 1996, [REDACTED]. [REDACTED] I was [REDACTED] SNR [REDACTED] I continued to work from St Katharine's and to be SNR [REDACTED] there while also line managing Howdenhall. I did this until I left practice in 200[REDACTED].
15. In latter years, I heard the term Edinburgh Secure Services used. I don't know when or why the name came in or whether it had any organisational significance. I had nothing to do with it.

Wellington School

16. Wellington School was a couple of miles outside Penicuik on the main Peebles Road. Its purpose was as a List D School offering care and education for boys between twelve and sixteen years of age.
17. My first impressions of Wellington was that it was fairly remote geographically. I remember that on my first weekend on duty, I was snowed in for four days and the power went down. The school had four functioning units, three residential and one for day boys. I thought it was pretty tightly and professionally run.
18. The make-up and structure of staff included four senior staff, an overall headmaster, a head of education, a head of social work/care and me as assistant head for social work. Lothian Regional Council had taken over overall responsibility for the school, which I think was exercised via an assistant principal officer from the social work department. But operationally, Andrew McCracken was headmaster. He was very professional and he was supportive of new ideas.
19. Compared to my previous experience, I think the tight confines of the living accommodation were a bit limiting, but the culture was a healthy one. Relationships that existed between staff and the children were generally very good. There was a mix of ages and experience of staff. There had been an influx of younger staff not long before I started and this brought some new ideas and, I think, refreshed things a bit.

Employment at Wellington School

20. I was employed at Wellington School from January 1990 to around October 1991, as assistant head with responsibility for the care side of things. In that role, I also acted as duty head, with overall responsibility for the school for one evening a week and every fourth weekend. In essence, I and the other seniors spent a quarter of our lives in the school.

21. The post was openly advertised and I know from Andrew McCracken that there was a strong field for the post. I was working in another List D establishment at the time I applied and the recruitment processes were those of Lothian Regional Council. I know that I had a reference from my former headmaster. I was interviewed by an Assistant Director of Social Work, Andrew McCracken, someone from the training section, I think, and the school attached psychologist. There was also possibly someone from HR.
22. My direct line manager was Colin Hunter but, I would also report direct to Andrew. I used to meet Colin on a fairly regular basis to discuss school issues and my own performance.
23. My performance was not particularly subject to any regular external oversight and appraisal, however I would have had access to the school psychologist.
24. While at Wellington, I completed a Master's degree in education that I had started previously. I completed a post-qualifying certificate through University of Dundee in child protection. This was a new course and I was one of the first cohorts in Scotland to do it. I also completed my practice teacher in social work qualification.

Personal influence at Wellington School

25. I led in relation to compliance with relevant regulations, the use and type of discipline and punishment at Wellington School, how staff should treat, and care for, children admitted to the school and the protection of children from abuse or ill-treatment, mostly through modelling in my own relationships with children. Also through talking to and offering advice to staff. For a while, I ran a weekly or monthly staff development session for newer staff.
26. The ethos of the establishment was one of care. I sought to ensure that this was foremost in staff responses. I had no concerns about abuse or mistreatment, but I was undertaking my child protection certificate over a period of a year, so such issues would have been to the forefront of my mind.

27. I don't recall any major changes to the establishment's regime that were introduced by me during my time there. However, I was there for less than two years.
28. Looking back, I consider my most memorable achievement while at Wellington School was to participate, and notionally lead, a trip to Italy to follow Scotland in the 1990 World Cup. With two fairly new care staff, we took nine boys by minibus, through France, including a visit to Penicuik's twin town in Provence, spending a week or so around Genoa and driving back. The trip lasted around three weeks and was very successful.

Policy at Wellington School

29. I had responsibility for care practice and most of the policy was already there, either via the Council or internally. I don't recall my being involved in any significant policy developments.
30. Almost all policy functions, including training, recruitment, child protection, requirement for qualifications, staff appraisal, complaints procedure, discipline and punishment of children, disciplinary process for dealing complaints and allegations against staff, whistleblowing and record-keeping, were exercised centrally through the Council.

Strategic planning at Wellington School

31. I was at Wellington at the point when some of the abuse scandals in Wales and England were beginning to be reported. There was certainly an awareness of such concerns and the need to mitigate for the possibilities of these occurring, however, I'm not sure it would have been a strategic approach at that point, more a growing awareness. There was a wide awareness evident in the development of child protection training, although this, at the time, was mainly focussed on abuse in families.

Other staff at Wellington School

32. Staff worked early and day shifts and operational management on a shift-by-shift basis was undertaken by two shift coordinators. For me, a flaw in the structure was the lack of anyone directly responsible for the units. So, if I recall, I would have supervised shift coordinators, who would have supervised unit staff. But, as I have indicated, I was also responsible for a weekend team consisting of care staff, teachers and instructors, who did what was called residential duties allowance (RDA).

Recruitment at Wellington School

33. I remember being involved in a couple of interview rounds for the recruitment of staff in Wellington School.
34. I probably didn't have any formal training in recruitment at that point, although I did have training a couple of years later. I didn't lead on any recruitment at Wellington and would only have been a member of the panel.
35. Recruitment policy was a central Council one and that would determine the extent to which references were obtained from former places of work and what references were expected to cover. I don't think it would have been standard practice to speak to referees, but I am not sure.
36. Staff came from a big mix of employment backgrounds. There were teachers, who would have been GTC registered, trade instructors and care staff. Many had been there for a while. Some had come from other List D Schools that had closed. Some of the newer staff were coming with qualifications in social work or community education. At least one was seconded to a social work course during my time there and returned qualified.
37. I think there may have been community service volunteers from time to time. This was an established scheme that had its own processes. I didn't have anything to do with it, so can't say any more about processes.

Training of staff at Wellington School

38. I was involved in the training and personal development of staff and others up to a point. I ran a short-life group for newer staff and I would have had conversations with staff on professional issues.
39. While I was at Wellington School, Lothian Regional Council introduced control and restraint training. This was Home office approved, I think, and was and is akin to the training received by police and prison officers. I attended one of the first courses. The methods were based on pain control and this was very quickly deemed to be inappropriate for use with children.
40. Consequently, the control and restraint training was discontinued and another model not based on pain control was developed, although during my time in Wellington it was the control and restraint method that staff were trained in. The new model Crisis Anger Limitation Management, I think, or CALM as it was called, was developed by someone called David Leadbetter who had worked in the training department for Lothian Region. He went on to develop it as a commercial venture.
41. I guess it depends whether at all times there were sufficient appropriately qualified and trained staff. Each unit had around twelve or thirteen boys and there were two staff on duty. By today's standards that would not be considered sufficient, however having said that, we managed with the staffing levels and there wasn't much sickness. There were about six boys to a class.
42. Qualification levels were beginning to creep in. I don't recall any difficulties in recruiting staff.

Supervision/ appraisal/evaluation of staff at Wellington School

43. I don't recall there being formal supervision of staff. I did meet with shift coordinators and others but I'm not sure how this would have been formally constituted or recorded. There was certainly informal supervision. Evaluation systems came quite a bit later.

- 44. Staff were supervised, appraised and evaluated via Lothian Regional Council recruitment procedures.
- 45. I wasn't involved with volunteers. I'm sure if we had them they would have had an allocated member of staff to support and mentor them.

Children at Wellington School

- 46. Almost all children came to be placed at Wellington School through the Children's Hearings system.
- 47. The children were all boys and consisted of around thirty-six residents and fifteen to twenty day boys, from the ages of twelve to sixteen. It is hard to say how long children tended to stay at Wellington, because it depended. Cases were subject to review, both child in care and through the children's hearings system, but most stayed for around eighteen months to two years, as a very rough estimate.
- 48. The ratio of children to staff/adults was up to six boys per class in the classroom and two staff to around twelve boys in the care setting.
- 49. The food was excellent. There was a choice of two dishes for the main meal.
- 50. Boys slept in the residential units, where the bedrooms were on first floor. They were mostly shared bedrooms, I think, although many would have been single occupancy.
- 51. Each unit had a shower room on the ground floor with four to five shower units. The routine was that boys showered after they came in from class. I can only assume that this was a throwback to when there was a greater focus on trades training.
- 52. The boys had lots of leisure time, which was spent in various ways. There was a large sports hall, so a lot of five-a-side football and there were also outdoor football pitches. They were taken to other outings such as swimming and skiing. During the summer, a favourite activity was to go down to the River Tweed at Neidpath, near Peebles,

where they would jump into the Tweed from a rope swing. We took a group of boys through France and Italy and there was another European trip the following year.

53. I'm not sure there was any guidance in relation to staff taking children on trips outside of the establishment. I certainly wasn't aware of any in relation to children going to staff homes. This wasn't a regular occurrence, but it did happen on one-off occasions. I remember one where I was taking a boy through to Hampden and he was dropped at my house.
54. Children were schooled on the premises.
55. There was a 'matron' or domestic superintendent who could treat cuts and grazes or such as headaches. Boys were enrolled with a surgery in Penicuik.
56. Boys did not do manual work.
57. Parents might have visited children for care reviews, etc., but not routinely. Most boys went home at weekends and increasingly on weeknights as well. Other visitors would be social workers. I don't recall anyone visiting who we would have felt needed vetting.
58. Professionals, for example, social workers, did visit the children and some did so more than others. They would have had the opportunity to speak to boys alone should they have wished.
59. Reviews were carried out by Wellington of children's' continued residence in the establishment, through child in care reviews and via the children's hearings system.
60. Children left Wellington generally via discharge of their supervision order, or of the residential element of this, via children's hearings system.
61. They are likely to have been plugged into careers support when they were leaving or after they left. Some may still have been subject to home supervision from a social worker. I can't recall if there was a specific aftercare service at the time. There were

no formal supports from Wellington. Through and aftercare was a broader structural gap in the system now improved.

Living arrangements at Wellington School

- 62. I lived in Edinburgh while I worked at Wellington School. Most of the other adults in positions of responsibility lived in or around Penicuik, or in Edinburgh.
- 63. The units were open, so I guess any member of staff had access to the children's residential areas, but mostly care staff attached to a unit.
- 64. Responsibility for the children's residential areas overnight lay with the discrete night care workers. Additionally, one of the senior team would sleep in at a former staff house at the end of a mothballed unit.

Discipline and punishment at Wellington School

- 65. My own approach to discipline and punishment was through personal authority and relationship building.
- 66. Corporal punishment was not permitted.
- 67. There was what I would describe as a points system in relation to discipline and punishment. Boys were awarded bonuses or given fines on their pocket monies, according to their behaviours over the previous week. All boys and staff were aware of this points system.
- 68. There was no official or unofficial policy of abrogating discipline to older residents.
- 69. We didn't speak of punishment when a child ran away. If a child ran away, of course, someone would speak to them on their return. They weren't punished. Depending on the circumstances, they might lose some pocket money or be denied home leave, although this decision would be as much related to the circumstances than being a direct punishment.

- 70. There would have been a record somewhere of boys' weekly fines or bonuses, but otherwise there was no record or punishment book kept of when children were disciplined or punished. Something might have been recorded in daily records.
- 71. Segregation or confinement of children was used perhaps briefly but not systematically.

Restraint at Wellington School

- 72. Restraint was used at Wellington, but I don't recall it being a common occurrence. Some would have involved children being held in a prone position. As I have stated, approaches to restraint training were emerging and developing. Most staff would have been trained at some point although I'm not sure how many were in my time. Numbers involved in a restraint would have varied depending on the degree of risk involved.
- 73. I'm not aware of any restraint being prompted by horseplay.
- 74. I don't recall being involved in many restraints. Instances might have been to remove a child from a situation, but generally, the principles of restraint were to avoid harm to another person, or property.
- 75. The policies and practices relating to restraint in Wellington School were Regional Council policies and would, I presume, have changed as approaches to training changed.
- 76. I don't recall any child being injured in the course of a restraint.
- 77. I never reported any member of staff for inappropriate or excessive restraint.

Day-to-day running of Wellington School

- 78. I have described my role as regards the day-to-day running of Wellington School and I would like to think I would have picked up most instances if any child was being

abused or ill-treated. I guess the nature of abuse may involve a secretive element and can remain hidden, but I had a good 'feel' for what was going on and I would like to think I could pick up most instances where something wasn't right.

79. I wasn't involved in the day-to-day care of children in the units, but I knew them all and interacted with them around various activities and by just being a presence around the school. The purpose of that interaction was to hopefully make them feel safe and to promote their enjoyment of being there.
80. I did not explicitly ask the children how they were feeling, whether they felt safe and whether they had any concerns about how they were being treated by other staff.

Problems at Wellington School

81. I did not personally, when in post, have any concerns about Wellington School.
82. I think there were some boys who were involved in using drugs of some sort.
83. I don't recall bullying of children by other children being a significant problem.

Concerns at Wellington School

84. Wellington School was not, to my knowledge, ever the subject of concern, within the establishment itself or to any external body or agency, or any other person, because of the way in which children and young people were treated.
85. I did not personally, when working at the establishment, have any concerns either about the establishment itself, or about any member or members of staff because of their behaviour or conduct towards, or treatment of, children resident in the establishment.

Child protection arrangements at Wellington School

- 86. Most staff were very experienced and knew how children in their care in the establishment should be treated, cared for and protected against abuse, ill-treatment or inappropriate behaviour towards them. As I have mentioned, the term child protection was beginning to come in with associated training.
- 87. Supervising social workers had responsibility for managing child protection, or what came to be known as child protection, matters. Any incident would have been reported to them and it would be up to them to take it through appropriate processes.
- 88. On a day-to-day basis, school staff at all levels, needed to exercise some discretion. Every fall out between an adult and a child couldn't be processed through a formal procedure. But I am satisfied that staff knew when cases needed to be escalated. I have no evidence of these arrangements not working.
- 89. Looking back, there was nothing I did, or failed to do, in relation to the treatment, and/or discipline of children and/or protection of children from abuse or ill-treatment that I now regret.

Reporting of complaints/concerns at Wellington School

- 90. I don't think there was a complaints or reporting process in place if any child in the establishment, or another person on their behalf, wished to make a complaint or report a concern.
- 91. I do not recall any specific complaints that may have been received.
- 92. Incidents would have been recorded somewhere, but not necessarily as complaints.

Trusted adult/confidante at Wellington School

- 93. As far as I can recall, there was not any person in the establishment, or outside of it, that a child could speak to about any worries they had, including any concerns about the conduct or behaviour of other children, staff or others, towards them.
- 94. This changed over time when children's rights officers came in at some point over the 1990s.
- 95. No child raised such concerns with me.

"Abuse" at Wellington School

- 96. A definition of "abuse" that was applied in relation to the treatment of children would be a Council policy responsibility. I think definitions were constructed around physical, sexual and/or emotional abuses.
- 97. I think staff knew that hitting a child, anything overtly sexual or anything that might seem cruel would be unacceptable and would constitute abuse of children in their care.
- 98. I can't recall how any such definition was communicated and explained to those working in the establishment.
- 99. I did not witness while working at Wellington school, any sexual abuse of a child, any physical abuse of a child, any emotional abuse of a child, any excessive or inappropriate restraint of a child, or any inappropriate practice in relation to a child on the part of staff generally or particular members of staff.
- 100. I do not remember any instance of a child ever reporting abuse to me.
- 101. Abuse could, of course, have happened and gone undetected during my time at Wellington school, but I am not aware of any instance.

Allegations of abuse at Wellington School

102. I have never been the subject of an allegation of abuse or ill-treatment of a child or children who resided in the establishment when I worked there.

External monitoring at Wellington School

103. I don't recall any inspectors or other officials visiting Wellington in my time there. In any event, concerns were never raised about the recruitment and training of, or training opportunities for, staff. Similarly, concerns were never raised about the discipline and punishment of children or the use of restraint or segregation.

Record-keeping at Wellington School

104. I know there was an admissions and discharge book and that each boy would have daily records kept about them. There would also have been reports for child care reviews and Children's Hearings and there may have been more specific records but I can't think of any.
105. I cannot comment particularly on the historical position as regards record-keeping. It happened according to what was expected at the time.
106. Records in residential child care, across the board, were probably not particularly helpful. Staff could find themselves writing daily records because they felt they had to. Often, what they wrote would not have been particularly helpful, but may have proved an aide-memoir for reports to Children's Hearings.

Investigations into abuse at Wellington School

107. I am not aware whether Wellington School or any member of staff was ever the subject of any investigation, other than by the police, into alleged abuse or ill-treatment of children who were, or had been, in the establishment.

108. No member of staff was dismissed, or otherwise subject to disciplinary action, because he or she had, or was found to have, abused or ill-treated a child resident in the establishment. Similarly, no member of staff resigned during my time working at the establishment because he or she was the subject of a complaint involving, or an investigation into, alleged abuse of a child or children accommodated at the establishment.
109. I was never involved in any investigation on behalf of the establishment into allegations of abuse or ill-treatment of or into inappropriate behaviour by staff or others towards children.

Reports of abuse and civil claims at Wellington School

110. I was never involved in the handling of reports to, or civil claims made against, the establishment by former residents, concerning historical abuse.

Police investigations/ criminal proceedings at Wellington School

111. I have not become aware of police investigations into alleged abuse at the establishment.
112. I have never given a statement to the police or the Crown concerning alleged abuse of children cared for at the establishment.
113. I have never given evidence at a trial concerning alleged abuse of children at the establishment.

Convicted abusers at Wellington School

114. No-one who worked at Wellington School when I did was convicted of the abuse of a child or children at the establishment, as far as I know.

Specific staff at Wellington School

115. I am aware that the Inquiry would like to find out about staff and others who may have been employed at Wellington School at the same time as me. They are HWG, GMA, HMM, GLX or GLX or GLX, HKM and GLY.
- HWG
116. I recall HWG, he died within the past year. My time at Wellington School coincided with his between January 1990 and October 1991. I guess he would have been mid-50s at that time.
117. He was SNR, so one of the four senior members of staff. He went on to SNR when around the end of 2002. HWG was SNR. I was an Assistant Head, so he would have had some more seniority but his responsibility was for where was.
118. He was a very experienced residential school figure. He was qualified in both education and social work. He was a big guy and a strong personality and a strong presence around the school. I knew him pretty well and I liked him.
119. I regularly saw him with children. He had some authority with them but he was liked by them.
120. I saw HWG discipline children on a day-to-day basis, by the strength of his presence and personality, mostly.
121. I did not see HWG abuse children and I never heard of him abusing children.
- GMA
122. GMA did not work at Wellington when I did.
- HMM

123. I do not know the name [HMM] he didn't work with me.

[GLX] or [GLX] [GLX]

124. No-one of the name(s) [GLX] or [GLX] or [GLX] worked with me.

[HKM] possibly aka [HKM] or [HKM]

125. [HKM] was the building instructor. He died a few years ago. He was approaching the end of his career when I was at Wellington. He was a lovely guy. I never had any concerns about him and was not aware of any.

[GLY]

126. I don't know who [GLY] is.

Evidence pertaining to Wellington School which relates to me

John Mullen

127. I have been provided with a copy of a statement given to the Inquiry by John Mullen.

128. When I initially saw the statement, I thought 'I don't know this person'. I have no recollection of working with him at Wellington.

129. I did come across him, briefly, at Howdenhall, when he took up a temporary teaching post during my time there. So, sometime between about October 1991 and September 199[REDACTED]. I had only fleeting involvement as the Education service was managed separately from the care service.

130. I remember a couple of conversations with John but nothing that made any connection to us having been at Wellington together. My only recollection of him is from Howdenhall. I think that is where we met for the first and only time.

131. He struck me as a nice, well-motivated individual.
132. On page 13, at paragraph 66 of his statement, John Mullen states: *'I came to the inquiry to tell you about one of the morning assemblies or parades as I think of it as. This incident happened near to the end of my contract, the reason I know this is because the weather was quite good so I estimate March or April time of 199█'.*
133. He continues at paragraph 67: *'It is important I describe HWG █ He was about six foot two, very well built, very muscular, he was about the age I am now, mid-fifties. He clearly looked after himself, he looked like he went to the gym and he was also a PE teacher. I think as well he may have had military experience. He would pace up and down the line commenting on laces untied or querying if the children had cleaned their teeth. This one day a little kid, who was about thirteen, stepped out of the line. HWG █'s immediate response was to knock him to the ground'.*
134. At paragraph 68, John Mullen says: *'HWG █ was obviously really good at it. What he did was, he put one of his feet behind the kid's and barged into him with his upper body, with his elbow at the kids face and the child was thrown to the ground. Almost like a rugby move. The boy went down with quite a clatter, it would have really hurt him. The boy was shaken. It was brutal to see a really well built grown man do that to quite a small child. Even in the context of the workplace where there was a lot of weird behaviour going on it seemed so out of place. It wasn't that the child was seriously physically injured it was more the combination of the mismatch in size and power and status. Also, the psychological effect on the boy, to be knocked to the ground by an adult in front of his peers. I felt terribly sorry for him. From HWG █'s point of view that was the job done, he had established his physical superiority like the big dog, like the leader of the pack. Nothing was said by him and the wee boy picked himself up and that was it'.*
135. John Mullen then says at paragraph 69 on page 14 of his statement: *'I think there would have been at least six staff there during the incident including HWG █ LUZ █ and myself. I just can't remember the others'.*

136. At paragraph 71 on page 14, John Mullen states : *'I did query it with one of the social work staff who had witnessed it, I think it was LUZ [REDACTED], though I can't swear on that. I suppose whoever I did speak to minimised it to an extent, as if to say what can you do, that's how it works, though those words were not used. I also recall some conversation following it about "that's restraint". I felt like saying "no it bloody isn't, it's not at all restraint, it's an assault".'*
137. I have no recollection of the incident he describes and hence no recollection of him speaking to me about it.
138. I have wracked my brains as to whether John and I could have crossed over at Wellington. He says he taught maths there. The maths teacher did go off for a bit during my time there after a heart attack but I've no idea when. So, I guess John may have come in to replace him. Having said that, I'm pretty sure I would have come across John in the wider school, especially if, as he says, he did residential duties. But I have absolutely no memory of him there.
139. I cannot explain why these things are being said.
140. I have been asked whether I would accept it was inappropriate and/or poor practice, if I had behaved in the way described. I'm not really described as behaving in any manner. John himself 'thinks' he spoke to me. As I say, I have no recollection of him, let alone him having spoken to me about any incident.
141. I can't say whether, if a child was treated in the way described, I would accept it was abuse. To do so would be speculative.

Leaving Wellington School

142. There were changes in management and organisational structure in the Council. 'Central services', which included Wellington, St Joseph's and Howdenhall, as well as family based (foster) care and some other services were brought together under a Principal Officer, Gerry O'Hara. SNR [REDACTED] at Howdenhall was moving on to another post and Gerry needed to find someone to take over while he decided on

management structure. I didn't know Gerry but he did some asking around and it seems that my name was mentioned and he asked if I would move to Howdenhall as SNR [REDACTED]

143. It was an internal secondment. I don't imagine there were any references required.

St Katharine's, Edinburgh

144. St Katharine's was at Balmwell Terrace on the south side of Edinburgh. Its purpose in relation to children was to provide secure accommodation under the terms of the HASSASSAA legislation (Health and Social Services and Social Security Adjudications Act), 1983 and a subsequent Code of practice, 1985.
145. St Katharine's was a purpose-built secure unit. The council architect had worked, primarily I think, with Andrew McCracken to design the centre. I think he did a really good job. The idea was to try and de-emphasise the security features and emphasise the care features. There were different shapes of room and heights of ceiling, which softened the feel. Partly as a result of this emphasis, there were some snagging and ongoing problems with aspects of the build but by and large I liked it. It opened in September 1994 on a site adjacent to Howdenhall.
146. It comprised a secure unit with 6/7 beds, an education unit and a gym. The secure unit was built around a small outdoor area and two open units housing four or five children, both boys and girls. The units were named after Victorian social reformers, Guthrie, Chalmers and Alison.
147. I have been provided with a copy of a statement given to the Inquiry by KTV [REDACTED]
KTV [REDACTED]
148. I note that on page 12 of her statement, at paragraph 43, KTV [REDACTED] states: *'Among the residential care frontline staff, I think that I was the only qualified social worker but I believe that KZB [REDACTED] was training to be a social worker. The only reason I believe that this was the case is because the head teacher in the education department had pointed it out to me. They asked me why I was working there when I*

was a qualified social worker and were shocked. At this point, I realised that what I'd been told at the assessment centre about people being qualified wasn't actually correct'.

149. I will take the opportunity at this early point to mention the staff team in more detail than I might otherwise, given the claim in KTV statement that she thought she was the only qualified social worker in St Katharine's. I had an MA, a diploma in social work and a master's in education.
150. Phil Garland, who had worked with me at Pentland View and who came over to St Katharine's with me to be unit manager of Guthrie, had a philosophy and theology background and a diploma in social work. Phil went on to work in Dublin as a child care manager. He then conducted the Archdiocese of Dublin Inquiry into child abuse and subsequently became director of child care services across the entire Republic of Ireland.
151. Onanda Randall, deceased, who managed Alison Unit, was a qualified social worker with extensive experience in social work centres and in residential care at Wellington, Pentland View and Howdenhall. She moved on from St Katharine's to become head of a residential school and then to open a very successful residential unit in East Lothian. She was so well thought of that East Lothian named their social work headquarters after her when she died.
152. Frank Phelan, who managed Chalmers Unit, had a psychology degree from University College Dublin. He had worked in residential care in Ireland and England and then briefly at Howdenhall. He went onto complete the diploma in social work at Edinburgh University and came to St Katharine's soon after that. He went on as Principal for secure accommodation and then into management positions in the City of Edinburgh Social Work/Children and Families department.
153. Phil and I had both completed the post qualifying certificate in child protection from the University of Dundee. Onanda and Frank did so in their first year or two at St Katharine's.

154. I have also been provided with a copy of a statement given to the Inquiry by KTS KTS
155. I note that on page 1 of her statement, at paragraph 5, KTS states: *'I applied for the post and was accepted. I didn't have any specific formal child care or social work qualifications but, at that point in time, because I was a qualified teacher, I was deemed to be a qualified RCO. Therefore, my training was only a four day recruitment process. That involved role play, written exercises, videos and discussions. I think it was to work out where peoples' values were but also to let people know what was expected of them in the role'.*
156. I will come on to report on staff qualifications more broadly but it is of relevance to state that, at the point KTV and KTS claims relate to, we also had Emily Campbell working with us over a period of years in an RCO and later senior capacity in Guthrie unit. Emily was an American qualified social worker who, while at St Katharine's, undertook the master's in child protection at LSE under the tutelage of Professor Eileen Munro, who went on to chair the UK Government's Review of Child Protection (2011). Emily completed the programme with a Distinction and the Class Medal. She left St Katharine's at the same time as me and returned to America, where she has advised state and federal governments on child and family welfare and protection.
157. For the duration of my time there, all the senior staff were qualified social workers with an advanced understanding of child protection and child care. A number of the care staff were also qualified social workers and those numbers increased during as SNR. Several other staff were qualified to HNC/SVQ level, which was considered a qualification for pay purposes and others were working towards this award.
158. We also had a couple of teachers working as care staff at different points, youth and community workers, a paediatric nurse, a psychiatric nurse, an artist, I could continue. We had by far the best qualified staff team in Edinburgh and, I suspect, one of the best in Scotland. The picture is very different to that described in the statements I am asked to report on.

159. I will further mention at this point the gender balance among the staff team. One might be led to believe from the statements given by KTS [REDACTED] and KTV [REDACTED] that the team was almost wholly male. The balance throughout my time was around 60:40 male to female. This was roughly parallel to the balance of residents. We sought to ensure a gender balance on each shift and in each unit.
160. There was a separate education staff managed by zGFG [REDACTED] through the education department of the Council. This covered both Howdenhall and St Katharine's.
161. We had a psychologist, based at Howdenhall but spending a couple of days a week at St Katharine's. She was available to speak to staff and/or children.
162. From the outset, St Katharine's was understaffed and this was a bone of contention until the final year of [REDACTED]. We opened with a senior complement of four, which was the same as a six-bedded children's home in the community, without any of the complexities of secure accommodation and we had three rather than one unit. We opened with only two or three established night staff and needed to pull people in from other places. We had no chef and had to 'loan' the Wellington chef, who went on to stay with us until he retired a couple of years later.
163. On a shift by shift-by-shift basis we would have two staff per unit, although three on a backshift in Guthrie. We may have had some staff working a day shift so had a bit more scope to cover things like doctors or dentists appointments, or to allow timetabled staff to attend meetings. But, there was no slack and staffing could feel dangerously low at times. I made this point consistently to senior management verbally and in writing. We eventually got a staffing review, which recommended substantially improved staffing at senior and main grade levels.
164. We got by, and in fact did really good work, because of the skills and commitment of a core staff team.
165. St Katharine's and Howdenhall were ultimately managed by Lothian Region until 1996, and latterly City of Edinburgh Council. Gerry O'Hara was external Principal officer for

around a year, until Bryan Chatham took over. Bryan was an excellent manager, clear thinking and available.

166. Andrew McCracken was Principal for secure services. He was based in Howdenhall but spent a fair bit time in St Katharine's until he moved on. Andrew was qualified in both education and social work, had worked in residential schools in England before coming to Wellington as headmaster. I was SNR of St Katharine's, 1996, I SNR

167. Andrew took a very professional approach to his work. He was organised, had authority with children and staff and was involved in everyday care situations. I had a good relationship with him.

168. As to my own style, given the staffing levels and the fact that we were bringing together entirely new staff groups, I spent a lot of time initially 'on the floor' modelling work with children. I never moved entirely away from that. I always did late nights and occasional weekends and was on call. So I always worked with the kids, often taking them down the gym or being involved in other activities with them. Others would be better able to describe my style than I would. What I would say is that I set and modelled high standards but was also aware that staff needed to feel safe and supported to do what was an exceptionally difficult job. I think, for the most part, I had the respect of most staff, most of the time.

169. I would say the culture within St Katharine's was child centred. I had studied with one of the leading international experts on residential child care and brought theory and ideas to my work. We sought to offer secure accommodation in the spirit of the legislation, which stipulated that children should only be kept in secure conditions when they needed to be. So, there was permeability between secure and open units and between all of the units and children's homes where possible.

170. We operated with a sense of purpose. Phil Garland did some very good work on care planning systems, which stressed the need for weekly planning meetings with social workers and, if possible, parents. So, plans were under very regular review with a view to moving kids out of secure accommodation at the earliest point.

171. For the most part relationships between staff and children were great. We had many staff who had personal authority but were also great fun. Most really cared about the children. Inevitably, and this is a feature of just about all residential child care settings, there were some who felt that children should be punished, not necessarily because they were bad people but because they had a pretty unsophisticated understanding of how children's behaviour might best be managed.
172. We had others who struggled to make relationships with children and then sought to blame this on others. But by and large, we had a very caring and skilled group of staff who were very committed to St Katharine's and the children placed there.

Employment at St Katharine's

173. I started in September 199[REDACTED] as SNR [REDACTED] At some point in 1996 I [REDACTED] SNR [REDACTED] covering St Katharine's and Howdenhall but still based in St Katharine's.
174. When St Katharine's opened, there was an open advert for staff at all levels, including management. Recruitment was via an assessment centre type model including psychometric testing and interview. This was managed centrally through Lothian Region HR and Training departments. I was recruited through that model. I'm not sure about references. The appointment was subject to all Lothian Region's HR processes.
175. As I have stated, Andrew McCracken was my line manager for around two years. This then moved to Bryan Chatham. There was then some organisational movement and I think David Cumming took over briefly. He left and Donny Scott became my manager in the few months before I moved on.
176. I'm not aware of any formal processes of oversight or appraisal of my performance at the time, but I met managers for regular supervision.

177. I did a fair bit training. The Council was putting all managers on management training at Stevenson College. I did this. I did recruitment and disciplinary training, supervision training at some point, CALM training. I probably completed other training too.

Personal influence at St Katharine's

178. As I have stated, I had an everyday presence in the Centre. I knew the kids, the staff and what was going on. I was well versed in secure, and wider child care legislation and ensured that staff were aware of this. I wrote a number of practice papers around topics related to children's care. I have one fairly lengthy one, which sets out a broad critique of contemporary residential care practice. I also have a paper, which Emily Campbell and I worked on around a developmental agenda for the secure units. I can make these available to the Inquiry.
179. With regard to punishment and discipline, the truth of the matter, which some staff could struggle with, is that there were few disciplinary measures we could take with children. Some of them were already locked up and they were at the end of the road. We couldn't threaten them with secure accommodation, they were already there.
180. Some staff sought to use care planning processes to restrict leave in order to punish, although they might say 'provide consequences to' kids. I resisted this and tried to maintain the focus of care planning on the continuing, or not, need for secure accommodation. The senior team, including the psychologist, had discussions around each child at a weekly meeting.
181. There was no physical punishment.
182. We were not allowed to withhold pocket money, which was a policy at Council level, and a policy I agreed with.
183. So, the only way discipline could operate was through the relationships staff were able to build with children and their ability to use these relationships, through modelling or just being liked, to help children change their behaviour and just because it was the

right thing to do. Some staff could struggle with this and could be jealous or resentful of those staff who did have such relationships.

184. I, with others, set the tone in daily care practices and was clear that no ill-treatment would be tolerated. I was always open to children coming to talk to me and several did. Children knew I was [REDACTED] and I think there was a general trust among them that I would listen to them and advocate for them. But there is a wider context to this. We were also subject to Council child protection procedures. Each child had a supervising social worker. As noted above, we sought to involve social workers on a weekly basis.
185. I'm not sure I necessarily introduced any major change to the establishment's regime during my time there. At one point, when staffing levels became critical, we needed to take the decision to close Chalmers unit. This was meant to be a temporary measure, but the unit never re-opened.
186. I am proud of my achievements at St Katharine's. Opening a new secure unit from scratch is not an easy task. Other authorities attempted and failed.
187. I am also proud of the role I played in the development of many staff members, supporting their training and career progression. I had a good sense of the kind of person who would be good at working with children and brought together a great mix of skills and dispositions. I wasn't afraid of bright staff and attracted several of those to come and work with us. But, to conclude, I will turn to something Emily Campbell said when she was leaving St Katharine's. She recalled fond memories and a sadness in leaving a 'community that cared'. She was right.

Policy at St Katharine's

188. I did have involvement in, and responsibility for, policy in relation to the care, including residential care, of children, via the senior and care team at operational level. Other policies were Council policies.

189. Policies did not change much over time, but there was a change in legislation with the passage of the Children Scotland Act 1995 and some policy changes followed from that.
190. There was also a major organisational change with the shift from Regional to smaller authorities in 1996. St Katharine's moved from being a Lothian Region resource to a City of Edinburgh one.
191. I would also mention the Edinburgh Inquiry, which was set up following the conviction of two men for abusing children in two care homes in Edinburgh. This resulted in an independent inquiry under Alan Finlayson, Kathleen Marshall and Cathy Jamieson. This came up with a raft of recommendations, and/or requirements, around a whole range of areas I have set out below. There were existing policies in all of these areas but the Edinburgh Inquiry prompted work to streamline these and bring them together in the one place, I think.

Strategic Planning at St Katharine's

192. Overall planning was a Council responsibility. In the aftermath of the Edinburgh Inquiry, abuse featured centrally, often to the exclusion of broader child care and practice development concerns. But, even before that, we were well aware of abuse because of major cases in England and Wales. I remember Andrew McCracken running a session on the findings and implications of these English cases and Inquiries. So, yes, we were well aware of abuse. Children's rights officers, for instance, complaints procedures, recruitment processes and CALM training among other things were introduced prior to the Edinburgh Inquiry.
193. One of the Council's main ways of addressing the requirements of the Edinburgh Inquiry was to set up a staff recruitment centre, which involved a three-day, I think, process of exercises designed to assess prospective staffs' values and commitment to working safely with children. This was taken forward by Duncan McAuley, the Deputy Director of Social Work.

194. I personally had a number of issues with this and wrote about this at the time. Firstly, we didn't really have difficulty recruiting good staff. As I have stated, St Katharine's had by far the best qualified staff group in Edinburgh. Secondly, I did not particularly rate those appointed to run the recruitment centre and did not necessarily agree with their views on bringing up children, which lacked any theoretical basis, or with the qualities or characteristics they were looking for in staff; for example, men seemed to be screened out of the process at every stage. Thirdly, the inception of the assessment centre removed any control of recruitment from units, assuming that staff who came through the process could be slotted in anywhere. This fundamentally compromised my ability to recruit to the kind of needs that were apparent in St Katharine's at any one time. We were being turned into a homogenised and low level workforce, while we had always brought in people who brought a range of skills, qualifications and dispositions.
195. At a pragmatic level, the delays in bringing people through the recruitment centre were making our need for staff to cover shifts, more difficult to come by and, ironically, compromising our ability to offer as good and safe care as we could.
196. I made this case in a number of forums and began to be seen as an impediment to the implementation of what I assessed to be a flawed idea. This impacted my relationships with senior social work management.

Other staff at St Katharine's

197. I was [REDACTED] staff, other than education staff. I [REDACTED] them through the senior team, which included the senior clerical, who oversaw catering and domestic staff.
198. I [REDACTED] the senior team, and they supervised unit teams.

Recruitment of staff at St Katharine's

199. I was involved in the recruitment of staff in St Katharine's, but within the parameters of Council recruitment policies.

200. I had done recruitment training with the Council and I'm pretty sure references were obtained from former places of work, but this would have been handled by HR. I don't think referees were actually spoken to, but I could be wrong.
201. As I have mentioned previously, most staff had some previous background/qualifications in working with children.
202. I don't recall any volunteers working in the establishment. We did take regular student placements. These would have been subject to College/University /Council training section checks.

Training of staff at St Katharine's

203. I was involved in training and/or personal development of staff.
204. The Council had a training department and I supported numbers of staff to pursue training. Several were seconded onto professional social work courses during my time, others HNC/SVQ training. Others attended courses through the Council on a range of topics. All permanent staff would have done CALM training. There was also a Centre for Residential Child Care at Strathclyde University, which provided training and conferences that staff attended. I always sought to support staff in attending these.
205. All permanent staff were required to do CALM training as soon as possible after appointment. I think this was a three or four day course. The training had been developed by a Council training officer who then set it up as a proprietary brand. CALM foregrounded behavioural/de-escalation techniques but also included restraint moves.
206. I was mostly satisfied with the qualifications balance of the team. Residential care needs people from a range of backgrounds and with a range of skills. I think we had that but had enough qualified staff to ensure a healthy balance.

207. As I mention above, we were consistently understaffed until, I think 1999, when the staffing review eventually concluded. I would also refer back to my previous comments regarding the impact of the recruitment centre on the balance and skill set of staff.

Supervision/ appraisal/ evaluation at St Katharine's

208. I was involved in supervision/staff appraisal/staff evaluation of staff. I [REDACTED] the three, later more than that, senior staff.
209. Staff were all meant to have regular supervision, albeit appraisal systems only came in later. I think formal supervision was carried out monthly, but the nature of residential child care is that it also happens informally on a day-to-day basis.

Children at St Katharine's

210. Children mostly came to be placed at St Katharine's through the Children's Hearings system. We also had a few remands through criminal justice legislation. Those admitted needed to meet particular criteria to be placed in secure accommodation. These were:
- a) he (sic) has a history of absconding and he is likely to abscond unless he is kept in secure accommodation and if he absconds, it is likely that his physical, mental or moral welfare will be at risk;
 - or
 - b) he is likely to injure himself or other persons unless he is kept in secure accommodation.
211. While Panel members could authorise a secure placement, the actual decision to hold a child in secure conditions was located jointly with the Director of Social Work responsible for a child and the Head of Establishment of the relevant secure unit. This aspect of the legislation could pose some tension when, as was the case at St Katharine's, the secure unit was managed by a local authority.

212. The secure criteria encompassed a range of children with very different behaviours, from self-harming and sexual vulnerability, risk to self, to serious assaults. We had murder and attempted murders cases on remand at points. This was not necessarily the problem it might be assumed to be and, for the most part, we managed the balance.

213. The legislation above was fleshed out in a Code of Practice issued by the Social Work Services Group (SWSG, 1985). This stated that:

The use of secure accommodation for children is seen as an exceptional measure; only those children who genuinely need secure accommodation are placed and kept there; where it proves necessary to use this type of accommodation, the length of time during which any child stays in it is restricted to the minimum necessary to meet the child's particular needs; and the use of secure accommodation is seen in the context of an appropriate child care framework which is fully consistent with the 'welfare principle'. (SWSG, 1985, pp3-4).

214. I took this guidance very seriously and sought to operate St Katharine's in its spirit. I always emphasised the welfare aspect; even for remand cases, the welfare principle was paramount.

215. In practice, we sought to use the two open units to move children out of secure accommodation to test if they needed to be kept there. Even when still living in the secure unit, kids would be taken out to various activities and home visits. Even with the best care planning, this inevitably involved some risks and kids on secure orders could abscond.

216. There should have been fourteen children at St Katharine's. We generally operated at sixteen or seventeen. Over the course of my time there, there was probably around a 60:40 split boys to girls, although that could vary.

217. It is hard to say how long children tended to stay. Children on secure orders were there on 21/22 day warrants or supervision orders that needed to be reviewed within

three months. Orders could be dropped or renewed at this point. In reality, many children bounced back and forward between open and secure units and could be with us for up to a couple of years.

218. As I have previously noted, there were generally about two care staff to five children.
219. Food was very good when we had the original chef. He was well liked by the children and while there was no choice of menu, he would cater for individual preferences. We had some issues latterly with catering, we struggled to recruit.
220. In the secure unit, children had single en-suite rooms with a number of security features. Doors were locked at night-time. In the open units, children had the kind of single bedroom they might have in a family home.
221. Children used their en-suite facilities for washing/showering in the secure unit and the open units had a family bathroom, although I can't remember if it was one or two.
222. In leisure time, the children had access to the on-site gym. Additionally, staff would arrange some indoor activities, such as board games, and, latterly, computer games. They might hire videos or do arts and crafts activities.
223. There were lots of organised trips, including football, running, swimming, cinemas, walks, cycling and shopping.
224. The statements of both KTV [REDACTED] and KTS [REDACTED] make entirely erroneous claims in relation to staff taking children on trips outside of the establishment, in particular trips involving a member of staff taking a child or children to their home.
225. I was not aware of any Council policy in this regard, albeit I think I heard that one turned up in a financial policy when people were trawling documents in the wake of the Edinburgh Inquiry. However, no-one was aware of it.

226. The question was discussed at Council unit managers' meetings. Interestingly, many of the senior managers, not residential workers, acknowledged they had taken children they had supervised home. So, it became a topic of discussion but there was no policy that was referred to. There was certainly no ban on it. There were different viewpoints: some thought it wasn't professional, others didn't see a problem with it so long as it was out in the open. I produced a guidance paper for staff at St Katharine's on this outlining the benefits, but also some things to consider regarding such practices, and I concluded with the need to discuss and record such instances through the care planning process. I was far from being alone in my views.
227. I had been taught residential care during my social work training by an international expert. He used to tell us of taking children home for meals and was advocating it as a move beyond overly regimented ways of working. A concise perspective, worth looking at from a former professor and director of social work is provided here <https://www.theguardian.com/commentisfree/2009/feb/10/care-society-culture-fear>.
228. Research into social work practice historically, indicates that taking children home was not an unusual occurrence. It also shows that children who do well from care settings can invariably point to the role of an adult who took a special interest in them in supporting this outcome.
229. I felt and still feel that taking children into your own home in a suitably reflexive and open way can be a humanising experience for them.
230. I'm not sure what is meant by informal trips. Sometimes children were taken to staff homes. In the early years, I took a girl who had no other outlet for home leave home for tea a few times. Each of the other seniors and several of the care staff also took children home from time to time, one for Christmas dinner when she had no home to go to, another, Onanda, took one of the boys home for an overnight on a weekly basis, this was all agreed through care planning.
231. But there was a wider context to this. I managed a couple of 'close support carers', who fostered children from the secure units, Guthrie and Braid. My idea was to extend such a model through having staff who were foster carers. There were at least four

couples, including my wife and I, and the idea was that they might take time out from working in the unit to offer foster care to children they had formed good relationships with. Of course, there were risks involved but there were also potential advantages. We had two cases where staff did take children on this basis, again which was fully sanctioned through care planning processes. With changes in external management, these ideas were lost.

232. More broadly, I have never understood how we can base an entire child care policy around fostering and then think it suspicious if a residential care worker were to take a child into their home. This says something about the low value that is placed on residential care workers.
233. I think the presumption against such practices has led to the kind of bureaucratic, soulless care culture that have characterised child care practice over the past twenty to thirty years. The current Scottish Government child care policy, The Promise, has recognised and is trying to shift this culture, which came about in the wake of the Edinburgh and similar inquiries and which permeated the approach of the recruitment centre.
234. KTV [REDACTED] and KTS [REDACTED] are evidently unaware of such shifts and seek to hold tightly to their own narrow, procedural versions of child care, which could often just mask their inability to build relationships with children. What we did at St Katharine's would be consistent with the spirit of The Promise, which talks about children's desire to experience loving relationships while being cared for. It would also be consistent with international literature in the field.
235. The children in Guthrie were schooled on the premises. Once they moved out to the open units they might still be educated in Guthrie, if they were still on a secure order. Others attended other schools, e.g. Wellington. One or two went to local schools.
236. Children were mostly registered, temporarily, with a GP practice on Howdenhall Road. Some continued with their own GP practices. We had good links with the adolescent psychiatrists at the Young Peoples Unit at the Royal Edinburgh. I think they respected the work we did.

237. Children did not do manual work.
238. People, including parents, family and others, did sometimes visit the children. We had a visitor room before entering the secure unit, where they could meet. There were some parents we would not admit if we felt they were likely to try and bring in contraband. This would have been set out in care plans.
239. We sought to get social workers to visit weekly. They could speak to children alone and could take them out if agreed. They ultimately had supervising authority for children.
240. Children were subject to child in care reviews at intervals stipulated in local authority, perhaps Scottish Executive, policy. They were also subject to review through the Children's Hearings system.
241. They would have had a plan about returning home or moving to another residential setting and be supported to do so.
242. The question of through and after care was becoming a big issue over the 1990s. I think there was a separate Council through and after care team set up by the time I left.

Living arrangements at St Katharine's

243. I lived off-site, in Edinburgh. Similarly, other adults in positions of responsibility also lived off-site.
244. All staff had access to the children's residential areas.
245. We had a separate night staff team, who were responsible for the children's residential areas overnight. There would be four waking night staff, one for each unit and one floating. We later introduced additional cover from 10.00 pm to 2.00 am in each unit.

Discipline and punishment at St Katharine's

- 246. My approach to discipline and punishment was that it could only be based on warm, authoritative, adult child relationships.
- 247. Corporal punishment was not permitted or used.
- 248. There was a Council care and control policy in relation to discipline and punishment, which staff would have been aware of. The terms of this would also have been addressed in CALM training and also through internal discussion.
- 249. Discipline was not the responsibility of more senior child residents.
- 250. Children were never punished when they ran away. They were spoken to, and staff would try and work out the circumstances and any reasons for running away. Depending on these circumstances and whether there were concerns about heightened risk, they may have had changes to their care plan to restrict time out, but that is about all.
- 251. In Guthrie, children could be placed in their bedrooms, sometimes with the door open, sometimes locked, if they were disruptive and needed some time away from the group. I wasn't really in favour of the use of bedrooms for this purpose and sought to limit such practices. Nevertheless, there were times when it was required. If children were locked in their rooms, there were Scottish Office requirements about the time they could be kept there and the need for regular checks.

Restraint at St Katharine's

- 252. Restraint was a feature of what we did in St Katharine's. It was required more at some times than others, depending on factors such as the composition of the resident group and the complement and skills of the staff group. We could go for periods with very few restraints and at other times they could be a regular occurrence.

253. I will mention two contextual factors, the first being that we, in some ways, became victims of our own success and a growing reputation in the field. This resulted in us taking some very difficult children who could not be managed anywhere else. We had one, for instance, who was kicked out of two longer-term secure units, both, ostensibly, better equipped to deal with such cases. We also admitted at least one case of a seriously self-harming child, who was placed with us because there was no in-patient psychiatric facility in Edinburgh. We were also sent a severely autistic child, without having any expertise in autism. This all placed inordinate demands on staff.
254. This happened at the same time that staffing was short and some of those staff coming through the new assessment centre, or being redeployed to us, were not able to do the job. As I have stated, I raised this repeatedly with social work management.
255. The method of restraint used was that taught in CALM. Having said that, we dealt with some violent situations and at times staff needed to do what they could to make a situation safe before they could manage to use CALM holds. In such situations they knew to use proportionate force. We spoke to the police about such situations. If what is meant by prone restraint is that children were taken to the ground, then many restraints were. I think CALM identified this as needing three staff, which might offer some context for the need for staff to respond to alarms.
256. Restraint was always a last resource, although there were situations that were so spontaneous and serious that 'talking down' or de-escalation was not an option.
257. New starts may not initially have been CALM trained. In such cases, they would take a lead from more experienced staff. If possible, female staff would restrain girls but it wasn't always possible.
258. Towards the end of my time, I/we were very aware of increasing levels of restraint, largely as a consequence of the kind of circumstances with resident characteristics and the lack of suitable staff. It was the focus of considerable discussion and even a training session where we brought in an outside group promoting anti-violence. The culture was never one that sought to normalise restraint although there were

undoubtedly times when it was a more regular occurrence than any of us would have wished.

259. All restraints were recorded on a Council form. I used to read and sign these off on a regular basis and my line manager also had to do this. So, external management was well aware of the level and circumstances of restraint.
260. With regard to whether the use of restraint was provoked or triggered by the conduct of staff, such as 'toy fighting' or 'horseplay', I would begin by stating that horseplay was not banned in the Council. Indeed, despite what KTS [REDACTED] and KTV [REDACTED] might claim, it was recognised as happening in the Care and Control policy. I don't recall what it said but I imagine it would caution against it being used inappropriately. It certainly didn't say not to engage in it.
261. While horseplay did happen at St Katharine's, I never felt it was used excessively or inappropriately. The atmosphere was not the kind of 'wild west' that might be imagined from the statements of KTS [REDACTED] and KTV [REDACTED].
262. It was generally settled and relaxed, as evident from inspection reports. I was never aware of a restraint being provoked by horseplay. There is a popular book by an author Steve Biddulph called 'Raising Boys'. In it he says: 'If you want to raise boys, learn how to wrestle'. I personally didn't get involved in wrestling, but I did understand children's, perhaps particularly boys', need for physical engagement. I used to attend to this through taking them down the gym.
263. One might just as readily make the case that physical contact, either through physical exertion or horseplay, offered children, usually boys, the kind of physical contact they might otherwise have sought through provoking restraint. More often than not it was kids who initiated horseplay and staff might respond. Like restraint, its incidence could depend on the composition of the resident group. I had, and have, no problem with physical engagement between adults and kids. Some staff were great at horseplay and kids enjoyed it. It isn't something that should be subject to a blanket diktat, but often comes down to what individual adults and children were comfortable with. This

did require an awareness among staff and managers. I recall specific conversations about this between Emily Campbell and myself.

264. I am aware of the claims made in the statements about a link between horseplay and restraint. Some of these were made while I still worked at St Katharine's. They were fully investigated by senior officers in the Council and found to be unwarranted. I received a letter from the Director of Social Work, Les McEwan, giving me the result of this investigation. He said the investigation had not found anything untoward but suggested that we were 'circumspect' in relation to how horseplay might be construed, but did not suggest we should ban it. I think he shared my views on the matter. I have a copy of this letter. As I say, we were already having these conversations, not with a view to banning horseplay, but to maintain an awareness of ensuring it remained at the level of healthy engagement.
265. I did restrain children. I can't think of any member of staff who didn't. Failure to be involved in restraint when necessary could lead to staff or other children being seriously injured. It was an expectation by the Council that staff would use restraint when necessary. There were no staff who were so skilled they didn't need to use restraint. I didn't do it very often as I was rarely the one dealing with kids for eight, or sometimes sixteen hours a day. But I might get called to a situation and need to help out.
266. The policies and practices relating to restraint in the establishment were all incorporated into CALM training.
267. The most obvious injury I saw from restraints was carpet burns, but I only recall this on a few occasions and with one lad in particular. These were generally caused by children, in the course of being restrained, deliberately rubbing their faces on the carpet and then accusing staff of causing this. If I recall correctly, previously we might have sought to place a pillow or something under a child's face to prevent this type of injury, but I think there was something in CALM that said we shouldn't do this. I could be wrong on this, but I think there may have been something to do with restricting airways.

268. I did not witness what I considered to be a non-accidental injury.

269. I have never reported any member of staff for inappropriate or excessive restraint.

Day-to-day running of St Katharine's

270. As I have stated, I was involved in the day to day running of the establishment.

271. In practice, this meant that I would spend time in the units, I would get involved in activities and I would take kids out to various appointments.

272. I cannot be absolutely confident, but am as confident as I can be that, if any child was being abused or ill-treated, it would have come to light at or around the time it was occurring. In addition to being a regular presence across the centre, I also had a number of staff members, but also children who I would trust to tell me what was going on and I am pretty certain would have told me if anything was untoward.

273. I don't believe abuse occurred in the establishment during my period of employment and I have seen no evidence to suggest it was, as detailed in my response to the claims that have been made.

274. As I have stated, I had a lot of regular interaction with the children, especially in the early years although this lessened as we got more senior staff following the staffing review and I took on more of an outward facing focus. I became involved in a European research project, for instance and I became chair of a Scottish, and Northern Irish, Secure Accommodation Network. But I continued to do late shifts and be around at weekends.

275. I think more than anything, the purpose of that personal interaction was to give the children a sense of trust that they could come to me to speak of any concerns. But I also liked being about them and most of them liked being around me.

276. I did ask children how they were feeling, although I would not have directly asked how they were being treated by staff.

Problems at St Katharine's

277. I was never sure about the quality of education. Many, although by no means all, teachers in secure accommodation weren't really there through choice but it provided for some a way into a job market.
278. As already noted, I was generally happy with the accommodation.
279. Again, as noted, I had concerns about the mix of children coming our way, the implications of recruitment being centralised, and the lack of recognition of this from senior managers.
280. Latterly, I was concerned with the senior management culture in the Council. In the wake of the Edinburgh Inquiry, this lacked any vision or values. Staff were afraid of allegations being made against them and fearful of a response from managers that would result in suspension. When working in difficult environments such as secure accommodation, staff need to feel safe and supported, they didn't. Some of the responsibility for this culture must be attributed to local politicians. But it was amplified at officer level. I raised my concerns about such a culture. I was seen as a problem for doing so, although I was by far from being alone in having these concerns.
281. At St Katharine's, many of these concerns played out in the establishment and operation of the recruitment assessment centre. Staff coming through the assessment centre were actually being briefed to 'dish the dirt', of which there wasn't any. One of the problems in the way things unfolded is that staff coming through the recruitment centre were being told that practices such as horseplay and taking children home were against departmental policy. They weren't. Moreover, I was told by a female member of staff that the recruitment centre was biased against men because they were being told that 'women were 'natural de-escalators'. All of this set up a situation, which was untenable, and was happening with the explicit approval of the Deputy Director.
282. In response to child abuse cases that had or were coming to light around the mid-1990s, the Scottish Office commissioned Roger Kent, a former Director of Social Work

in Lothian Region to produce a report on children's safeguards. This was published in 1997. Kent made a number of recommendations. Of relevance to this statement, he stated that it was essential that we provide children with the necessary warmth, affection and comfort for their healthy development if we are not further to damage them emotionally. He went on to say that he was horrified to come across policies that denied children physical expressions of comfort or affection from adults.

283. Furthermore, he made recommendations about staffing, advocating a social pedagogy (the European approach to child care) approach, which sought to attract staff with a range of qualifications and skills and then to educate them to degree level.
284. In both cases, that of hanging on to the need children have for physical contact and our approach to recruitment, St Katharine's was entirely consistent with Kent's recommendations.
285. One of the staff who came through the assessment centre, who was happy in St Katharine's, told me that Carol Mentiplay had called her at home and had asked if she had any concerns about St Katharine's she would like to speak to Duncan McAuley about. The member of staff was very happy at St Katharine's and felt it inappropriate that she had been asked to report on us. I raised my concerns about this with Duncan McAuley, I still have the letter, and he acknowledged that Carol Mentiplay was operating to his instructions. There was no protocol to justify such actions; it was wholly undermining and ultimately contributed to staff in St Katharine's losing some of the confidence required to care safely for children.
286. As I have previously noted, I regularly drew attention to my concerns about staffing and safety to senior managers, verbally and in writing. So did other senior colleagues. I did not feel listened to and indeed felt blamed for even raising the issues. Emily Campbell used the new Expression of Concerns policy to report to ELRIS about staffing levels and a bullying departmental management culture and the ramifications of this on day-to-day care. I have a copy of this document, which I can make available.
287. I'm not aware of any problem with the use of solvents by children in the establishment. Towards the latter part of my time, drugs became an issue and we were aware that

some were coming into the open units. One of our seniors, KEH had a background in drugs work and rehabilitation and was adept at recognising the signs of drugs and was able to advise us, and children, on how to work with this.

288. I wasn't aware of bullying of children by other children being a problem. There may have been the odd instance as there is an any setting, but there was no systemic bullying.

Concerns about St Katharine's

289. Before the period pertained to in the statements I am to comment on, St Katharine's was never the subject of concern, within the establishment itself or to any external body or agency, or any other person, because of the way in which children and young people were treated.
290. There was one episode where a disaffected member of staff who had been seconded to us because she had been a problem elsewhere applied for a permanent post and we didn't appoint her. She then made claims to a newspaper, which received headline coverage. The claims were mostly saying that we did not punish kids enough. Several did not even pertain to St Katharine's.
291. I'm not aware of any concerns that children were mistreated. All inspection reports noted they were safe. The claims were entirely tittle tattle from a disaffected former staff member. But, because it hit the local press and local politicians became involved, the Department said it had launched an investigation. I have the letter from Les McEwan indicating that the investigation, and the subsequent one triggered by KTS KTS and KTV, did not find anything beyond what would be considered everyday practice and nothing requiring any disciplinary action. There was certainly no action taken. Nevertheless, it was a stressful period for staff. More broadly, it was indicative of the public profile of secure accommodation and the scrutiny it can face, even when it is clear, as it was in this case, that claims are malicious.

292. No individual was subject to concern. The claims related, mostly I think, to practice issues such as absconding and children not being punished.
293. As I have stated, I am not aware of specific instances of concern. The supervising social worker would be the official point of contact with parents, although we certainly had regular and mostly positive relationships with parents.
294. I do not consider the concerns I raised with senior managers about staffing and safety were appropriately and satisfactorily addressed. I think one reason they weren't was that the social work department had gone down a singular direction of thinking that its recruitment assessment centre would resolve any staffing issues.

Child protection arrangements at St Katharine's

295. As I have stated, we had a well-qualified staff group including many with social work qualifications and with post qualifying qualifications in child protection. From the time of the Edinburgh Inquiry, we spoke, at Council level, of little else than abuse, to the detriment of any developmental agenda of how best to care for children.
296. The Council had clear child protection guidelines, which would require the supervising social worker to be told of any concern, such as reports of abuse or ill-treatment of children by staff, other adults, or other children.
297. In cases where there were clear child protection concerns there was no discretion.
298. The literature would suggest that the best safeguard in such situations is a staff team that is open and prepared to discuss practice. I know that staff worked together to ask someone to withdraw from a situation that might be becoming heated, and they would also debrief after difficult situations and consider how an outcome could have been averted or a situation better dealt with.
299. These arrangements did work, however I can't recall specific instances.

300. Looking back, there was nothing I did, or failed to do, in relation to the treatment, and/or discipline of children and/or protection of children from abuse or ill-treatment, that I now regret.

Reporting of complaints/concerns at St Katharine's

301. If any child in the establishment, or another person on their behalf, wished to make a complaint or report a concern, there was a Council procedure where complaints were made direct to a complaints officer in departmental headquarters. I, or colleagues did not screen them.
302. Like any complaints procedure, there was an emphasis on early resolution of concerns. So, sometimes a young person would come to me or another member of staff and say they weren't happy about something and we would try and work it out, usually to everyone's satisfaction.
303. I can't recall many complaints being received, but I wouldn't necessarily know because they bypassed me and went direct to a complaints officer at Council HQ.
304. I can't recall receiving specific complaints of abuse myself. If I did, I would have let my line manager, and the supervising social worker, know.
305. Complaints were presumably recorded centrally.

Trusted adult/confidante at St Katharine's

306. The children all had supervising social workers, some may have had other professionals involved, such as psychiatrists, whom they could speak to about any worries they had. Additionally, there was a children's rights officer, latterly two, who visited regularly and could speak to children without the permission or presence of staff. Representatives of the children's advocacy organisation, 'Who Cares?' also came in. We had good relationships with the local community police and two officers used to regularly come in and knew many of the children and we had a resident psychologist, who the children knew.

307. I'm not sure that practice changed over time in substance, but the outside scrutiny did become more intense, especially in the wake of the Edinburgh Inquiry.
308. I think children in practice did occasionally raise concerns in this way, generally about things like pocket money and leave being restricted. I can't recall specific instances. I did receive such concerns, but low level ones.

"Abuse" at St Katharine's

309. It wasn't really up to the establishment to have a definition of "abuse" that it applied in relation to the treatment of children. I think this came down from the Scottish Office through the Council. I think it identified physical and sexual abuse, I think emotional perhaps came later.
310. I don't think the definition changed substantially. As I say, emotional abuse may have come later, I'm not sure.
311. All of the seniors would have known the definition. It would have been discussed in team meetings. Many staff attended a range of training courses, which would have addressed this.
312. Children never reported abuse to me in respect of anything that happened in St Katharine's. There were a couple of situations where kids told me, or perhaps initially a keyworker or unit senior, that something had happened when they were on leave or had absconded. I recall two or three such cases where supervising social workers and police were involved.
313. I cannot 100 percent be confident that, if any child was being abused or ill-treated, it would have come to light at or around the time it was occurring, because children, despite adults giving them opportunities to do so, can still feel reluctant to report abuse.
314. Abuse could of course have happened in my time at St Katharine's and gone undetected.

Allegations of abuse at St Katharine's

315. I have never been the subject of an allegation of abuse or ill-treatment of a child or children who resided in St Katharine's when I was working there.

External monitoring at St Katharine's

316. We were inspected by Scottish Office inspectors from the Social Work Services Group. The first one was to give us the initial certificate of approval to operate as a secure unit. There was at least one, perhaps two more in my time. These were conducted by two very experienced inspectors and lasted around a week. Every aspect of our practice was examined and observed.
317. We were also inspected by the Edinburgh and Lothian Inspection Service (ELRIS), which later became subsumed within the Care Commission. These were, I think, annual and I think at least one was unannounced. Full inspections I think lasted three to four days.
318. The inspectors spoke with children both individually and in a group and staff/other adults were probably not present.
319. They also spoke with me and they gave feedback, which initially was verbal and then was written.
320. If the inspections raised concerns about how children at the establishment were being treated by staff, or other safety and welfare concerns, then those concerns, if other than relatively straightforward practice issues, would have been raised with external management. I don't recall specific instances, however.
321. I don't recall concerns ever being raised about the recruitment and training of, or training opportunities for, staff.

322. I don't recall concerns ever being raised about the discipline and punishment of children or the use of restraint or segregation.

Record keeping at St Katharine's

323. We kept a number of records, which included daily records on each child, we also did reports for children's hearings and child in care reviews, we had an incident register, a record of children held in a locked room, medical records, etc. Allegations of abuse would have been dealt with outwith the units.
324. Record keeping was as good as record keeping ever is. I think staff were conscientious in keeping records. There may have been some gaps here and there if they were pulled to deal with a crisis, but generally they tried to maintain the requisite records.
325. The quality and content of the records we received on children was variable.

Investigations into abuse at St Katharine's

326. In addition to my previous comments, I was subject to unfavourable [REDACTED] in 2017/2018. A number of claims were made by a girl and her mother about her having been mistreated in St Katharine's. The Council claims that they had conducted an investigation into the claims. In response to representation, they subsequently retracted this statement and acknowledged that they had not conducted any proper investigation. I received an apology, which I have a copy of.
327. I had assumed that the complainants on this occasion had given statements to the Inquiry, but I note I have not been asked to respond to these.
328. I remember one temporary member of staff, I can't remember his name, being dismissed for threatening behaviour towards a boy.
329. I wouldn't be involved in any investigation on behalf of St Katharine's into allegations of abuse or ill-treatment of or into inappropriate behaviour by staff or others towards

children, as this would have been done externally. I did act as an investigator on cases involving other establishments, although not involving abuse.

Reports of abuse and civil claims at St Katharine's

330. I have never been involved in the handling of reports to, or civil claims made against, St Katharine's by former residents, concerning historical abuse.

Police investigations/ criminal proceedings at St Katharine's

331. I became aware of a police investigation into alleged abuse at St Katharine's in 2017.
332. I was approached by the police for a witness statement about complaints being made by KTV [REDACTED] some of which are repeated in her statement to the Inquiry. I gave a full statement. I had no prior knowledge of most of the claims other than the one in which she mentions a drill being used to 'restrain' a boy.
333. I am aware that several others, including former residents were involved in the police inquiry. My understanding is that the police found no substance to the claims.
334. Around 2018, Kevin Glancy was accused by four boys who had been in St Katharine's, in fact one of them had not been but claimed to have been, of sexually and physically interfering with them. I gave evidence for the defence. Kevin was found not guilty and perhaps not proven on one.

Convicted abusers at St Katharine's

335. I know of the Gordon Collins case, but he did not work there until 2006, [REDACTED] after I left St Katharine's.
336. I did not at any time have any personal dealings with any such person who had been convicted of the abuse of a child or children at the establishment.

Other staff at St Katharine's

337. I am aware that the Inquiry would like to find out about staff and others who may have been employed at St Katharine's at the same time as me. They are KEI [REDACTED], KEL [REDACTED], IDJ [REDACTED], KEM [REDACTED], KEH [REDACTED], Kevin Glancy, KEJ [REDACTED], KZB [REDACTED] or KZB [REDACTED], KEO [REDACTED], Vicky Grant, KTS [REDACTED] and KTV [REDACTED].

KEI [REDACTED]

338. I recall KEI [REDACTED] KEI [REDACTED] was at St Katharine's throughout my time there. He was probably in his mid to late thirties and he was a shift co-ordinator.

339. KEI [REDACTED] was a mainstay of the centre and took responsibility for the staff rota and building related issues, as well as running shifts. He would report to me on staffing and building issues and on anything that I needed to know from shifts he had run. KEI [REDACTED] was very principled with strong and appropriate values towards children. He was very fair with both children and staff.

340. I knew him pretty well and I regularly saw him with children. Children liked him, he was sort of fatherly, they knew he was fair.

341. I did not see KEI [REDACTED] discipline children, other than in daily interaction. He had personal authority but was also very caring.

342. I did not see KEI [REDACTED] abuse children. I did not hear of KEI [REDACTED] abusing children.

343. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

KEL

344. I recall KEL wasn't there from the opening, he maybe came a year to eighteen months later. He came from another residential unit in the city. I guess he was around my age and he was a residential care officer.
345. He worked in Guthrie unit and I would have come across him in his role there. KEL was an interesting character. He had been a miner who retrained as a psychiatric nurse. He had some really good insights into children and situations. He had a bit of character about him.
346. I did not know him particularly beyond our working relationship, however I did see him with children. He had his own way with them, which I think maybe reflected his psychiatric nurse background. But he was good with them and cared.
347. I did not see KEL discipline children, other than in daily interaction. He disciplined children through his personality.
348. I did not see KEL abuse children. I did not hear of KEL abusing children.
349. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

IDJ

350. I recall IDJ was with us from the start. He had just finished his social work qualification and this was his first job, I think. I presume he would have been in his early twenties and he was a residential care officer.
351. His role in relation to me was the same as other residential care officers. I recall he dressed unconventionally for the time. I think he may have had tattoos and piercings and that he dressed sort of like a skater, which he was. Given his age some of the

boys sort of gravitated towards him a bit. Again, given his age, he had a lot to learn but was open to that.

352. On reflection, I didn't know much about him at all, but I did see him with children. He built some relationships but in his early days he could find some of the situations he came across a bit difficult. Like many younger staff, he looked for rules.

353. I did not see IDJ discipline children.

354. I did not see IDJ abuse children. I did not hear of IDJ abusing children.

355. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

KEM

356. I recall KEM. I think he was at St Katharine's from 1995 to 2000. He was maybe a couple of years younger than me and he was a residential care officer, initially in Chalmers unit.

357. His role in relation to me was the same as other residential care officers. KEM had worked for the transport section of the Council as a driver and in that role had been involved in taking runaways back to units and wondered if he might like working in care settings. I think his manager approached Andrew McCracken to ask about a possible secondment and he was seconded to us. He did well and I presume must have applied for and been appointed to a permanent post. He was very solid and dependable. Always keen to help out and to learn.

358. I knew KEM on the same sort of level I knew most residential care officers. I saw him with children. He cared for kids and sought to listen to them and support them.

359. I did not see KEM discipline children, other than in everyday interaction, which he mostly did using personal authority.

360. I did not see [KEM] abuse children. I did not hear of [KEM] abusing children.

361. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

[KEH]

362. I recall [KEH]. [KEH] came on a social work placement from Moray House. Onanda Randall supervised him. He went on to complete his social work training and came back to take a job with us, perhaps about the end of 1995. He was a couple of years younger than me and he was a residential care officer in Allison unit, later promoted to a senior in Guthrie.

363. As a residential care officer, his role in relation to me was same as any other residential care officer. As a senior he would have had more direct contact with me. [KEH] is one of the most insightful and intuitive people I have come across. He was utterly committed to St Katharine's and to the kids there.

364. I knew [KEH] on a similar basis to my relationship with other seniors during my time in St Katharine's. I saw him with children and he was incredibly skilled.

365. I only saw [KEH] discipline children in daily interactions. He had a strong personality but also conveyed that he really cared about the kids and kids picked this up.

366. I did not see [KEH] abuse children. I did not hear of [KEH] abusing children.

367. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

Kevin Glancy

368. I recall Kevin Glancy. Kevin was recruited through the initial assessment centre and deemed appointable. He joined us about a month after we opened. He was maybe thirty years old and he was a residential care officer in Guthrie unit.
369. As a residential care officer, his role in relation to me was the same as any other residential care officer. He was pretty quiet, he would come along to some staff outings but didn't socialise much with others beyond that. He was fine, pretty friendly and helpful.
370. I knew Kevin on the same sort of level I knew most residential care officers. I saw him with children and he was okay. He seemed pretty well accepted.
371. I only saw Kevin Glancy discipline children in the same way everyone did, which, like everyone else, he did through trying to build relationships.
372. I did not see Kevin Glancy abuse children. I did not hear of Kevin Glancy abusing children during his time at St Katharine's. I am aware that Kevin was convicted of internet pornography offences several years after he left St Katharine's.
373. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

KEJ

374. I recall KEJ. I think KEJ probably came late 1996/1997. He had a degree and an MLitt in Scottish literature, I recall, and he came to us from another residential unit. He would have been in his late twenties and he was a residential care officer in Guthrie unit.
375. As a residential care officer, his role in relation to me was same as any other residential care officer. I recall he was really keen to do things right. He put a lot of effort in with

any keychild. He could get a bit frustrated when things didn't go as planned but generally was a very strong worker.

376. I knew him on the same basis as other residential care officers. I saw him with children and he was good with them.

377. I only saw KEJ discipline children on the same basis as everyone else, which he did through building relationships.

378. I did not see KEJ abuse children. I did not hear of KEJ abusing children.

379. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

KZB

380. I recall KZB. I think KZB came around the same time as KEJ and from the same children's unit in the Council. He had been a glazier and had also played a lot of football. He would possibly have been in his mid-twenties and he was a residential care officer in Guthrie unit.

381. As a residential care officer, his role in relation to me was same as any other residential care officer. KZB was one of the most naturally gifted residential care officers I have come across. Kids are intuitive. One of the things they ask, in every unit, is who is on duty. If they knew it was KZB they'd be happy. He was always available to take overtime shifts and to help out. He was always cheery and good fun but could hold a line with them when required.

382. I knew him on the same basis as other residential care officers. I saw him with children and he was great with them.

383. I only saw KZB discipline children in day-to-day interaction, which he did through his relationship with them.

384. I did not see KZB abuse children. I did not hear of KZB abusing children.

385. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

KEO

386. I recall KEO I think he arrived six months to a year after we opened. He was in his mid-twenties and he was a residential care officer in Guthrie unit.

387. As a residential care officer, his role in relation to me was same as any other residential care officer. He was generally fine and did some good keyworking. Some staff were a bit wary of aspects of how he was. If the statements I am asked to comment on have any truth in them, which is a big if, he seems to have been involved in some very unprofessional gossip.

388. I knew him on the same basis as other residential care officers. I saw him with children and he was fine with them.

389. I only saw him discipline children on the same basis as others. He didn't have the same strong personality that others mentioned did, but I had no concerns.

390. I did not see KEO abuse children. I did not hear of KEO abusing children.

391. He did not raise with me concerns about the conduct or practices of staff at St Katharine's.

Vicky Grant

392. I recall Vicky Grant. She was only at St Katharine's briefly. I'm not sure how old she would have been, possibly early-thirties. She was a

residential care officer, but I think she was only there on through an agency. I'm pretty sure she wasn't a permanent member of staff.

393. Her role in relation to me was pretty minimal. I always had the impression that she wanted to do a different job to the one that she had actually been employed to do. I have somewhere in my head she was a counsellor or wanted to be. I don't really know enough about her to comment on what she was like. I hardly knew her at all. I didn't see her with children much and I can't really comment on how she was with children.

394. I did not see Vicky Grant discipline children.

395. I did not see Vicky Grant abuse children. I did not hear of Vicky Grant abusing children.

396. She did not raise with me concerns about the conduct or practices of staff at St Katharine's.

KTS

397. I recall KTS. Her employment coincided briefly with mine, for perhaps six months in . She was possibly in her late-twenties and she was a residential care officer who had come through the Council's assessment centre.

398. Her role in relation to me was minimal. I think I did a brief induction with her and someone else and may have had some brief interactions but none that I have any strong memory of. I remember she had an unfortunate personality. Her body language and tone of voice was almost sneering. People, staff and kids, tended to recoil from her. She gave an impression of superiority and that she had nothing to learn from me or anyone else at St Katharine's. There was no evidence of her attitude being based on any knowledge of children or child care. I suspect this wasn't helped by her connection with Carol Mentiplay who ran the assessment centre.

399. I knew nothing about her personally and I probably did not see her with children much. I did have children tell me that they didn't like her. Staff also made representation to me that they didn't feel safe working with her, they thought she was a 'plant' trying to

find dirt on them, which, it transpires, she was. She was lacking in warmth or insight with children.

400. I did not directly see her discipline children, but it is interesting that in her statement she reports on the practice of placing children in their rooms. My recollection is that she was one of the worst offenders. She was very rigid and looked to rules and then blamed others when she children didn't respond to her.

401. I did not see KTS [REDACTED] abuse children. I did not hear of KTS [REDACTED] abusing children.

402. KTS [REDACTED] did not raise any concerns directly with me but clearly took them directly to Carol Mentiplay and to the Deputy Director and Director. I was unaware of this at the time, although did have some suspicions about her role in the unit. I raised this at one point with the Director and he acknowledged that she had been placed there to report back. She created havoc in doing so.

KTV [REDACTED]

403. I recall KTV [REDACTED] Her employment at St Katharine's coincided with mine for around the [REDACTED]. I thought she was early to mid-twenties, but I see from her statement that she was probably late twenties. She was a residential care officer, initially in Chalmers Unit.

404. Her role in relation to mine was strictly limited. I, and others, began to develop real concerns about KTV [REDACTED] over her short time with us. I think she is a very odd personality. Initially, her demeanour was very quiet. It was hard to say what she offered. [REDACTED]

405. [REDACTED] I was working on the same shift as her, which would have been the Christmas period 1999-2000. There was a restricted bus timetable. I knew KTV [REDACTED] lived near Canonmills, which was on my way home, so I offered her a lift. She seemed a bit reluctant but did get in the car with me. I dropped her off and said I'd pick her up on my way in the following day, which was a backshift. Before I set off for work KEI [REDACTED] phoned me to ask if I was picking her up and went on to tell me not to as she had phoned to say she had been admitted to hospital the previous evening after I had dropped her and would not be coming in. It seemed strange, as she was fine when I dropped her. I went to work and around an hour after the start of shift she turned up. I asked her how she was and whether she was okay to be in work but she just ignored me as though she didn't know what I was talking about.

406.

407.

408. I did not know KTV [REDACTED] well. I didn't get anything from her at all but, [REDACTED] was starting to build up some major concerns about her.

409. I hardly saw her with children and it is hard to say how she was with children, I didn't see enough of her.

410. I did not see KTV [REDACTED] discipline children.

411. I did not see KTV abuse children. I did not hear of KTV abusing children.
412. KTV did not raise concerns about the conduct or practices of staff at St Katharine's with me. I do recall her coming to see me about a more general gripes about the way the unit functioned and how she had spoken to her mum in Northern Ireland, who said it sounded like we were still very old fashioned in Scotland. But she didn't raise any specific concerns. The first I heard of these was when she broke the story about the drill incident. I'm not sure what channel she did this through. Like KTS she caused havoc and her behaviour was very destructive and certainly not in the interests of children.

Evidence pertaining to St Katharine's which relates to me

KTV

413. Before commenting on specifics, I will note that KTV claims to have made at least four previous statements about what she claims was going on in St Katharine's, two to the Council and two to the police. My understanding is that none of these found evidence to support KTV claims.
414. She also claims that there were so many incidents that she couldn't write them all down contemporaneously and more and more came back to her over the years. I would suggest that she has made these, and the initial ones, up. In this regard, I would point out that as far as I am aware, I did not figure in her earlier statements but seem to have been introduced more recently. I have to wonder why this might be.
415. It is of concern that both she and KTS choose to use the Child Abuse Inquiry and the anonymity and protections this offers as a vehicle to rehash claims, and to introduce new ones, that have been persistently found wanting and which if made elsewhere would lead to defamation actions.
416. On page 8, at paragraph 27, KTV states: *'About two weeks into my time at St. Katharine's, I witnessed a member of staff running in the secure unit after a boy*

of about fourteen called ... At the beginning, it appeared jovial. The member of staff went into the office and grabbed a drill that was on the desk. He forcibly put ... to the ground by grabbing his arms and unbalancing him using his feet to ... legs. He then straddled him. He put the drill against his head and turned it on until blood trickled down ... head ... began screaming and shouting and the whole tone changed. It turned into a restraint.'

417. Before KTV mentioned this situation to anyone outside the unit, I knew about it. I can't remember who told me or who the staff member was, but it was reported to me as an incident that had been very well managed.
418. An electrical contractor had left an electric drill sitting in the middle of the secure unit, which he shouldn't have done. One for the boys went to grab it. A member of staff saw this happening and got to the drill first. He then put the drill towards the lad's face and said something to the effect of, '*so what tooth is it that's bothering you*'? He then made the noise of a dentist's drill. The drill was not switched on. The lad was apparently in stitches laughing. There was no blood and it did not turn into a restraint.
419. Nothing was hidden regarding the situation. Senior management clearly knew about it and took no action. I remember speaking to our HR people after KTV had reported it. They were bemused by her version of events and had no issue with what had happened.
420. I know that KTV has struggled to let go of this and raised it again in a police interview in 2017. I understand they spoke to the lad in question and he said it had been a laugh and he had no issue. It is concerning that KTV continues to question his account, as boy and man, and to persist in what is clearly a false view.
421. At paragraph 28 on page 8 of her statement, KTV states: '*The culture within the unit became very apparent. The sectarianism started quickly. I was asked "what foot I kicked with", an expression I'd never heard in my life. That comment came from a male member of staff who had been shipped out of Howdenhall. I can't remember his name, but there had been concerns about his practice. He was an older*

man, short and stocky with dark hair. I was wondering why he had been moved to St. Katharine's if there had been concerns about him. He also accused me of being some sort of spy because I was staying with Peter McClusky at the time. There were lots of racial, Irish jokes. There was lots of misogyny. I was called a "wifey" repeatedly, which again was not a term that I had ever heard. That was just what females in the unit were referred to as being. That culture dehumanises people'.

422. I will deal with the sectarian claims raised at different points in KTV statement. It was highly unlikely that there would be any overt sectarianism at St Katharine's. I am a Catholic of Irish descent. I am married to an Irish Catholic. Frank Phelan is an Irish Catholic. One of the RCOs, Tracey McCaig, was a qualified architect and a very intelligent and ethical individual, and a very good worker, was a Northern Irish Protestant. One of the, equally absurd, claims a former member of staff, who had not been given a permanent appointment, made against me a year or so previously, was that I only appointed Hibs supporters and Catholics.
423. The issue of misogyny is more complicated. As I say earlier, there was around a 60:40 split of male to female staff, in line with the sex/gender split of the children and I think in line with other secure units across Scotland at the time. Some female staff were brilliant at the job, and I don't believe would say that they had encountered any misogyny.
424. I do think there could be an issue for female members of staff, though. Some could become frustrated that boys, particularly, would not do as they told them but might do so for a male. It could be easy to say that this was to do with sex/gender. I think it was more complicated than that. But I was aware of the potential of a maleness, I don't think it was macho or toxic, terms that are too easy to bandy about to close down discussion.
425. I was always aware though of the need to try and attract able and committed females and to ensure that I always had one on the senior team. It wasn't enough but I could only appoint those who applied. I used to have conversations about gender mix and the position of female staff members in the team with Emily Campbell, it wasn't

something we were unaware of. I question whether KTV would ever have been called a wifey, if she knew the term she would know it applied to an older woman.

426. Also on page 8, at paragraph 29 of her statement, KTV states: *'That happened within the first couple of weeks. Before I arrived at St. Katharine's, I didn't know that it had already been under investigation. While there, I was told by several staff that investigations had been happening very frequently. Staff had already been leaving and I was told [that] one person in particular had threatened to go to the newspapers and the police. When I look back, if those investigations had taken place then why were these things still happening? But I can also see why I was met with some suspicion because I came in as a qualified social worker, which wasn't usual in Edinburgh'*.

427. I'm not sure what previous investigations, or their frequency, KTV means. There was only the one I have already mentioned, which was malicious and came to nothing. Staff were not leaving – one member of staff did because she was not appointed to a permanent post because she was not considered suitable. And it was not at all unusual to have qualified social workers in St Katharine's, again, as I have stated.

428. On page 9 at paragraph 32, KTV states: *'Speaking out was difficult because some of those in senior roles were quite powerful and often dictated what was happening in the unit. For example, LUZ who was SNR and KEH who one of the seniors. He was particularly aggressive and on one occasion I was physically assaulted by him in the secure unit office, in front of the kids. That was a measure of how extreme the behaviours could become. There were drugs filtering through the unit and on occasion these were found. I was aware of a member of staff who was offered drugs by other members of staff.'*

429. I'm not aware of any contemporaneous allegation of assault. Is KTV really saying on the one hand that she had a direct line to the senior management of the social work department, and they did nothing about an assault she claims to have experienced at the hands of a colleague? Or that she failed to mention it in the

statement she gave at the time? Did it just slip her mind? This is nonsensical. I also think that if this happened in front of children, word would have been all around.

430. I know nothing of drugs.

431. Also on page 9, at paragraph 33 of her statement, KTV states: *'I can always remember a member of staff saying that it wasn't children's services and that we were run by the SPS (Scottish Prison Service). I'm not aware of staff at St. Katharine's coming from an SPS background, but there were staff who had army experience. There was a kind of toxic masculinity. There were some staff who were constantly involved in restraints. The alarms would go off five, six, seven times a day, often for very little reason. At the time, I felt that certain staff were on a power trip and appeared over-stimulated by getting involved in the restraints. There were occasions when some staff were inappropriate with the girls, such as texting them and being alone with them'.*

432. A quick internet search would throw up that hardly anyone was texting in 1999/2000. I think we were still working on a pager system that required senior staff to phone in on a landline. I'm not aware of any member of staff having a mobile phone that allowed texts, and certainly no kid did. This is a fabrication.

433. On pages 9 and 10, at paragraph 34, KTV states: *'There appeared to be a tiered staff system. There were those who tore up complaint forms and intimidated you physically and verbally. An example of the threat was when LUZ told me that I'd never work in social work again when I raised those concerns. LUZ appeared to be best friends with KEH and KZB and they presented as being extremely powerful. The atmosphere changed when they came into the unit. Other staff often reminded you of how close they were. For example, I was told that KEH was dating LUZ's sister. I was also told that KEH was supporting KZB to do social work and was helping him with his essays. All of this second-hand information reinforced that this was true, that they were a clique and that they would have each other's backs. There were also quiet members of staff who were always involved in restraints and appeared complicit. They didn't seem to openly challenge anything. One of those was later was later convicted of sexual offences, Kevin Clancy. There were*

also those like ..., who was complicit and quiet in a different way, such as helping documents to go missing'.

434. I have never ever told anyone they would never work in social work again. No-one who knows me would recognise this. Moreover, it was clearly not within my power to do so. And it is absurd that someone with a direct line to the Director and Deputy Director of social work could feel threatened by someone some levels down in the organisational hierarchy.

435. A profusion of second-hand nonsense doesn't make anything true as KTV suggests. KTV really shouldn't be passing on tittle-tattle. To put the record straight, KEH did not date my sister(s) and she really has no right to make such a claim without any hard evidence. I shouldn't need to respond but I will, because to do so further highlights the lack of substance behind any of KTV claims.

436. I say earlier that I had no social relationship with KEH while I was at St Kats. The real story is that a few months after I left St Kat's, KEH phoned me and said he was doing a class in the area and asked if he could pop round to catch up. He did and did so semi regularly for a few months thereafter, coming after his class for some tea. In the course of these visits, he met my wife's sister. He went on to marry and have two children with her. As this relationship started about a year after I had left St Katharine's it clearly had no bearing on the culture there. And KTV could not have heard of this relationship during her time in St Kat's as it did not start until a year later.

437. At paragraph 36 on page 10 of her statement, KTV states: *'These conflicting staff approaches made for a very combustible, constantly chaotic atmosphere. I was trying to keep some stability. I used to do activities with the children, like face painting, pancake-making, movie nights. I was also trying to make sure my case notes and care plans were updated. I tried to make sure that the kids were getting leafletted information. However, on one occasion I can remember putting up a poster about the Human Rights Convention for Children. I found it torn up in big pieces and sat on top of the bin, not hidden. I would often say to the kids that the staff*

had nothing to hide and that we had to be transparent. I told them that they should come forward if they had a concerns, but often complaint forms would also go missing'.

438. I don't recall KTV [REDACTED] trying to keep stability. She was a destructive influence in more ways than one. Nor do I recall the movie nights or the pancake-making. We did have one brilliant female member of staff who was great at this kind of thing. It wasn't KTV [REDACTED]. I don't recall KTV [REDACTED] doing much at all.

439. I'm not aware of any complaints forms ever going missing and KEI [REDACTED] would never have done this. He was entirely ethical and straight in such matters.

440. At paragraph 40 on page 11 of her statement, KTV [REDACTED] states: *'It's difficult to describe LUZ [REDACTED] style. In my opinion, things felt off with his [REDACTED] demeanour and boundaries. For example, he would bring his children into the actual secure unit where there were other children who had committed serious offences. Another example was that a social worker from one of the practice teams told me that LUZ [REDACTED] turned up at a social workers' 5-a-side football game with a kid from the unit, but this is second hand information. He could be intimidating, but quietly so. On occasion, he would try to gaslight me and say that the social work that I had done in Northern Ireland was not the same as social work in Scotland. There was an underlying tone about "paddies". He appeared to be close to KEH [REDACTED]. It often felt that orders came from LUZ [REDACTED] and were carried out by KEH [REDACTED]. In turn, KEH [REDACTED] then did the same with KZB [REDACTED]. To be clear, the orders that LUZ [REDACTED] gave KEH [REDACTED] were not practice or procedure related. They appeared to be designed to intimidate.'*

441. I did bring my children up to the unit on a few occasions, probably if I was on call over a weekend. I had three children under five at that point and some of the girls in particular would ask me to bring them up. If the place was the kind of wild west described in the two statements, then it would be strange that I would bring my young children in. But of course, it wasn't at all like that. Children and staff were happy to see my children; it was another of these humanising moments in residential care.

442. As for taking boys to play football, of course I and a number of others did. Along with Phil Garland and whoever might be on duty, I did so for years at a game at Loanhead

community centre with a group of social workers and senior social workers. One of the lads, who was a brilliant footballer, played in a Saturday morning league with me and a group of social workers from Wellington and elsewhere. There was no lack of boundaries, just an attempt to include kids in something they enjoyed and were good at.

443. It says something about the mindsets of KTV [REDACTED] and KTS [REDACTED] that they seek to insinuate some nefarious intent from everyday and healthy activities. I see nothing in her statement to suggest that the social worker she claims told her this was doing anything other than stating a fact, to which she has sought to add some nasty innuendo.
444. At paragraph 48 on page 13 of her statement, KTV [REDACTED] states: *'Initially, Robert Henderson oversaw supervision with me. However, I questioned the standard of the supervision that I was receiving. I wanted to be sure that I received supervision from someone capable and who understood safe practice. Supervision notes can be called in evidence, which I was acutely aware of given the things that I was experiencing in St. Katharine's'.*
445. I wasn't aware that KTV [REDACTED] was supervised by Robert Henderson. She seems unaware that Robert was a qualified social worker.
446. At paragraph 49, KTV [REDACTED] continues: *'At one point, Carol Mentiplay took over my supervision. I believe she was a team manager for children with disabilities and may have ran a residential unit for children with disabilities called Seafield. She visited for supervision only. At the time, candidates who were successful following the assessment process at the Festival Theatre had to complete a six month probationary period. As part of that period, I had to gather evidence of group work, examples and observations to show that I understood the job. In supervision, I began to raise that while completing the portfolio of work I was leaving things out, like the drill incident or a child being bitten on the face or someone having their rib broken. It was becoming a meaningless process. It felt like I was being threatened with not getting a permanent job unless I significantly censored what I was seeing. That then made me question my integrity as a social worker'.*

447. Is KTV saying here that she was asked to keep notes on her experiences but somehow managed to omit episodes of boys having blood drawn by a drill, a child being bitten, another sustaining a broken rib and she herself being assaulted? This is not credible.
448. At paragraph 61 on page 17 of her statement, KTV states: *'Sometimes withholding food was used as a punishment. For example, I remember an incident where a girl had thrown a rubber to another child for them to use in the education wing. They were place into their room for hours. This is one of many examples that I brought up in my supervision with Carol Mentiplay. It seemed like an extreme response and I felt that it was abusive'.*
449. Withholding food was never used as a punishment.
450. At paragraph 70 on page 18 of her statement, KTV states: *'There were occasions when kids sustained injuries and medical attention was not sought. For example, KZB bit a child and there were teeth marks and blood on the child's face. The child was not given medical treatment. Another child was injured during heavy restraint or what some staff like to call "horseplay". He was complaining about being in pain and could barely walk. He kept complaining about the rib. After several staff, including myself, insisted that medical attention be sought he was eventually taken to hospital. I'm sure it came back that the rib had been fractured.'*
451. I am not aware of any child having been bitten and there being teeth marks. Had it happened, I would have been. Likewise, I am not aware of any child sustaining a fractured rib.
452. At paragraph 75 on page 20 of her statement, KTV states: *'Social workers did visit, but in my memory it was rare. If a social worker asked to speak to a child then you would maybe close the door over and allow them time alone. Social workers would sometimes take children out of the open unit. They were in the open unit for different things and not necessarily a major risk to themselves or others. It was very much on an individual basis'.*

453. Social work visits were not rare. Indeed, we stressed to social workers the importance of regular, weekly, visits while children were in the secure unit. Admittedly, some were more conscientious than others.
454. At paragraph 92 on page 24 of her statement, KTV states: *'I'm not sure whether it was a regular occurrence that male members of staff would restrain female residents. After I began to raise concerns about the secure unit, I was pulled to work in the Alison Unit a lot of the time. In my time working there, the only restraint that I remember taking place was that of ... The Alison Unit had a calmer atmosphere. I was forward and back to the secure unit for shifts, but I can't vouch for what was happening to the female residents in there in terms of restraints. Females were subjected to strip searches. I can remember a girl being told to strip in her room for a search. Men were involved in that initially, but I think a female came over eventually after a big row. I can't remember who exactly was involved in that incident. It tended to be the same core of people'.*
455. No child, male or female, was subject to strip searches. We had situations of drugs and razor blades being secreted into the unit and on one occasion a sharpened screwdriver. We had a duty to mitigate the dangers in such situations. Indeed, we would not have received approval to operate from the Scottish Office had we no procedures in place to search children on admission and in other circumstances as necessary.
456. In such cases, they may have been asked to remove clothes in their en-suite facility and throw them out to staff to check. They themselves always had a towel or dressing gown on. Searches were done by same sex staff. This was a firmly established procedure, and all staff were clear about it.
457. KTV continues at paragraph 93: *'I can't remember a child sustaining an injury while they were being restrained. That didn't happen while I was present. I saw very few physical restraints because I was told to leave or I was in Alison Unit. Quite often, things would kick off very quickly. For example, when the child was pushed against the wall by the table, he was grabbed by the arms and shunted out of the room*

very quickly. You're not following because you have to watch all the other kids. If there are three staff on duty and two of them do that, you're then on your own with five kids. The environment was created where these things were done publicly and privately. Publicly, the alarms are going off, you know a restraint is happening and you can hear the screaming. The situation is that you have no other option but to watch the other kids. You weren't necessarily in the room, but you might see injuries afterwards, such as a carpet burn to the face. Children were often quite distressed after being restrained and they just wanted to be on their own'.

458. I will just repeat and highlight KTV opening statement in this paragraph: *'I can't remember a child sustaining an injury while they were being restrained. That didn't happen when I was present. I saw very few physical restraints ...'* Let that sink in! I suspect it is likely the case. So, what is her entire statement about? Imaginary restraints and assaults, that she didn't actually witness.
459. At paragraph 96 on page 25 of her statement, KTV states: *'KEO used to talk about Cathy Jamieson's 1999 inquiry into abuse at two Edinburgh children's homes. He told me that LUZ was good friends with one of the people convicted of abuse at those children's homes. He said that there used to be contact between them and they would go to each other's houses. KEO would often make throwaway comments like that. It was in the days before the internet being as big so I couldn't go and confirm this, but those comments sat heavily with me'.*
460. This is a very serious claim. All I know of the circumstances that led to the Edinburgh Inquiry is what I read. I have never had contact of any sort with either of those convicted, not even in a passing professional context.
461. At paragraph 99 on page 26 of her statement, KTV states: *'The kids I interacted with knew about the complaints procedure. I can't speak for other staff so I don't know whether they gave complaint forms to children. I can remember children telling me that they hated a member of staff because they'd restrained them. It was more general comments rather than specific complaints. Even then, they were quite careful about what they said. Children are quite guarded. After everything I saw, not one of those kids came forward to raise a complaint, even if they were badly injured.*

They'd be screaming and crying, then taken to a private place by a staff member and would return quiet afterwards. I felt that I was constantly advocating on their behalf. I would sometimes find children crying in the unit, on their own. I'd ask them what was wrong, but they wouldn't say anything'.

462. We have here confirmation that children knew about the complaints procedure.
463. She continues at paragraph 100: *'The only time I ever gave a child a complaint form was when a boy called [KTB] sustained an injury to his face. The skin on half of his face was missing and he told me it was as a result of a restraint. It looked to me like a carpet burn. After discussing this with another member of staff, [LUZ] unexpectedly turned up to Alison Unit. He took [KTB] into what was the dining/conference room. They both came out. [KTB] walked past me quietly, with his head down, and went upstairs. [LUZ] stared at me, tore up the complaint form in front of me, smirked and put it in the bin. When I raised concerns, [LUZ] said that he would make sure I never worked in social work again.'*
464. This statement is just not true. I have no recollection of a boy called [KTB]. I did not turn up at Alison unit and take him aside and I certainly did not rip up any complaint form, nor did I tell [KTV], yet again, that she would not work in social work again. If any of this had happened [KTV] would have had a professional obligation to report it to senior management. She clearly had access to them. I would also note, in relation to my alleged telling [KTV] and [KTS] that they would never work in social work again, that they (and I) were working for a large local authority, with a range of HR processes, including harassment and whistleblowing policies. Such threats were not reported at the time.
465. At paragraph 102 on page 26 of her statement, [KTV] states: *'Several weeks after the drill incident, a member of staff called ... came to Alison Unit out of the blue. I'd never really spoken to him before. He said that he wanted to say sorry ... said that he'd been in the secure unit and the staff involved in the drill incident were openly discussing it. They noted that I couldn't take a joke. He told me that he had challenged them because they had said they hadn't been on shift with me. At that point, he realised that the incident had occurred. Around 2017, ..., the child involved*

in the drill incident, was interviewed by the police. He told them that what I'd described had happened. He said that he had taken it as a joke, but I queried this with the police because he was only a child when it happened'.

466. We have confirmation that the boy involved in the drill incident, seventeen years later, as an adult, still considered it to be a laugh. KTV clearly feels she knows better than he does. Being able to listen to and respect the views of the person involved in a situation should be a core skill for a social worker and it is clearly lacking here.

467. At paragraph 107 on page 28 of her statement, KTV states: *'It's really hard to explain, but the children almost gravitated towards people they felt safe with. They enjoyed the time that they spent with them, but they didn't necessarily tell you if they had a concern. It's not that they had nothing to say or didn't want to say it, it was the way that the whole culture was being played out. Everybody was walking on eggshells as to who they spoke to and what they said.'*

468. I agree that children gravitate towards adults they feel safe with. I know who those adults were and I would include myself in that and indeed, most of those implicated in KTV statement. It manifestly was not KTV or KTS KTS. This really is turning reality on its head.

469. At paragraph 110 on page 29 of her statement, KTV states: *'You would never take a child to your home address. You could have good working relationships with children and children could look to you almost as a parental figure if you'd worked with them for a period of time, but that would be crossing a massive boundary. I don't know whether it was written down in any policy, but there were standards of practice, even in those days. You'd have your fair treatment at work and your grievance process, which laid out bullying, boundaries, conduct and everything else. I would struggle to understand how someone could justify, in terms of professional conduct, taking a child to their home. While it might not explicitly say that you shouldn't take a child home, we have a code of conduct. How would you explain bringing a child from a unit to your house? Everybody would have known that. You do not encroach boundaries. It's standard. You just wouldn't do it'.*

470. I have dealt with the issue of taking children home earlier in my statement. The only thing I would add here is that we didn't have a code of conduct at that time. That came later after the Regulation of Care Act. But even that is not explicit on taking a child home.
471. At paragraph 112 on page 29 of her statement, KTV states: *'The council's disciplinary code was available to all residential care staff and issued to them when they accepted a position of employment. The code I have was dated 26 August 1996. It clearly outlines behaviours which are unacceptable while employed as a council member of staff. It was explicit. In my experience, there was a lack of understanding of trauma and complex trauma, of the impact of moving a child into care. There was a power imbalance and staff did not follow the behaviours expected of them, as laid out in the disciplinary code. There were statements said to me by staff like, "We're the Scottish Prison Service, we can do what we like. We don't follow children's services rules." According to LUZ and Frank Phelan, physical abuse was "horseplay" and "boys will be boys". I would be accused of not understanding that boys needed to express themselves. Both of them made comments like that to me separately'.*
472. Talk of trauma and complex trauma is entirely out of context. These are words that have only really come into the professional lexicon in the past few years. Of course we weren't explicitly trauma informed. But we did have a good understanding of children's needs and the impact past experience might have on these.
473. At paragraph 117 on page 31 of her statement, KTV states: *'The Care Inspectorate carried out a routine inspection towards the end of my time at St. Katharine's, but I can't be specific about the timings. The best 'china' would be displayed for the inspectors coming in and children would immediately say that they didn't usually get fed like that, pointing out the differences'.*
474. The Care Inspectorate did not exist during KTV or my, time in St Kat's, and we had no 'best china', which is a strange term to come across.

475. At paragraph 120 on page 31 of her statement, [KTV] states: *'At the time, I was told that the inspector had worked in the social work department at Edinburgh Council and knew everybody. I think he might have been called Duncan, but I'm not sure. He was short with dark hair. We were all very clear that practice wasn't great, however nothing was mentioned in his report. As far as I'm aware, he didn't raise any of the concerns brought forward by staff. I would have seen the inspection report at the time, but I can't remember it. I can remember [KEO] tore up the report at a staff meeting and said it wasn't worth the paper it was written on. It was quite dramatic, but he had a point. He was absolutely furious'.*
476. Here [KTV] casts aspersions about the professionalism of the ELRIS inspector, Duncan Craig, now deceased. Duncan had not worked in Edinburgh. He had, I think, worked in the North of England and Glasgow. He only knew me and other staff in his role as inspector. He was an experienced and insightful residential care worker and manager. He spent days at a time in St Kat's. He was very astute. He was good at getting the inside story from staff. There is no way he would have covered anything up or compromised any child safety issue. That is a slur. He was very positive about St Katharine's, he told me he thought we were up with the best residential units in Scotland and that what we did should be 'bottled'.
477. At paragraph 122 on page 32 of her statement, [KTV] states: *'I filled the forms on a number of occasions but there were also occasions when they were torn up, but I don't know by who. The pink forms would go into a tray that would go through the main office in the reception. There was a bit of a process after you had filled in the form, but I can't remember what that process was'.*
478. She continues at paragraph 123: *'I tried to put the bite mark incident and the drill incident on a pink slip. They kept being torn up. I can't remember if I finally got to submit them. When that happened, I would bring the torn forms to supervision and tell Carol Mentiplay or whoever was supervising me at the time. In my previous experience, significant occurrence forms could also be used for positive achievements by a child'.*

479. I am not aware of forms ever being torn up. If I remember correctly, they were numbered, so gaps would be obvious. In fact, I have some correspondence, which I can make available, which references numbered significant occurrence forms being submitted to the Council drawing attention to instances of concern. Restraint forms were signed off by me and then by external managers. Clearly, KTV didn't need to use 'pink slips' to bring her concerns to the directorate as she had a direct line to them.
480. At paragraph 127 on page 33 of her statement, KTV states: *'Kevin Glancy was always front and centre of restraints. At the time, I felt that some staff were getting a power arousal by being involved in the restraints. I later found out that Kevin was arrested for sexual offences around 2008 or 2009. I don't think he was qualified when I knew him but he must have gone on to do his social work training because he was working as a social worker in Victoria Street when he was arrested. He was convicted of being in possession of indecent images, mainly of boys'.*
481. Kevin Glancy was convicted of internet sex offences in 2008. I am not aware of him being 'front and centre' of restraints at St Kat's, I don't believe he was involved more than any other member of staff. Kevin was a qualified social worker when KTV knew him.
482. I don't know the exact nature of Kevin's offences, only what I read in the newspaper. I had left St Katharine's previously. I looked up reports of his court case in preparing this statement. The newspaper report of the court proceedings indicates that the offences dated from three years prior to Kevin's arrest, which would be around three years after he left St Katharine's. As noted in KTV statement, he had been working for several years as a community-based social worker. There was nothing about his behaviour at St Katharine's that cause me any concern and none of the offences he was convicted of took place during his time there.
483. She continues at paragraph 128: *'At the time of his conviction, I was working as a Sexual Offences Liaison Officer and I was asked to chair his risk management case conference. I excused myself because of my previous professional knowledge of him at St. Katharine's. My understanding is that the images he was found in possession*

of involved the restraint of boys and boys being bound. It was a lightbulb moment for me, given he was involved in so many restraints at St. Katharine's. It did not go unnoticed that his frequent involvement in restraints and the nature of the images were similar. Children would shout, "Beast," or, "Get off me," but there were often several men present. It was difficult to know whether this was directed towards Kevin Glancy. He was very quiet and I always found him very amenable. Compared to [KZB] and [KEH] for example, who were very aggressive, Kevin seemed quite pleasant I was therefore surprised by his conviction.'

484. I am wondering how [KTV] seems to know more about the nature of Kevin's offences than seems available in newspaper reports. That could suggest that she accessed departmental reports.

485. At paragraph 129 on page 34 of her statement, [KTV] states: 'One member of staff, [KZB] went missing with an older girl. I remember a member of staff who was involved in an exchange from Australia. The Australian member of staff came out of the car one day when I was in the Alison unit and was angry. I can't remember her name, but she had long blonde curly hair. I asked if she was okay. She said that [KZB] had left her with all the kids and had gone missing with a girl in a shopping centre for several hours without explanation.'

486. She continues at paragraph 130: 'I can't remember the name of the female child involved, but she would have been about fourteen or fifteen. The Australian worker went on to say said it was completely out of bounds and that [KZB] had also been repeatedly texting the girl. She thought that it was outrageous. One or two staff were texting children and were very inappropriate with girls. I can't remember who the other member of staff involved was. It is my understanding that [KZB] was later arrested in a significant cocaine bust. It was a several years after I left St. Katharine's and I am unclear if he was still working there'.

487. Then, at paragraph 131, she states: '[KZB] behaviour within St. Katharine's was often erratic. On one occasion, he straddled a child and he bit him on the face. It was during what he would call "horseplay". He was holding the child down by the wrists, leant down and bit him. He seemed to be so high and aroused.

The bite broke the boy's skin in his lower cheek area. I can't remember the name of the child'.

488. I remember the Australian member of staff. I had supported the request for an exchange and one of our staff went out to Australia. I can't remember the Australian girl's name either. I did drop her home on occasion as she lived near me. She never raised any concerns with me.

489. As I mention earlier, there was no texting between staff and residents.

490. I am aware that KZB was convicted of drugs offences after he had left St Katharine's. I have never seen him since I left St Kat's. From what I understand he had issues in his personal life and things fell apart for him. He moved to Wellington School. This was all after I had left St Kat's. I'm not sure if he was at Wellington when he was arrested. I know he wasn't at St Kat's. As I indicate earlier, I held him in high regard and had no concerns about his practice and there was no indication of a drugs problem in my time there.

491. At paragraph 132 on page 34 of her statement, KTV states: *'I came into Alison Unit one day to start my shift. A child had the skin missing from half his face. His name was KTB. The entire side of his face was bloodied and it looked like a significant carpet burn. I gasped in shock. I didn't see him sustain the injury, but I saw him immediately after he had been restrained'.*

492. She continues at paragraph 133 on page 35: *'KTB was shaken and teary. Nobody had given him medical treatment. He was clearly struggling to keep it together. I told him that it was not acceptable and it was not how restraints worked. I asked him if he'd spoken to his keyworker and he said that he didn't know what to do. I told him that I'd log all of it and speak to staff. I told him that there were complaint forms readily available if he'd like to make a complaint. I told him I'd make sure that it was escalated up immediately, but not through LUZ. I planned to go to someone who I thought might listen a bit better'.*

493. At paragraph 134, she states: 'KTB completed the complaint form. It wasn't much later, maybe a matter of hours or a day, that LUZ bursting through the front of the Alison Unit. I was taken aback to see him coming in. There was a big dining room by the office. He pulled KTB in there. They were in there for ages and I wondered what was going on. LUZ came out and he had his hand on the shoulder of the boy. He was kind of just guiding him. KTB had his head down and walked as if he was going upstairs to his room. LUZ had the complaint form and he just looked at me. He ripped it up and put it in the bin whilst smiling at me'.
494. She continues at paragraph 135: 'When I was later working in another team in Edinburgh, a team manager came to me to say that they had been doing parenting work with KTB and asked for some department information. The manager stated that, during the parenting work, KTB disclosed that he had been sexually abused in St. Katharine's. His disclosure happened at a time when the Scottish Child Abuse Inquiry phone number was everywhere. It was very much publicised. Clients were disclosing physical and sexual abuse, some of whom you had worked with for years but hadn't said anything before. It wasn't a surprise that KTB had disclosed abuse. Looking back at my interactions with him, he seemed quite withdrawn'.
495. At paragraph 136, KTV states: 'I witnessed another incident with KTB I had a suspicion that something was wrong. I don't know that I suspected sexual abuse but I knew that there was something. I had found him with drugs when he was very young. It was cannabis and joints and they were sitting on the windowsill in the main bathroom of Alison Unit. Looking back and given KZB involvement in drugs, I wondered where KTB had got the drugs from'.
496. Then at paragraph 137, on page 36, she states: 'On another occasion, I came into Alison Unit and he was sitting at the top of the stairs. He had his arms over his knees and his head down. He appeared small. I asked him what was wrong. I told him that he could tell me anything. He just wouldn't speak to me. I told him that if there was something wrong, I would take it forward and stand by him. I said that I could speak to the Children's Rights Officer. In hindsight, given what the team manager later said about KTB disclosures, I wondered if he was being sexually abused at that time. It was sometimes difficult to speak to a child alone because it was common for staff to

appear from nowhere and interrupt the conversation. There was often no reason for the staff member to be there or be involved in the conversation. You would note that they had seen you speaking with the child and it resulted in the child clamming up'.

497. As I have stated, I have no recollection of KTB
498. There was no case of any investigation of sexual abuse relating to any child involving a staff member at St Kat's. I have a vague awareness of a situation in Alison, where a lad had alleged inappropriate behaviour by someone in the community. It may have involved KTB but, as I say, the name means nothing to me. I had nothing to do with the handling of the case. I think Peter Fleming dealt with it and I think the police were involved but, as I say, it was to do with something that had happened in the community. It is, at best, disingenuous for KTV to insinuate that there was sexual abuse in St Katharine's.
499. At paragraph 138 on page 36 of her statement, KTV states: *'There was a girl who was in St. Katharine's because of very vulnerable behaviour. I can't remember her name. I just remember that she had dark hair. She came to me one day and told me that she'd missed her contraceptive pill. She said that she thought she needed to see her doctor because she didn't take her pill. I seem to remember that she had to take the pill to regulate her periods. I said to her that it wasn't a major issue missing it for a day because she was in a secure unit. She then told me that she had had sex with another resident and implied to me that it hadn't been consensual. She told me that residents and a couple of staff had been having a cigarette in the courtyard in the centre of the unit. They had left the courtyard door open so she could get to her room and get access to her loo. She told me that someone followed her to her room and they had sex in there. It was a boy in the unit'.*
500. She continues at paragraph 139: *'As I was writing up the incident, a member of staff stormed into the secure office. I remember someone trying to take the case notes off me. I think it was this incident that led to Peter Fleming calling me in and asking me what I thought of the practice at St. Katharine's. I told him that I didn't think it was great. He said that I was being polite. He told me that the notes I had written had gone missing and someone had tried to amend them, as they were later found on the*

photocopier. I believe someone had also tried to fax them to KEH Peter was incensed'.

501. I know nothing of this.

502. At paragraph 149 on page 39 of her statement, KTV states: *'Immediately, through my supervision with Carol Mentiplay, I started to express concerns about St. Katharine's. Carol carried out my professional supervision because I was a qualified social worker. She was a team leader from the Children with Disabilities Team. She was very supportive. She was shocked by what she heard and asked me to put it in writing. I also spoke to Patrick Walker. I flagged my concerns to Peter Fleming and LUZ I spoke about over-restraint and the horseplay. Frank Phelan, LUZ LUZ and KEH tried to say that I just didn't understand horseplay, that boys will be boys and that boys need horseplay. I knew that it wasn't horseplay and that it was abuse of children and abuse of power'.*

503. I am not sure why KTV would need to be supervised by Carol Mentiplay, who knew nothing about secure accommodation. She could easily have been supervised by a qualified social worker in St Kat's, we had around a dozen of them. If she wanted a female, we had Emily Campbell in a senior role. I am intrigued she doesn't mention Emily. They certainly crossed over. Perhaps Emily's intelligence and her position as a senior disrupts the narrative KTV and KTS seek to lay down.

504. At paragraph 153 on page 40 of her statement, KTV states: *'My concerns were raised in various formats over the years. Initially, I had a blue notebook that I wrote everything down in. The police took that from me when I met with them in or around 2017. But it was difficult to put full detail the book. I couldn't do my day job and deal with everything that was there and then also keep an eye on the staff. I kept a log for her and it was also going into my supervision notes. As it was getting worse, I was also asked to put my concerns into writing. I can't remember who asked me to do that. I think it might have been Carol or Peter Fleming rather than anybody higher up. I can't be specific. In and around 2017, the police told me that they found my original statement. Apparently it was on file'.*

505. She continues at paragraph 154 on page 41: *'As a result of the concerns raised by myself and other staff at St. Katharine's, the director delegated Christina Burnette to carry out an investigation. That resulted in my meeting with Duncan McAulay. Staff were interviewed to seek their experiences. I don't know whether they spoke to the children. We were asked about things like restraints and assaults. Some of the interviews with staff seemed very brief, but I do know that other staff raised concerns similar to mine. It went on for a period of weeks'*.
506. This confirms that KTV gave a statement to the police in 2000. Then another one in 2017. This is on top of initiating an internal investigation in St Kat's. None of these investigations uncovered anything. I am aware she has obsessively raised concerns with social work colleagues and management over the years. None were ever vaguely substantiated. This raises worrying questions about her personality and suitability to be a social worker.
507. At paragraph 155, KTV states: *'While the investigation was ongoing, I was standing outside Alison Unit with some other members of staff. Christina Burnett and someone else, I can't recall who, arrived in their cars. As they did so, LUZ left the unit with a cardboard box with his belongings in it. He just got into his car and drove off. KZB ran from the unit, shouting to staff who had gathered outside that LUZ had left and got a job at [REDACTED]. We were later advised that the investigation had been dropped because LUZ had left. Looking back, I always thought LUZ must have been prompted to leave'*.
508. I don't recall my departure from St Kat's being so dramatic. In fact, I don't remember it at all. I don't recall Christina Burnett being there to see me off the premises.
509. The fact of the matter is that any investigation was complete by the time I left and nothing had come from it, as per the letter from Les McEwan.
510. I told the staff group I was leaving around six weeks before I did. The general response was of shock. A couple were in tears. A colleague organised a leaving party for me in an Edinburgh hotel. Over one hundred people attended from across social work.

Donny Scott, who was my line manager when I left, came and gave a very appreciative speech. Christina Burnett sent me a best wishes card.

511. At paragraph 159 on page 42 of her statement, [KTV] states: *'I think that [LUZ] left about a month and a half before I did. After he left, it was much quieter. I think he was the only member of staff who resigned when I was there, but I don't know what reasons he gave for his resignation. I'm not aware of any staff being the subject of disciplinary action because he or she was found to have abused or mistreated a child. Other than [LUZ] it was many of the same staff when I left'.*
512. She then says at paragraph 165 on page 43: *'When an opportunity came up for a secondment, which Peter Fleming okayed, I needed a reference from [LUZ]. Eventually, he did provide me with some sort of reference. I don't remember asking him for it but it had to come from him as [SNR]. He wrote that I was new and I didn't really know anything. He said that I didn't know anything about the set-up of residential. He wrote that I was from Northern Ireland and implied that our social work wasn't the same. I kept that reference for a number of years and found it during a clear out in 2013, 2014, but it was too painful to read and I tore it up'.*
513. I'm not sure if I left before or after [KTV]. But she needs to get the record straight on this. If I left before her (and the fact that she claims to have been in a meeting convened by Frank Phelan after I left would suggest that I did) then I don't see how I could have written her a reference, which she has conveniently torn up because it was so distressing. I have no recollection of writing a reference. If she left before me and I did write a reference, it would have been an honest appraisal.
514. Emily Campbell resigned and left [REDACTED] to return to America.
515. At paragraph 161 on page 42 of her statement, [KTV] states: *'I'm not aware of any police investigations into alleged abuse at St. Katharine's when I was there. I don't know whether anybody who worked at St. Katharine's had been convicted of the abuse of a child or children there. I read in the papers that Gordon Collins was convicted of the abuse of children, but I don't know whether he worked at St.*

Katharine's when I was there. He looked familiar to me, but I don't really remember him'.

516. I'm not sure how Gordon Collins would look familiar to KTV, it certainly wasn't from St Katharine's. He only started working there in 2006.
517. At paragraph 182 on page 47 of her statement, KTV states: *'I'm not sure about the name Vicky Grant. I vaguely remember the name, but I don't have specific memories'.*
518. At paragraph 183, she states: *'I'm aware of a KTS being mentioned at St. Katharine's while I was there and being informed that she had raised concerns. Years later, I met her while working in another team. She confirmed that she had been the person who had worked at St. Katharine's and advised that she had raised numerous concerns. She never said what those concerns were'.*
519. KTV is very vague about her knowledge of Vicky Grant and KTS. KTS Yet they worked together. Both KTV and KTS had come through the recruitment centre and had a common link to Carol Mentiplay and the directorate. It seems as though both are being less than honest when they claim they scarcely knew one another.
520. At paragraph 185 on page 48 of her statement, KTV states: *'Years after leaving St. Katharine's, I had a meeting with a social worker from another authority when I was working in Waverley Court. It was around 2008, 2009. She had reached out because she had a similar job to me elsewhere and she wanted to get ideas about progressing the role. We were discussing each other's backgrounds and what led to this current role. I mentioned St. Katharine's. Naively, I presumed that because she was in another authority she wouldn't know anything about it. In response, she immediately asked me if I had heard of LUZ and his ..., who I think was called ... She also mentioned KZB. She also asked if I was aware that LUZ LUZ brother had taken over a unit and had been taking children home and giving them substances. She expressed concern that nobody had listened to her and I expressed concern that this was still going on, ten years later'.*

521. This is perhaps the most egregious claim among a catalogue of such claims.
522. This statement gives some context to events of several years ago. My brother also worked in residential child care. He was at Wellington School until that closed and then moved to St Katharine's. We did not cross over in either establishment. Sometime in 2016, I think, he was suspended from his work at St Katharine's. He was not told why other than that an allegation was being looked at by the police. The police took no action, did not even interview him, and he returned to work. The Council took no action, accepting there was no basis to the story.
523. He was given some vague account by the Council of a claim of him taking boys home and giving them drink. KTV [REDACTED] was named as having made this allegation. He and KTV [REDACTED] did not know one another, had never met and he did not know her name. This is clearly the same allegation. To put the record straight, my brother did not open any unit. He worked continuously for the Council. The social worker who KTV [REDACTED] claims told her this story denies ever having done so. This clearly did not happen and is indicative of KTV [REDACTED] confabulation or downright lies.
524. At paragraph 186 on page 48 of her statement, KTV [REDACTED] states: *'I was good friends with the lead of the Child Protection Committee and discussed it with her before then speaking to my manager in supervision and putting it in writing. After a period of silence, my manager came back to me and told me that I had to be careful about what I was saying. He said that I was going to be sued. He said that they had spoken to the social worker and she denied saying anything to me. Years later, I was aware that at the time this was happening and I was being told to stay quiet, a member of staff at St. Katharine's, Gordon Collins, had been arrested in relation to sexual offences in the unit'.*
525. This paragraph becomes more bizarre. It reinforces the fact that the claims in the paragraph above, 185, have no basis. The social worker who KTV [REDACTED] claims to have given her this initial information denied saying anything to KTV [REDACTED]. Yet, she still insists she is right. Again, this is a concerning personality trait that

indicates she is unable or unwilling to change her views despite clear evidence which contradicts them.

526. At paragraph 191 on page 49 of her statement, KTV states: *'However, my fears came to fruition because not long after I gave my statement to the police a senior manager in my then department asked to meet with me and demanded to know what was in the statement and suggested I shouldn't work in their department. She said that the police didn't find anything and therefore I wasn't telling the truth. I said to her that I had done exactly what I had a duty to do as a social worker. I queried why we were being asked to come forward but being pulled into rooms in the background. I told her that I had given a statement in 1999 and three members of staff had all been arrested and convicted for sexual and drugs offences, so I was telling the truth. She just shuffled her papers and said that she didn't know that. I expressed that this was intimidating and concerning and she backed down. Ironically, two months later I was allocated ... as a client'.*

527. It is clear that KTV was becoming an embarrassment to the Council.

528. It should not be of any consequence that three members of staff, who at varying times had worked at St Katharine's, had been arrested. She infers this was as a result of a statement she made in 1999. Yet none of these offences had happened at that point and certainly not in response to her statement. There was absolutely no connection between the three convictions. Only one related directly to St Katharine's, but also a previous establishment. And none of them happened during [REDACTED] at St Kat's.

KTS

529. At paragraph 27 on page 5 of her statement, KTS states: *'It was a very male orientated, very macho set up at Guthrie's and women weren't really thought that highly of, not within the unit'.*

530. Some women were very highly thought of within Guthrie and St Katharine's generally.

531. At paragraph 32 on page 6 of her statement, [KTS] states: *'Every child had a Care Plan which was child specific and identified particular needs and intended outcomes for that child. It set objectives for work with the child, their family and the carers in relation to the child's developmental needs. Things like health, education, emotional and behavioural development, family and social relationships and self-care skills'.*
532. [KTS] acknowledges that every child had a care plan. They did, and this was joint with the supervising social worker.
533. At paragraph 34, also on page 6 of her statement, [KTS] states: *'The staff could decide not to give a young person pocket money, perhaps as a form of punishment for bad behaviour. That could then be used by the staff member to provoke a toy-fight incident and tell them they weren't getting their pocket money'.*
534. We were not allowed by the Council to withhold pocket money.
535. At paragraph 36 on page 6 of her statement, [KTS] states: *'Someone couldn't just turn up and visit a child, it did have to be arranged. I think the social work managed that. The children had their Care Plans and if it was in the plan that there were no visits then there were no visits. Perhaps their allocated social worker would visit, but they might not, and residential staff always had the final word so they could always say no. The management wasn't keen on having anybody from outwith the centre involved in anything inside the unit'.*
536. The 'management' was always very happy to have people from outwith the centre in the unit so long as it was safe. In fact, I welcomed showing visitors around. I was proud of the centre.
537. At paragraph 38 on page 7 of her statement, [KTS] states: *'One concern of mine was that some staff gave children cigarettes. That was as a gift and in my view that was a potential grooming tool. I'm referring to actual packets of cigarettes here, not just the odd single cigarette'.*

538. Smoking would have been commonplace in residential care units at the time. Children in Guthrie were allowed to smoke four cigarettes a day, with parental consent. Some, who were not allowed to leave Guthrie and thereby buy cigarettes, may have been given the occasional cigarette by staff. If that did happen it was far more likely to be because a member of staff was being kind rather than 'grooming'. I never witnessed KTS being kind to a child. She seems to have a thing about grooming, without offering any evidence of it ever having happened in St Kat's.
539. At paragraph 39, she states: *'When I first started at St. Katharine's there was a lad, KSL that the staff all called LUZ's golden child. LUZ who was SNR would take him up to his office, out the centre or give him cigarettes. KSL seemed to get different treatment from other children. I wasn't aware of anything untoward happening, there wasn't any evidence of that, but that was totally inappropriate and wasn't part of LUZ's role as SNR.'*
540. I have no idea why anyone might have thought KSL was my 'golden child'. I suspect KSL would not have recognised himself as such. I remember speaking to KSL a couple of times in my office after particularly difficult situations he had been involved in with some of the staff. I don't recall taking him out other than once with a group of children to the opening of the Scottish Parliament.
541. Some felt, understandably, because KSL could be very difficult, that I shouldn't get involved other than to punish him, which wasn't possible anyway. I spoke to him to try to get to the bottom of his behaviours and to try and give him a way forward, without too much success. That would be entirely appropriate and consistent with my role. I have never smoked and so did not carry cigarettes. So I did not give him cigarettes. Apart from anything else, no-one was allowed to smoke in the building.
542. At paragraph 40 on page 7 of her statement, KTS states: *'Many staff, KEM KEM IDJ and KEL spoke of LUZ taking children to his own house. That is not something I ever saw but it was spoken of and when you look at the training we receive as RCO's you know that is not a good idea. You could be setting yourself up and it may lead to people questioning what's happening. The suspicion was that there was some kind of abuse happening.'*

543. I have covered the matter of taking children to staff homes earlier. It is a bit concerning that, on the basis of her six troubled months in St Katharine's, KTS [REDACTED] should feel in a position to tell me what was or wasn't a good idea, especially when her own perspective was not a universally held one, and nor was it departmental policy.
544. At paragraph 41 on page 7 of her statement, KTS [REDACTED] states: *'I raised my concerns with LUZ [REDACTED] prior to submitting anything formal and he very much said that he thought anything within the context of the relationship was appropriate, even sexual behaviour. He was talking about sexual attraction being okay between a child and a member of staff.'*
545. I am not sure what KTS [REDACTED] raised with me. This statement would be defamatory if made outwith the Inquiry. I did stress, regularly, the importance of staff making good relationships with children. I never, ever suggested that any sexual relationship was appropriate between adults and children. In fact most people would describe me and I would describe myself as fairly socially conservative.
546. Philosophically, I just would not and did not make any such claim. I have very clear views about the nature of adult child relationships, which are that these need to have a purpose that is oriented to the good of the child. That involves close relationships but also a very clear understanding of boundary violations. Aside from my philosophical position, I would have been mad to have made any such statement in a climate where I knew my every movement was being scrutinised.
547. At paragraph 42 on page 7 of her statement, KTS [REDACTED] states: *'On one occasion I went to see him with Carol Mentiplay, a supervisor, and he wasn't interested in what I had to say. I was expressing my concerns about staff massaging children. Staff were massaging children's shoulders, sometimes without even asking their permission, often even at the request of the child (ref. 'Some concerns that I have' notes from KTS [REDACTED] and 'Background Notes re KTS [REDACTED] from Carol Mentiplay).'*

548. She continues at paragraph 43 on page 8: *'I thought this behaviour was completely inappropriate, and we weren't trained to do that. The outcome of that meeting was that it was okay to do that if you felt okay doing that. I still don't think that's appropriate. KEL [REDACTED] and KEH [REDACTED] both massaged children, without being asked'.*
549. I have a very vague recollection of a meeting involving Carol Mentiplay but have no idea what it was about. I don't recall specific instances of staff massaging children. I wouldn't necessarily have had any issue with staff giving neck massages in public settings, especially if at the request of a child. Just because KTS [REDACTED] thought such contact was inappropriate, as she states in paragraph 43, doesn't mean it was. I and other colleagues with far more extensive experience in child care considered it differently. Her issue perhaps is that it was male staff doing it. I wonder if she would have the same issue with female staff.
550. At paragraph 45 on page 8 of her statement, KTS [REDACTED] states: LUZ [REDACTED] *spoke to me later on and told me he was unhappy I had brought Carol Mentiplay to the meeting because she was somebody who was outwith the unit. He very much viewed it as his unit'.*
551. As should be evident, I had no issue with others being in the unit. The very fact that Carol Mentiplay was, might suggest I had little control over this anyway.
552. At paragraph 47 on page 8 of her statement, KTS [REDACTED] states: LUZ [REDACTED] *also wrote a report up on my competencies. The Inquiry have that as well. (ref. 'Report on KTS [REDACTED] Progress' by LUZ [REDACTED] dated 23.2.00). He described me as being 'concrete.' I take from that, he means I follow the procedures that were in place and not wanting to physically abuse children, but that is what I witnessed in that unit. Children were being physically and emotionally abused and not treated with any dignity or respect. In my opinion that unit wasn't a safe place for a child to be'.*
553. I have actually found a copy of the report I did on KTS [REDACTED] which I can make available. I would stand by every word of it – it did what any assessment of competencies should do and did so in a balanced way. I sought to identify some possible strengths. I would suggest that she has, in her statement, confirmed my

assessment of her as being a concrete thinker. I have always prided myself on giving honest references even when it might have served my purposes to do otherwise. Children were not being physically and emotionally abused in St Katharine's.

554. She continues at paragraph 48: *'He also stated that I can sometimes have a 'critical approach to colleagues practice' and that I have 'taken some non-contextualised concerns beyond the individual with who they are located and beyond established line management channels'. He is purely commenting on me speaking to Carol Mentiplay, but she had to be there, that was part of her role, to monitor the competencies. He didn't know I was a whistle-blower and that my identity was protected, when he wrote up those comments'.*
555. This is a serious admission and one that does not reflect well on the Council. Essentially KTS [REDACTED] had been placed in St Kat's, covertly, to try and find dirt, which she didn't. If this is the case there are wider questions as to how the Council treated staff who were undertaking a very challenging task, which requires a culture of honesty and transparency at all levels of the organisation. That was clearly absent in the actions of the senior social work management.
556. At paragraph 50 on page 9 of her statement, KTS [REDACTED] states: *'There are complaint forms available for the young people but they are not readily available and staff are hesitant to hand them out. There was also the Children's Rights Officer (CRO) but if a child decided to speak to the CRO negative things are going to happen because the CRO has to speak to someone else within the unit. So, the children wouldn't report things, they were afraid to do so, they were afraid of the consequences'.*
557. The whole idea of a children's rights officer is that she did not report back to the unit but, if she felt it necessary, would take any concerns to an appropriate level outwith a unit.
558. At paragraph 53 on page 9 of her statement, KTS [REDACTED] states: *'I think use of restraints was supposed to be recorded. Certainly if there were physical assaults on staff that was meant to be recorded. Sometimes those records got ripped up though,*

sometimes they were left and sometimes nothing got done at all. There was definitely a serious incident or injury form'.

559. All restraints were recorded. I am not aware of forms ever being torn up and it is beholden of KTS [REDACTED] to specify such incidents or to retract them.
560. At paragraph 59 on page 10 of her statement, KTS [REDACTED] states: *'There were inspections or checks at the unit but they were never ad hoc, you always knew when people were coming. Staff would tidy up paperwork, puts things in place and have the unit looking the way it should look. Staff who would tow the LUZ [REDACTED] line would then speak to the inspection people. I was never involved in any of that'.*
561. I think there were unannounced inspections and I'm sure we had at least one during my time at St Kat's. If we had notice of an inspection, of course, staff would tidy up paperwork. The inspector(s) could speak to whoever they liked, I had no control over that, nor did I give staff a line to tow. KTS [REDACTED] imagines me to have had far more power than I ever did.
562. At paragraph 60 on page 11 of her statement, KTS [REDACTED] states: *'I remember on one occasion, prior to an inspection, it became apparent that only two of the six young people staying at St. Katharine's had Care Plans. Every resident should have a Care Plan. A member of staff then had to fill in the four outstanding programmes the day before the inspection'.*
563. She is contradicting herself. She says earlier all children had a care plan. Now she's saying they didn't. As I say, there was, rightly, some last-minute preparation for an inspection.
564. KTS [REDACTED] has made mention of *'toy fighting'* in a number of paragraphs in her statement. For example, at paragraph 62 on page 11, she states: *'One of the main things that concerned me at St. Katharine's, which I attempted to address, was male staff entering into what they would call 'toy-fighting' with young people. About 99% of those toy fights ended up with young people being restrained on the floor, and undoubtedly injured. That restraint could involve four or five adults, primarily men'.*

565. She continues at paragraph 63: *'Those toy fights could start in a residents room, in education or maybe when a young person was just sitting watching television. I remember on one occasion ^{KEH} [REDACTED] who worked at the unit, came in and started poking at one of the lads, ... He was poking at ... arm and flicking his head, just looking for a response'.*

566. As I have said, I was never aware of toy fighting being excessive or leading to a physical restraint, and I was aware of that potential. We did have one resident, who was essentially operating at the emotional level of a toddler level within a six feet three body. He craved physical attention. I suspect most instances of horseplay involved him. This was a very trying time for staff. The boy in question had been kicked out of other long-term secure units. We did a great job in hanging onto him, but at some cost to the staff team. I recall meeting him a few years after we both left St Katharine's. He was very positive about his time there.

567. At paragraph 74 on page 13 of her statement, ^{KTS} [REDACTED] states: *'Children would be sent to their rooms as a punishment. That could be for not eating their breakfast, but there was no food in their rooms. If the staff member that put them there decided they weren't getting out then they could go without their lunch as well. That could just be because the staff member didn't like them or perhaps because a senior member of staff had said to just leave them in their room. That wasn't frequent but it did happen, maybe every few weeks'.*

568. I was clear that children should not be sent to their rooms unless there was no other option. I wrote a paper to that effect. I've no idea if that or other papers I wrote is still available anywhere. From what I was hearing from colleagues they were concerned that ^{KTS} [REDACTED] was sending children to their rooms too regularly and keeping them there for longer than they needed to be there, basically, because she could not build relationships and navigate herself out of situations with them. She thought there was a rule book that she could follow and that others weren't.

569. At paragraph 76 on page 13 of her statement, we have the never work in social work canard again, when ^{KTS} [REDACTED] states: *'Then later on, when I started raising*

some real concerns, I was getting told that if I started doing that I'd never work in social work. So it wasn't just the young people that were being affected, it was staff as well'.

570. At paragraph 79 on page 14 of her statement, KTS [REDACTED] states: *'That was just about always the case, I would say that only about 5% of the time the staff sat down and talked to the children, and actually engaged. It was always about going in and pulling somebody out the class. That could be a thirteen year old girl, screaming and shouting and writhing on the floor with five or six adult men, trying to restrain her'.*

571. This is nonsense. Staff spent most of their time trying to engage with children and mostly very successfully. I have addressed the 'never work again in social work claim' elsewhere.

572. At paragraph 81 on page 14 of her statement, KTS [REDACTED] states: *'I don't remember ever seeing a doctor at St. Katharine's, but that's not to say it didn't happen. I did take a girl to the doctor once and there was some sort of health assessment when the young people were admitted. I can't remember the detail about that but there was a medical and a search of every child that was admitted. That led to an investigation by Edinburgh Council'.*

573. She continues at paragraph 82: *'It relates to a woman who came forward to the council and complained about the way she was treated at St. Katharine's. She was a resident there. Her name wasn't released but she received an apology from Edinburgh Council. I don't know the specifics but it was in the papers and will be public knowledge'.*

574. I won't go into the details here other than that the Inquiry will know of previous publicity regarding St Katharine's [REDACTED]. The claims were never properly investigated by the Council despite what they claimed [REDACTED]. The outcome is that I received a written apology from the Council, which I have a copy of.

575. At paragraph 83 on page 15 of her statement, KTS [REDACTED] states: *'All their belongings were searched, primarily for drugs, and then there was, more or less, a strip search procedure. The child would be asked to go into the bathroom off their room, take off all their clothes and throw them out to the staff. They then wrapped a*

towel around themselves, came out and jumped up and down before going back into the bathroom. Then they handed out the towel before dressing again. Staff would search the bathroom before and after'.

576. There was not 'more or less' a strip search procedure. There either was or there wasn't, and there wasn't. I have covered this elsewhere in my statement.

577. At paragraph 86 on page 15 of her statement, KTS [REDACTED] states: *'I mentioned ..., if he had self-harmed then he would be taken to the hospital by two staff. He would get [REDACTED] once he was back at the unit. Staff, not me, would then make a decision that he didn't need to be taken back to the hospital again'.*

578. This is an example of the kind of very difficult and distressing situations staff had to manage. The boy in question is the one I mention earlier and he did [REDACTED]. He was also very well looked after in St Kat's.

579. At paragraph 90 on page 16 of her statement, KTS [REDACTED] states: *'One of the things I had completely forgotten about was that staff would bend children's fingers back until the children were begging for the staff to let go, sometimes lying on the floor. That really could be just because the staff felt like it. Part of the toy fighting thing I was talking about'.*

580. Like KTV [REDACTED], KTS [REDACTED] seems to be 'remembering' things which were clearly not significant at the time.

581. At paragraph 103 on page 18 of her statement, KTS [REDACTED] states: *'There was so much inappropriate behaviour that staff were participating in. It was not deemed inappropriate to grab a child and twist their nose until it was bright red and possibly bleeding. It was not deemed inappropriate to grab a child's hand and bend their fingers back until they were pleading on the ground to be let go of. That happened throughout the time I was at St. Katharine's and after I had raised my concerns'.*

582. Here we have a further vague statement, about staff twisting boys' noses until they were 'possibly bleeding', did she see a boy with a bleeding nose or didn't she?
583. At paragraph 104 on page 18 of her statement, KTS states: *'There was no concern shown for the child, the staff that carried out the abuse I'm talking about, enthused about it. It was used to control people but also for pleasure, I think the men that were responsible were happy, they were pleased about it. You would hear them saying 'did you see that carpet burn' or 'you missed a brilliant restraint this morning, you should have seen it'. It was that type of thing there was no concern for the child or focus on the child after what had happened'.*
584. She continues at paragraph 105: *'I have named a few people and they were all responsible for unacceptable and inappropriate behaviour towards young people in St. Katharine's unit. There was KEH ..., KEO who I spoke about and KEM a big ... guy who was very fond of grabbing noses'.*
585. At paragraph 106, KTS states: *'Then there was ..., ... and KZB KZB who I've also spoken about. The majority, I'd say as much as 90%, of the restraints I witnessed were provoked by staff, that was mostly the male staff that I've mentioned and it was mostly for entertainment and pleasure. I think the men were bored and it gave them something to talk about'.*
586. There is clearly no detail here. What I would say is that I do not believe I worked with anyone at St Kat's who enjoyed restraints. Anyone who has been involved in them would know they are unpredictable and distressing. There is no way that children were provoked into restraints because male staff, I note again that it is only the male staff, were bored.
587. At paragraph 114 on page 20 of her statement, KTS states: *'I understand that LUZ left St Katharine's before he was asked to leave ... It's a question of mind-set, he sees there to be a different way of caring for children and seems to stand by what he said in relation to taking children home'.*

588. I left St Katharine's because I was appointed to an [REDACTED] post in residential child care. I couldn't just be 'asked to leave'. I was never subject to disciplinary action despite being subject to intense and unwarranted scrutiny over my final year. And, yes, I do stand by my views on how to care for children and these are widely articulated, broadly accepted and welcomed by those who have any expertise in residential child care.
589. At paragraph 116 on page 20 of her statement, KTS [REDACTED] states: *'As a result of the investigation the social work department recognised there were some things that had to change and they would be addressed through staff supervision. LUZ [REDACTED] left St. Katharine's during the investigation of my whistle blowing complaint'.*
590. I'm intrigued to know what needed to change after I left. I have a letter from the Director of Social Work saying he was not concerned with the care at St Katharine's. He also visited and spent most of a back shift there and told staff on duty he was impressed with what he experienced.
591. At paragraph 125 on page 21 of her statement, KTS [REDACTED] states: *'Most of the children I've talked about actually thought it was a good laugh and everything was okay. They were told what to think though, that it was just toy-fighting and a laugh and not to complain. That's the environment that was created, a culture where people would not complain'.*
592. How does one respond to this? Children had no concerns about their care and thought everything was OK and that any toy fighting was a laugh. As social workers, we are exhorted to listen to children. Yet when they say something KTS [REDACTED] doesn't agree with then her recourse is not to consider that she might be wrong but that they were brainwashed ... all of them?
593. At paragraph 134 on page 23 of her statement, KTS [REDACTED] states: *'I know the police interviewed ... about his treatment but he thought it was acceptable, that's what he was always told, that it was toy-fighting and that it was all just a laugh. It's not acceptable but he's been conditioned, if you like, to think that it is acceptable ... life was ruined in there over several years and I believe he's now in prison'.*

594. The police interviewed a lad and he thought horseplay was acceptable. But she says it wasn't. This really calls into question her values as a social worker. What purpose does KTS [REDACTED] hope to serve by continuing to insist that she is right and other staff members and former residents wrong?
595. At paragraph 136 on page 23 of her statement, KTS [REDACTED] states: *'In relation to specific incidents there was, on more than one occasion, incidents where I was assaulted by a young person and had wanted to report it to the police. I reported physical assaults to LUZ [REDACTED] and recorded them myself, but he was not of the opinion reporting it to the police was something that should happen'.*
596. She continues at paragraph 137: *'LUZ [REDACTED] felt it would make the relationship with the child worse. So he did not allow that. He made it very clear that if I wanted to have a job, it was not something I could do. I subsequently discovered, when working in other units, that it was common practice to report assaults on staff to the police'.*
597. Duncan McAuley at the time was putting pressure on units not to report situations to the police because he was being put under pressure by the police on account of how trivial many of them were and that this was wasting their time.
598. For once, but perhaps for different reasons, I agreed with him. I saw no point in reporting behaviours to the police because children were already in secure accommodation. There was no next step, and they weren't going to learn anything by accumulating a further charge. This would only sour relationships with staff who reported an incident.
599. This said, I always left the final decision to a member of staff, they had the same right to do so as any member of the public. I never said it was something they couldn't do, just to consider what they wanted to achieve by it.
600. At paragraph 138 on page 23 of her statement, KTS [REDACTED] states: *'A colleague of mine, KTV [REDACTED] also gave a statement to the police, that was about different behaviours that she saw. I think that was to do with a drill being held to a child's head,*

but I don't know all her concerns and we've not discussed anything. It was probably while LUZ was but I'm not sure'.

601. As above in my response to KTV statement, I find it hard to believe that these two haven't discussed their respective statements.

602. At paragraph 146 on page 25 of her statement, KTS states: 'LUZ didn't update senior management properly, put fake documents in place for inspectorate's and minimised social work involvement at that unit. We need to be transparent and have a much wider input, not be secret and have self-run, self-managed groups and have some consistency across the board'.

603. Again, this statement is defamatory. There is no evidence I put false documents in place for inspections, because I didn't and nor would I.

604. At paragraph 147 on page 25 of her statement, KTS states: 'Howdenhall secure unit is only next door and when staff from there came to St. Katharine's they were as appalled as me because that regime wasn't happening in there. It was a secure unit in Edinburgh at the same time and was being run completely differently'.

605. This statement misrepresents the management structures of Howdenhall and St Katharine's. I was SNR for Howdenhall. Frank Phelan, who had been a senior in St Katharine's, was operational manager there. The aim over time was to bring the cultures together. The building layout was different but the cultures not substantially so.

606. At paragraph 148 on page 25 of her statement, KTS states: 'I believe a culture was created where anything could happen and I didn't see sexual abuse, but with that culture that was created anything could have happened, that would have been seen as acceptable and that is a terrifying thing'.

607. I'm glad to see that KTS ends on a positive. She 'didn't see sexual abuse'. In fact, I don't believe she saw any abuse. Just practice that didn't fit with her narrow view of what child care should be and which she, personally, struggled to undertake

with sufficient empathy and understanding. She has embarked on a path of blaming everyone else, including former residents, for not agreeing with her.

Comments on both statements of KTV and KTS

608. It seems as though both KTS and KTV made statements about St Katharine's while they were still there. I am not aware I was mentioned in them, in fact, I didn't see them. I was told that in KTV statement, where she was taking issue with horseplay, that this would stop if I entered the unit, suggesting that this was something hidden from me and that I would disapprove of. Her more recent statements would implicate me in condoning this, whereas her original indicated I didn't know about it, suggesting that later statements are changed/embellished to seek to create an unfavourable impression of me.
609. The only concern I am aware of that was raised contemporaneously is the drill incident. Others are invented/embellished/reinterpreted subsequently. Indeed KTV KTV seems to have gone out of her way to find 'dirt' on me, in a quite unprofessional manner.
610. There is a commonality across both statements, which suggest collusion. For instance, both make the claim that I told them they would never work in social work again. As I never said this to either, or indeed anyone, and nor was I in a position to, I can only assume that there has been collusion.
611. Both try to claim they had little contact with one another, yet they worked in the same unit at the same time. Both went on to work in criminal justice services in Edinburgh. They would have ample opportunity and reason to make common cause.
612. More broadly, attempting to explain why KTS and KTV have said these things would involve speculating on the psychological state of both individuals.
613. More immediately, KTS gives some of the answer to this. I gave her what she considers to have been an unfair and I consider to be an honest appraisal of her

abilities and aptitude to work with children and staff groups. It seems she has nursed her wrath since. KTV [REDACTED] similarly claims I gave her a less than glowing reference, but also makes contradictory statements in this regard.

614. Some of these points are elaborated in my response to the statements.
615. I would make one final point at this stage. Clearly, none of the claims made that mention me, were taken seriously by City of Edinburgh Council. Over the years since I left St Katharine's, I have been a respite and foster carer for the City of Edinburgh. At no point did anyone raise any concerns about my ability or suitability to look after children the Council was responsible for, despite clearly being aware of the claims these individuals were making. Indeed, it appears from KTV [REDACTED] statement that council officials actively disbelieved her statements. As noted above, I have a letter from the Council stating that they have never had any concerns about my suitability to work with children.
616. Both statements make so many claims that have no substance or context that it is hard to provide a direct answer to whether I would accept they are inappropriate and/or poor practice. Most are hearsay. Some, such as taking children home, did happen but these were not contrary to policy. I do not believe for a minute they were inappropriate, far less abusive. If I had ripped up complaints or other forms that would have been inappropriate and a disciplinary matter, but I didn't do so. Telling someone they would not work again in social work would have been unprofessional but, again, I never did it.
617. I responded at the correct level to any minor practice concerns that were raised with me. Others were made beyond me and without my knowledge.
618. I am not accused of treating any child in any way that was abusive. I do not accept that staff engaging in horseplay with children is in and of itself abusive and I never witnessed or was aware of any instance where it was.

Leaving St Katharine's

619. I left St Katharine's after I applied for and was offered the job as [REDACTED] in residential child care at [REDACTED].
620. I was asked for three referees. I gave Brian Cavanagh who was a friend and who had been a councillor and convenor of the Lothian Region social work committee, I think. Andrew McCracken, who had been my headmaster at Wellington and manager initially at St Katharine's, and Bryan Chatham. All were very positive. I have a copy of Bryan Chatham's reference.

Helping the Inquiry

621. There are myriad, complex reasons why people make claims of abuse. I note in those cases I am being asked to comment on, , it is not a child making any claim.
622. I am aware that the Inquiry has information to the effect that the experiences of abuse some children had at the establishment has continued to affect them and impact on their lives. This is a very complex area. Definitions and interpretations of abuse change, memory changes, there can be both internal and external motivations to make such claims.
623. Such establishment as Wellington, Howdenhall and St Katharine's are few and far between. There have been numerous inquiries into residential child care. I think any lessons to be learned should already have been. I think the bigger issue is how residential child care, or what remains of it, can be valued and can provide not just a safe environment, which I would take as just a baseline, but one in which children can experience an enjoyable childhood.
624. The allegations contained in the statements I have commented on and which relate to me are wholly hearsay and those relating to others have been exhaustively investigated and nothing found. None of the allegations come from children. In fact,

former residents spoken to by the police do not substantiate any of the claims. I can only conclude that these are wrongful, I would suggest malicious, allegations.

625. As above, I am not asked to comment on any allegations from former residents and none have been brought to my attention. I would say that most children placed in St Katharine's felt safe and enjoyed their time there. Of course, a whole range of subsequent experiences could lead to them reinterpreting these experiences.

626. As to why KTS [REDACTED] and KTV [REDACTED] might make their allegations, I can only ponder.

627. A lesson that can be learned to protect children in places like St Katharine's is to value the staff looking after them.

Other Information

628. 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.

Signed..... LUZ [REDACTED]

Dated..... 13 January 2025