

Scottish Child Abuse Inquiry

Witness Statement of

KEM

Support person present: Yes.

1. My name is KEM but I'm known as KEM. My date of birth is 1964. My contact details are known to the Inquiry.

Background

2. When I left school I jumped about a number of jobs before I got a job driving buses for Eastern Scottish, where I worked for a number of years.
3. In 1996 or 1997 I got a job working in social work transport, which was part of the social work department. It was for handicapped children, young people, and adults and I took them to their day centres or children's homes and things like that. We also used to have to do 'duty driver' shifts, where you were the on-call emergency duty driver. You had a phone and a car and if anyone needed you, they would call. When I was the duty driver, I would pick up staff from St Katherine's and Howdenhall or other units. I'd take them to pick up a young person at the police station or wherever they were, and then take them all back to the secure units up and down the country. I'd never heard of secure units before that, but that was how I got into it.
4. I was lucky enough to get the opportunity to do a six-month secondment as a residential care worker at St Katherine's residential unit. I jumped at the opportunity. After my six-month secondment, I got a permanent post.

5. In 2001, whilst working at St Katherine's, I completed my HNC in Social Services and my SVQ level 3 in Social Services and Healthcare. In 2002 I started my Diploma in Social Work, but I took a years sabbatical. When I came back, I finished my Diploma and I moved over to Howdenhall Residential in 2009 as an assistant team leader where I spent a vast number of years.
6. In 2022, I was asked if I would like to go to a placement in Wester Hailes for Throughcare and Unaccompanied young people. In that capacity, I work with young people between the ages of sixteen and twenty, who are from various backgrounds, including some who are seeking asylum. I do two days a week and I love it.

Edinburgh Secure Services - Howdenhall Assessment Centre and St Katharine's Secure Unit

St Katherine's – Residential Care Worker, 1996 - 2009

7. St Katherine's was a purpose built complex with a secure unit and two close support units. The close support units were Chalmers and Alison. Guthrie was the secure unit.
8. I had never experienced secure care before I started and, never having locked a young person up before, it was strange. The complex was purpose built and was fairly new when I started.
9. When I arrived there, I found it all very friendly, both staff and young people. The management were really keen on allowing you to progress and move forward with your training and they were keen on staff doing courses.
10. Some of the young people in secure care were difficult, but generally the attitude of staff and relationships between children and adults in both secure and close support, was good. There were some really good positive relationships built with both staff and young people.

11. None of the doors or windows were locked in the close support units, so young people just used to run away. Some of the young people would run away on a Friday and not come back until the Sunday night. If they hadn't returned after a short period of time, approx. thirty minutes, we would fill out a missing persons form and report it to the Police. We would also make their parents or carers aware that they had absconded.
12. It was good working there, but you had to work on building a relationship with the young people. They were very closed off and they just saw us as social workers or someone who had taken them away from their family. You had to work to build that relationship and I enjoyed the challenge. I am still in contact now with some of the kids I worked with. I still have contact with one of the first key kids I had. She's married with three kids now. It makes me feel proud.
13. I worked in Chalmers for the duration of my time at St Katherine's. It was a close support unit for young people who didn't quite need secure but couldn't just quite make it out in the community, so we offered them the extra support. It was all young people aged twelve to sixteen, or the odd seventeen-year-old, but nobody over that.

My role and recruitment at St Katherine's

14. I initially started at St Katherine's on a six-month secondment. I heard about the role when I was out doing a duty driver shift and one of the night workers suggested I come to St Katherine's to work with them there. I hadn't ever thought about it but he suggested I ask for a secondment. I didn't even know that was an option. From what I remember, I put in a letter of interest saying that I wanted to come to St Katherine's on a secondment. My manager in the transport section had to agree to release me as a driver. As far as I know, the two managers discussed it, an agreement was made and I was released to start.
15. For the secondment post, I was interview by **LUZ** who was **SNR** of St Katherine's. The secondment was almost a level transfer so the transport manager had agreed I could go for six months. I don't remember having to provide

references as I'd given them for the transport job. I also already had my PVG check for the transport role.

16. After my six months secondment, I jumped at the chance of a permanent post. I was interviewed by LUZ [REDACTED] and Frank Phelan who had been my supervisor over the six months of my secondment. He was a unit manager at St Katherine's. I didn't need to provide any additional references and Frank would have seen me working there over the previous six months.
17. I remained as a residential care worker until I got my Diploma and I was promoted to an assistant team leader post at Howdenhall in 2009.
18. As a residential care worker, I was responsible for the young people's care, clothing, education, care planning meetings and looking after the daily needs of that young person. Hopefully being that person, they could come to if they needed support.

Staff structure – St Katherine's

19. LUZ [REDACTED] was SNR [REDACTED]. As a residential care worker (RCO) I had very little to do with LUZ [REDACTED]. He was based in the admin block as we called it. We only ever went over there for things like petty cash. His door was always open though and he was very friendly; he had quite a good connection with everyone. We all carried personal alarms and if you had to respond to an alarm, the senior managers were there if they weren't busy. LUZ [REDACTED] might have responded, but I don't recall specifically and I would never have spoken to him at those times in any case.
20. Onanda Randall was the unit manager in Alison unit and Frank Phelan in Chalmers unit. He was my line manager at St Katherine's until he became the principal. I can't actually remember who it was after Frank.
21. Frank Phelan was absolutely brilliant to work for. He was knowledgeable but was so fair with everything. Nothing flustered him, he was always calm. We used to have a joke that he would float in, because that's what he was like, so calm with everything.

We joked about his red pen covering your reports, correcting them, but that was good, it was learning for us.

22. Each unit had a shift co-ordinator and in Chalmers that was Scott Edmonds. Then there were either six or eight staff in each unit, spread over three teams, A, B and C. I think Scott Edmonds was on team C and I was on team B. Teams A, B and C in Chalmers had two care staff on each and there were also waking night staff.
23. The dynamics of the shifts were lates and earlies. If you did a late shift, I think you finished about 10:00 pm, the night staff would get a changeover with the shift co-ordinator and would then come into the unit. We would then have a chat with them to give them anything they'd missed from the changeover and then we went home.
24. If you were on a late shift, you were an early shift the next day. It was all about continuity for the young people, if you were the staff putting them to bed, you were there in the morning to wake them up. Bedtimes can be the worst time for a lot of the young people, so seeing the same face helped.
25. I honestly can't remember if there were volunteer staff or not.

Recruitment of staff

26. I wasn't involved with staff recruitment at St Katherine's.

Howdenhall – Assistant Team Manager, 2009 - 2020

27. Howdenhall was the old assessment centre. It was dire, very much a 60's concrete block. It was secure up the stairs and there were no ensuite bedrooms and the close support was downstairs. The food used to come up on a trolley. One wall was next to the showers and was so covered in damp that young people would draw pictures to put up on the wall to cover it. They knocked that building down completely and built a new one.

28. There wasn't much of a tie between the St Katherine's and Howdenhall until the new building came into force and the Principal came. We then became Edinburgh Secure Services.
29. The new Howdenhall unit was a close support unit with a purpose-built secure unit and an education wing.

My role and recruitment at Howdenhall

30. When I went over to Howdenhall, there had been an investigation there. Stan Goddick, who worked for Edinburgh City Council Social Work Department, had carried out the investigation. Stan had interviewed me once before when I was an RCO. I had said I wanted to move up the ladder and progress so he asked me if I would consider an assistant team manager role, as it was then. I jumped at the chance and took the opportunity to go over to Howdenhall.
31. I was the first one in the new building when we moved in and did all the staff development for the new unit. I wasn't directly involved in staff training; it was more staff induction for the new building. It wasn't just a case of closing the old unit down and opening the new one up, there was a phased period. The old building had panic buttons on the wall but in the new building all staff were issued with personal alarms so there was a bit of training around that. I was a first aid trainer and in later years, trained staff on how to use a defibrillator.

Management at Howdenhall

32. John Stevens was the centre manager of the old Howdenhall unit when I first moved over there. He was my line manager at that stage and he was fantastic. John was the force behind getting the finances to build the new secure unit and he travelled up and down the country and picked all the different bits to put into his unit.
33. Frank Phelan, my line manager at St Katherine's, later became Principal of Edinburgh Secure Services and was responsible for both St Katherine's and Howdenhall.

Recruitment of staff at Howdenhall

34. As an assistant team leader at Howdenhall I was involved in the recruitment process. The managers would attend specific training for recruiting staff. I think at the time it was a five-day assessment centre that they all took part in. I didn't do that but I did go on a course on how to interview staff and then took part in some of the assessment centre days for staff recruitment. They were very superficial so when I had a choice, I chose to take part in the interviews and not the assessment centre.

Supervision St Katherine's and Howdenhall

35. At St Katherine's, I would meet with Frank Phelan for supervision monthly. Supervision was a way of monitoring what I was doing. As a key worker you used to have to attend reviews, planning meetings and hearings. We had to do reports in the open unit and if you had any reports to do, you took it to supervision and discussed it there. Frank would check them and he had his red pen that he'd mark all over your report. We joked about him and his dreaded red pen. You knew you were doing well when you never got a red pen through your report. He was quite pernicky.
36. When I was at Howdenhall I had four or five staff that I supervised on a monthly basis. It was very much about how they were doing, personal development and their caseloads. Each staff member would have one young person to keywork. Every four to five weeks we would meet for supervision and there would be minutes taken of those meetings.
37. Guidance in relation to supervision came down from [LUZ], John Stevens or Frank Phelan, when he became the principal of Edinburgh Secure Services. Having had my experiences of monthly supervision, that installed in me the need to follow through on my staff's supervision. It was part of the department's policy as far as I was led to believe.

Training at St Katherine's and Howdenhall

38. I would have had induction training at the start of my secondment at St Katherine's. As far as I recall, my induction was in Alison unit for the first week and then I went with Frank in the Chalmers unit because there was a vacancy. Everybody got induction training. It was all about the unit, health and safety and the procedures. I think it was a week and was all inhouse.
39. We had ongoing inhouse child protection training and the management were supportive of ongoing training.

Policy - St Katherine's and Howdenhall

40. A lot of the policy development in both St Katherine's and Howdenhall was led by the children's hearings and the social workers. The social workers were the main case leaders, even when it came to secure, it was still the social worker who led the case. We would only look after the young person's day-to-day, week-to-week and education. It was still led by a social worker.

Strategic Planning – St Katherine's and Howdenhall

41. I would attend meetings about the development of the service, which would be hosted by the unit/centre managers. Everybody, all of the care staff, was able to have their say at those meetings. We were listened to and our ideas were taken on board.

Children / Routine at St Katherine's and Howdenhall

42. In St Katherine's when I was an RCO in the open unit, most of our young people came from secure care. It was a step for them to move back into the community. At that time, to get a young person into secure care, it used to be that a social worker would phone the unit managers. They would be looking for a vacancy for a young person who was unruly and out of control. If the unit had a vacancy and they met the criteria for secure, then they would come to secure. Within seventy-two hours of that

placement, they would have a children's hearing. That children's hearing would dictate whether the young person met the criteria for secure care and whether they remained. They would only be in there for three months at a time. Every three months they had to go for a further children's hearing.

43. As time moved on, the procedure changed and for secure care it was all done through admission or referral meetings. A social worker would have a case, they would complete a case referral and that would go to the managers for discussion. The social worker would be invited in for a meeting. I sat in on one of those meetings and I was amazed at the questions the management asked the social worker. Secure care really was the last resort, so they'd be asked about everything they had tried to implement prior to applying for a secure placement. They were trying to encourage the social worker to try everything else before the young person was admitted to secure.
44. In the close support unit at St Katherine's, we had five young people and in the secure unit there we had six beds and one emergency bed.
45. In Howdenhall we had six beds which were all ensuite.
46. It was boys and girls in both St Katherine's and Howdenhall, all from the age of twelve up to sixteen.
47. We had a young person as a resident for almost a year, but that was only because every time he went out, he was offending and ended up coming back. There were very limited places to move young people onto. It's still the same today, there are no resources for young people.
48. In the secure part, the young person can only be there for a maximum of three months, unless they are on a remand order from a court. I think a remand order was and is still, one hundred and ten days. After three months, the young person would then have to go back to a children's hearing.

49. Every child had an individual key worker. The ratio of staff to young people was good. In St Katherine's, there were two staff on shift at any time in Chalmers and Alison units. I think there was maybe three staff in Guthrie's and there was always a shift coordinator on duty, who went between the three units.
50. In Howdenhall, there were two staff members in the open unit and two in the secure unit, although most of the time it was three. You also had the assistant manager who would float between both.

Mealtimes / Food

51. In St Katherine's, the main kitchen and a seating area were within Guthrie, the secure unit. The food used to come over into the open units in insulated boxes, so it was a surprise when you opened the box to see what was in it. We had a chef that cooked the food, but it was really like school dinner food. We had an old chef at the weekends and the food he made was great. He would do all the baking for the week ahead.
52. There was always a choice for the young people. We ate with the young people at lunch and dinner. It was communal and we all sat round the table together. That was the same in secure and at Howdenhall too.

Sleeping Arrangements

53. In St Katherine's you'd have one staff member doing a sleepover after nighttime. You'd also have two waking staff in each unit. You'd have one full waking staff in Guthrie with a twilight staff member who would come in from 10:00 pm until 2:00 am. The sleepover staff member was expected to get up and deal with any incidents overnight and you got a sleepover payment for that. That was the same in Howdenhall, you'd have one staff member between the two units doing a sleepover in the sleeping room.
54. The night staff on duty would have the shared responsibility for the young people overnight. They were the only ones who had access to the units overnight. They

wouldn't have access to the senior manager's offices but they did have access to the admin office or any of the units. In St Katherine's the shift coordinator would give the nightshift staff a changeover briefing at 9:45 pm.

Washing and Bathing

55. In St Katherine's, Chalmers unit had a communal bathroom. Bedroom doors were always open in the open unit and the young person would just disappear for a shower. They could decide themselves when they wanted to shower and it wasn't supervised. In the secure part, they all had ensuite rooms so could shower whenever.
56. In the old Howdenhall, the bathroom was communal. It was horrible and it stank. In the new purpose-built unit, Calton, which was the open unit, it was ensuite and the secure units were all ensuite.

Leisure time

57. In St Katherine's, leisure time was very much shift led; in Chalmers certainly. If you wanted to do an activity with them at night, you did an activity. That could be out in the community, for example going swimming or to the cinema, or we used to go down to the gym which was a purpose-built facility in the admin block at St Katherine's.
58. A lot of us liked going down to Peebles to swim in the River Tweed on nice nights. You would only do that if you had a bronze medallion swimming award, which was a life saving qualification.
59. As time went on, we progressed to taking the young people out for a cycle or other outdoor activity. You had to do a leadership course to be able to take them out on outdoor activities and it had to be organised through Bela. Bela was an outdoor activity course run by Edinburgh City Council.
60. There was always the main television and videos available, as well as a stack of games. We used to encourage the young people to play board games too.

Trips / Holidays

61. I organised three trips with the young people when I was at St Katherine's. I took a group of young people up north and we walked the Spey Way.
62. I'd got wind of one of the open units at Howdenhall, Pentland View I think, who took a group of young people to Alton Towers. I asked LUZ [REDACTED] if we could go somewhere and when he asked me where, I said France. He said that I was to organise it, price it and let him know. I looked into it all, set the costings and set the itinerary. There were three of us that were minibus drivers so the plan was to drive the minibuses from St Katherine's.
63. LUZ [REDACTED] gave us the go ahead but asked if we could take some young people from Howdenhall secure unit and that was the very first interaction between the secure units at that point. It was a mixture of staff from there, staff from St Katherine's and young people from both. I think there were four staff and four young people and it was absolutely fantastic.
64. At that time, you could still travel on a group passport. All of the staff had their own passports but for the young people it was a group passport. We were away for five days. We drove down to Dover and got the ferry. On the ferry we asked the kids what they wanted to eat and all they wanted was MacDonalds, even though there was a nice restaurant on board. We stayed in tents on the trip.
65. The first year we went to Belgium, Holland, and Germany. The trip was when the Holland and Germany World Cup was on so we watched the World Cup too. The next again year we went to France and did the Normandy invasions. The kids loved it. It was a really good feeling, organising it for them. We didn't have any bother with the kids at all. The only incident we had was one young person lost his money. We had given each kid a bumbag to keep their money safe. We literally had a tin that was choc-a-block with money and we would given them money each day to spend or use for calling home. One lad, [REDACTED] had his money belt and he was

always looking in it and counting his money. On the last day he'd phoned home to his mum and when we were halfway home, he realised he'd left his money belt in the phone box. That was literally the only incident.

66. I still smile when I think about those trips. The opportunities it gave both me and the young people were fantastic.

Healthcare

67. In close support in St Katherine's, they were allowed to go out to the doctor if they needed to. If it was in Guthrie, the secure unit, doctors would come in to do their medical assessments.
68. In Howdenhall, within roughly the first week, we would have the looked-after nurse come out to do a quick medical on the young person. We also had doctors come in to do their medical assessment and any visits, as needed. If any young person needed to go and see a doctor, staff would facilitate taking them. If they were going from secure, it would be two members of staff with one young person.

Schooling

69. In St Katherine's, there was an education wing in the main complex and young people from both Chalmers and Alison used to get taken over to it by staff. As far as I know, the young people were taught the full curriculum. The young people would go into their classes and they would mix with the young people from Guthrie's, the secure unit.
70. Each unit had to do what we called 'education cover', whereby all you were doing was a corridor monitor. If there was an issue with the young people, the teaching staff would either pull their alarms, or shout "Staff!", which we hated. I always got the impression the teaching staff almost had a 'wait until your father's home' type of attitude. They wouldn't deal with whatever the issue had been and instead would rather leave it to the care staff to deal with. That annoyed quite a few of us. The teaching staff at that point were getting a lot more money than care staff.

71. It was the same in Howdenhall. You had the main admin block where the senior's office was and then down the whole back end of the building was the education block. It was the same set up as St Katherine's in that teaching staff would come in and teach the young people onsite.
72. I can't recall young people sitting exams in St Katherine's, but in Howdenhall they did.

Chores

73. In Chalmers, at the weekend, the young people would have to get up and help tidy up. They would clean the living room, dining room, and kitchen, but it was really just a superficial clean.
74. In Howdenhall, there were six people in the secure unit that I was assistant manager of and it was always the first young person up who got the choice of what job they wanted to do. They'd always take the small visitor room and all they had to do was Hoover it. Last one up got the big dining room.
75. It really was just a superficial clean as we had cleaners in all week doing it. It was their home so it was more about teaching the young people the value of looking after it.

Visitors

76. In St Katherine's, provided it was agreed at care planning meetings, family could come in and visit. In Chalmers, we would encourage the family to take the young person out.
77. In Howdenhall it was very much led by the social worker. If a young person's family came to visit, we always did the first visit supervised by a member of staff in the room as we didn't know the families. It would then go to parents coming in and seeing the young person unsupervised and then both parents and siblings could see the young

person unsupervised. No one under the age of eighteen was allowed to visit a young person without their parent there.

- 78. Visiting times were always after teatime, about 5:30 pm or 6:00 pm until about 8:30 pm.
- 79. In Chalmers, the social worker was encouraged to come and we had weekly care planning meetings. I think it would have been the same in Guthrie's.
- 80. In Howdenhall we certainly had weekly care planning meetings and the social worker would come in for that
- 81. It was encouraged to have weekly care planning meetings because the social worker was the main case holder.

Review of Care/placement

- 82. At weekly care planning meetings, we would talk about the previous week; how the young person was, how their visits went, their education and then we'd talk about moving forward with the case. The young person was in the meetings and had an involvement so they knew that they hadn't just been stuck in and locked up in secure care. We would encourage the parents to come to those meetings too.
- 83. We had a care planning sheet that was in the front of each young person's file and that would have all their weekly movements for the next again week.
- 84. At a care planning meeting, the key worker would take the lead on how the week had been. The social worker would talk about any up-and-coming professional meetings, reviews or hearings. The young person would have an opportunity to say how they had been and then they'd talk about the coming week and what plans were ahead. All that would all be recorded by the key worker on the young person's care planning sheet, which we called the 'CPM'.

85. The CPM would then go to the young person's case worker, so that they knew what was happening. Thereafter, it would go onto the front of the daily file for the young person so that if any staff came in and the young person said that they had time out that day, for example, if it wasn't on the CPM, it wouldn't happen.
86. If a child was in on a three-month order, at about the six to eight week mark, we would start pestering social work about where that young person was going. At that point you would know if you were going to need another secure order. I think that St Katherine's and Howdenhall were licensed to care for a young person for eight months maximum, unless it was a remand. After eight months, they would have to look for an alternative secure unit or an alternative placement.
87. At the six week point you would generally know if the young person was progressing and if they were going to get out of secure care. The social worker would have to make a recommendation to the Hearings centre. The unit, whether it be St Katherine's or Howdenhall, would also make a recommendation. Those recommendations weren't always the same. I've made a recommendation before that the young person needed to leave the secure setting and the social worker has disagreed. That would then get to the children's hearings and both views would be put across to the hearing panel and the child would have their say. Ultimately, it was the panel's decision whether to continue a secure order or release them.
88. Some people would leave open support to go home, some would go to a young person's centre. If a young person was going back home, we would offer to meet up with them once a week for the first three or four weeks after they left the unit. Our main bread and butter was the unit but staff would be released to go and meet up with young people and take them to MacDonalds or have a cup of coffee, provided they wanted it. The majority of the time they didn't want to as they didn't want anything to do with a secure unit or close support unit once they were away. It was always offered by me, certainly.
89. You have a captive audience when you are looking after a young person for three months in a secure unit. You build up a really good, positive relationship and that

relationship doesn't go away. It's all about moving a young person on safely and making sure they know that you've not just said "Bye" and forgotten about them. We always gave them a couple of weeks where we could meet up if they wanted.

90. I am still in contact with some of the young people from my time in secure care. I've seen more of them since I've gone to [REDACTED] Throughcare' because a lot of the young people are now coming up to the age of twenty-four or twenty-five and I worked with them in secure care. It makes me feel good to still have that relationship, especially when they bring in their own kids and talk about when they were in secure care.

Discipline and Punishment

91. Discipline and punishment are two strong words. Were they punished? If a young person came back in a taxi and the taxi driver wanted his money, the money would come out of the young person's pocket money. I wouldn't say that was classed as a punishment as the young person has got to be seen to be paying for it.
92. If a young person 'kicked off', becoming aggressive physically or verbally, they would be asked to go to their rooms or they would be removed to their rooms. We were all trained to move the young person safely through Crisis and Limitation Movement, 'CALM'. You would remove them to their room and allow them to calm down.
93. In St Katherine's, in education they would have a quiet room and Braid had that as well so the young person could take time out. That was to allow them time to calm down. If they were in the quiet room, you'd send them from there, back to class or over to the units. You could class that as punishment and I would say that was the maximum level of punishment that I witnessed.
94. We, the staff, wouldn't tolerate being abused by a young person. We wouldn't tolerate being assaulted. If a staff member was assaulted it was up to them to decide if the police were involved or not. Personally, if I was ever assaulted or my staff were assaulted, I would get the police in because I felt that the young person needed to see the consequences of them assaulting you.

95. There was a policy on what would happen to young people, but there was never a policy of how to deal with particular incidents. You couldn't realistically have a defined policy saying 'If this happens, do this or that' as things changed all the time and you couldn't predict.
96. In the education block, it was always the quiet room first or if the young person was at such an aggressive level that they had to be removed from the class, they would go straight to their room. It was narrow corridors and taking a young person, with two staff in a figure of four down a corridor, you're walking sideways. You always tried to resolve it in the quiet room before you moved on. If you were taking a young person from education in St Katherine's, through the open units, none of us could physically hold them all the way over there while staff were holding the doors open. It just wasn't possible because someone would have ended up getting hurt.
97. No young person was ever responsible for the discipline of other young people.
98. A situation could come from nowhere. It could vary from a young person not getting enough sugar in his tea or coffee, to young people fighting over who liked ketchup more. It did actually happen that young people got into fisticuffs over that. If there were two people fighting, you would separate them and, if you were in the units, they'd both go to their rooms.
99. In the open unit, the bedroom door opened and closed so a member of staff would sit in the corridor and say to them to close their door and stay in their room until they had calmed down. You'd then bring the two young people together again to try and resolve the issue.
100. In the secure unit, both young persons would go into their own rooms and their doors would be closed. They couldn't open their doors so you didn't need to remain in the corridor outside. Instead you'd go to the office and do your write-up about the incident and wait for them to buzz and you'd talk to them then.

101. When I was working in Chalmers, there was never a record of a young person being put in their room following an incident. When I was working in Howdenhall ten years later, we had what was called a bedroom log in both the open units and secure. If any young person was put in their room, a bedroom log was started. That had to be agreed by the care staff who had put the young person into their room and the on-call manager, who was the duty manager at that point. Both would agree and then you'd have a set time, which was every fifteen minutes, when you'd go and talk to the young person and all that was recorded on the log.
102. Anytime you put hands on a young person, it had to go on a 'pink sheet' which was an incident form. The pink sheet detailed who was involved, the number of the incident as was recorded in the register, the date and time, a brief description of the cause, a description of what was done and a debrief, which included how you resolved it all with the young person. Those were used anytime a staff member had any physical contact with a young person, whether that was by physically removing them by guiding them or by the use of an approved restraint. As soon as you put a hand on a young person, a pink form had to be done, religiously.
103. In Chalmers that was the case too. Sometimes there wasn't enough detail put into the pink forms so the staff would be given them back by the manager and asked for more detail. The pink forms would go to the shift manager or the senior involved. The member of staff who took the lead in the incident would be the one who wrote the pink form. It would go to the shift manager for their approval which would be assistant team leader and then it would go to the unit manager and then from there it would go to the service manager at Waverley Court or Shrubhill.

Restraint

104. CALM training was founded, I think, in 1998 by a social worker called David Leadbetter. I think I had been in the job for about a year when I got my training. Up until then there was no formal training. I think the CALM training consisted of a three-day course and then one day of physical training in the gym. Every year we did refresher training.

105. If you have a young person who is completely agitated and willing to take your head off, stab you with a pencil, spit at you or anything like that, that young person will do anything to have a go at you. I'm a big lad and I have always been very aware of my size and it was always the case that the young person would try to hit the big one first. However, for the duration of my work as an RCO at St Katherine's, I worked with two female colleagues Emily Campbell and Leanne Dale. They were fantastic and great to work with. They would always stand in front of me because they knew the young person would always come for me. That has been my whole career.
106. On one occasion, a young person stabbed me with a pencil and we had to get the pencil off of him. You wouldn't do it on your own, you never did anything on your own. Instead, you would pull the alarm and wait for other staff to come. It was always two to three staff members that would then manage the situation. You always waited for the shift coordinator or the manager to come and assist.
107. The young person would then be held in what was called 'a figure of four' which was a crossover hold on their arms. If the young person continued to be aggressive, you'd place them into prone which was them lying on the floor, with one staff member on their legs, one on the left side of them and one on the right. You'd wait until the young person was calm enough to release them. One staff member would take the lead and they would control who moved off and when. It was all done in slow time and it was always the person on the legs who came off first because they could easily go back on if the young person started kicking again. It would depend on where the door was, which side would come off next. Whoever was closest to the door would be the last one off and that was the process.
108. There were some weeks that you would have to use restraint four or five times a day. Although in the last two years at Howdenhall, it was only once or twice during the duration of the young persons stay that we would have to restrain someone. We had moved on in our techniques and there was a big push about not putting young people into a prone position. Through our assessment and annual accreditation, they removed prone so we stopped using it.

109. The policies and practices all followed the CALM process. I didn't ever see any excessive restraint being used during my time at St Katherine's or at Howdenhall. I wouldn't tolerate it. Restraint was always a last resort, if there was nowhere else for a young person to go and their aggression levels were so high, you'd put them into prone.
110. Sometimes our young people wanted to be restrained because that was the only time they felt safe and they felt secure. Knowing that staff were going to control them and keep them safe. Some children tried to encourage us to restrain them.

Concerns about the institution

111. While I was an RCO at St Katherine's, I was aware that there was an investigation going on. Les McEwan and Duncan Macauley came in from Edinburgh City Council. Nothing was found from their investigation and we just carried on as normal.
112. I wasn't aware of St Katherine's or Howdenhall themselves being the subject of any concerns. There was the Tanner report, but that was it.

Reporting of complaints/concerns

113. It was really about the trust and relationship that you built up with a young person. For me as a key worker, if any young person had come to me and said that they were having issues with another person, generally I would already have known about that. The relationship with them was so important. If they had an issue of any sort, it just went straight to the manager, I had no questions whatsoever about doing that.
114. If the relationship between a keyworker and a young person wasn't working, they could change their keyworker, but I don't recall that ever happening. The staff were there to do a job and we knew we were there for the young people.
115. If a young person was to make a formal complaint, it went on a complaints form. The forms were openly available in both the secure and open units. In Howdenhall we had

a post-box where the young people would post their complaints form after they had filled it in. No one went into that post box, the forms would only be taken out by Children's Rights Officers or by a senior manager.

Trusted adult/confidante

116. We had two Children's Rights Officers, firstly Linda McCracken and latterly she was joined by Julie Arbuckle. They would come into both St Katherine's and Howdenhall and were always meeting with the young people. If a young person wanted them to attend their care planning meetings or hearings, they would attend. As things progressed, Who Cares Scotland would come in and would sit with the staff and young people on a regular basis.
117. If Linda came in, we all sat in the office and had a coffee while she talked to the young people. It gave her a free space to sit and talk to the young people without us around.
118. When I first started, there wasn't a trusted person for each child, apart from their social worker, who was their case manager. The young person could also, potentially, speak to their keyworker though, because they would have built up a relationship with them.
119. Trusted persons only came into the system about ten or fifteen years ago. Prior to that, when you went to a children's hearing they would ask the young person who their trusted person was and nine times out of ten it would be Linda or Who Cares Scotland.

Allegations of Abuse

120. I didn't ever witness abuse from staff of young people, not that I heard of either. I wouldn't have tolerated it then or now. I don't remember there being anything written down about the definition of abuse or what it meant. It was just through experience on the job that you picked up when something wasn't right.
121. I only ever saw a couple of incidents that caused me concern. On one occasion at St Katherine's, I saw a locum worker, I can't remember his name, smack a young female

on the bum. That was about twenty years ago and that locum worker was never back after that because I reported him. I just wasn't comfortable with it. I spoke to the unit manager and raised my concerns. They spoke to the young person, [REDACTED] or [REDACTED] and she said there was nothing in it and it was left at that, although the locum worker didn't come back.

122. The other incident was in 2016 when I was a manager at Howdenhall. A member of staff, [REDACTED], had a young person between her legs and was brushing the girl's hair, which I was uncomfortable with. I asked the member of staff to stop it and reminded her of personal boundaries. That was passed onto my manager and that member of staff was then moved on from Howdenhall to St Katherine's. That individual ended up being sacked from St Katherine's because she had inappropriate relationships with a female young person.
123. I just felt that the behaviour of those two individuals made me feel uncomfortable and I passed my concerns onto my manager. Working in a secure setting, you get to know the nuances of the environment. You can't just sit and read a newspaper, you need to be watching what's going on. The seating arrangements in the living area and dining area were organised so that the young people couldn't sit next to each other. The reason for that was to try and stop them from colluding with each other to wind up staff or other young people.
124. I've received a number of disclosures over the years from young people about their families. When I did, I would make contact with their social worker. You wouldn't discuss it at a care planning meeting, but I might ask their social worker to come in early. If it was really urgent you would speak to the social worker that day and pass it onto your manager.
125. I remember one night I was walking down the corridor and a young person called [REDACTED] buzzed and asked me not to wear my shoes as she thought her dad was coming into her room. I walk on my heels and have always had segs on my heels but I didn't wear those shoes again. There were disclosures like that all the time. When

anyone made a disclosure, I would always sit on the floor to get down to their level to discuss it with them.

126. Looking back, I'm confident that if any child was being abused or ill-treated it would have come to light at the time. It never happened on my shift and if it had happened on my shift, it would have been reported straight away. I know that abuse had happened in the past, but hand on heart, to my knowledge, it hasn't happened during my time there.
127. I know now that abuse did happen but that it went undetected. I heard all about the incidents with a member of staff called Gordon Collins. I was shocked.

Child protection arrangements

128. As well as care planning meetings, every Thursday we had our staff meetings where we would discuss the everyday, run of the mill operational business of the unit. Each keyworker would then talk about their young person and everything that was going on with them was discussed with the entire staff team. Everyone was then aware what was going on both regarding the centre and with our young people. We had those meetings every week without fail and everything that was discussed was recorded.
129. We had in-house child protection training in both St Katherine's and Howdenhall. We had external lecturers come in and talk to us. As things progressed, child protection was included with your HNC and your Diploma. A lot of it was experience as well. You knew if it was right or not. I reported everything that concerned me, which was probably down to personal interpretation. In the number of years that I've been there, I can't say there was anybody that I worked with who wouldn't report something that concerned them. I am confident that the child protection arrangements worked.

External monitoring

130. Inspectors from the Care Commission were in every year. We had regular checks, both at St Katherine's and at Howdenhall. You always had an idea if they were coming or if it had been twelve months since they were last there, you knew you'd be next.
131. I don't remember anyone ever panicking that the inspectors were coming, it was just the inconvenience that they would be there for four days and they'd be talking to the young people so you couldn't plan anything. They spoke to the young people, individually and in groups without staff present. They spoke to all the staff too. They visited at different times to speak to all the shifts.
132. They used to grade us from one to five. At Howdenhall certainly, we never got below a grade four. There was one year in 2015 or 2016 that we got a grade three. The principal questioned it and we got put back up to a grade 4. We always got a high grading. The gradings encompassed facilities, record keeping, keeping young people safe and everything to do with secure care. A grade five was exceptional, grade three was on par and a grade zero was drastically under par. The feedback was always to the manager about the centre as a whole, not individual units.

Record-keeping

133. As I've highlighted already, we religiously kept records at both St Katherine's and Howdenhall.
134. Each child had their own care plan where everything was recorded. There was a care planning sheet that was updated following the young person's care planning meeting. This was attached to the front of their care plan and recorded everything for the week ahead.
135. In Howdenhall we had what was called a bedroom log in both the open units and secure whereby if any young person was put in their room, a bedroom log was started. Any checks or interactions with the young person were recorded on the log.

136. We also completed incident sheets anytime you had to put hands on a young person. Those were called the pink sheet and detailed everything about the incident and the action taken. Those were used anytime a staff member had any physical contact with a young person, whether that was physically removing them by guiding them or by approved restraint.
137. The records from our weekly staff meetings, which were held to ensure that everyone in the centre knew what was going on with regard to both the centre and the young people, were also retained.
138. Care planning sheets, monthly reports, hearing reports and 'looked after children reports' would all be enveloped up and sent to the social worker. Any of the bedroom logs and what we called 'pink sheets', which were the incident forms, would all go to the senior manager. When a young person left, they would all go onto their local authority social worker. Any inhouse documents, such as shift reports, would be archived by the admin team.

Investigations into abuse – personal involvement

139. I was never involved in any investigation on behalf of the institution into allegations of abuse or ill-treatment of or into inappropriate behaviour by staff or others towards children.

Reports of abuse and civil claims

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

Police investigations/ criminal proceedings

141. I was part of a police investigation after I was suspended from Howdenhall in relation to an allegation of assault on two separate occasions. However, on both occasions, no action was taken and I was not the subject of any criminal charges.

Other Staff

142. I am aware that the Inquiry would like to find out about certain staff and others who may have been employed at St Katherine's at the same time as me.

Gordon Collins

143. I didn't ever work with him. He came to St Katherine's from Northfield YPC but I was at Howdenhall by that point. I never worked with him as such. When I did my Diploma, my first placement, he was finishing his Diploma. We were in the social work centre at Victoria Street, Edinburgh. He had his last week there when I started and that's the only dealings I had with him.

144. As far as I know, he was an RCO at St Katherine's but I didn't know him at all as we were working in separate centres. I only remember him as a grey-haired bloke, that was it. I didn't ever see him discipline or interact with young people.

145. We were told back in 2007 that he had been suspended pending investigation, but we weren't told what he had been suspended for. It wasn't until it came out in the press a number of years later on that I found out what it was all about.

Kevin Glancy

146. Kevin was an RCO when I started at St Katherine's. I think he was around ten years older than me, although age wasn't something we ever discussed. In all fairness, we were all astonished when we read in the papers that he had pornographic material on

his computer. That was a shock to everyone. We had all called him a 'God lover' and that was how we thought of him so we couldn't believe it.

147. He was there throughout my time at St Katherine's and I think he left to become a field social worker. Kevin was very much a loner. He played the guitar and would play at Chapel on a Sunday. He was elusive and would keep himself to himself on shift. He was a different shift to me so we didn't work together much at all. There was the odd time where I would have assisted on an emergency personal alarm call, but there would have been two or three staff members there. That was really the level of my interactions with him. I didn't ever have any concerns about it.
148. He must've been a fully qualified social worker as he went on to be a field social worker. To do that you need to have a degree or diploma in social work. It had changed from when I started and when you could just complete your study in post. You had to be qualified to get into social care or become a field social worker.

KZB

149. I remember KZB I think he came to St Katherine's early on in my time there, maybe about 1998. He was a similar age to me. He came as an RCO and then got an acting post as a shift coordinator. He applied for the permanent job and didn't get it, so left and went to Wellington Farm School.
150. He was a really nice bloke and he was great with the kids. He had a lot of empathy for the young people. He'd spend a lot of time with them, kicking a ball about in the yard or in the gym.
151. I didn't ever see him discipline a child and didn't ever see or hear of him abusing any child.

KEH

152. He was an RCO around about the same time I was. He actually did his final degree placement at St Katherine's. He applied for a team managers job and moved to that role. Through the interactions I had with him, he was another good bloke. He was great with the young people.
153. I didn't ever see him have to discipline a child and didn't ever see him abuse any child.

IDJ

154. He was one of the quietest, educated blokes I've ever come across. Would he have ever abused anybody? One hundred percent not. I didn't ever see him discipline anybody.
155. When I was in St Katherine's, IDJ was in Chalmers with me. He was the shift coordinator on the other team. IDJ got the assistant unit manager job at St Katherine's. He came to Howdenhall after I went there. He was there for a number of years as an assistant team leader working with me in Braid unit. He left as he wanted to try the field social worker role. He didn't enjoy it so applied for his job back and then he went to Throughcare, where I am now. He left there about a year ago to go to West Lothian as a field worker.

LUZ

156. He was SNR for St Katherine's. I only knew him as any RCO would know his manager. He is now a . LUZ was straight down the middle, everything he did was for the young people, for the good and the benefit of the young people. I didn't see him interacting with the young people. He was SNR SNR so he would come in if he had to. I don't think I was ever even involved in a restraint of a young person with LUZ
157. I didn't ever see him have to discipline a child and didn't ever see him abuse any child.

KEO

158. KEO is currently working with me in Throughcare. I want to say that he started at St Katherine's, literally the same month as me. He went onto nights and was there for a few years. He came onto being a day RCO at St Katherine's and then when I moved onto Howdenhall, he stayed on there. He moved to the Alison team which was in the secure complex but that moved away to Wester Hailes a number of years ago. He went to Throughcare Services and moved to where it is now.
159. He was another steady bloke and I'd never seen him involved in any abuse whatsoever, definitely not. I didn't ever see him discipline anyone either.

KEI

160. When I first started, KEI was the shift coordinator on another team from me. He was an old bloke who was as fair as they come. He was an absolute gentleman. He would forget what day it was but he was great with the kids.
161. I didn't ever see him have to discipline a child and didn't ever see him abuse any child.

KEL

162. KEL was a bundle of laughs, he was a really big guy but an absolute gentleman of a bloke. The kids and staff liked him. He would, one hundred percent, not abuse anyone.

Allegations that have been made to the Inquiry about me

KTS

163. I remember KTS from St Katherine's. We all talked about KTS being a plant by Les McEwan, the director. It was an open discussion that she was a very cold person. I did very few shifts with her, maybe one or two in the six or eight months that she was there. I found her totally lacking in empathy for young people and to the point that the young people used to call her the 'jaggy jumper'. If you hugged a jaggy jumper, it was horrible and that was the expression that was used. I can't recall ever seeing her discipline a child.
164. KTS has given a statement to the Inquiry. At paragraphs 90 and 91, page 16 of her statement, she has said, *'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'.*
165. *'Three people who were primarily responsible for that kind of behaviour were ..., KEM and ..., all of whom I worked with'.*
166. That is utter lies. Never have I ever abused or twisted anyone's fingers and I don't ever recall anyone else ever doing that either. I wouldn't have stood for it either. The passage of time has definitely not affected my recollection. This allegation was part of my eleven-month suspension in 2018 that the police investigated. I went in on a voluntary basis and at the end of they said that they were vexatious allegations that were completely untrue. The police officers were based in St Leonards.
167. I have no idea why these things are being said. If a child was treated in that way, I do accept that it is abuse, but it definitely did not happen.
168. KTS goes on to say the following at paragraphs 103, 104 and 105, page 18 of her statement, *'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.

169. *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.*
170. *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 ... and KEM, a big ... guy who was very fond of grabbing noses.'*
171. *That is utter lies, it's not true at all. This again was in the police investigation and nothing was found, there were no charges brought. It was utter lies. Personally, I wouldn't stand for that and I don't believe any other member of staff named there would either.*
172. *The passage of time has not affected my recollection. As far as I am concerned, these two individuals named in here, KTS and KTV, are just making up vexatious allegations. They were dealt with at the time and she alludes in her statement to Les McEwan doing an investigation at the time and nothing was found. I can't believe that fifteen or eighteen years later the same thing is being regurgitated again. It makes me angry as it is just all lies.*
173. *I would accept that such behaviour is abusive.*
174. *There are several points in the statement of KTS that I would like to clarify as they are just not true. She talks about being a locum RCO and there not being*

much of a handover and this just wasn't true. There was always a full induction done for any new staff. Likewise, her claims that there was no proper handover for evening shifts is also not true. Each handover was the same, full and detailed. She mentions that the contents of young person's rooms were removed if they weren't getting up in the morning and this was their punishment; again this is not true, I certainly never saw any practice like that. KTS speaks of it being a macho, male-orientated environment but my two colleagues for years were women, this is more rubbish.

175. She talks about the children being allowed to smoke under the age of sixteen. The youngest they could smoke was fourteen and they had to have their parents' and social worker's permission. They were given four cigarettes a day and they were never given a full packet as she later suggests as potential grooming. I never saw anything like that. She alleges that staff would provoke a toy-fight incident and then withhold pocket money as a punishment. This is simply not true, it never happened. We didn't take pocket money away from the young people. She also alleges staff would withhold medication if a young person kicked off, or staff just decided they weren't getting it. This is utter rubbish.
176. In relation to visits, KTS suggested that residential staff always had the final word on whether their visits happened or not and this is not true. It was discussed at their weekly CPM and decisions about visits were agreed and approved by social work. These weekly CPM's were not, as she suggested, weighted by residential staff. Everyone involved with the child, including the young person, had input. Any visits, including any young person being taken out by a staff member to their home or elsewhere was always agreed at the CPM.
177. She also suggested that on an occasion there were two children without care plans and that they were quickly put together before an inspection. This is not true, it never happened or I certainly wasn't aware of it happening.
178. Our Children's Right's Officers were very involved with the young people and KTS's claim that the young people wouldn't speak out because they were scared of the consequences just isn't true.

179. In relation to restraints, KTS suggested that they were not recorded and this is simply not true. All restraints were recorded. She goes on to suggest that about 90% of the restraints were provoked by staff or staff would provoke a 'toy-fight' which would lead to the young person being restrained on the floor. This just didn't happen, or certainly I didn't see it happening. Restraint was a last resort. When she alleges that only about 5% of the time would staff sit down and talk to the children, and that instead it was always about going in and restraining someone, this is just not true.

180. KTS also talks about the searching of residents and males searching females, not due to the lack of female staff but because the men said they were doing it. That never happened. It is utter rubbish.

181. These two individuals, KTS and KTV are horrendous. KTS had conditions on her from the SSSC that I bet she hasn't disclosed. I don't know what it was for, but I know that there were conditions on her.

I think that KTS was a plant right from day one and I think she alludes to the fact that she was a whistleblower and that some people thought she was a plant. I can't prove it, but I'm in no doubt that she was a plant for Les McEwan and she was to dig for absolutely anything and that's where this is coming from. When I read her statement, I just kept saying, "Not true". I haven't ever witnessed any of what she is talking about.

Other allegations

183. I was suspended in 2018 for eleven months for allegations of assault. I heard that it was KTS and KTV that made the vexatious allegations against me. I was interviewed by the police after eleven months sitting at home. There was

no proof of any of it and even the police said that it was vexatious allegations. I returned to work following my suspension. Michelle Millar, the chief social worker for Edinburgh City Council, and Scott Dunbar who was the service manager, were both hopeless and lied to me. Scott Dunbar committed suicide three or four years ago.

184. After that suspension, I came back to work and had only been back for six months, when two female residents made an allegation that I had watched pornographic material with them in the secure unit. I was suspended for five weeks while that was investigated. That would have been around 2019. I was knocked for six.
185. That was investigated and there was nothing found. The police weren't involved, it was just an internal investigation. One of the other young people in the unit said it happened but there are cameras everywhere and you were never left alone. Staff were interviewed and confirmed it didn't happen. One of the young people had passed onto her carer that she was being forced by the other individual to make the allegation and that it had never happened. Both young people failed to turn up for the interview after a number of requests from the investigating officer and the investigation was concluded. It was Neil Bruce that did the investigation and he said he was surprised it had even got to him.
186. About a year later, around 2020 I was suspended again. The only reason I knew I was being suspended was that I have a firearms license and keep guns and the police turned up at my door to take my guns away. I phoned my boss and asked what was going on. It turned out that ^{IOV} [REDACTED] had got a number of young people to make allegations that I had assaulted them. There was no internal investigation as Bernadette Oxley, the chief social worker, started the investigation but she left halfway through the case when Sean Bell [REDACTED]. It was then handed over to another investigator and that's when it was handed over to the police. The whole time you are in limbo.
187. Again, that was eight or nine months of suspension and a police investigation and again nothing was found. I'd never been in a police car before and I was put in a cell and interviewed under caution, it was horrendous. I was only interviewed for about

fifteen or twenty minutes before I was sent home. I was told there and then that there would be no further investigation and that was the end of it.

188. The police officers told me that the complaints had been made by a disgruntled female ex-member of staff, who left because she was getting sacked, that's the words they used. It's still a vivid memory for me having never been in a police car.
189. That's why I'm angry about all of this. My life has been turned upside down, and my wife's life has been turned upside down because of this and I am still angry about it all. When I was contacted by the Inquiry, I just keep wondering when this is all going to end.
190. There is no love lost with the department because they didn't support me in any of those suspensions.

Leaving Edinburgh Secure Services, St Katherine's and Howdenhall

191. After I returned back to work after that last suspension I had just had enough. I was fifty-five and took flexible retirement. When you are fifty-five, you can access your pension, access your lump sum and reduce your hours. In hindsight, by accessing my pension I took a drastic loss in my pension, yes I've been able to go mortgage-free earlier but when I do retire, all I'll get is what I'm getting from them at the moment. It was because of the way that I had been treated by the department that I just wanted out. Particularly Michelle Millar and Scott Dunbar who knowingly gave me wrong advice in relation to my flexible retirement which resulted in me losing out on a vast amount of money.
192. From the way I felt, I would have left completely but I couldn't afford it so dropped down to the bare minimum and work two days a week.

Helping the Inquiry

193. I think that the allegations of abuse that have been made go back to those two individuals, KTS [REDACTED] and KTV [REDACTED] who have a gripe against LUZ [REDACTED]
194. Don't get me wrong, I one hundred percent agree that the Scottish Child Abuse Inquiry has been needed, across the whole spectrum. However, I think the focus needs to be on the positive aspects of children in care.
195. In KTS [REDACTED]'s statement, she alludes to someone who I'm positive is a boy called PCX [REDACTED]. He was six foot tall and I mentioned the incident earlier where he got into a fight with someone over ketchup. I got into a restraint with him because someone hadn't put enough sugar in his tea. He was a nightmare but he was a young boy in a man's body and his family life was horrendous.
196. PCX [REDACTED] loved it in secure care and he used to go out and come back in on repeat because people acknowledged him and spent time with him. That's the people you want to be speaking to, all of the positive parts of care. I think he would speak positively of his time with us.

Other information

197. 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..... KEM [REDACTED]

Dated..... KEM [REDACTED] 30 Nov 21