## **Scottish Child Abuse Inquiry**

Witness Statement of

CDR

Support person present: No

My name is COR 1940.
 My contact details are known to the Inquiry.

### Background

- 2. I attended Merchiston Castle School as a boarding pupil between 1954 and 1959. I left Merchiston at age 19 having stayed on for an extra year to retake the Oxford entrance exam which I had failed the previous year. I was not aware of any abuse when I was a pupil at Merchiston.
- I returned to Merchiston between 1966 and 1979 when I took up the role of I also taught and I also took on the role of resident boarding house tutor.
- When I left Merchiston as a pupil in 1959 I completed a degree at Oxford in and I went on to Glasgow University where I obtained a degree in Whilst I was in my last year in Glasgow University I was contacted by the then Headmaster of Merchiston a man called Alan Bush. He asked if I would be interested in the post of I was in The school was

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- 5. I accepted this offer without formal interview. I had no previous teacher training experience when I took up the position. I had heard that teacher training was a waste of time and the best part of it was the placements at schools during the course of the training. I had no official teaching qualifications.
- Before I went to Merchiston I gained some teaching experience

in the Scottish Borders. I wanted to become a teacher and so it was organised through Mervyn Preston a teacher at Merchiston who was also the liaison between Merchiston and the feeder prep schools that I would teach for two terms before I went to university to see if I enjoyed it.

for Merchiston. It was an all-boys school with about 90 pupils aged between nine and thirteen.

### Employment within Merchiston Castle 1966 - 1979

- 7. I took up the position of a second at Merchiston in September 1966 and remained until July 1979. I was teaching mostly and some and some a second. I also taught which the boys received once a week. While I was teaching at the school there must have been about three hundred boys.
- 8. I was a bachelor and so I was given a room in Chalmers East which was one of the boarding houses within the school. In all there were five boarding houses as part of the whole school. The houses were called Chalmers East and West and Rogerson East and West. During my time teaching there a fifth house was added called Pringle House. I took on an additional role at Chalmers East as a house tutor. There was a retired teacher called Gilbert Mair who still had rooms in Chalmers East.
- 9. I was "In loco parentis" and would be on call or available to the boys all day and night. I had been there as a pupil and I knew how the school functioned. I had a bedroom and a sitting room which were my own quarters in the house. I shared the showering and toilet facilities with the boys and it was very easy to use them when the boys were otherwise engaged with school activities.

- There were four houses at Merchiston I suppose that my manager would have been the Headmaster. When I first arrived I was responsible to the Housemaster at Chalmers East. He was called Bill Donaldson and was very much in charge of the House.
- 11. During my association with Merchiston there were five Headmasters or acting Headmasters. Mr Evans, Mr Humphries, Alan Bush, Mervyn Preston and Donald Forbes. The pupils would change houses each year according to age and progression through the school years.

# Policy

- 12. I always worked very closely with the Housemasters Bill Donaldson and Ken Houston. They made the policy decisions. There was an accepted way at Merchiston and because I had been schooled there I knew how it worked. Some of the teachers had gone to teacher training and I know that Ken Houston who taught physics was one of them.
- 13. There were no policy documents drawn up in those day. There were no staff appraisals as we watched each other and were watched by each other. I was very close to the staff in the bachelor group and I spent a lot of time in their company. We had our meals together and would debrief the day over the evening meal. I don't think the systems changed in all the time I taught there.

# Discipline and punishment.

14. As teachers in Merchiston during the 1960's and 1970's we had never heard of Child Protection. There was an accepted practice as far as discipline was concerned. I knew the system having been a pupil there. It was a hotly debated system amongst the bachelor teachers.

- 15. There was a policy on beatings which was devised by the Headmaster Cecile Evans. If someone committed a "beatable offence" you would have a meeting with the boy to discuss what happened. You would then have to speak to the Housemaster to get permission to beat the boy. He would make the final decision. You would then notify the boy to attend at your study and to bring his scarves. At Merchiston the boys were always beaten on the hands and the scarves were tied round the wrists to prevent injury. Before you beat the boy they had the right to appeal to the Headmaster and you had to ask if they wished to appeal.
- 16. There was a set amount of strokes you could give with the belt depending on which boarding house the pupil was living in. This coincided with the age of the pupils. As I recall Chalmers West would get between three or four strokes. Chalmers East between four and five strokes. Rogerson East between six and seven strokes and Rogerson West who were the more senior boys more than six or seven. The boys learned that if you warmed your hands first on a radiator before the beating and put them in hot water after the beating the pain would go away very quickly.
- 17. As far as the offences that qualified for a beating most of them were for repeating other offences and not heeding warnings. The prefects were also allowed to beat boys. They had to approach the senior prefect who was head of house who would then go to the Housemaster to approve the beating. The only prefects that could perform the beating were the School Captain and the four heads of house. That practice continued all the time I was a pupil and also taught at the school.
- 18. The beatings were always carried out in the presence of the other prefects and there could be sixteen or seventeen prefects present. There were no members of staff present. The prefect who raised the complaint was not allowed to perform the beating. The number of strokes administered was the same as the teachers were permitted to give.

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- 19. There was one occasion when I was asked to act as Housemaster for a three week period at Chalmers West when the house master Mervyn Preston was away. The school matron called me in to say that there had been a fight and it had gone over the top as far as the injuries were concerned. I spoke to the combatant who had not required medical help. He was a Dormitory Second which meant he served immediately under the Dormitory Captain.
- 20. I interviewed the boy and made the decision to demote him from Dormitory Second. The House senior prefect was unhappy with this and spoke to the Headmaster. This resulted in me being called to the Headmaster's study where after a discussion he reversed my decision and the boy was reinstated as the Dormitory Second.

#### Complaints by boys to staff.

- 21. Fairness was a massive thing and I was not aware of any complaints made by the boys about members of staff or their peers. If a prefect had one of the boys in trouble all the boy had to say was that it wasn't him and that would end the matter and it would be dropped honesty and trust were fully respected.
- 22. Most of the serious offences were things like smoking or drinking alcohol. They were beatable. Drugs had not arrived at the school and there were no problems there. Beatings were issued for offences that seriously undermined the smooth running of the school. Blatant disobedience and breaking bounds. I am afraid I can't remember them all. The parents of the boys accepted the punishments prescribed.
- 23. If one of the boys needed to speak to anyone they could approach the staff, the dormitory captains or any of the senior boys in their boarding houses. The boys would also go to a sport changing room in the boarding house where if there were differences to sort out they could fight. This is how disputes were resolved between the boys.

24. I have since often thought about bullying at Merchiston when I was both a pupil and a teacher there. I just can't seem to remember any incidents. I did encounter bullying episodes at other schools I would teach at after Merchiston. Fairness was a very important part of the ethos of Merchiston. It was respected during my time as a pupil and a teacher.

#### Record keeping of punishments.

25. I don't recall any system of record keeping when punishments were handed out. I didn't keep any record but all punishments would be discussed with the Housemaster and I am unsure if he kept records.

### Strategic planning, staff recruitment and training.

- 26. I assume that strategic planning was carried out by the Board of Governors and the Headmaster. I had no input. I was in a suppose I was left to get on with it although I was directly responsible to the Headmaster.
- 27. I was not involved in the curriculum for teaching although these things would be discussed between the teachers and the head of that department. We would also discuss exam results. I had no input into staff recruitment. We learned on the job and there were no staff appraisals. I do remember sometime in the 1970's there was an inspection from an outside agency. It was the only one in the whole time I taught at Merchiston but I do not know where they were from. They did take an interest in the department because the inspector taught
- 28. When you were working with boys who were sixteen and seventeen the attitude of the Housemaster Ken Houston was to keep them active and so they were focussed on what was happening. I think that one of the Housemasters Bill Donaldson told me how he wanted his house to be run and he may have sat me down and explained this to me.

### Working week at Merchiston.

- 29. My working week consisted of me teaching to each class of boys once a week. I was entirely in charge of these lessons. I also
- 30. The Memorial Hall was multipurpose and had many uses during the school week as any school hall does. All the pupils were compelled to attend the **school** along with some of the staff although it was not compulsory for the staff to attend.

### Living arrangements

- 31. When I first arrived at Merchiston I lodged in two rooms, a bedroom and a sitting room in Chalmers East. I was in the same corridor as the boy's dormitory on the second floor. There were four dormitories between the first and second floors. The Housemaster was on the ground floor. When I moved to Rogerson East I was on the first floor.
- 32. You would be on call for the boys twenty four hours a day although it was very rare that you would be required through the night. I do recall that I was wakened one night by a boy who told me that one of the other boys had been sick and I had to get up to clear things up.
- 33. It was very strict that you stayed in your own houses and that included the staff. If I wanted to make visits in my role as visits I would need to ask the permission of the Housemaster to enter another boarding house.

Culture of the school.

- 34. I thought it was a good school and I am not embarrassed of being a teacher at the school at that time because I felt that they gave the boys a good deal. The boys were well coached. There were teaching weaknesses in very few members of staff but the weaker staff members didn't tend to stay long.
- 35. I was aware of fagging whilst I was a pupil but I have no memories of the fagging system whilst I was a teacher.

### Bullying and abuse

36. I am fairly confident to say that there were none, if any, incidents of abuse or bullying. It would come to light if there was an incident and the Headmaster would be involved. If one of the prefects over stepped the mark he would be spoken to by the Headmaster.

### Concerns about the school

- 37. I am only aware of one incident of concern that happened in Merchiston. I don't recall an outside body or agency being involved with the school over any incident. I know that from time to time we would hear that a teacher within the Scottish Independent Schools system had left in a hurry for acting inappropriately. It seemed to be accepted that this was a risk that was there and you couldn't rule it out. If it happened the teacher would be "down the drive" and gone from the school.
- 38. I was never involved in any incidents at the school where there were allegations made against teachers apart from one incident involving a teacher called OZK
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   OZK
   Some years later I was interviewed by the police in connection with OZK
   OZK
   OZK
   and I provided them with a statement.

Incident involving teacher OZK

- 39. In my time teaching at Merchiston there was one incident I was directly involved with. It was the day after the end of a second second 1977 and the school was empty. I was still there as the teacher in charge of a second second was also there as they were competing in a second tournament on one of the first days of the holidays.
- 40. At six in the morning I received a knock on my bedroom door. There were two boys there. I could see that they were upset. They sat down in my sitting room and spoke to me for about an hour. One of them had been assaulted by a master who had taken private parts of a boy in his mouth.
- 41. I was told by the boys that they had gone to the Headmaster and he was aware of their complaint but they needed to speak to someone so they came to me. One of the boys was the **second second sec**
- 42. The boys who were both eighteen years of age told me that they had been at a party in Edinburgh somewhere and when they came back to their boarding house in Merchiston they were met by OZK who had invited them into his sitting room where the sexual assault occurred. There are a lot of the details that I don't know like how they had ended up in OZK who had invited them.
- 43. I listened to their story and provided what pastoral care I could. I didn't get a lot of the details but I could see they were very upset. I assumed that the Headmaster was dealing with the matter as I never managed to speak to him about the incident and I don't think that he knew that the boys had consulted me.

- 44. I took two actions. I managed to get a replacement for the second of the second
- 45. The result of this incident meant that the Master OZK was "down the drive" next morning. There was no police involvement. The way the schools dealt with that sort of incident was to dismiss them on sight and then block any future teaching positions they may try to apply for through the references. It should have been the end of a teaching career. The decision was made by the Headmaster Donald Forbes. According to the culture of the time it was dealt with correctly. I appreciate that in 2020 it would have been reported to the police immediately.
- 46. I later heard that <sup>OZK</sup> had gone down south to England to live with his sister and was working as a librarian. I don't know if the incident was recorded anywhere.
- 47. Between five and ten years ago a police woman contacted me and came to visit me and take my statement. I described this whole incident to her. She told me that she would be back in touch but I have not heard from her since. I don't know the outcome of the police investigation and I can't recall the police woman's name.
- 48. I don't know what the procedure in regards to informing the parents of the boys was. I would imagine that Donald Forbes the Headmaster would contact them to let them know what had happened. I know that in the Independent schools network the word would travel very quickly amongst boys, former pupils and parents.

49. There was no written policy for dealing with complaints of abuse. The boys knew that they could speak to prefects, their friends, House Tutors, Housemasters and the Headmaster if there was a more serious problem. They might also have a teacher who was coaching them in rugby or other sport they could speak to. There was no formal procedure that I was aware of. The Headmaster would consider it his duty to deal with any complaints. I think we felt confident that boys would be able to speak to the staff if there was a problem. I knew of no other incidents in all the time I taught at Merchiston.

### Incident involving teacher James Rainy Brown.

- 50. I knew James Rainy Brown who committed suicide. He took his own life after leaving an interview with the Headmaster and a lawyer when allegations of inappropriate behaviour were put to him. I only learned of these allegations after James had died. I was no longer teaching at the school.
- 51. James was a close friend of mine and had been spent many hours with other retired teachers from Merchiston discussing what must have happened. As far as I know it involved allegations of him supervising the boys swimming naked in the reservoir whilst they were on a cycle trip in the Pentland Hills. James would not have regarded this as inappropriate behaviour in his role as the supervisor.
- 52. James was a single man and was able to work at the weekends. He was invaluable to the school. He would take the boys out on expeditions. He was a godsend for the married teachers as it gave them time off at the weekends. James was a real outdoor person and enjoyed these expeditions as did the boys.

### Child protection

- 53. I think that I was given some minimal instruction on child protection issues although it had no meaning to me at that time. The 60's and 70's were a different time and although questions about child protection are appropriate today they had not come to the surface when I was teaching at Merchiston.
- 54. There were informal systems of child protection. I had access to the dormitories day and night but there were sixteen boys in the dormitory and they would know if anything was going on. I did see boys naked in the showers and in the dormitories. I was discrete and the boys were also discrete. It was just part of the school routine and I didn't think anything of it. I don't think that the boys did either and I had firsthand experience of this when I attended the school as a pupil.
- 55. I have never given evidence at any trial into abuse at Merchiston. I have only ever provided one statement to the police in connection with the incident involving OZK
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  I don't know what the outcome of that was.

#### Official visits

 Apart from the one visit in the 1970's I don't recall any other official visits from an Educational Authority in all the time I was at Merchiston.

### Report cards/record keeping

57. I only kept records of the performances of my class pupils. Those records were not mandatory and were only for my own information. I did not keep a record of any discipline issues. I did not keep a written record anywhere of when I had to punish a boy. I don't know where these records are now.

- 58. There was a report card that went round every three weeks. The boys were responsible for going to each of their teachers who would add a comment regarding the progress with each subject. The card would then go to the Housemaster who would add a comment. The Housemaster would identify any issues with regards to the subjects being studied. If necessary the Housemaster would call the boys in to speak to them if there were issues. The report card then went to the Headmaster.
- 59. The Headmaster produced a report card that was sent out at the end of every term. Every subject teacher and sports master along with the Housemaster would add comments. The Headmaster would then add his comments and it would be sent to the parents of the pupil concerned.
- 60. I can recall talking to parents on a few occasions with regards to comments on the school report. If a child was struggling with a subject I would discuss this with the parents. The parents did visit the school on the odd occasions.

### Dismissal of lan Robertson.

61. When I was a pupil at the school there was a teacher who was called Ian Robertson. He also used the names Ian Robertson Brown and Ian Stewart Robertson. He was my highland dance teacher at Merchiston. Very soon after I left the school he was dismissed over some allegations of child abuse but I am not sure of the circumstances. I can only guess that these circumstances were similar to those of OZK

#### Allegations against and knowledge of James Rainy Brown.

62. I knew James Rainy Brown very well. All the time I was at Merchiston as a teacher he was also there. He was three years older than me and had been a former pupil. He was a pupil in school when I was there as a pupil. He was a Housemaster at Pringle House. He taught sciences and was **Exercised Control**. I would go on trips with him and I recall one trip to St Kilda where we lived in tents for two weeks.

- 63. James Rainy Brown was odd. He was very thrawn. He was a very gifted man but was socially awkward with other adults. He was very difficult to work with but we became good friends through the hill walking clubs that he ran. I saw him around a lot of children and had no issues of concern. He had his own way of exercising his control and discipline over the pupils. I recall one occasion when climbing Ben Cruachan with me and some boys from Pringle House. One of the boys was racing on ahead. He deliberately stopped the boy from getting to the top first. It was his way of exercising his control. He did use the tawse in school to discipline boys but I never saw him using it.
- 64. I recall on an occasion that I was driving down to Gatehouse with James to visit another colleague when I had a talk with him about his sexual orientation. During that conversation I didn't pick up any issues of concern about him working with children. He never disclosed his own orientation to me.
- 65. On reflection I suspect that it is highly possible that the allegations of him supervising naked swimming whilst on a school trip would have been true. I don't think that he would have regarded that behaviour as being wrong.

#### Allegations against and knowledge of Gordon Cruden.

- 66. After I left school I do recall I heard about an incident from Ken Houston which involved Gordon Cruden. I think that the incident involved him wearing a pair of trousers that had a hole in the crutch and his private parts and underwear could be seen. This upset one of the pupils and he made a complaint. Ken's assessment of the incident was that the boy was over sensitive. It went to the Headmaster and I think that Gordon Cruden bought a new pair of trousers and the incident was dealt with in that manner. I did not have first-hand knowledge of the incident but first heard of it maybe ten years ago.
- 67. Gordon Cruden was at the school when I was teaching there in the mid 1970's. He was a House Tutor and I recall he was a good swimmer and involved with the swimming team. He taught French

68. He was a decent normal guy but I did not have contact with him out of school. I think that the pupils were comfortable with him. I have no memory of him disciplining children and I never saw him abusing children.

### Allegations against and knowledge of QZA

- 69. I recall that QZA came to the school in the mid 1970's and I did overlap with him. I can't recall his subject but I think that he was a bachelor and had previous teaching experience in the Caribbean. I think that he had a room in one of the the houses.
- 70. I was never close to <sup>QZA</sup> and didn't know him well. I can't recall seeing him interacting with children and I didn't witness him disciplining the boys. I never saw him abuse any pupils and never heard any stories about his behaviour at the school.

### Allegations against and knowledge of BRW

- 71. BRW was a great guy. He was a very shy man and he was a teacher to me when I was a pupil at the school. He taught me He was still a teacher when I returned to the school as **Example**. He developed cancer not long after I left Merchiston and sadly died soon after that.
- 72. I think that he was a house tutor. He **second second second** and he would access books that the pupils need for their studies. I remember him better when I was a pupil and he was my teacher. No one at the school knew him well as he kept his distance. He didn't know how to relate with other people.
- 73. He hardly appeared out of his room although I have no idea what he did in there. I can't recall how he treated the boys. When I was a pupil he did beat me on one occasion when I put a drawing pin on his seat. I am ashamed of this but it had the desired effect. I would say that he was a loner and I never saw him beating or abusing other boys. I am not aware of any incidents of child abuse involving BRW

Allegations against and knowledge of OZK

- 74. I have already described the incident involving OZK I recall that he was younger than me and taught I is the was a very strict teacher. He wore Edwardian style clothes. He was a second and on one occasion he asked me in my role as I is the could form a small group of boys to practise the second is the second teacher. I was not happy with this as our second were so he didn't pursue it any further.
- 75. When I was at the school as I have saw OZK punish a pupil or abuse any of the boys. I was involved in the incident resulting in him resigning. I have given a statement to the police in connection with that incident.

Allegations against and knowledge of Mervyn Preston.

- 76. I had a lot to do with Mervyn Preston. He was teaching when I was a pupil at the school. He was my Housemaster. When I was a pupil at the school I took a "scunner" to him because he criticised a decision that the Headmaster made with regard to finishing a term early because of an infectious disease that was doing the rounds in the school. He addressed the whole house and called the Headmaster "a wet" which I didn't like.
- 77. When I arrived at Merchiston as a teacher Mervyn Preston was still there. He was second in charge of the school. He was a great schemer and you had to avoid getting sucked into one of his schemes. He was a history teacher.
- 78. As a teacher at the school I observed him with the boys. I would describe him as being pompous and paternalistic. On reflection I think that there may have been a question mark about his attitude with some of the boys. I do recall that he would often put his arm round boy's shoulders. I never witnessed him abusing any boy and I never saw him punishing any of the boys.

- 79. I have since heard some stories about Mervyn Preston being in the showering area after games supervising the boys. It was not inappropriate that he was supervising the boys. I think that he laid himself open to potential allegations because when I was a pupil at the school the boys would talk about it.
- 80. Mervyn Preston would do the sex education with the boys and it was called a pep talk. These talks always took place in his own sitting room on a one to one basis. He would call the boys out during prep. He would speak to all the boys about sex and some of the boys said that Mervyn Preston had asked them questions about their own bodies and whether they had had erections. I suspect that some of the boys embellished their stories. I recall when I was a pupil I was waiting to get this pep talk from Mervyn Preston but it never happened.
- 81. I do not know of any allegations against Mervyn Preston. In the past ten years I was at a Merchistonian Reunion Dinner of my fellow pupils. The contemporary who gave the speech at the dinner thought it appropriate to home in on all the stories about Mervyn Preston. A lot of the people at the dinner were very embarrassed about what he said. I suspect that there was nothing concrete proved against Mervyn Preston or the speaker at the dinner would not be making jokes about it.

### Allegations of abuse

#### CCZ

82. I am aware of the allegation that was made about me in a statement from CCZ
 CCZ
 I know that it involved a third party boy who is not named but was struggling to fit in with the other boys at Merchiston. It is alleged that I wanted to check under his kilt when he was kneeling down to see how puberty was progressing.

- 83. I remember CCZ when I was teaching at Merchiston. I knew a lot about him. He was a poor soul in the wrong school. He had no academic ability to keep up with the rest of the school. I wondered what we as a school could offer him. I think he was placed in the school for the wrong reasons. If I recall correctly he was adopted by two older parents and the reason they placed him in Merchiston was because they couldn't control him and they expected Merchiston to be able to do that. He wasn't a desperate problem and I don't recall any sexual allegations he may have made against teaching staff.
- 84. I have no memory of punishing CCZ I I was a house tutor with him twice and I never abused him. In response to the allegation he made about the other boy being touched and asked about his puberty by me I have searched my memory and have no recollection.
- 85. There are many incidents when adults can give younger persons a message which they are not intending and all I can think is that is what may have happened. I suppose I was capable of doing it but I would not have had physical contact with the genitals of any boy and I would not have a discussion with any boy about puberty. All I can say is that I have no memory whatsoever of this incident. I suppose that the passage of time may have affected my memory but I would have to say that it is most unlikely. I do accept that any behaviour like that would be child abuse.

#### Allegation about beating too hard

86. I would have to accept that this was the case. I had a reputation among the boys for beating hard. I thought it was right at the time. I recall when I was beaten on one occasion by BRW when I was a pupil the tawse barely flopped onto my hand. I felt that this was counterproductive. A punishment has to be a punishment and it has to correct you so it is needed to do its work as unpleasant as that is.

- 87. I have never been the subject of a complaint for being overzealous with the tawse. I didn't own a tawse and so I had to borrow it from Brian Thomson who was the housemaster of Rogerson West. I had to go to him every time I did a beating. He was a gentle man and soft with the boys. I feel that if anyone was going to complain about the way I beat the boys it should have been him but he never said a word, he would just hand over the tawse. I always had to have permission to beat the boys from a senior member of staff.
- 88. The police have never contacted me with regard to "beating too hard". I do recall that one member of staff called CDS once said to me that he had heard that the militant had been at work again. I took this to mean that he had heard about a beating I had given. It was the way I did my beatings and pupils knew what was coming if I was going to beat them. As far as I know CDS had no issues with the boys and was not abusive.

#### Leaving Merchiston School

- 89. I was on holiday in Orkney with friends in 1979 and I suddenly realised that I didn't want to go back to Merchiston School. I would say that I was "burnt out". I couldn't stay there for another day longer. I had been there for thirteen years. I had to give a terms notice so I sent a postcard to the Headmaster with my resignation written on it.
- 90. I do not know what references I was given as in those days they were private and you didn't get to see them. It was two years later before I started at started at school. High School. I took a year out and visited friends and relatives all over the world. I was contacted by the started at an under started at a number of schools in Scotland, England and Malawi.

91. On my 59<sup>th</sup> birthday I left teaching and along with my wife changed direction and moved home. I became a **second second second** 

### Reaction to complaints from CCZ

92. I feel in regards to the complaints made by CCZ that that although he is an unhappy person his complaints should be taken seriously because that is where Inquiry evidence should come from.

### Helping the Inquiry

- 93. I wouldn't know where to begin with this as all I can really say is that I am very glad that I am not still teaching. I think that it will be up to the Inquiry to draw their own conclusions. I don't feel that I am able to provide any helpful comments. Having been both a pupil and a teacher at Merchiston I now know that I am not in favour of the independent schools system. The cohesion of society is broken by having different schools and it is divisive in society.
- 94. 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.

