

## **Scottish Child Abuse Inquiry**

Witness Statement of

EXL

1. My name is EXL. My date of birth is 1942. My contact details are known to the Inquiry.

### **Background**

2. I am providing this statement on a three dimensional basis, as someone who worked out with the school environment, as someone who was occasionally involved in school meetings and as a parent of pupils within the school.
3. I have a Class 1 Master Mariner's Certificate which is equivalent to a top university degree. My training to qualify as a Master Mariner included extensive studies in Maritime Law. I am a Yachtmaster Offshore Instructor and registered with the RYA (Royal Yachting Association). My previous experience was fourteen years as a deckbridge officer with BI/P&O shipping. From then I worked as a Ferry Captain and then ran my worldwide yacht delivery business and have been a superyacht captain. I worked for two years as a deck officer with the British Steamship Company educational cruise ships.
4. It must be appreciated that in many respects, the law of the sea is very different to the law on dry land, for obvious reasons.

### **Employment with Gordonstoun School**

5. I began working with Gordonstoun in January 1984 until August 1998 as

6. Prior to commencing with Gordonstoun my references were requested before the interview process. To fulfil the role the successful applicant had to be a Master Mariner and experience yachtsman. The interview panel was chaired by the Headmaster, Michael Mavor.
7. For the first thirteen years at Gordonstoun I did not have any line manager, but if needed I had direct contact with the Headmaster. In my last year this changed and I was told I needed to have a line manager. I tried to find out why this change was needed, but could not get any answer. It was the first time that I was aware of that a [REDACTED] was prevented from direct contact with the Headmaster.
8. During my time at Gordonstoun I was also Principal of the [REDACTED], separate from anything to do with the school. The courses I ran were all offshore. At the school the set up was at my instigation with the final approval of the [REDACTED] and with the approval of the Headmaster.
9. Gordonstoun School was rather unique in as much as during their time at the school all pupils had to do regular mountain expeditions along with mandatory periods at sea, the latter being under my command. Being at sea provides a kaleidoscope of experiences, requiring real physical and mental endeavour, good organisation and self-discipline in order to cope with them safely.
10. The constant changes of the elements have to be faced up to, sometimes providing irritation, tension and exhaustion, highlighting the value of using logic and teamwork in day to day problem solving situations. This produces a spirit of resilience, tolerance, togetherness and a worthwhile sense of achievement. Most of our aims are set out in the school development plan.
11. For the Cutter sailing, Third formers came in classes for a week at a time, spending three hours each morning during Spring term. Fourth formers came for the same length of time in the Autumn term and had their training in the afternoon. Lower sixth formers came in groups of approximately sixteen for six afternoons during the Spring Term. Cruise sailing would involve two cruises as they graduate through school.

12. While they were on cruises the pupils were under my command. Some of the pupils were trained to assist with the Coast Guard unit, a mountain rescue team and the Fire Brigade. The members of the Fire Brigade have assisted during the day and at night in fighting fires reported within the Moray district. Those trained carried pagers on them at all times, including in the classroom and at night in bed.
13. Under Maritime Law the Master of a British ship is in charge and control of the vessel, *as Master under God*. The logic of this is to put the full responsibility of the safety of the ship and crew upon the Master. It also entitles him to avoid any pressures put on him by the owners of a ship, that may compromise the safety of the vessel and the crew.
14. During their fire training the pupils were taught that if they were ever called to a fire on a ship one of the greatest dangers is that if they use too much water on the fire, the vessel would sink. This had the obvious effect of endangering the lives of all on board, risks of the fuel tanks erupting and the consequential serious environmental hazards. At sea you cannot just call the Fire Brigade as you would on dry land. Accordingly another hazard which is frowned upon is smoking at sea.

### **Policy**

15. While I was [REDACTED] and running the courses all the pupils on those courses were in my total care at all times. I was not at the school for any other reason and had no involvement with policy matters or any of the strategic planning.

### **Other staff**

16. The only person I supervised would have been the Bosun, Iain McMillan, who was my direct assistant. The day before the Autumn cruise took place the Deputy Headmaster, David Monteith, told me that Ted Parkin would be coming with me on the cruise. I was happy with him coming as he had been with us before and had also replaced Iain McMillan, when he was ill. He got on well with the pupils. I was happy but would have preferred to have been told before.

### **Recruitment of staff**

17. I had no involvement in the recruitment of any staff. If there were any periods the Bosun was unavailable through illness or other reasons, the Deputy Headmaster, who was an experienced Mariner, would fill in.

### **Training of staff**

18. When I started I found that the Bosun needed training up in all on-board practical training tasks while at sea.

### **Supervision/staff appraisal / staff evaluation**

19. I was not involved in teaching within the school and therefore I was not involved in any staff appraisals

### **Living arrangements**

20. I lived in my own house outwith the school grounds. I am aware that some of the staff in the school resided on campus but I had nothing to do with their accommodation or who may have had access to the children's residential area.

### **Culture within Gordonstoun School**

21. In my opinion the culture within Gordonstoun was very good during the 1980's but it changed and was not so good during the 1990's. I had concerns about discipline and standards of behaviour at the school. The pupils were thinking that they could get away with the same behaviour they had at school, while on board.
22. To my knowledge fagging did not exist during my time with Gordonstoun.

### **Discipline and punishment**

23. Within the school I have to presume that all discipline matters were dealt with by the teachers there.
24. When each new crew joins the vessel the importance of zero tolerance to smoking, together with the serious consequences of a fire on board, is given top priority at the crew briefing.
25. On their tour of the deck all the crew are shown where the large gas bottles are stowed within a substantial wooden locker. Again it is stressed why smoking on deck is absolutely forbidden. Although the vessel's hull is built of steel, the whole deck top, along with much of the internal construction is made of wood.
26. The normal routine school punishment for being caught smoking on board was to transport the culprit straight back to the school, which may involve further punishment by the school. The parents would also have to pay the considerable costs of fuel and a driver for a six-to-eight hour return journey from the school, to a harbour on the west coast and back to the school. This usually worked as an effective deterrent for many years, consequently it was hardly ever used. It was especially respected as some of the crew were often members of the Fire Brigade. The decision of what and if any punishment was to be administered was left for the Headmaster to make.
27. I recall writing to the Headmaster regarding our differences in opinion on how punishments could be administered. This was a result of some of the girls having returned late to the boat, after having spent some time on shore. The girls had not taken into account the limits of the boat, needing to leave with tides or the berths having to be vacated for other booked vessels.
28. One of the punishments that was on occasion used was to have the pupils run around the harbour. We also had the attitude that although we administered some punishment, if the pupils did not understand the reasoning they were free to come and ask. The Headmaster was not in favour of any kind of physical punishments. We had discussions and his response was that punishments should be administered only after

a second indiscretion. The Headmaster was making such decisions having never been on our vessel, despite invites. In 1996, during some of our conversations the Headmaster would quote to me "If I don't like it, I am free to leave".

29. About three years after our initial conversations he came to realise his approach was not working and he withdrew any thoughts it required a second indiscretion before any punishment administered. Again he had been invited to come aboard to see what was happening but never accepted any of the invites.
30. I wrote to Ben Goss, Senior Housemaster, regarding the discipline during seamanship. I told Ben that in my opinion there was a lack of coherent punishments by the school hierarchy.
31. I also wrote to the Strategic Review Committee at Gordonstoun (which consisted of three School Governors). In that letter I was expressing concern about the discipline in the school becoming more lax, so much so I believe that if it was to continue there was a possibility that there would no longer be able to continue to have those cruises. I spoke with the Deputy Headmaster and made him aware I had not received any reply from the Committee. His answer was they did not see it as an important enough issue to make any comment on.
32. Within the School Development Plan 1997-98 under policy the school surveyed the staff and the pupils in areas of concern. This survey was used as one means of making changes to policy within the school.
33. One of the questions within the survey was a concern that teachers' punishments do not always fit the crime. This survey showed that the majority of the pupils were happy. It also showed that two thirds of the of the pupils felt that the teachers were not strict enough with pupils who did not behave well. Over 80% of those surveyed found that seamanship was both rewarding and challenging. In the survey it found that they wished for the school's disciplinary policy should be more clear and effective. The school acknowledged in Seamanship discipline is perceived to be a problem.

### **Day to day running of the school**

34. I was not involved in the day to day running of the school.

### **Concerns about the school**

35. Over the years, but mainly in the early mid 1990's, it became apparent that general standards of pupil behaviour at the school were worryingly deteriorating. Although I never taught in the school, as [REDACTED] I was party to all the general staff reports of the school. It soon became clear to me, from the various reports of staff meetings and such like, that many staff were voicing concerns about discipline and standards of behaviour at the school.
36. During this period I began to notice a general decline in attitudes amongst the lower calibre of our pupils, probably because they regarded our vessel, Sea Spirit, as an extension of the school, so they probably thought that they could get away with the same behaviour, while on board. I would remind them that such behaviour at sea was going to meet zero tolerance from me. Undermining crew morale was tantamount to undermining safety at sea and it was for that reason no disobedience was going to be tolerated.

### **Reporting of complaints/concerns**

37. It eventually came to a point where I felt I had to air my concerns to the Headmaster and we had a friendly chat about it. After the conversation I have to admit I came away feeling less than comfortable. Instead of sensing he had the same concerns as me, he had seemed to be trying to play down its seriousness, which made me wonder if he had any concept of what life was like at sea. Previously I had invited him to come and join us but he never took up those offers, I repeated this offer but again he did not take it up. As those problems continued to deteriorate I did have further communications with the Headmaster, in writing, as I felt sufficiently ill at ease about it, and the need to put it on paper.

### **Trusted adult/confidante**

38. I believe the Housemasters or Housemistresses were always available for anyone that needed this support.

### **Abuse**

39. I would have to assume that the school did have a definition of abuse but I am not aware of it. I am not aware of what, in the eyes of the school, would constitute abuse of children in its care. Nor am I aware how any definition was communicated and explained to staff working within the school.

### **Child protection arrangements**

40. I do not know how the staff within the school were given guidance on Child Protection arrangements.

### **External monitoring**

41. I was aware that there was monitoring of the school by external organisations. I always suggested to the Headmaster that they were welcome to come aboard and examine the vessel and our practices. No one ever took us up on those suggestions.

### **Record-keeping**

42. The only record keeping was the log book that was kept updated and stored on board at all times.

### **Investigations into abuse – personal involvement**

43. I was not involved in any investigation on behalf of the school into allegations of abuse or ill-treatment of children at the school or into inappropriate behaviour by staff or others towards children. I am not aware of any alleged abuse at either Gordonstoun or Aberlour.



### **Reports of abuse and civil claims**

44. I was not involved in the handling of reports to, or civil claims made against the school by former pupils, concerning historical abuse.

### **Police investigations/ criminal proceedings**

45. I am not aware of any police investigations into alleged abuse at the school. I have never given a statement to the Police/Crown concerning alleged abuse of children cared for at the school and have never given evidence at any trial concerning abuse of children cared for at the school.

### **Convicted abusers**

46. I don't know of any person who worked at the school who was convicted of abuse of a child or children at the school.

### **Specific allegations that have been made to the Inquiry in relation to me**

BZG

47. It is most unfortunate that this incident is being looked into, such a long time after the event. I have looked at hundreds of pages to provide as much pertinent evidence as I can. Two witnesses, Caroline Hill, School Governor and David Whelton, Departmental Head, who could have provided further evidence to back up my version of events have since passed away.
48. With regard to the allegation made to the Inquiry I was very surprised to read in the Part D report that I appear to allegedly have been accused of abuse or physical abuse. To the best of my knowledge, neither the terms abuse, child abuse, or physical abuse were used against me in the school investigation of the complaint.

49. The allegation made against me is that 27th September 1997, I hoisted BZG BZG to below the lower mainmast spreaders, a height of about 7.5 metres. That she was hoisted in the Bosun's chair attached to the main halyard and also secured by a second halyard and her safety harness. She was left in this position for approximately 2½ hours (see reasoning for time in paragraph 51 below).
50. I have a letter written subsequent to the investigation but part of it I have mentioned here as it has bearing on the decisions made after the incident occurred. The letter was to James Stevens, training manager at Royal Yachting Association, after a conversation we had. I made mention to him that there were previous incidents of smoking on board, reported to the Headmaster and no action was taken. Two cruises after notifying the Headmaster another pupil was caught smoking on board.
51. The incident with BZG BZG was on the final day of the cruise. On that date there was no ferry available to transport her back to shore. I took time to consider the punishment and taking into account that I had every reason to believe the school were not going to do anything about it, I felt the punishment was justified. This was not only to punish Miss BZG BZG for the smoking but as a warning to others about the danger. Miss BZG BZG remained safely tethered in the chair for about two and a half hours and was released when I believed she was suitably contrite. I am aware that on her return home Miss BZG BZG informed her parents, who in turn, wrote to the school.
52. BZG BZG had broken, not only school rules, but a cardinal law of the sea.
53. With regard to the internal school investigation, in my opinion was a sham and the Headmaster was untruthful in his reporting matters. I was summoned to the Headmaster's office as soon as I returned to the school at the end of the season. Prior to attending his office the Vice Chairman of the Board of Governors, Grenville Johnston, came to see me in person, at home, with my wife and a friend, David Welton, present. He explained that it would be to the school's advantage, as well as myself and my family, if I was to keep my head below the parapet during the forthcoming investigation.

54. David Welton was Head of Design and Technology Department and Chairman of the Staff Consultancy Committee. He and three other senior staff, all Heads of Departments, advised me to take a tape recorder into the meeting. This was a sad reflection on how the school management was not held in high esteem, by even the most senior staff.
55. This turned out to be very wise advice as minutes of the meeting were taken in a very unsatisfactory manner, and subsequently, it seemed certain that I was able to ascertain that the Headmaster had not told me the truth. Present at the meeting with the Headmaster was David Welton and my wife. Needless to say once the deceit was uncovered the three of us had no further faith in the Headmaster's plausibility. We each agreed that it was going to be interesting to see how things would pan out in the end, if I stuck to the Vice Chairman's request to keep my head below the parapet. However, we all agreed that top priority should be given to keeping the incident under wraps from the public domain, for the sake of the school, myself and my family. At this stage I would like to add Prince Andrew and Princess Anne were members of the Board of Governors and that Princess Anne's children were pupils at Gordonstoun. Should anything have come to light this may have caused them some embarrassment.
56. I believe the meeting should have been conducted in a fair, open and reasonable manner, with myself being able to enquire about **BZG** complaint and its veracity, in accordance with appropriate school investigation guidelines.
57. When I subsequently wrote to the Headmaster and **BZG**'s Housemistress about her recent past history at the school etc, I was met with no comment at all and I still don't know why. I did hear through the school grapevine that she was a problem girl and that this wasn't the first time she had threatened legal action.
58. I was told by the Head of Activities that **BZG** was caught smoking again at school a few days later, although he told me, at the same time, he had been instructed not to speak to me. I found out a number of staff had been ordered not to talk to me. One loyal friend told me that **BZG** was a compulsive smoker, and may have reached her tally of smoking punishments and may well have been the subject of expulsion. Therefore it is possible she conjured up a complaint against my treatment of her to

create a smokescreen, thus hoping her parents' complaint would detract from her rightful punishment into a full blown investigation instead.

59. I was told that during her investigation, much was made of her doctor's report, to support her complaint of bruising on her thighs. I don't understand why, because I know that a lot of the crew suffer from bruising on cruise, because it is all part of the nature of going to sea, especially in the seas off western Scotland, during the equinoctial gale season. The crew access to deck has basins very close to the ladder which are at thigh level, likewise the tables in the saloon. Therefore, it is very likely that her bruising was part and parcel of the everyday life of a week in unfamiliar surroundings on the high seas.
60. After the investigation, when this came to light, I asked the senior nurse at the School Medical Centre if they had any evidence on record of BZG coming to them after her return from the cruise and complaining about bruising on her thighs. She said there was nothing in their logs about bruising on her thighs, but the log did say she came in about the tick on her thigh. I had advised her to go to the Medical Centre about her tick, which we had removed while on board, upon her return to the school.
61. It is important to note that neither the school nurse nor the two Bosuns or myself, mentioned anything in their evidence to the investigation about seeing any bruising on her thighs, all shortly before she went to see the school doctor, when bruising was noticed and reported by him. This adds extra credence to the staff member's comment to me that her bruising may well have been self-inflicted shortly before seeing the doctor, but after her initial visit to the Medical Centre.
62. It is sad to say, parts of the remaining investigation were a bit of a sham, but as agreed, I let it go over my head. To give a couple of examples, the Deputy Headmaster's report stated that BZG was 'in distress'. I pointed out that the Bosun, on deck at the time, said in his statement that she was not in distress, and that she was singing much of the time she was aloft. I was also keeping an eye on her and emphatically deny that she was in distress at any time, nor did she say in her statement that she was in distress. The Headmaster insisted on keeping the word 'distress' in the report. The Headmaster also asked me what I would have done if we had hit an iceberg. You could



have heard a pin drop at that moment, and my colleagues told me afterwards that they expected a curt nautical correction from me. To the best of my knowledge there haven't been icebergs reported in Scottish waters for hundreds of years.

63. I have also sent the Inquiry the lawyers letters which show a possible reason for the school wanting to get rid of me. i.e. our very different approaches to discipline. This is highlighted by one particular conversation I had with the school Chaplain, Peter Dewey, following which I made notes of, showing the Headmaster regarded me as a thorn in his side, I think as early as 1993. To me it speaks volumes that Peter felt so strongly that what the Headmaster had asked him to tell me was morally wrong, and therefore later decided to tell me about it so that I should know the truth. The evidence shows that I was put 'in between a rock and a hard place' sort of situation where I would be damned if I did, and damned if I didn't.
64. During the conversation with Peter Dewey, he told me that the Headmaster wanted to get rid of me and he had been sent to persuade me that it was time for me to look for another job. Peter informed me the Headmaster wanted to be seen as liberal progressive and that my reports were critical of some of the pupils and he saw this as being counter to his success. He saw me as a critic of his ambitions to change the ethos of the school. Peter had to go back to the Headmaster to say he had been unsuccessful with his persuasions and that I had not allowed him to take on board what he was trying to say and he was under the impression I was adamant in trying to enforce my point of view. In fact, what I had said, was that I was not dumbing down the discipline of the sea, for safety reasons. I found it extremely distasteful to discover that the headmaster should sink to such depths, as to use his chaplain for this purpose.
65. Subsequent to this conversation it was suggested by the Finance Committee that a rumour should be started that the school were going to sell Sea Spirit. I was also made aware of this rumour from other people. Unbeknown to me this idea backfired as the Board of Governors turned this idea down.
66. Should I have sent BZG back to the school for the standard punishment which, as had been shown on a previous occasion, probably wouldn't happen, or should I make a more 'effective deterrent' example of her on board?. As per my conversation

when I called Chris Barton, Head of Discipline, the night before, where he said, "EXL we're going to have to do something serious about this smoking on board". This I felt was the last straw and I considered it during the night what action I should take. The former option was not likely to be effective, especially sending her back only one day before the rest of the crew returned to school. This option was taken out of my hands anyway, because no ferry was operating to take her back to the mainland that day and I had to press on towards Kyle of Lochalsh, for a crew change the next day. The latter was the obvious best option as it was sending a strong message back to the school. This was strengthened even further by weighing up the worst case scenario for myself in each situation. The former I reckoned could result in a reprimand from the Headmaster. The latter could have involved my having to stand up in an open court (with probable headline press coverage) to explain to some parents why their children never made it back home.

67. I received a copy of a letter sent from Mr Lindsay, to the Headmaster, the owner of another vessel used by Gordonstoun for Seamanship. In the letter Mr Lindsay makes references to safety and discipline on board vessels. One safety area discussed was the risk of fire in a confined space. Mr Lindsay states the punishment of being sent home in a taxi is mute, if for example, on the last night. He goes on to mention that he is aware that smoking by the children is tolerated at the school, but cannot be tolerated in any manner whilst on board the vessel.
68. I also have a letter from Ted Parkin, relief Bosun, for the cruises. Mr Parkin was also aware of the extent of the smoking within the school. In Mr Parkin's experience the school had no discernible structures in place for Bosun's replacement. In his opinion the school operated on a crisis management system, leaving everything until the last minute and then running around trying to organise things.
69. Mr Parkin goes on to confirm that during his involvement with Gordonstoun he never had an employment contract. On most occasions he was engaged with only a couple of days' notice. This was the same for all temporary staff, whose competences were only checked immediately prior to boarding. He is unsure what the school would have done should someone be found not competent to be on board, with such short notice.

70. Mr Parkin also made comment that the discipline of the pupils nose-dived over the three previous years (1995-1998). He confirmed that smoking amongst the pupils had reached epidemic proportions. When Grenville Johnston came to visit me (before the Inquiry) I also suggested he should take a visit, preferably on any Sunday evening to the main access to the school driveway, for himself, how many cigarette ends he would find lying amongst the trees. He came back to thank me later, for my advice, and told me he was amazed what he saw and had been to seen the Headmaster straight away to tell him, "This had got to stop immediately".
71. Mr Parkin quotes in his letter "Having made my thoughts about this incident, very clear in my submissions to the school. I think that it has been blown out of all proportion to further a long running ambition of the senior management to get rid of you. The political shenanigans have been, at times, bizarre and would laughable if it were not for the seriousness of the situation and effect on your career".
72. With the correspondence I have sent to the Inquiry, I have also included a letter from my Doctor, who was also the School Doctor, and my surgeon, along with one from an employment solicitor. My surgeon and my doctor would have been in touch with each other regarding my illness and subsequent operation. Both of them were of the opinion that the school had a lot to answer for.
73. The letter from my surgeon quotes "I was greatly disappointed to hear that the situation at Gordonstoun has not yet been resolved. As you know, as an onlooker who had heard the story from many different sources, I am concerned that EXL did the right thing and had my child been a member of the crew on that occasion I would have applauded EXL's actions. It is in my opinion, right and proper that he should strive to see justice done and I have to say my own feeling is that he was made a scapegoat to satisfy the complaints of others. You both know that you have my full support in your quest to have this injustice rectified. It does worry me though that the events following the incident took a tremendous toll on EXL physical and mental well-being and it could have been easy for him to submit himself to abdominal surgery whilst the matter was still very much a current issue".

74. This ties in exactly with the thoughts of all the crew aboard at the time of the BZG incident, where it says they all agree with the punishment to BZG. See letter with No 12 written thereon.
75. The employment solicitor gives an opinion that under Maritime Law, the action taken by me was both legal and safe. This opinion was from Mackay Simon, solicitor, who were my solicitors and were with me throughout. This opinion was endorsed by solicitors Holman, Fenwick and Willan who were one of the top Maritime Lawyers, whose advice was sought throughout the world on such matters, and were being considered to instruct in case there was any court case.
76. The importance of a firm sense of discipline at sea cannot be emphasised too strongly, for the safety of lives at sea, especially with children aboard as crew, as shown in the accompanying documents sent to the Inquiry and in my contract.
77. Earlier in the year of the incident I had been feeling a bit under the weather, with occasional flu-like symptoms, which I reported to my doctor. After many thorough tests, a final X-ray of internal organs showed up worrying signs of diverticular disease. This meant a section of my intestine needed to be operated on. My surgeon agreed that this should be carried out as soon as reasonably possible, once our offshore season was over. Meanwhile he was comforted to know that Sea Spirit was also an auxiliary coastguard vessel, frequently in touch with their shore bases with VHF radio, and not normally beyond the range of helicopter rescue, if urgently needed. I mention this as at the end of the investigation I was unable to return to the school as a result of the illness.
78. I knew that the school was using me as a scapegoat. I was fully expecting a letter of apology from the Headmaster admitting I was not at fault. This never materialised. I think the Headmaster was looking after his reputation rather than getting to the truth of the matter.
79. When I was in hospital recovering from my operation, there was a continuation of correspondence being sent to our home which [REDACTED] was having to deal with while I was in hospital. She had to discuss things with our friend, David Whelton, who agreed



it was inappropriate while I was in hospital. They were not taking into account I needed time to recover and recuperate before making reasonable responses.

80. I was already under stress with the operation and trying to keep it from our children who were still at the school. I felt the school were using the children as pawns. They offered to pay the children's school boarding fees, suggesting we go away so I could convalesce.

### **Helping the Inquiry**

81. To assist the Inquiry I have submitted a number of documents which may assist in understanding Seamanship at the school, the needs for safety to be learned and adhered to. They also include letters before and after the incident with <sup>BZG</sup> [REDACTED] from the Headmaster and other staff. These letters show the manner in which the school dealt with the incident and myself. I suppose I should comment that Headmasters should or could pay more attention to reasonable and serious concerns of his/her lieutenants, rather than pressing on regardless, following their ambitions.

82. 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.....<sup>EXL</sup> [REDACTED] .....

Dated..... 14 December 2020 .....