

## **Scottish Child Abuse Inquiry**

Witness Statement of

PBT

Support person present: No.

1. My name is PBT. My date of birth is 1958. My contact details are known to the Inquiry.

### **Background**

2. I grew up in Edinburgh and went to Ainslie Park School. After leaving school, I worked as a civil servant with the Department of Health and Social Security for a few years. While I worked there, I spent a lot of time working with groups for disabled children and my father told me that I should really get into teaching because of my interests. Consequently, I applied for a primary school teaching course at Callendar Park College in Falkirk, which was part of Moray House.
3. The course was a three year diploma in Education and, after qualifying, my first teaching job was in 1981 at Starley Hall School on the outskirts of Burntisland, in Fife. In total, I worked at Starley Hall for thirteen years, but I did so in two phases. I first worked there between 1981 and 1984 and then between 1986 and 1991. In between, I worked with the Aberlour Childcare Trust.

### **Starley Hall School, Burntisland**

4. Starley Hall School was an old, baronial building, set in its own grounds between Aberdour and Burntisland in Fife. The main building was used as accommodation and the school classrooms were in 'portakabins', located halfway up the drive. One side of the portakabins was the junior school, then there was the office block and the other side was the senior school.

5. The girls' accommodation was on the ground floor of the main building and the boys' accommodation was on the first floor. Above that, on the second floor, was staff accommodation. There was also a lodge at the bottom of the drive, which was for the older boys, between the ages of fifteen and eighteen. I'm not sure how many boys would have been in the lodge, perhaps nine or ten.
6. As you went in the front door, there were two girls' bedrooms to the left-hand side and a set of stairs going up with an office underneath. The main lounge and the dining room were on the right. Upstairs, there were about five boys' bedrooms. Some of the bedrooms had bunkbeds in them, but I think there would be no more than six boys to a room.
7. My understanding of Starley Hall's purpose in relation to children, was that it was a 'List G' school. As I understood, it was for children who had social, emotional and behavioural problems, who couldn't be catered for within mainstream schools.
8. The number of children increased over the years I was there, but there were about forty children ultimately. That included both boys and girls, ranging in age from eight to eighteen, although there were actually very few girls, perhaps only five or six.
9. I hadn't actually realised there were schools like Starley Hall when I was doing my teacher training, but I liked what I saw when I first went there. The classes were in small groups and I thought the relationships between the staff and the children were pretty good. The children were all clean and tidy in their uniforms for school and there seemed to be a nice atmosphere.
10. The school had a family feel to it and, as time went on, I used to go in more often when I was still single. I would stay over on a Saturday night so that I could go out with the groups on a Sunday, doing the various activities that we used to do. I also stayed in the lodge one summer when the school was closed and I was in between moving homes.

*My role and recruitment at Starley Hall School*

11. I applied for the position of general subjects, primary teacher, with an interest in music. I also understood when I applied that the job would involve working on the residential side in the evenings and at the weekends. I suppose references must have been needed, but I'm not sure. I would imagine I would have provided a reference from my previous employer in the civil service.
12. I had not had any prior training for working with children with social or emotional needs. My interest was with children with disabilities and I had done a lot of voluntary work at Gogarburn Hospital, on the outskirts of Edinburgh, while I was training. The advert for the position that I applied for at Starley Hall mentioned that it was a special school, so I went along to see what kind of school it was.
13. I was interviewed for the job by FXE, who was SNR. I had to explain at the interview that I was no music specialist, however I liked music and I would do my best to teach it. I was asked to come back to take a music class, so I went to the music department and put together a lesson with a guitar and chimes. After I took the class, FXE told me that the school was a teacher short and asked me to take another music class.
14. I actually ended up taking another two classes and FXE sat through them all. Afterwards, when he 'phoned up to tell me I had got the job, I told him I couldn't take it because I wasn't a music specialist. I told him I was prepared to do my best, but music was not my subject. He told me that was obvious but offered me a job anyway as a general subjects teacher.
15. I was a general subjects teacher from 198█ to 198█ and I was also made a duty person in 198█. As a duty person, I was in charge of a team of care workers, working evenings and weekends, co-ordinating activities. In 198█, I left Starley Hall for two years to work with the Aberlour Childcare Trust and returned in 198█ as a general subjects teacher again. In 198█, I was promoted to acting-depute care and assistant principal teacher. In 199█, I was promoted to principal teacher.

16. As a general subjects teacher, I mainly taught the youngest class group. There would be five or six children in my class, all between the ages of eight and thirteen. I also took an induction class for any child who had just started at the school. They would come to me first before going onto the class group for their age.
17. I did not get any training when I started, which I always found strange. I was basically put straight into it and I had to work from there. It was really tough at first because the school had only been open [REDACTED] before I started and I had to go and buy textbooks. Looking back now, it was quite a big responsibility and I feel I would definitely have benefitted from more training and a template for teaching classes.
18. It also took me a long time to get my registration through from the General Teaching Council for Scotland (GTCS). The GTCS came to Starley Hall so that I could demonstrate I was teaching every subject at primary level. I only had five or six children in my class, whereas a teacher at an ordinary school would usually have thirty and the GTCS thought I needed experience elsewhere.
19. They told me that they would send me to Aberdour Primary School for six months, or so, and they would get somebody to come to Starley Hall to do my job. At the end of that, if everything was okay, I would get my registration. However, the GTCS couldn't find anybody to take my job on during my absence and so they gave me my registration anyway. One of the reasons I left Starley Hall in the end was that I'd never actually taught in an ordinary primary school.
20. In later years at Starley Hall, I mentored other people who came there to teach. By that time, the school was following the five-to-fourteen curriculum and I helped them through that. I was part of the management team by then, so although I wouldn't say I was training the new starts, I didn't have the same teaching commitments and was able to be around and spend time mentoring them.

*Structure and recruitment of staff at Starley Hall School*

21. When I started at Starley Hall, [REDACTED] FXE [REDACTED] was [REDACTED] SNR [REDACTED] and was [REDACTED] SNR [REDACTED] of both the care side and the education side. [REDACTED] KYU [REDACTED]



KYU [REDACTED] KNU [REDACTED] was the senior care worker, in charge of the care staff and he was also a social worker. KNU [REDACTED] left to go to the Aberlour Childcare Trust in 198[REDACTED] and Nigel Lloyd took over his position.

22. Jeremy Leitch was the senior teacher and there were quite a few teachers under him. One was Margaret Griffiths who was a teacher when I started and later on became a principal teacher. All the teachers also worked evenings and weekends, with the exception of Sandra Lowe and zFKK [REDACTED]. Sandra Lowe taught older children and zFKK [REDACTED] taught the primary aged children alongside me.
23. I was never involved in the recruitment of staff at Starley Hall.
24. I don't think volunteers ever worked at Starley Hall.
25. As a duty person in the evenings and at the weekends, I would be in charge of a team of staff, which would consist of a couple of teachers and perhaps two or three care workers as well. I was not, however, responsible for their management and development and I did not monitor the work or the progress of any other staff.
26. I did not receive any appraisals or have regular meetings about my performance. If I wanted to speak with anyone about any concerns I might have had or about my development, I would speak with my line manager. When I started, that was SNR [REDACTED], FXE [REDACTED], and [REDACTED] it was Nigel Lloyd and KYU [REDACTED].

#### *Policy at Starley Hall School*

27. Every fortnight we had a staff meeting, at which we would discuss anything that had arisen. Otherwise, I was not involved and had no responsibility for the development of policies in relation to the care of children. However, there were no policies to my knowledge when I started.
28. In later years, I'm not sure when, but possibly around 199[REDACTED], a staff handbook was developed and introduced. It included all the guidelines we were expected to follow,

including health and safety and that sort of thing. There was also a section for staff training and if you went on a course you would write the details in your handbook.

*Strategic planning at Starley Hall School*

29. I did not have any involvement in, or responsibility for, strategic planning in relation to Starley Hall School.

*Children at Starley Hall School*

30. There were some day pupils at Starley Hall, but the majority were residential. Children would be placed at Starley Hall through the social work department, after there had been Children's Panels and reviews. My understanding was that a List G school, as Starley Hall was, was not the same as a List D school. Children were not 'sentenced' to a period of time at Starley Hall by a Children's Panel, it was more a voluntary arrangement, following a recommendation by social work.
31. When a child was placed at Starley Hall, we would be told they were coming in advance and the senior management team would get reports from social work about them. We might be told about any problems they were having in school, but there was very little really. Over the years, we developed a key worker system, whereby a named member of care staff was made responsible for each child. It was their responsibility to read any reports that came with the child and to complete any necessary reports about that child on time.
32. In addition, we had a meeting every fortnight about each child before they went home for the weekend. Most children went home every second weekend, although some did get home every weekend after a while. They would be dropped off by their key worker and each key worker would have contact with the child's family at that time.
33. The children at Starley Hall came from all over Scotland. If they came from somewhere like Inverness, you would drive up to Perth and an escort would be sent to meet you and you would get the train from there. One time there was bad weather

and the escort never turned up so I ended up taking the child all the way home and staying overnight.

34. I don't know if any assessments, either physical or emotional, were carried out on a child when they arrived at Starley Hall. They did all get given the clothes they would be wearing and each child would be assigned a number for their clothes when they arrived. They wore a uniform for school during the day, which was a grey jersey, a white shirt, blue tie and black trousers and their assigned number was put on them to make sure they got them back from the laundry. They were also provided with play clothes, which were jeans, jerseys, tee shirts and swimming stuff as well. Everything was new, I don't think any child was ever given another child's old clothes.
35. Children were never referred to by their number, they were always called by their first names.
36. There would be five or six care staff on duty during the day, plus teaching staff, which would give a ratio of staff to children of one-to-six and sometimes one-to-four. In the evening, there would be five or six care staff and teachers working in total. Overnight, there would be three staff on duty. Two of those staff would be awake and the other would be sleeping in the attic room above the boys.
37. In the main, the waking night staff were two women, although sometimes there was a man with the boys. I can't remember their names. One of them would be on the boys' landing and one would be downstairs with the girls. The member of staff on the boys' landing would just have a chair to sit on, but downstairs there was an office under the stairs where the member of staff looking after the girls would be.
38. Catering staff were employed at Starley Hall and they prepared good, wholesome food for the children. Everyone ate together in the dining room and mealtimes were supervised by the staff on duty, who ate the same food. If a child didn't want to finish what was on their plate, they could leave it. I suppose if a child had a food allergy, food would be made for them, but I don't remember a child getting an alternative if they didn't like something. I never saw food being re-served to a child and I don't think that is something that would ever have happened.

39. Showering was done on set days, mainly every second Thursday, before the children went home and a Sunday night as well. The boys' showers were on the same landing as their rooms, just past the stairs, and the girls' showers were just past the dining room area. Children were allowed to go to the toilet during the night.
40. Showers were monitored by the staff on duty and there wasn't really any privacy. The boys showered in cubicles, which had partitions between them, but there were no doors. They would usually be in the lounge, watching the television or something and they would go up for their showers whenever they wanted. Although they were monitored, there was no restriction on how long a child could have in the shower.
41. There were always organised activities on in the evening. Children would maybe be taken swimming, or they could play football. They could also use the gym or there was an art room and a computer room as well. At the weekends, the same activities would be organised and there would also be day trips to different places. Children would also get 'tuck' on a Saturday from the shops in Burntisland. Staff would take them down in the minibus and bring them back to the school again.
42. When I first started at Starley Hall, everybody went to church on a Sunday, but that died away over the years. In my later years, only those who wanted to go to church would go.
43. We tried to get all the children away on holiday at some point and there were various trips, which I went on too. I remember going to Aviemore one time and another time we went down to a residential school in the Lake District near Blackpool. They gave us a dormitory to sleep in and we let them use the lodge when they came up to us for a holiday. I think there would be six or eight children on those trips, although everybody had the chance of going. It just depended whether they wanted to or not. Another year a cycling camp was organised, so the children who were keen on cycling went on that.
44. All the children would usually be home for Christmas, although if I remember correctly in my latter years some children did stay. It was the responsibility of each child's



keyworker to make sure they got a cake and a present for their birthday and I do recall seeing that happening.

45. We were teaching children who weren't able to be taught in a mainstream school and all the teachers were professionally qualified. The five-to-fourteen curriculum had its own criteria for measuring a child's progression and I had to evidence that I was teaching every subject in the curriculum. I had to show that each child was making progress and the level of education must have been pretty good. Some children were eventually allowed back into mainstream schools for part of the time while they were with us.
46. A matron, Colette Adams, worked at Starley Hall and dealt with any health problems the children might have had. I think she was a qualified nurse. She had a surgery, which was a small room on the boys' landing on the first floor. I don't think there were regular checkups, children would just go to her whenever they needed to. There were doctors attached to the school, who would come in if a child wasn't well and children would have their own G.P.s at home too.
47. I was aware that some children had to take prescribed medication at night, but I never had anything to do with that. The matron would look after that sort of thing, albeit she didn't stay overnight.
48. Children did not do any manual work or chores. I don't remember if they had to make their own beds in the morning, but there were staff who looked after changing beds, laundry, doing the dishes and that sort of thing.
49. While I was at Starley Hall, possibly around halfway through my time there, a massive gym was built by professional builders. Children were never involved in its construction or in moving furniture or equipment into or out of it.
50. Families could visit children and normally did so at the weekends, although they could come at any time. They would phone up the office and say when they were coming. There were also open days throughout the year. Visits were not monitored and at the

weekend families could come into the main building and they could take children out, if they wanted.

51. I don't think visitors were vetted, but I don't think a stranger would have been able to come in and see a child. If there was a reason that somebody was not allowed to come and see a child, we would be told at staff meetings.
52. There was almost an open door policy at Starley Hall. Social workers and educational psychologists came in every day and speech and language specialists came in as well. Children would show them around the school and they would get a chance to speak to the children on their own. Efforts were made to address any issues children had and we also had contact with each child's family when we took them home every fortnight.
53. There was never an indication how long a child would be with us, but the usual period of time would be eighteen months and there was a review every six months. That review would consider the child's progress and would consider whether the child was suitable for being integrated back into a mainstream school. I would be asked by FXE FXE or another of the senior staff to contribute an educational report and also a care report, if I'd worked with the child in a care capacity.
54. Social work would decide following these reviews if a child was ready for discharge from Starley Hall. Their leaving would be planned over a period of months, it wouldn't be the case that they would go to a review meeting and not come back.

#### *Discipline and punishment at Starley Hall School*

55. Loss of the right to participate in activities was a recognised means of discipline at Starley Hall School and the children were aware of that. If a child, for example, was misbehaving in class, they wouldn't get the chance to go to the football that night. At the end of every school day, there would be a meeting and teachers would feedback how their class had been. The teacher would note in the daily log if someone had misbehaved and was not to get to the football and the staff on duty would enforce that.

- 56. I would sometimes hold a class back at breaktime or at the end of the day if they'd been misbehaving, but restricting home leave was not used. The loss of pocket money or giving lines were not used either. I don't recall any other means of discipline.
- 57. Corporal punishment or physical discipline was not permissible.
- 58. We would write in the daily log if someone had misbehaved, but there was no punishment book.

*Restraint at Starley Hall School*

- 59. My understanding was that you were allowed to use restraint if you needed to, but that it must be as gentle as possible. I think that must have been communicated to me in some way when I started, but I can't remember if it was or how. There was no training, I learned what was permissible and what was not by watching other staff. Normally, you would try and talk to a child before using restraint at all, but if necessary, you would hold onto them until they stopped whatever it was they were doing.
- 60. I wouldn't be sure how frequently restraint would be used, but perhaps every couple of days. It would be used if students were fighting or were in danger of hurting themselves or other people, or damaging property. It was a part of the job. It was more like safe holding that we were using and we were doing so to keep people safe, to stop them fighting and to stop them getting hurt. Normally there would be two members of staff involved, so that there would be a witness to ensure everything was okay. I suppose there could have been occasions when more than two adults would have been involved in restraint, but I can't recall any specifically.
- 61. Children were never locked in a room on their own as a means of restraint, nor would a child be removed and left in a room on their own. They might be taken away from other children into the office, or into another room along with staff, but isolation was not used as a means of restraint. Medication was never administered either, that I am aware of.

62. If you had to use restraint, you had to fill in an incident report, detailing what had happened, why restraint was used and who was all involved. That report would go in the daily log, which was kept in the main office and which was monitored by the senior management team. All incident reports would be scrutinised and queried and any occasion a child had to be restrained would be discussed with their social worker, their psychologist and with their family. If necessary, it would be discussed with the police as well.
63. It wasn't explained to me when I was recruited that I might have to use restraint, but it was obvious even from the day of my interview that some of the children might pose challenges. In the middle of one of the music lessons I took on the day of my interview, one boy got up and tried to climb out of the window. I stopped the lesson and told him to get down and he did.
64. I never saw excessive restraint being used.
65. In later years we had training in CALM methods, but that was around 199█ or 199█, towards the end of my time at Starley Hall.

#### *Concerns about Starley Hall School*

66. I was not aware of any concern about Starley Hall because of the way in which children were treated and I did not have any such concerns.
67. I felt supported at Starley Hall and I think if I had concerns I would have been able to report them to either FXE█ or KYU█.

#### *Reporting of complaints/concerns at Starley Hall School*

68. If any child in Starley Hall wished to make a complaint or had a concern, they could speak to their keyworker or any of the care staff. They could speak to their social worker or their parents, or anyone. I would think all the children would have been aware of that. I suppose there must have been occasions a child didn't get on with their keyworker, but I was never aware of any.



69. The children all had access to a public payphone in the main hallway and they could also use the phone in the office if they wished to speak privately. They would be able to pay for calls on the payphone with their pocket money.
70. I don't think there was a formal reporting process as such. If a child made a complaint to me about anything I would inform my line manager, but I don't recall ever doing so.
71. If a parent wished to make a complaint or report a concern, they could speak to **FXE** **FXE** or **KYU** **KYU**. If any such complaint had involved me, I would have been aware of it, however that never happened and I was not aware of any such complaint or concern being made about another member of staff.

*Abuse at Starley Hall School*

72. There was no definition of abuse that Starley Hall applied in relation to the treatment of children. We were expected to have our own understanding of what would constitute abuse and mine would be to physically strike or sexually abuse a child, or to touch a child inappropriately, for example.
73. I never saw any behaviour that I considered to be abusive either at the time I was working at Starley Hall or looking back.
74. No child ever reported abuse to me.
75. Looking back, I would say that in later years, if a child was being abused, it would have come to light at the time, but perhaps not in my early years there. A few years ago, I happened to meet **PUU** **PUU**, who had been the school social worker at Starley Hall and he told me that he had been charged with abusing one of the girls. **PUU** **PUU** had been the school social worker when I started and remained there throughout my time at Starley Hall.

76. [PUU] is dead now and I don't know much of the circumstances, but he told me he had been charged with offences committed against a girl called [REDACTED]. I don't know if there was a court case and, if there was, whether he was convicted.
77. I was very surprised to hear that. I was not aware of anything like that going on at the time and, if I had been, I would have taken it up with [FXE [REDACTED]]. I remember [REDACTED], who was probably between fifteen or sixteen and eighteen at the time I knew her at Starley Hall. I never taught her, though, and I never noticed anything about her demeanour to suggest something may have been going on.
78. I think now that I must have had blinkers on, because as far as I was concerned there was no abuse going on. After speaking with [PUU [REDACTED]] and after all the publicity there has since been, I now accept that there could have been abusive behaviour going on and I was not aware.

*Child protection arrangements at Starley Hall School*

79. I don't know if any child protection measures were put in place at Starley Hall. I don't remember being given guidance and instruction on how children in our care in the institution should be treated, cared for and protected against abuse, ill-treatment or inappropriate behaviour. I do consider staff would have benefitted very much from being given such guidance, though. If I'd been trained to look out for abuse, I would hopefully have been more aware.

*External monitoring at Starley Hall School*

80. We never had a full school inspection, but there were inspections of the teaching side of things at Starley Hall by the GTCS and the social work department monitored the care side of things. I think they would normally inform the school before they came and they would speak to children on their own. I don't recall being spoken to by them though.

### *Record keeping at Starley Hall School*

81. The daily log, which was held in the main staff office, was like a running commentary of what was going on at Starley Hall and it was the duty of every member of staff to keep it up to date. If any incident reports had been completed, they would be filed in the daily log. Children also had their own, individual files and information would be transferred from the daily log to those, if it was relevant.
82. Other than those records, I would complete records of children's educational progress, in line with the curriculum.

### *Allegations of abuse at Starley Hall School*

83. I thought I got on really well with the children at Starley Hall and I had never been the subject of an allegation of abuse or ill-treatment of a child or children who resided at Starley Hall while I was there. I was never questioned about anything or the subject of any complaint while I was there.

### *Investigations into abuse at Starley Hall School – personal involvement*

84. I have never been involved in any investigation on behalf of Starley Hall into allegations of abuse or ill-treatment of children. Nor have I been involved in any investigation into inappropriate behaviour by staff or others towards children.

### *Reports of historical abuse and civil claims at Starley Hall School*

85. I have never been involved in the handling of reports to Starley Hall by former residents, concerning historical abuse.
86. I have never been involved in the handling of civil claims made against Starley Hall by former residents, concerning historical abuse.

*Police investigations/criminal proceedings at Starley Hall School*

87. I have only been aware of two police investigations into alleged abuse at Starley Hall. One was that involving **PUU**, after he told me about it. The other involved myself and other former colleagues. Following that investigation, I and those former colleagues were charged with various offences and in 2022 there was a High Court trial. The prosecution did not proceed with charges against one of my former colleagues before that trial and in the course of the trial, they dropped all charges against me. All of my former colleagues were found not guilty of the charges libelled against them.
88. I am not aware of any other police investigation.
89. I have never given a statement to the police concerning alleged abuse at Starley Hall. I have never given evidence at a trial concerning alleged abuse at Starley Hall.

*Convicted abusers at Starley Hall School*

90. I do not know of any person who worked at Starley Hall who was convicted of the abuse of a child or children at the institution.

**Other staff etc. working at Starley Hall School at the same time**

**FXB**

91. I remember **FXB** he was a senior social worker at the school between approximately 198 and 199. His wife was a principal teacher while I was there. He was older than me and I remember he was quite a tall man with dark hair.
92. He worked as a duty person as well and he was alright with the children. I did not see him discipline a child. I did not see him abuse a child. There was nothing about **FXB** that gave me cause for concern.



FXE

93. FXE was an older, American gentleman, possibly in his fifties, when I was in my early twenties. He and when I started he was SNR. KYU in as SNR and both of them worked together for years. I think he called himself SNR then, but he wasn't there as much. He lived in Aberdour and he would sometimes come in to do the duty person role.
94. He was very much SNR and had an air of authority about him. He was quite strict and you knew he was SNR. If he wanted something done a particular way, you knew it had to be done that way.
95. I saw him with children. I did not see him abuse a child and there was nothing about FXE that gave me cause for concern.

*Nigel Lloyd*

96. Nigel Lloyd was a senior care worker who worked at Starley Hall almost all the time I was there. He was roughly the same age as me and he was quite a gentle soul.
97. He was very good with the children and spent a lot of time with them and talking to them. If a decision had been made that a child wasn't allowed to participate in a particular activity one evening for some reason, Nigel would already have worked out something else to keep them occupied.
98. I did not see Nigel Lloyd abuse any child and there was nothing about him that gave me cause for concern.

KYU

99. I think KYU SNR before I left for Aberlour in 198. He was certainly there when I came back in 198 and he was still there when I left Starley Hall in 199. He was the same age as me, if not a wee bit younger.

100. KYU [REDACTED] was very good with the children. He was very sporty and had a lot of energy. I would have seen him discipline a child and I would think I would have seen him restrain a child, but I can't remember any specific incident. I did not see him abuse a child and nothing about his behaviour gave me cause for concern.

*Robert Jennings (or Bertie)*

101. Bertie Jennings was a big Irish rugby teacher, who used to teach art. He was about the same age as me and he was quite a comedian of a character. He came to Starley Hall after about a third of the time I was there and was still there when I left.
102. He was a jokey character who got on well with everybody, including the children. I did not see him discipline or abuse children and nothing about Bertie Jennings gave me cause for concern.

*Mrs FIP [REDACTED]*

103. Mrs FIP [REDACTED] was an older woman, who was one of the night staff when I started, before she came onto the care side after a few years. I think she was still there when I left.
104. She had a matronly manner with the children and did the more sedentary activities with them. I did not see her discipline any child. I did not see her abuse any child. There was nothing about Mrs FIP [REDACTED]'s behaviour that gave me cause for concern.

PUU [REDACTED]

105. The only PUU [REDACTED] I recall is PUU [REDACTED], who I have already mentioned and who was a school social worker. He was maybe about ten years older than me and he was there most of the time I was.
106. I saw PUU [REDACTED] with the children. He was like a father figure to the children. He would be the one to give a child a cuddle. I did not see him discipline any child and I

did not see him abuse any child. Nothing about PUU's behaviour with the children gave me cause for concern.

*Robert DeKoning/De Koning*

107. I know Robert DeKoning because he was part of the trial at the High Court that I was involved in, but I never worked with him. I think he was a care worker, but he started after I left and we never worked together. I did not see him with children.

*Robert (Bob) Taylor*

108. Robert Taylor was a general studies teacher of secondary age children. I think he started about halfway through my time at Starley Hall and he was still there when I left. He was perhaps four or five years older than me. He was also involved in a court trial, but he was found not guilty as well.

109. I saw him with children and he was good with them. I did not see him discipline any child. I would probably have seen him restrain a child, but I can't remember any particular occasion. I did not see him abuse any child and nothing about his behaviour gave me cause for concern.

*Angus Munn*

110. Gus Munn was a care worker who was at Starley Hall for most of the time I was there. He was possibly about five years younger than me.
111. He was very good with the children. He was very popular and he had a good sense of humour. I did not see him discipline children. I probably saw him restrain a child, but I don't recall. I did not see him behave abusively toward a child and nothing about his behaviour gave me cause for concern.

Mr FXC

112. FXC was a care worker who was at Starley Hall most of the time I was there. He was a similar age to me, although he has passed away now.

113. I saw him with children. He was good fun. I did not see him discipline children and I did not see him abuse any child. There was nothing about his behaviour that gave me cause for concern.

KPG

114. KPG is SNR. He started as the computer teacher about halfway through the time I was there.

115. He was a gentle soul. I never saw him discipline or abuse any child and nothing about his behaviour gave me cause for concern.

KUZ

116. I don't recall any member of staff called KUZ.

FKK

117. The only person I knew who took Scottish country dancing was zFKK. She was an older lady, who was the senior teacher of the younger children, who were primary school age. She was at Starley Hall when I started and was there for pretty much all the time I was.

118. She was okay with the children. I did not see her discipline or abuse children and nothing about her behaviour gave me cause for concern.



## Leaving Starley Hall School, Burntisland

119. In 198█, after I had been at Starley Hall for three years, I decided to get some more experience so I left to work in children's homes with the Aberlour Childcare Trust. █KNU█  
█KNU█, the senior care worker at Starley Hall had moved there and I went to work with him for a couple of years. I returned to Starley Hall two years later, in 198█, to the same role.
120. I left Starley Hall the second time in 199█, partly because I wanted to teach in an ordinary primary school. It was very strange when I came to leave, because Fife Education Authority wouldn't take an applicant for a teaching post from Starley Hall and so I had to go to Dundee for a position. █KYU█ provided a glowing reference for me.
121. I had enjoyed my time at Starley Hall. I felt like we had been making a difference, teaching the children that other people couldn't teach.
122. I succeeded in getting a position as a behavioural support teacher at █Academy in Dundee, which was a secondary school. Dundee Council had decided to put behavioural support teachers in each of their secondary schools and there were two of us at █. My role was assisting teachers in class with children who were having problems or taking them out of class and teaching them somewhere separate.
123. I worked there for █until 2000, when I returned to Fife, however I struggled to find a school with my specialities. There were only two in Fife and I ended up working at █Primary School in Methil. I taught there for four years until I was injured at work and had to stop. I was kneeling beside a youngster, reading, when a child on the other side picked up a desk and slid it into the one I was at. It caught the fingers of the child I was reading to, so I stood up to intervene, caught my foot and fell over, injuring my back.
124. I got back to work after about six months, until I was injured again and I was advised that if it happened again, I would be in a wheelchair.

125. As a consequence, I trained as a driving instructor and worked at that from around 2004 until 2013, when I retired.

### **Applicant allegations**

FIY

126. I have been provided with a copy of the statement of FIY. I remember FIY as being quite a small boy, but I don't remember very much more about him.
127. At paragraph 48 on pages 11 and 12 of his statement, FIY says: *'Sometimes children were force fed. When I say force fed I mean the staff would hold your nose and force the food into your mouth. They would literally force it down my throat. I remember being given deserts like semolina. I don't know even to this day what that stuff is. I remember getting things like that forced down my throat. It wasn't right for them to do things like that. PBT Nigel Lloyd and ... were the ones who were particularly bad for doing that. They would do that in the dining hall in front of everyone'.*
128. That never happened. I never force fed any child. If a child didn't want to eat something they would be allowed to leave it. Children could ask for a small portion if they didn't like something and we had a lot of staff meetings over the years about how much a small portion of vegetables was. There was never any discussion about a child having to finish what was on their plate. If they didn't want to, they didn't have to.
129. It is not possible that the passage of time has affected my recollection, that never happened.
130. I would accept that such behaviour would be abusive if a child was treated that way. I think this has been a fabrication to gain attention and compensation.

131. On page 15 at paragraph 62, **FIY** says: *'I was expected to go to church every Sunday whilst I was at Starley Hall. I think the church was in Aberdour. I would hide to avoid going to church and show up later on. Not going to church was seen as being 'unholy'. I remember being punched, kicked and knee'd for refusing to go to church. When I was knee'd it was in the guts. I remember quite a few members of staff doing that. I especially remember Nigel Lloyd, ..., **PBT** and another member of staff I don't remember the name of doing that. Your punishment might not necessarily be on the morning that you refused to go to church. It might come later on. Nobody should be punished for not going to, or wanting to go to, church'.*
132. That never happened. I never hit anybody. I remember we all went to church when I first started, but I can't remember people not going. I don't remember children saying they didn't want to go or hiding because they didn't want to go. I don't remember what the attitude of the staff might have been if a child had intimated they didn't want to go to church. I don't think going to church on a Sunday was compulsory, but it was expected.
133. If a child was treated that way, I would consider that was abusive, but I do not accept that happened.
134. At paragraph 96 on page 23, **FIY** says: *'When staff hit you they did it in such a way where they would not leave marks. They would cover their fists in things so that they could punch you. They'd wrap their hands with anything that was there. It was usually tea towels. Sometimes they would hold you down in your duvet whilst they hit you with their fists, head or knees. They did that every time they hit you. The staff members I remember in particular doing that are **PBT** Nigel Lloyd and ...'.*
135. That is lies. I would accept if that had happened it would be abuse, but it did not.
136. On page 26, at paragraph 108, **FIY** states: *'I remember **PBT** being both physically and sexually abusive. He was another staff member who would pull me out of bed by the mattress or by my legs. When I was either nine- or ten-years old **PBT** slammed me into the wall during a lesson in one of the classrooms. He did that because he thought I wouldn't let him continue sitting there and play his guitar.*



*I didn't care whether he wanted to play his guitar or not. He did that in front of the rest of the class'.*

137. That did not happen. I never pulled any child out of bed.
138. At paragraph 109 on the same page, FIY [REDACTED] says: *'He was one of the staff members who would watch me and other children washing when you were showering. He was a fat bastard. I can remember on occasions other than the shower times where he would get very close to you. He would put you in positions so as he could do that. When he stood close to you, you could feel his penis pressing against you. That wasn't right'.*
139. I did monitor showers, but from the hallway, where you could see the back of people. That would be sexual abuse if that had happened, but it did not.
140. It is not possible that the passage of time has affected my recollection.

KPT [REDACTED]

141. I have been provided with a copy of the statement of KPT [REDACTED]. I remember KPT [REDACTED] KPT [REDACTED]. He was from Edinburgh, he had blond hair and he was one of the older children in the school. He was quite an intelligent, polite lad.
142. At paragraph 83 on page 15 of his statement, KPT [REDACTED] states: *'On one occasion, I was coming down the stairs and I saw Mr PBT [REDACTED] going into [REDACTED]'s bedroom who was one of the girls there. I think she was in the bedroom on her own at the time and had been refusing to come out. He went into her room and I stopped at the bottom of the stairs and couldn't move for some reason. He didn't close the door. I heard [REDACTED] arguing and her refusing to leave and then she started screaming. The next thing I saw was him coming out the room and she was on the floor behind him as he was dragging her along by the hair. Her arms were flailing about but she couldn't get a hold of him. I remember the panic and fear in her face. He dragged her from her bedroom to the living room by her hair.'*

143. That never happened. I remember [REDACTED], she was alright. I think she was from Musselburgh or Tranent, or that area.
144. I never disciplined or punished [REDACTED]. I would never go into a girl's room on my own anyway, but I certainly didn't take her, or anybody, by the hair like that.
145. It is not possible that the passage of time has affected my recollection. This has been made up for gain. I would accept such behaviour would be abuse, but I never saw anybody behave in such a way towards [REDACTED] or any child.
146. At paragraph 85 on the same page, KPT [REDACTED] states: *'I was physically abused by Mr PBT [REDACTED] too. I don't know what provoked it. I was probably cheeky but I know I didn't swear because I had learned not to. He just came at me, without saying anything, put his hand round my throat and pinned me against the wall near the front door. It felt like it lasted forever and I wondered if this was how I was going to die. I think my eyes might have rolled back because I felt like I was going to pass out when he let me go. Nothing else was said after that. I was just left there'.*
147. I would have no reason to do that. I do not remember ever punishing KPT [REDACTED] and the passage of time has not affected my recollection. I would accept that would be abuse if a child was treated in such a way.

#### **Indictment of KYU [REDACTED] and Others**

148. I have been provided with a copy of the indictment relating to the High Court trial involving myself and a number of former colleagues at Starley Hall. Those colleagues were KYU [REDACTED], Angus Cargill Munn, Nigel Lloyd, Robert Thomas Jennings and Robert De Koning. Nigel Lloyd didn't have to go to the trial for health reasons and Bertie Jennings wasn't at the trial either, because all the charges against him were dropped beforehand.
149. I am aware that there were a total of seventy-seven charges on the indictment and eleven of those relate to me.



150. The first charge that relates to me is charge number 10, which reads: *'On an occasion between [REDACTED] 198[REDACTED] and [REDACTED] 198[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you [PBT] [REDACTED] did assault [REDACTED] [REDACTED] born [REDACTED] 1969, c/o Police Service of Scotland, Glenrothes and did seize her by the tie and pull same whereby her breathing was restricted, cause her to fall to the ground and drag her along the ground, all to her injury and to the danger of her life'.*
151. That did not happen. I remember [REDACTED]. She is the same girl [KPT] [REDACTED] mentioned. If that did happen, I would accept it was abusive. The passage of time has not affected my recollection.
152. Charge number 13 also relates to me and reads: *'On various occasions between [REDACTED] [REDACTED] 198[REDACTED] and [REDACTED] 198[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you [PBT] [REDACTED] did assault [REDACTED] or [REDACTED] born [REDACTED] 1968, c/o Police Service of Scotland, Glenrothes and did seize her by the body and force her arm behind her back, to her injury.'*
153. I remember [REDACTED], but that did not happen. She was from Edinburgh and she was the lass [PUU] [REDACTED] told me he had been charged with abusing. Her father was an alcoholic and she had ginger hair. I would accept it would be abusive if somebody did behave like that. There may have been a time I had to hold [REDACTED], because she was quite a feisty character, but I don't recall actually doing so and I didn't injure her at all. The passage of time has not affected my recollection.
154. Another charge that relates to me is charge number 19, which reads: *'On various occasions between [REDACTED] 198[REDACTED] and [REDACTED] 199[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you [KYU] [REDACTED] and [PBT] [REDACTED] [PBT] [REDACTED] did, while acting with another or others, assault [REDACTED] born [REDACTED] 1979, c/o Police Service of Scotland, Glenrothes and did seize her by the wrist, force her arm behind her back, force her to lie face down whereby her breathing was restricted, lift her by the arms, force her body forwards with her arms behind her back, throw her to the ground whereby she struck her head, kneel on her back, sit on*

*her, hold her head against the ground, and seize her by the legs and force them behind her back, all to her injury and to the danger of her life'.*

155. I remember [REDACTED], but I don't remember ever having to restrain her. It is possible that she was at some point though and her legs might have been held if she was kicking them. However, this has all been added to so that it seems much more than just that. You wouldn't restrain somebody like that because you would end up hurting them. You would pin their arms to their sides to stop them from fighting, but you would not lift their arms behind their back.
156. I did work together with KYU [REDACTED], but I don't remember ever having to restrain anybody with him.
157. I never had any reason to kneel on a child's back and never saw anybody else do so. It is not possible that the passage of time has affected my recollection. I would accept such behaviour would be abusive.
158. Charge number 24, which also relates to me, reads: *'On various occasions between [REDACTED] 198[REDACTED] and [REDACTED] 199[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you PBT [REDACTED] did assault [REDACTED] born [REDACTED] 1976, c/o Police Service of Scotland, Glenrothes and did seize him by the body, push and punch him on the body, drag him down a set of stairs, force him to the ground, force your knee into his body, seize him by the arms and force them behind his back, and bend his wrists, all to his injury.'*
159. I remember [REDACTED], who was a small dark haired lad from Dundee, I think. I don't recall ever having to restrain him. I have never hit, kicked or punched anybody. That is assault and I accept it would be abuse. The passage of time has not affected my recollection.
160. Charge number 25 reads: *'On an occasion between [REDACTED] 198[REDACTED] and [REDACTED] 198[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you PBT [REDACTED] PBT [REDACTED] did assault [REDACTED] born [REDACTED] 1970, c/o Police Service of Scotland, Glenrothes and did strike him on the face whereby he fell over to his injury'.*

161. I remember [REDACTED], but that never happened. That would be abuse. The passage of time has not affected my recollection.
162. Charge 34, which also relates to me, reads: *'On an occasion between [REDACTED] 198[REDACTED] and [REDACTED] 199[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you [REDACTED] KYU [REDACTED] Nigel Lloyd and [REDACTED] PBT [REDACTED] did assault [REDACTED] born [REDACTED] 1974, c/o Police Service of Scotland, Glenrothes and did seize her by the body, force her to the ground, kneel on her arms and pin her down, all to her injury.'*
163. I remember [REDACTED], I think she was from Edinburgh and had long dark hair. I don't remember ever restraining her. I don't remember ever restraining a child along with [REDACTED] KYU [REDACTED] and Nigel Lloyd. It may have happened, but I can't recall. The passage of time has not affected my recollection.
164. Another charge that relates to me is charge number 47, which reads: *'On various occasions between [REDACTED] 199[REDACTED] and [REDACTED] 199[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you [REDACTED] PBT [REDACTED] did, while acting with another, assault [REDACTED] born [REDACTED] 1980, c/o Police Service of Scotland, Glenrothes and did seize his arm and force it behind his back, push him to the ground and pin him to the ground, all to his injury.'*
165. I can't remember [REDACTED] and I never behaved in that manner towards any child. I have never injured anyone.
166. Charge 50 reads: *'On an occasion between [REDACTED] 198[REDACTED] and [REDACTED] 199[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you [REDACTED] KYU [REDACTED] Nigel Lloyd and [REDACTED] PBT [REDACTED] did, while acting with another, assault [REDACTED] FIY [REDACTED] or [REDACTED] FIY [REDACTED] or [REDACTED] FIY [REDACTED] born [REDACTED] 1978, c/o Police Service of Scotland, Glenrothes and did pull him from his bed, pull down his trousers and repeatedly strike him on the buttocks, all to his injury.'*



167. This is FIY [REDACTED], I became aware that these are his other names at the trial. In the middle of the night, there would only be three staff on duty, not four, as this charge states and children were never sent to bed during the day when there would be more staff on. That did not happen. It would be straightforward assault and I would report that if I had seen something like that.
168. Charge 52 also relates to me and reads: *'On various occasions between [REDACTED] 198[REDACTED] and [REDACTED] 199[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you PBT [REDACTED] did assault FIY [REDACTED] or FIY [REDACTED] or FIY [REDACTED] born [REDACTED] 1978, c/o Police Service of Scotland, Glenrothes and did pull and twist his ear, strike him on the head, seize his arms and force them behind his back, and push him against a wall, all to his injury'.*
169. That did not happen.
170. Another charge relating to me is Charge 59, which reads: *'On an occasion between [REDACTED] 198[REDACTED] and [REDACTED] 198[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you PBT [REDACTED] did assault [REDACTED] [REDACTED] born [REDACTED] 1968, c/o Police Service of Scotland, Glenrothes and did seize him by the neck, drag him by the body, repeatedly punch and kick him'.*
171. I have never punched or kicked anybody. I remember [REDACTED] he was quite a stocky, older boy, who lived in the lodge most of the time.
172. Charge 62 reads: *'On various occasions between [REDACTED] 198[REDACTED] and [REDACTED] 198[REDACTED], both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you KYU [REDACTED] and PBT [REDACTED] did use lewd, indecent and libidinous practices and behaviour towards [REDACTED] born [REDACTED] 1969, a girl of or above the age of 12 and under the age of 16 years, c/o Police Service of Scotland, Glenrothes and did watch her while she was naked or in a state of undress in the communal shower and bathroom; contrary to the Sexual Offences (Scotland) Act 1976, Section 5'.*

173. The male staff would never go anywhere near the girls' showers when it was shower night. That would only ever be done by the female staff. That is just nasty, it never happened.
174. The last charge reads: *'On various occasions between 10 October 198█ and 23 January 201█, both dates inclusive, at Starley Hall School, Aberdour Road, Burntisland, Fife you █KYU█ Angus Cargill Munn, Nigel Lloyd, █PBT█ Robert Jennings and Robert de Koning acted in an aggressive and violent manner towards pupils and parents whose identities are meantime unknown to the Prosecutor, shouted, seized said pupils and parents by the body, forced them to the ground, forced their arms and legs behind their back, pinned them to the ground, and otherwise inflicted injuries upon them by means unknown to the Prosecutor, all to their injury'.*
175. I have never injured anybody. It is not possible that the passage of time has affected my recollection, however I would accept that it would be abusive if anybody behaved in the manner detailed in any of the charges.
176. The first I heard of the investigation was when I received a phone call from the police on Christmas Eve in 2018, when they asked me if I could come down to the police station in Kirkcaldy. I did so and I think they interviewed me, before they then read all the charges on the indictment out to me and I was released. I never heard any more about it until the indictment was served on me and there was a preliminary hearing in 2019.
177. The trial itself was at Edinburgh High Court in 2022 and lasted for about three weeks, although it felt longer. I had to appear in court every day and sit with all of my co-accused. My solicitor was Peter Robertson, but I can't remember who my legal counsel was. In the course of the trial, all the charges against me were dropped and at the end of the trial, all of my co-accused were acquitted of all the charges against them by the jury.
178. It was such a weight off my shoulders. I knew I hadn't done anything wrong, but it was a huge relief when it was all over.



## Helping the Inquiry

179. It is nearly thirty years for these allegations to suddenly come to light and it became clear when the court case was ongoing that the youngsters had been coached into saying they had been abused so that they could claim compensation. It became clear that they had got together to get their stories right. I hate to say it but it certainly appeared as if it was the police who had been coaching them.
180. My legal team told me that they thought that the whole case had been a manufactured situation by the police. They thought that the police had approached the various people and coached them to say certain things that would make it worse and those people would then have a far better case for claiming compensation. I suppose the motivation for the police was just so that they could get a conviction.
181. I don't understand how, if something had happened, it hadn't been raised at the time. I had an open-door policy when I taught. Anyone could walk into my classroom at any time. I had nothing to hide. Furthermore, we had regular visits from social workers, parents and the police. Children would take their visitors round the school themselves and so they would have had plenty of time on their own with adults.
182. I am aware that some of the people who have made the allegations about the use of restraint have said that they didn't report it at the time because they just thought that was what was done. I am aware that some have said they weren't aware that they had an option to report an over-zealous restraint.
183. I only used restraint when I had to and only ever to safeguard, but I was as gentle as I possibly could be. I was never over-zealous. I never assaulted anybody and I never intended to hurt anybody. Nobody ever reported having been injured by me and I would certainly hope I never unintentionally hurt anybody.

**Other information**

184. 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.....PBT

Dated.....10/06/2025