

Scottish Child Abuse Inquiry

Witness Statement of

Janice MacNeill

Support person present: Yes

1. My name is Janice Burns MacNeill. My date of birth is [REDACTED] 1954. My contact details are known to the Inquiry.

Qualifications/Employment History

2. Initially I had wanted to become a journalist but when this was not possible for financial reasons, I then decided to train as a teacher of English. I went to Craigie College in Ayr for three years and became a primary teacher. After two years there, I was one of sixteen students to be selected to transfer into the first year of the newly created Bachelor of Education (B.Ed.) course, developed in conjunction with Strathclyde University. I did my 4th year in Glasgow, where I gained my Bachelor of Education (B.Ed.) in English and Drama although I have never used the drama. Of the sixteen candidates, only thirteen achieved the award, of which I was one.
3. I taught English for about two and a half years at what was then called Ravenspark Academy in Irvine. It is now called Irvine Royal Academy. I was then seconded in 1978, by what was Strathclyde Region at the time, to Moray House College (now part of Edinburgh University) in Edinburgh, to do my Diploma in Special Educational Needs. I achieved that and decided not to go back to teaching English, as I really enjoyed working with children and people with Additional Support Needs.
4. I secured a teaching post with what was called at the time The Scottish Council for the Care of Spastics, which is now Capability Scotland. The post I secured was as the first

teacher in Murrayfield Day Centre, which had just been given school status, and catered for children, who until the implementation of The Warnock Report 1978, had been considered ineducable. After the appointment of a Head Teacher, she and I worked together recruiting a small team of teachers to work with: Physiotherapists Speech and Language Therapists Occupational therapists, Instructors and Classroom Assistants.

5. In 1983, I was seconded into the post of Acting Depute Head at Westerlea School, which was on the same campus and a sister school of Murrayfield School. The children from Westerlea were very much more able cognitively, with most of the pupils from there later transferring into mainstream schools or units. This was not the case with the pupils from Murrayfield. For one year, I was the Acting Depute Head there because I had the special needs qualification. The incumbent Depute Head did not have this qualification, therefore, I was seconded to cover her attendance at Moray House to achieve this.
6. In 1984, the Head Teacher's post at our sister school in Lanark, Stanmore House School, became available. Stanmore was a residential and day school for pupils very similar to those of Westerlea. There was also a very successful nursery with able bodied and disabled children learning together. Stanmore was a G.A.S. School. (see later). Although I was only 29 years old, I thought I would apply for it for interview practice, and no-one was more surprised than me when I was appointed. I was Head Teacher there from 1984 until 2000 and during that time we re-evaluated our services.
7. Conscious that many more pupils could now attend mainstream schools with support, we redesigned our curriculum and staffing to meet the needs of pupils with more severe and profound global difficulties, many of whom had life limiting conditions. Many parents were trying to send their children to the PETO Institute in Budapest, Hungary, where the system of Conductive Education had been developed. We secured funding and set up the first Conductive Education Unit in Scotland, which was opened by Michael Forsyth. Conductive Education is a holistic educational approach designed to help children and young people with neurological conditions, such as Cerebral Palsy, and motor disabilities to overcome physical challenges to help them

develop greater independence in daily living. It was a process designed to encourage children to become more engaged – and take more responsibility – for their own learning through verbal prompts and repetition to encourage motor memory. This later led to the development of the Craighalbert Centre in Cumbernauld.

8. When I left Stanmore, we had eighty-five pupils, forty-six of whom were fed by gastrostomy tubes. We had a team of nurses on 24/7. Only two pupils were ambulant and only one had some verbal language, so it was very challenging but so worthwhile. We offered mixed packages – some pupils were residential, and some were there as day pupils. The majority of them were there five days a week, returning to their parents either every weekend or every second weekend. We closed for school holidays.
9. I left there in 2000 and I started working in Further Education. Initially, I worked in three different colleges at the same time. I worked in the college at Kilwinning lecturing in multi-disciplinary team working. I worked in John Wheatley College in Glasgow, with people who had been drug abusers to help them develop their self-esteem and CVs to enable them to re-join the workforce. In West Lothian College, I worked with young people and adults, some of whom had learning difficulties, and others with Autism, physical disabilities or mental health issues. I met ^{PWV} here twice, when he was supporting a young deaf learner. (Although he told staff at Donaldson's he was a friend of the incoming Principal, I can assure you nothing was closer to the truth. I could not actually remember him well).
10. In 2001, I then was appointed as Head of the Department of Inclusion (later changed to the Department of Employability and Lifeskills). Interestingly enough, this was where I first met Mary O'Brien who was the Head Teacher at Pinewood Special School. West Lothian Council had decided that children in special schools in West Lothian would not do their final year in their school, but would transfer into the college. Our department devised a curriculum to help make them more independent, and to reinforce the life skills which they had. We also set up work experience placements for many of the students.

11. In 2001, I joined West Lothian College as the Head of the Inclusion section. It later became the Department of Employability and Lifeskills.
12. We set up a lot of courses for people who had learning difficulties, physical difficulties, Autism, mental health problems and/ or very low esteem. A lot of the people who came to our department had missed out on the early stages of education. The majority, therefore, needed significant support to improve their basic literacy and numeracy skills, and especially help them to improve their confidence and feelings of self-worth. We did do a lot of quite innovative work with St John's Hospital in Livingston because at that time there were many people in the hospital with mental health issues, some of whom were in secure wards. We were contracted to go in and teach the patients, the majority of whom were in severe distress. The staff team were extremely committed and provided much job satisfaction.
13. When I started in that role, we had twenty-eight young people in the college and when I left there was something like three hundred and fifty people enrolled on a variety of fulltime and part time courses. That was a really fulfilling role, and one which lead me to be runner-up in the West Lothian Businesswoman of the Year Awards.
14. In 2005 I went to Donaldson's School as Principal. I stayed with Donaldson's until my unfortunate dismissal, but I very much enjoyed much of my time there. Initially, I had a good rapport with the Board of Governors, and it was unfortunate how this deteriorated some nine years later when my career ended. I was accused of not dealing with an incident where a member of staff called [REDACTED] (referenced earlier) had been at a party at another member of staff's house and had inappropriately touched the son of the hosts.
15. It wasn't a pleasant end because I had previously had an unblemished career in education, and I think many colleagues in Education, Social Care and Business had respect for me throughout my career and were shocked by my treatment.
16. I was later exonerated by the GTCS (General Teaching Council for Scotland), retained my 'fitness to teach' and, therefore, my PVG (Protection of Vulnerable Groups). After

I retired and before my husband died, I worked as a volunteer in a Trussell Trust food bank, for which I needed my PVG.

17. When I worked at Murrayfield, I also worked in the evenings for the Social Work department, delivering courses to young adults from day centres. I ran a series of programmes, mostly life skills, basic literacy and numeracy, in the McLeod Centre, McLeod Street, Edinburgh. It was great fun and really enjoyable.

Donaldson's School for the Deaf and Hard of Hearing

18. In 2005 I saw the job of Principal of Donaldson's advertised and was successful in my application. As I already had experience of running one of the seven GAS (Grant-Aided Schools) schools in Scotland, I was viewed as quite a significant candidate for the post. There weren't too many people who understood how the GAS system worked, and I had already had quite a lot of interactions with colleagues in the Scottish Government through my previous role.
19. Donaldson's had started as one of the few establishments historically, which would not exclude deaf children, and therefore it developed from Donaldson's Hospital to Donaldson's College and then into Donaldson's School for the Deaf. Its history was fascinating. Designed by Playfair, it was immortalised in a very famous picture painted by Roberts who had been employed as Playfair's colourist. This painting was rediscovered during the clearing out of the old building and featured on The Antique Road Show. It was then gifted in perpetuity to the City of Edinburgh. Once in post, I learned a lot about the building and the history of the Trust, which I developed into a series of talks for groups such as the Rotary, Probus, Guilds and schools.
20. There were seven Grant-Aided Special Schools in Scotland and the grant – which was allocated from the Scottish Government – was to allow them to provide services to each of their given specialities. Donaldson's was for the deaf and hard of hearing.

21. The GAS School system was developed in order that Local Authorities could afford to send children there. The model was that we got roughly sixty percent funding from the Scottish Government. Each of the local authorities, which sent pupils to Donaldson's, would pay the remaining forty percent with the exclusion of pupils from England. They could not get the benefit of the Scottish government grant, so they had to pay one hundred percent of the fees.
22. It wasn't a private school. It was open to all. We had to work very closely with local authorities to make sure that they understood what we were offering, and to justify the extra expenditure. Parents could not self-fund.
23. We had a very robust assessment of need. Around this time, more and more deaf children were being accommodated in mainstream schools, or units attached to schools. We had to diversify and take in pupils who – alongside their hearing losses – had other barriers to learning, such as challenging behaviours. Many were on the Autistic Spectrum or in a few cases had been the subject of abuse and needed a place of safety.
24. The Donaldson's building in Edinburgh – beautiful as it was – was not suited to the needs of the pupils. It had dreadful acoustics, was on flight paths, and its maintenance was becoming ever more expensive especially as it was a Grade 1 listed building. The diversification into other areas of need had already started to happen at the Edinburgh site, but it took off much more when we later moved to Linlithgow in 2008.
25. Before I started at Donaldson's, I knew a little about the resource, because the grant-aided schools met regularly with the Scottish Government. The Principals or Heads had formed a little informal support group because – as there were only seven of us running grant-aided schools – at times, it was a bit of a mystery as to how any new legislation would impact upon us. We met maybe twice a year, discussed common difficulties, or just have a moan!
26. The Board made the bold decision to relocate the school around 2004, and a suitable site had been purchased in Linlithgow. As this would be a long-term project, the

previous Principal, Mrs Janet Allan (now deceased), had decided she didn't wish to commit to a five year project so she stepped down and I was appointed. The Board made it clear that my overriding priority was to be their representative on the project team along with the architect, surveyors, finance, design etc; to get the school built on time and in budget (£23.5 million); relocate all the staff and pupils to Linlithgow; engage with the parents and Local Authorities; and once that was completed; to close down and clear out the old school in preparation for its sale to a building company to develop into luxury flats. All this was very challenging, but I absolutely loved it. It was so different from any other projects of which I had been a part.

First Impressions/Culture

27. While I had worked over my lengthy career with many people with different disabilities and challenges, I had never worked with pupils or staff who were deaf or hard of hearing. I certainly didn't understand the deaf culture. That was one of my biggest learning curves, and I have to tell you that even though I worked there for all these years, much of it still remains a mystery to me.
28. John Chalmers, who was the Chair of the Board, who appointed me, used to say that staff at Donaldson's first kneejerk reaction was not to go and see someone to get something sorted out, it was to raise a grievance. That was something that was very evident within the culture of the school.
29. I had deaf staff who would phone me up and ask me for a meeting. I would arrange the meeting, and they would say they needed their BSL (British Sign Language) interpreter there. My thought was that they had just phoned me, so 'why do they need a BSL interpreter at the meeting?' but it was their 'right'.
30. In my first year at Donaldson's, I think we spent something like £150,000 on providing support to deaf staff for meetings and training. We cut it down to about £46,000 the following year because it did not make sense to have an interpreter present just

because it was their right'. Of course, If someone did need an interpreter, we were very happy to pay for one, so none was ever discriminated against.

31. My first impressions were that it was not a positive culture in Donaldson's. I think hearing people were scared of challenging anything that deaf staff wanted to do or wanted to say. I didn't want to fall out with them, but I didn't want to spend a lot of resources that could have been better spent on supporting the children and young people in the school, by providing interpreters for people who were able to communicate on a one-to-one basis.
32. The culture was very much one of grievance and when I was taking over, I met with Janet Allan who was the previous principal. She told some cautionary tales about the dos and don'ts. When I started at Donaldson's, the then Head of Deaf Studies, an Australian Lady), decided to get a cochlear implant to facilitate what hearing she had. She often came to my room before classes and was very upset. She told me that her deaf colleagues were ostracising her as many felt she was 'selling out their deaf culture' by wanting to be hearing. They felt she should be proud of being deaf, which they called 'deaf abled'. I was fortunate that a hearing member of staff, whose parents were both deaf, helped me to understand what he called the 'pecking order' within the deaf world.
 - First were people who were deaf and used B.S.L (British Sign language) to communicate;
 - Next were people who were hard of hearing and who used a combination of B.S.L and lip reading;
 - Next were C.O.D.A's – Children of Deaf Adults whose communication skills were excellent;
 - And finally, came people who had elected to have cochlear implants. As many pupils had hearing parents, they obviously wanted their children to benefit from the new technology as communication within the family was so difficult. They also wanted to give their children the best chance to fit into society. Some deaf staff did not want to work with such pupils.

33. I was learning to sign, and you would think if somebody was making the effort to sign that deaf people might be supportive. Some were lovely and helpful, but others pretended they didn't understand. If you were talking to them and they didn't want to see or hear what you were saying, some would close their eyes. I was never a competent signer although I did try but my confidence in this area was very low.
34. Initially, I had some concerns about how the children were being taught. I have always believed that children should be challenged and encouraged to make their own decisions as much as they can. At Donaldson's, I felt some staff mollycoddled many of the pupils, and I considered the staffing ratios in some of the classes were high. The teaching staff liked to have a team of support staff. My view was that too many classroom assistants prevent the children from making their own mistakes and learning from those experiences. This view was not shared by the Head, Mary O'Brien or to a lesser extent, by SNR [REDACTED], PZY [REDACTED].
35. When I took up my post, the Head of Primary was Mrs Thompson, and the Depute Head and Head of Secondary was called Steve Kelly, who was a very good Depute Head. I had a lot of time for Steve. He was a hard-working person and had a lot of adversity as he himself had an acquired disability. Mrs Thompson left for personal reasons and Steve Kelly sadly chose not to transfer to Linlithgow. Mrs O'Brien and Mrs PZY [REDACTED] were then appointed.

My Time at Donaldson's School

36. I would say the recruitment process when I got the post as Principal was very robust. I put in an application, then there was an formal tour of the school and residence, and a meeting with the then Principal, Janet Allan. There was a first round of interviews, and from that I was short listed. At the second interview, I had to do a presentation on where I saw the future of the school, what type of strategies I would hope to develop to integrate it into Linlithgow, and how to encourage staff, pupils, parents and other key stake holders to support us in the transition. They also asked about my experience of governance and working with the Scottish Government.

37. The interviews took place in the old Donaldson's School with John Chalmers, the Chair of The Board of Governors and a number of other members of the Board. It was supported by the then Clerk to the Board. Janet Allan was not on the interview panel.
38. They asked for references, and I know that they spoke to all of them. I didn't have any problems with the recruitment procedure. I thought it was very robust and thorough. The interviews were very long, and they went into a lot of detail about different areas of my career.
39. There was a six-month probationary period. I also had three months prior to starting from the March to the June when West Lothian College kindly released me one day a week, and I went into the school for familiarisation. To be honest, it wasn't really much help because it meant with Janet Allan and I both there, I felt a little bit out on a limb. I wasn't there in a decision-making capacity. Janet Allan didn't really want me around to shadow her, so I spent most of the time reading through children's files, Board and Committee minutes and things like that.
40. Well before I started at Donaldson's, I started BSL with Donald Richards, who was the Head of Deaf Studies at Donaldson's. We met at his house or at the school on a weekly basis, and he also tried to explain deaf culture.
41. As Chair of the Board, John Chalmers was my line manager for the first few years. John and I had a really good relationship, and he was very supportive. We met regularly, he phoned regularly, and he was always available, especially when we were at the stage of moving from the old Donaldson's to the new premises. John was very proactive because this new build/relocation was his vision, and I was proud of being part of making his vision a reality. John and I met much more regularly than I did with the next Chair of the Board, Richard Burns. Sometimes I thought he was paying lip service to the role.
42. When John felt it was time to step down from the role, partly because he was to become the next Moderator of the Church of Scotland, it was quite embarrassing to

hear him literally begging for somebody to take over the role. He and Richard were quite friendly, and Richard – I felt – drew the short straw.

43. Richard took over from John in about 2010, and he was a different type of Chair to the Board. In my opinion, Richard was never totally engaged in the role, not to the extent John Chalmers had been. Richard was Head of Investment Banking at Baillie Gifford, and a philanthropist. I felt it was good for him to be seen to be Chair of the Board of a special school.
44. Although my relationship with Richard was maybe not quite as good as it had been with John Chalmers, we initially did get on well.
45. When Richard decided that he wanted to give up the role, I remember being at a Board meeting. He said he was looking for someone to take over as the Chair of the Board and he said, 'It's not too onerous, all you need to do is meet with Janice, once every so often and tell her things are okay'. As he said this, he patted my hand. I felt patronised.
46. Richard and I had a good relationship until the collective grievance came in and the issue arose in respect of PWV being accused of child abuse. I think this was in 2014. Richard was more difficult to work with because he was not always available, and to be honest, when somebody doesn't want to be in the role, it makes it difficult to feel supported. He was going through the motions and at the same time trying to get other board members to take on the role so I didn't think at that time the governance was maybe quite as robust as it could have been.
47. At the time of the grievance being raised against me and the Head of Finance and Administration, Helen Greene, he sadly did not follow our grievance procedure. He allowed another Board member, Christine Roebuck, whom I considered a loose cannon, to take the lead without any due diligence or duty of care, which I deserved as a member of staff. When things were getting difficult, Richard phoned me and out of the blue asked about my retirement plans and my health. He asked if I was 'up for a fight'. I took it in a different way to what he had meant. I thought he was talking about

the Doran Report (see later) and he was talking about me keeping my job. I considered later that this was age discrimination.

48. Mary Mulligan MSP (Member of Scottish Parliament) became Chair of the Board but only for a matter of weeks. She lost her role because of the situation around my dismissal – and her mismanagement of that – and over the **PWV** affair, when she failed to follow the advice of our lawyers. I believe the Scottish Government played a role in removing her from being Chair.
49. I had worked with Mary Mulligan as a board member, but I didn't really work with her as Chair. Apart from wanting the lowdown on senior staff and Board members, it was only really at the latter stages of the **PWV** affair that we had much contact.
50. I was appraised in my role, but whether or not it was ever written up, I could not tell you. I did go through a process to assess me in the role, after which I was given a significant pay rise in acknowledgement of my work and commitment. It was Richard Burns who authorised this. He wrote me a letter saying that it was well deserved and that Donaldson's would require my ongoing hard work and political acumen.
51. My role as Principal was supervised not only by the Chair and the Board but also by a variety of different committees, and I attended each of them.
52. There was the Education and Care Committee, which was chaired initially by Kathleen Fairweather, who was ex HMIE, and then latterly by Christine Roebuck, who was also ex HMIE. Mrs Roebuck was a different kettle of fish to deal with. Later on, when it came to the grievance against Helen and myself, she unfortunately decided that it was a camp thing, and she went into the camp of Mary O'Brien and **PZY** – and the senior staff group who raised the grievance. I considered that she should have looked at it as the Trust being responsible for all members of staff equally but that never happened. (Interestingly, I met Helen Greene at the funeral of Michael Buchan in January this year, and she told me that when she resigned from Donaldson's, Mrs Roebuck had said to her that she wished she had never supported the collective grievance.)

53. We also had an Executive and Strategic Development Committee. Both Helen Greene, Head of Finance and Administration, and I attended that.
54. We had a Business Development Committee which again Helen and I attended. After we had employed a Marketing Officer and a Fundraising Officer, they also attended. It was chaired by a member of the Board who specialised in these areas. We were looking at the business model which we were trying to develop. This eventually became CAMPUS, which concentrated on developing the premises as a business to generate income and promote fundraising.
55. We also had a Finance Committee, which over saw the finances. This was chaired by an accountant in Edinburgh. Richard Burns was on that committee. It also was responsible for both internal and external audits.
56. The fourth Committee was the Quality Assurance Committee. Its role was to ensure there were sufficient internal control mechanisms in place to minimise risk to the Trust. All these committees were attended by different groups of the governors with interests in each of the areas. We would feed our reports into each Committee, All their subsequent reports and my Principal's report then went to the Board of Governors every three months and were minuted by the then part-time Clerk to the Board, Alastair Montgomery and latterly Helen Rice. I had very little to do with Helen Rice because all the mess was happening around the grievance and PWV.
57. There were all these different committees and sometimes tensions arose because of conflicting interests. Budgeting was an onerous task and also there was a lot of work to be done in maintaining the grant. Helen Greene and I attended the Scottish Government meetings about this.
58. I didn't operate autonomously. I did have a lot of opportunities to develop what I wanted to do but at every stage it had to be approved, quite rightly, by the Board of Governors. Almost all had a business or HR background they certainly didn't want a loose cannon flying off and taking the Trust down a route which they had not approved. I met regularly with the different members and chairs of the committees and by sending

them my reports, I determined that none of them could come back and allege ignorance of something which was planned, or in its planning stages. If that had happened, it would be because they hadn't read my report to the board. I was very meticulous and thorough in them. In the job I liked to be on top of what was happening which is why I was completely blindsided later on.

59. When I first started at the old Donaldson's, I was more involved in the day to day running of the school, mainly because Mrs Thompson (Head of Primary) was not on top of her game. However, The Board always made it clear to me that my main role was to work on getting the old Donaldson's closed down, relocated and be very much involved in the building of the new Donaldson's. The Board never wavered from that. That was my role. That was what I had been taken on to do.
60. As a result, my involvement in day-to-day management wasn't hands on. This would be done by Steve Kelly, the Depute Head. He and I would meet every day I was on the premises. If I was going in of a morning, Steve would get the classes settled, then we meet for ten or fifteen minutes, talk about anything that was problematic, and decide on a way forward.
61. We also had what started off as a Senior Management Team that developed into the Strategic Management Team, and we met every second Tuesday. Initially I chaired them, but the group decided we should share the chair on a rotational basis. I had hoped this would help them to support the strategic development of the Trust. Mary and Neil never bought into that.
62. Initially, when I started, the structure was a bit confusing. The Education and Care Committee and I decided we didn't have a proper structure, so we implemented some changes. Kathleen Fairweather was very aware that the education management structure wasn't robust and couldn't be carried into the new school. We needed to go into the new school with a structure which would be effective. because my role then was to be to develop the community links and the business side and not take on the day-to-day management of the school and residence.

63. The Board was very keen that we had developed this building and that it had been designed with the dual purpose of being an income generating tool, out with term times. We were trying to attract conferences, dinners and different club to use our space. During the holidays we wanted to use the site for residential holidays or activity camps for the RNID (Royal National Institute for the Deaf – later Deaf Action), or other groups associated with the work of the school. We didn't intend just to take in random groups – they always had to have some connection to education, social care and / or the deaf world.
64. Mary O'Brien had been appointed as the Headteacher whilst we were still in Edinburgh. Steve Kelly, who had been called Depute Head, had been in overall charge as Head – but without the title. The restructure addressed this with Mary O'Brien being appointed as Head and PZY as SNR.
65. At the Strategic Management Team meetings there would be myself, Mary O'Brien, PZY, Neil Donald who was the Head of Care, Helen Greene, and Olivia Lovely, the Human Resources Advisor. Later Michael Buchan came in as the Human Resources Manager because there were many issues around the relocation of staff to Linlithgow, for which Olivia did not have sufficient experience to take forward. She was, however, always involved for her own professional development.
66. Michael Buchan, Helen Greene and I set up the Employment Forum, which was required by law as Donaldson's employed just over 100 staff. It also demonstrated good practice. This allowed us to negotiate with staff representatives about the terms on which they would move to Linlithgow. All staff groups were represented. We met on Friday afternoons. I can't remember the frequency. We reiterated to them that there was no point in having a beautiful new resource if we didn't have experienced staff to deliver the services, and to provide continuity to the pupils.
67. Initially some group members had quite unrealistic expectations. They felt each should be rewarded for moving with £10,000. They had other demands as well, but we would go back with a counteroffer. It was like any negotiation like you would do and we were delighted when we reached an agreement. Each staff member was awarded £2000,

the offer of interest free car loans, free travel for two years thereafter half for the next year and a quarter for the year after. Later through savings were made in travel costs, we provided all staff and their families free medical insurance through Westfield Health. We were pleased that ninety-eight staff out of one hundred and two moved with us to Linlithgow.

68. At the Senior Management Team, we had a fixed agenda with day-to-day items like school issues, residential issues, finance, HR, and child protection on it. I would brief them on where we were with the relocation, and we would pick up any matters pertaining to staff performance. Helen would update them about budgeting and finance and later when the staff put the collective grievance, this was one of the areas which Mary O'Brien claimed she knew nothing about.
69. I tried to interact with the children as much as I could. I went down at lunch time and had a chat with them whilst they were having their meals. I did need signing support with that. Not regularly but on occasions, I did go down to the Lodge for tea with the residential pupils. If necessary, I sat in at reviews if there was an issue which was pertinent, and I wanted to see how it was being managed. Such a case was the one highlighted in the letter from parents – included in the pack sent out to me.
70. I didn't have as much contact with the children as I would have liked but this was due to me having to spend the majority of my time in meetings in Edinburgh. I regularly met with the architectural team, the project team, the finance team and was on the site a lot in Linlithgow. I was also trying to set up fundraising and develop links into the community in Linlithgow because this was a new area that we were going into. I was out there talking to different groups regularly, to tell them what this establishment coming into their community could offer them, and what I hoped they could offer us.
71. My first responsibility was to the pupils. While of course I would have been concerned about reputational damage to the Trust, this would never have stopped me from doing the right thing in terms of what was best for the pupils. Certainly, if I had any idea that there was any serious abuse going on, and it was not being dealt with appropriately by the Education and Care Management team, I would have intervened. It would not

have stopped me from going to the police – as I did later in the **PWV** case – the Board and/or the Care Inspectorate. Their welfare was my first responsibility. I do know that in some of the documents, I do refer to reputational damage being done to the Trust, but that was more about how things would be managed, rather anything being hidden.

Move to the new Donaldson's School, Linlithgow

72. We did a lot of fundraising to get extra income to make the new place very much high tech. The old school was not the place for deaf people as the acoustics were absolutely appalling. The upkeep on the place was costing a fortune and there was no way the Donaldson's Trust could keep up the cost of maintenance. It was dilapidating around us with many areas – such as the attics – already out of bounds.
73. The new building was a state-of-the-art establishment, finished on time and within the budget of £23.5 million. It was built on a large site on the very outskirts of Linlithgow. The site was chosen before I was appointed and had been identified because of the amount of land it had, and because it wasn't on a flight path. The old school had planes flying over it all the time and that interfered badly with the quite basic loop system in the school.
74. We moved to Linlithgow over Christmas 2007 into 2008. The staff all left on Christmas Eve for the holidays and the removers came in on Christmas Eve and Boxing Day and every day the following week. The admin team didn't get much of a break as we moved everything over and set the new school up in the classrooms. The staff came back on the 5th of January, and the pupils on the 6th January. It was opened officially later in the year by the First Minister of the time, the R. Hon. Alex Salmond. The new build and relocation of the school and services were captured on a one hour 'fly on the wall' documentary, commissioned by the BBC, and produced and directed by George Cathro, entitled 'Life in A Hearing World'. This was first shown at peak time on Easter Monday 2008 on BBC 2. It chronicled the progress of the project, and its impact on parents, staff and pupils. It has been repeated a number of times since then.

75. Once we opened, we had many visitors, often from abroad, such as Scandinavia, Holland and America. They were interested in how we had integrated new technology into the design.
76. The new school really was 'state of the art'. When the children moved from one classroom to another, each area had a separate frequency, and their hearing aids would automatically tune into that frequency, so that they couldn't hear anything that was going on in the corridor or any other room.
77. We colour coded all area, to make it easier sit all so that it was easier for the pupils who were autistic or had other syndromes or conditions. We also made sure that all the text on all the areas was in a script that all the children could recognise. We spent a lot of time on signage and just making sure we had everything as accessible as possible. Every room was equipped with a smart whiteboard.

Personal Influence

78. We had a good set of child protection guidelines. Whether or not they were always followed I am not entirely certain. My role was more if something had happened, I would have expected Mary O'Brien, PZY or Neil Donald to report back to me. If it was urgent, I would expect them to contact me immediately. If it was something that was being dealt with and I only needed to know on an information basis, it would be brought up at the senior management team meeting on a Tuesday. I needed to keep back from any initial investigations as according to our Child Protection guidelines, I was held in reserve for an appeal, if required.
79. The child protection guidelines were in place before I started at Donaldson's. Although Neil Donald was a very strange person, he appeared to be very competent in the area of child protection. Mary O'Brien thought she was, and in my opinion, PZY was. It was their role to make sure that their departments were familiar with and adhering to all the child protection guidelines. Regular ongoing training was provided.

80. I always made sure, apart from a very brief period of about three weeks, that child protection was on the senior management team agenda and there was a section in my report to the board on child protection. The reason for the three-week break was a result of Neil Donald did not want child protection being discussed in front of Helen Greene. However, this was overturned because as well as being Head of Finance and Administration, she was the main legal team Law at Work contact. This was logged in the minutes and on our records. I obviously anonymised pupil names in my report to the Board.
81. Mary O'Brien and Neil Donald reported anything to do with child protection to the Education and Care Committee. Any reports to them about child protection matters would be documented in the minutes of the meetings. On that committee were Christine Roebuck who was an ex HMIE (Her Majesty's Inspectorate of Education) and Jan Miller who had been a very senior social worker. Any extra advice required could be sought from them.
82. When I took over as principal, CALM (Crisis, Aggression, Limitation and Management) was the preferred restraint method that was used. We made sure that key staff were trained in that, but it was always only used as a very last resort. When an issue arose, there was a CP1 (Child Protection 1) form which the staff member would fill in. That form would go to Mary O'Brien, PZY [REDACTED] or Neil Donald and it would be their responsibility to investigate that issue.
83. If there was anything that was serious, it should have been reported back to me immediately – this rarely happened – or at Tuesday meetings. Obviously if there was anything relating to the team that I directly managed, it would be up to me to take that forward. As I managed the [REDACTED] team, I should have been informed immediately about the incident with PWV [REDACTED] and [REDACTED]'s son.
84. Each child in the Lodge had a named care worker that they could go to if they required any extra support.

85. We also paid to put Ann Clark, who was the art teacher at the time, through a counselling course, so that if there was an issue with a child, then Ann Clark would have been there to support them.
86. I also created a part-time post for an educational psychologist and employed John Schneider in that role. He was also very much involved in supporting the children who were referred to the school. A small number of pupils who came from abusive backgrounds, were placed with us from England. That was usually the reason the English LEAs sent them to us. John would support them through therapy to try to help them come to terms with it. He also did robust educational assessments.
87. A lot of the children had learning difficulties on top of their deafness, so assessments were complex processes.

Policy

88. Policies in relation to the curriculum and care were informed by national guidelines. We had a very good relationship with the Care Inspectorate or Care Commission, whatever it was called at the time. We also had a very good relationship with Education Scotland because every GAS School had an Inspector or ex-Inspector attached to it that you could call on for support. Donaldson's was served by Mike Gibson, whose role was to provide advice and support, as required.
89. Apart from confidential minutes and reports, everything pertaining to the school was available to the school staff via the intranet. We also put minutes of different meetings up there. They were very rarely viewed but they were there.
90. Policies did change or adapt over time. When we moved to the new school, the population of the school was undergoing a change, like any other special school. Special schools had been having to adapt to survive because of the legislation about more children going into mainstream schools. That meant it became a smaller group of pupils, who required the more intensive services of a residential facility within a

GASS system. The local authorities were very keen to make sure that if a child was admitted to such a school, then it was really a last resort. We wanted Donaldson's to be a first opportunity but sadly in this time of financial difficulty, the money wasn't there. Local authorities were – and still are – very strapped for cash.

91. This meant that the children that were coming through to us were perhaps ones that had been at a number of different units and schools beforehand and had failed. Donaldson's was really the last option, which meant that the type of young people we were taking in were becoming more and more challenging.
92. Other policies and processes were updated as required, and record-keeping improved. When I took over the HR department was run by Olivia Lovely, who was an HR Assistant. She was a very able lady, and she was very keen on record-keeping, of which I approved. Therefore, if there was anything that was to do with staff recruitment, disciplinaries or any other issues like whistleblowing, it would be well documented. Later on, I understand some information disappeared, but I have no idea where that went. I have my own views on that, but I do know that in the time I was there, staff records were very full.
93. We introduced a whistleblowing policy as there wasn't one in situ. We didn't call it whistleblowing, we called it something else, but it was whistleblowing. I have to say that on any occasions when staff came to me or went to Olivia Lovely with an issue, it was looked at very carefully and there were never any repercussions for the staff member. I appreciated it if staff came forward with a concern. None of the issues were ever too serious. It happened on occasion, just like any other establishment. There were times where you had to make a decision whether or not it was a genuine complaint or whether there was a little bit of malice or lack of thought. Each of them was considered very carefully and we made sure that the staff member was protected and supported.

Strategic Planning

94. I led on strategic planning with the support of the various committees and the Board. There was a lot of things that the Board wanted done and it was my job to make sure these happened. I also took to the Board, projects which that I thought would be beneficial to the Trust. We had a very full business plan which we wrote every year. It had to be submitted to the Scottish Government, who would consider it then come out and discuss it. Once that had been done, and approved by the Board, it was then up to me to action it and delegate different tasks to different people in the school in order to take projects forward. From that came the further development of our nursery; [REDACTED]; and CAMPUS (our business arm); and our after-school clubs; We also had hoped to start Respite Care during the summer holidays.
95. The Board and I were very keen to maximise the use of the building and to make it income generating. To achieve this, as I said earlier, we appointed both a Fundraising Officer and a Marketing Officer. CAMPUS became more corporate, and professional. This was a big issue for the staff. Many of the staff – among them ones who were senior – and therefore, held a lot of sway over more junior staff, didn't like the school being used for other activities, as they failed to grasp the need to bring in additional funding to support their work. As part of the induction training which everybody received, I delivered short sessions to tell them what a GAS school was, and about the Trust. They were not the most exciting subjects in the world, but I tried to impress upon them that our funding was not infinite, and we needed to raise money externally.
96. We developed a form on our intranet to use if any of the staff wanted to buy something from this extra pot of money. They could fill in the form; Helen and I would look at the merits of it – whether it was for an outing or a piece of equipment, or another innovative idea – and we would approve the expenditure. The forms had to be first signed off by their line manager. We developed the outside garden; built a sensory garden; developed an outside classroom; a n enclosed football pitch; and also a storytelling area using money in that pot. We couldn't have afforded to do these worthwhile things from our everyday funding. In the collective grievance, the senior staff claimed the did not know what happened to money raised through fundraising etc.

97. The potential for abuse featured in the strategic approach. We always made sure that risk assessments were done in every single way that we could. I wasn't responsible for them, but the risk assessments were approved and lodged with the Head, Depute Head or the Head of Care, depending to which department it related. If any of the other departments were doing them – for example if the Speech and Language Department were taking pupils out – it too would have to put in a risk assessment. I thought PZY and SNR, PZZ were very good at managing risk and making sure it was minimised.

Structure/Recruitment of Staff/Appraisal

98. The school staff structure was the Headteacher, Mary O'Brien, who was second in command in my absence, SNR, PZY, a Head of Deaf Studies, Donald Richards, Head of Speech and Language Therapy, Marjorie Douglas, and the Audiologist, Joe O'Donnell. We appointed two new SNR, Moira Andrews and PZZ. Both of them had different responsibilities across the school. There were class and specialist teachers – Art; Design; Home Economics; PE; etc – supported by classroom assistants. The audiologist had a sound proofed hearing testing facility.
99. We had our nursery which was run by a nursery manager, and it always scored sixes across in Education Scotland inspections. It was an excellent facility, with a mix of abled bodied and disabled children.
100. Our residential facility was the Lodge, of which Neil Donald was the Head of Care. The Depute Head of Care was Maureen Greig, known as Mags, and there were two senior care workers with a number of care workers.
101. Although Neil Donald was head of the residential care, there was a carry over. On my instigation, Mary O'Brien and Neil Donald met on occasions, because I felt Neil could offer some support to the school support staff. He was charged with ensuring that they

were kept up to date with CALM, and any changing legislation coming out from the Care Inspectorate at that time.

102. The majority of the time, the number of children we had in the Lodge at any one time was about fourteen. When looking at the budget, the Education and Care Committee felt the management structure to be too top heavy, given the small number of residents, and the fact it was only offering residential care four nights a week.
103. The restructuring there didn't go particularly well. One of the innovations we had wanted to offer was to open up the Lodge at the weekends. We envisaged that this could also be offered to day pupils. That was met with huge resistance from Neil Donald and Mags Greig. It never came to fruition. As a result of an external review by Social Work consultants, both the Head and Depute Head posts were made redundant, and although Maureen Gregg at one point seemed keen to stay, this didn't happen. A new Head of Care, Susan Hepburn, was appointed and the savings reinvested into more hands-on staff in the Lodge. This process followed all the advice from Law at Work.
104. As Principal, I attempted to manage the heads of these departments. I held fortnightly meetings with the Head of Care and the Head of School. Mary O'Brien rarely attended which was of real concern to me. When she did, she appeared late or agitated, and never with a notebook. We had constant battles. Mary had been a Headteacher in and LEA, and she felt she was autonomous. She didn't like having to report to anybody. She liked to be a 'free spirit' and do her own thing. She didn't like being tied down and she absolutely hated the thought that she had some responsibility to the Board.
105. She hated attending Board meetings. She would get out of them at every single turn, especially if Celtic were playing. She would have stress, a cold or an urgent appointment. I had a lot of issues with her initially and particularly latterly. I have a document that shows I raised my numerous concerns with Richard Burns. There were three occasions where she was supposed to register a service with the Care Inspectorate but didn't. Again, no action was taken.

106. When Mary O'Brien was appointed, I wasn't on the interview board. I knew her and PZY from having liaised with them at Pinewood School, when I was at West Lothian College. At that time, when we were having meetings about handovers and exchanges of information about the young people, whom we would be taking over for their last year. I do not have any recollection of Mrs O'Brien being too involved or interested in this.
107. A couple of years after I started at Donaldson's, interviews were held for the Head Teacher's post. The interview panel was chaired by Kathleen Fairweather. There was an external headteacher on it as well from Linlithgow Primary. I believe there was also a parent representative. I felt I should have had a place on the interview panel and fought my corner, but I was over-ruled. That was one of the things that I had to accept. My part in the process was to show the candidates round before they went in for interview. I had a conversation with Kathleen Fairweather expressing my concerns about Mary O'Brien.
108. After the interviews I was invited in to give my views on who was the best candidate. There was a very able gentleman, whom I had shown round. He had been very impressive. I believe he had been a depute in a deaf school in England and in my opinion, he would have been an outstanding candidate. Unfortunately, the panel decided the preferred candidate was Mary O'Brien. She had talked a good talk. I don't think she would have known anybody from the Board of Governors because they were very Edinburgh centric and she was from Glasgow.
109. I remember having a meeting with the Ms Fairweather afterwards, and I told her I knew more about Mary O'Brien than you have may have learned from your interview. I told her I didn't think I could work with her very well. In my opinion, she was a loose cannon and that I didn't think her standards were what we would want in Donaldson's. Kathleen said to me that it was their decision. I was to go home and sleep on it and then come back in the morning and tell them I had accepted their decision.

110. I was annoyed at that because I knew that I was the person that was going to have to work with her. I knew that she was sloppy in a lot of ways, whereas I was quite organised in my workplace.
111. To the best of my knowledge, I don't think that Mary O'Brien knew I had opposed her appointment. I never told her, and I would hope nobody else had because I then tried to work purposefully with her.
112. Neil Donald disliked me intensely and therefore our meetings were not positive, albeit I have to say he did attend. At the first Senior Management Team meeting when I was introducing myself formally, he sat at the end of the big table with his back to the table. I carried on with the meeting and at the end I asked him to remain. I said to him 'Don't you ever do that to me again. If you don't respect me, you have got to respect the position of the principal, and I expect you as a member of the management team to participate and to contribute'. He never replied and just looked down his nose at me.
113. For the entire time I was in role, he never, ever called me Janice. He called me Janet, the name of the previous Principal, which I think gives you an indication of the lack of respect he had for me.
114. Neil had been very fond of Janet Allan, and they had a very good relationship. She told me when I took over that Neil would be one of my best allies and supporters. That did not turn out to be, as he hated me from the minute, he set eyes on me and until the minute he left. Even after he left, as he continued to do damage to my reputation. He took it personally against me about his post being made redundant. No matter how much had impressed on him that this had been a Board decision, he never believed it.
115. I raised my concerns about Neil Donald's loyalty to the Trust with John Chalmers away back at the beginning but there was no outcome. I think this was partly because, when working with Janet Allan, he had always been supportive.

116. I tried to maintain a professional relationship with him, but it was difficult as he was so belligerent. The Board didn't give me any support. They were supportive of the many innovations I introduced, but not with the issues I had with either Mary O'Brien and Neil Donald.
117. I worked tirelessly for Donaldson's, and I did things out with the school to promote the Trust. I put in so many extra hours to the extent that I missed lots of family occasions and celebrations. I even re-organised my wedding because I was in the middle of the school relocation. Neither Mrs O'Brien or Mr Donald had any interest in anything out what they perceived as their roles. It wasn't until much later on that I discovered from PZY [REDACTED] that Mary O'Brien had taken two weeks off her headship at Pinewood to go and follow Celtic in Europe, and she had covered for her.
118. It was very difficult working at the school for a long time with some people on my management team who didn't like or respect me and indeed hindered much of my work.
119. I was responsible for appraising both of them annually. These never went well! I would be very honest with them in the process. Every attempt to appraise Mary O'Brien was just a nightmare. Again, she would fail to turn up and there was always something else going on, which she viewed as more important. Usually, it was a child protection issue and of course, I could not argue with that being a priority. When I did pin her down, it was never productive, and I don't think any her appraisals were ever signed off.
120. I don't think Neil Donald's appraisals were ever signed off either. He had the most abhorrent attitude. If you can imagine somebody brushing rubbish off their shoe – that was how Neil Donald was with me. He got the perfect platform later on to criticise me in the dismissal procedures. Although no longer employed at the school, he was interviewed about the PWV [REDACTED] situation, and subsequently at the G.T.C.S. hearing.
121. As far as recruitment of other staff was concerned, my involvement would depend on if they were going to be under my line management.

122. Olivia Lovely was exceptionally correct in her recruitment procedures. Everything was anonymised. The gender of the candidates was unknown, therefore the initial procedures for selection were done very professionally. She took notes and everybody was scored after interview. Sometimes it wasn't always the person you thought would do the best job who scored highest. Because of that, the pressure was on to appoint that person.
123. Apart from Mary O'Brien and Neil Donald, I think that the team, which I appointed around me were very committed.
124. When Mary O'Brien was appointed, she was responsible for the recruiting of teaching staff. Neil Donald was responsible for the recruitment of the care staff, but I always made sure that I met who the candidates were before they started. Before the appointment went through, I would read through all the information there was on them – their CVs and the copious notes taken by Olivia at interview.
125. There were very few volunteers who worked at Donaldson's because there was the communication issue. Our fundraiser Gill Sinclair, who is now sadly dead, was responsible for managing any volunteers who came in.
126. We took volunteers from the sixth year at Linlithgow Academy. We set up an induction course for them and at the end of their placements, they were awarded a certificate to acknowledge they had attended this for a week; had information on deaf culture; had done minimal BSL; and been given an insight into hearing loss; autism; and challenging behaviour. It worked really well as a lot of these young people benefitted from it and found out they had skills in caring or supporting young people they didn't know they had. I also believe it helped develop their own self – esteem.
127. Any volunteers that we had went through the recruitment and vetting process. They would all have to have a PVG certificate. The pupils from Linlithgow Academy had been recommended to us by the school.

Training

128. Olivia, with Mary and Neil, developed a pro forma of what training and what information new staff needed for their induction process. This included my section on the Trust, the development of CAMPUS, and G.A.S.S.
129. At times I was involved in the training and personal development of staff. I did more training on the more strategic side, than I did on the day-to-day side of things. I supported one of the Board members, Ken MacDonald, providing training to staff on the new Data Protection regulations when they came in, and on the dangers of social media.
130. In my opinion, we had a highly competent staff team largely in part to our commitment to encouraging continuous development. We put a lot of staff through different courses. Ann Clark was put through the counselling course. A number of teachers were put through the Teacher of the Deaf course, albeit we could only release one a year because of the funding. Every single member of staff was trained in BSL 1. Most achieved level 2 and if they wished to go onto Level 3 – which became an SVQ level – we would support them through that.
131. All the care staff were given very good opportunities in career development. That was one area in the Lodge, in which Maureen Gregg excelled. After all their appraisals, any training, which they required was identified and funded by Donaldson's.

Supervision/Appraisal/Evaluation

132. As well as being responsible for the appraisals of the Heads of Education and Care, I was responsible for the appraisals of Helen Greene, Olivia Lovely, the Fundraising Officer, the Marketing Officer, and my secretary – all of whom came under the business side. I also appraised Liam Donnachie when he was appointed to lead on the [REDACTED] project.

133. They all had job descriptions; we had agreed targets developed from the business plan for them, and then we would appraise them on how well they had delivered their targets. This informed their follow up targets.

Children

134. Initial contacts for children to come to Donaldson's came from various sources including family, social work and health providers, but the actual placement request had to be made by the local authority in which the child lived, whether that was in Scotland or England.
135. We were provided with information from the local authority; from their other schools; and the psychological assessments which had been carried out. From my memory, I think our own psychologist was instrumental in carrying out further assessments on potential pupils. He would then feed that into the Education and Care management. I would do most of the liaison with the local authorities on the finance side but not so much on the placement side.
136. Copies of the assessments which were carried out would be passed to the teaching and therapy team and audiologist. This would inform both their learning and teaching plans, as well as their care plan, if appropriate.
137. Some children were placed very late with us, simply because they had sadly not achieved in their school placements. All of them stayed until they were eighteen, with the exception of one particularly bright boy who left earlier to go to university.
138. The number of children at the school at any one time varied. I really can't remember exactly how many, but I would estimate there were about sixty to sixty-five in the school, and residence, and twelve in the nursery.

139. There were more boys than girls because my understanding is that deafness is more prevalent in boys. Off the top of my head, I would say it was two third's boys to one third girls.
140. Our nursery was standalone, and it was registered as a separate entity under the Care Inspectorate. The children would come to the nursery when they were approximately two and a half to three years old. They would stay until they were ready to go to whatever school they were allocated. None of the children from the nursery came into Donaldson's school because it was not intended a feeder.
141. I cannot recall a child as young as five starting at Donaldson's Primary in my time. This was because the local authorities would want these children to have a good opportunity to be within their local school, or within a special unit in their home local authority first.
142. There were twenty-four beds in the residence but only sixteen of them were used. There were sleepover rooms for staff. There were three units of eight. One was called Avon, but I can't remember the names of the other two. They had dedicated staff teams in each of them. The children personalised their rooms, with curtains and bedding of their choice. We had a policy of using the light doorbell if we wanted to go in and see them. No staff member ever entered a room without permission, and I will give credit for that to Neil Donald and Maureen Greig as it was considered good practice.
143. The units had communal dining, recreational and lounge areas. The young people had ensuite bathrooms. There were a couple of extra showers for staff to use.
144. The policy of using fresh and locally produced ingredients was developed by Helen Greene and myself and greatly supported by our kitchen team. Helen Greene and I looked at the processed food the pupils and staff were being fed at the old school, and knew this had to change. When our cook left, this gave us the opportunity to implement new menus. We had appointed a cook called Peter Anderson and his remit was to provide meals from locally grown, fresh vegetables and fruit. Our food was organic, and it was homemade all the time. We had a contract with the local butcher and

another with a local fishmonger. We also wanted to try to embed ourselves into the community and where it was cost effective, we used local services and shops.

145. We developed a whole range of different menus. If the children didn't like something, there was always an alternative. Peter went out and met with all the classes in the school and with the residents in the Lodge. He catered for any allergies, likes and dislikes, and the menus were very much tailored to each child. We could cope with any type of allergy, anything at all. As a result, I had no concerns over the quality of the food and the diets of the pupils. The staff too loved the food, and the kitchen team were very adventurous, introducing the pupils to a range of different cuisines. We appointed a second chef as an assistant, and she had exactly the same ethos. Peter and the new assistant were always making healthy treats, and on the children's birthdays they would make them cakes.
146. The food that came out our kitchen was amazing. We did buffets for the Board and different organisations at times. We put on – at very a short notice – a four-course dinner for the Provost and councillors from West Lothian Council when they were let down by a hotel at the last minute. Ironically, Provost Tom Kerr chaired my dismissal meeting.
147. We won many awards for our kitchen, including being runner up in the BBC Food and Farming Awards. We got awards for our food from various culinary organisations, and we were asked by the City of Edinburgh Education Department if we could provide training to cooks from their schools.
148. Each child was in a class with, where as far as possible, other children of similar ages and ability. Taking that we had a very small pool of children it was quite difficult to match them all the time into a group with other children with the same needs. Each of them had a I.E.P. (Individualised Education Plan). This incorporated Speech and Languages, Deaf Studies and Audiology. These needs mostly informed the staffing ratios within the classrooms.

149. I thought, with some of the older children or young adults particularly, the ratio was too high. Again, in my opinion, if you were trying to make children or young adults independent, they have got to be allowed to take risks and be allowed to make their own mistakes. I sometimes felt that the number of staff in the room stopped them from having those learning experiences.
150. In the classrooms, there were six children maximum and usually four members of staff. In one of the reports sent out to me by the Inquiry, it highlights that there were far too many support staff. I was having continual significant discussions with Mary O'Brien because I felt that in educational terms that was very top heavy. Certainly, that view was supported by the Education Scotland report, but Mary O'Brien was adamant and could not see herself as being the 'baddie' or taking unpopular decisions. My view was that this could be achieved though natural wastage or redeployment within the school, residence or [REDACTED], without the need for redundancies.
151. Mary would not get involved in anything like that, but PZY [REDACTED] would have done. When Mary wasn't there PZY [REDACTED] and I would meet far more regularly. PZY [REDACTED] would come up to my office every evening and give me a run through of what had happened during the day in the school. I found that really helpful.
152. I never got that from Mary and in one of the documents the Inquiry has access to, PZY [REDACTED] is quoted as saying "Mary was always in a spin." I think that is a very good phrase to describe Mary. She was all over the place.
153. As part of their learning, care staff encouraged the residents to make their own beds, hang away their own clothes and, if they were capable, look out their own school uniforms and things like that. They were encouraged to keep their areas clean and tidy, but we had a team of cleaners who went in every day to do the proper cleaning. In the Lodge the children cooked their own meals. They would put in a proposed menu to Peter, and the kitchen would order many of the ingredients. They would also go out on shopping trips and buy the supplementary ingredients, and snacks. They would set the table and just do what you would do in a normal house, with the support of the care team.

154. The children had a whole range of different things they could do in their leisure time. The staff put different activities in the evenings, after any homework was completed. The resident pupils all had very meticulously constructed care plans and all their own interests were noted in them. As far as possible, the staff managed to make sure that if the children wanted to go to an external club, and the club would have them, they would made sure they got there.
155. Every year, each of the classes would do a number of day trips. A risk assessment would be done prior to that, and we would ensure the staffing was adequate. Some of the parents volunteered to help with them. They went to the zoo, to Blairgowrie, to other units run by deaf organisations and to meet up with deaf mentors. It was basically the same sort of range of activities that any other school would have.
156. We didn't organise holidays but sometimes the children were taken on holidays by external organisations, arranged by their parents. An area that, perhaps at a later date we might have developed into doing would have been activity holidays based in the school when school was in recess. We had hosted a couple of them for Deaf Action, and also one from Holland – all on an accommodation basis only.
157. I have no knowledge of any child going to any member of staff's home. I would not have approved of that as that could not have been risk assessed properly to maintain the safety of the pupil.
158. If pupils had any health problems, we had trained first aiders on the staff, and all resident pupils were registered as temporary residents with the local G.P. practice.
159. There were pupils who required medication, and this was dispensed by the pharmacist. It was administered by two of the care staff that were trained to do so. It was mainly administered in the Lodge. It was all properly recorded.
160. I can't recall any children having to take medication to control their behaviour. I would think a couple of them may have been on Ritalin, but I am not entirely certain.

161. Medication was always discussed with parents or others with parental rights, and they were always asked to consent when any child was being prescribed any medication. This would be recorded on different forms that we had, mostly in the care plans because it was the residential pupils. This was audited externally by the Care Commission or Care Inspectorate. There was never a problem with this. That was an area that was always assessed as being very positive.
162. Parents were welcome at any time. We did like advance notice though as we wanted to make sure the child was in and available. Mary, PZY and PZZ could review what was going on to see if it was suitable. Some of the parents would take them out, but because we were a Monday to Friday facility it didn't happen that often. I know some parents would take them out on their birthdays and occasions like that.
163. We went on to the model of closing at Friday lunchtime because some of the children had a long journey home for the weekend and we used the Friday afternoons for the professional development of the teaching staff.
164. Social workers and educational psychologists attended all the reviews but in between reviews, they were very welcome to and did come in and sit in the classes to observe. They didn't speak to the children separately as most of the children had communication difficulties and I don't know of any of the professionals who was BSL proficient.
165. These professionals would provide reports. From my experience at my previous school, when the reports came in, we would review them and any points made by the psychologist would be added into their teaching plans.
166. Whether a child was to remain at Donaldson's was continually reviewed. When you are working in a grant-aided school, where the funding is so high, local authorities were always keen to encourage pupils back into their own provisions, which meant every review technically was a review of placement, not just progress.

167. There were a number of different processes when children were leaving Donaldson's. If the local authority had decided that the child was ready to go back into one of their facilities, we would help plan a transitional return for that young person. It very rarely happened though because we were almost the last resort. There were occasions when it did happen, and one time when a child was returned to Northumberland.
168. Bar the pupil who went to university, the young people left at the age of eighteen. We had a project called the '██████████ Project' which we later developed into '██████████ ██████████' of which I had overall responsibility. They did a lot of work on budgeting and learning to be more independent. I helped in the development of the curriculum given my previous experience at West Lothian College.
169. We got many pupils on work experience, and they went with support because of the communication issues. ^{PWV} ██████████ was very effective in setting up the work experience placements.

Living arrangements

170. I lived in South Lanarkshire which was equidistant to both the old and the new buildings. Before I started, Initially, there apparently was a lot of resentment from staff towards me. They wrongly thought I lived in West Lothian so that was why Linlithgow had been selected. I had to unpick it and discovered that because they knew that I had worked in West Lothian, they thought I had had a say in the new location. The land had been purchased well before my time so the siting of it had nothing to do with me.
171. With the proposed relocation, a lot of the staff would have longer journeys. It was closer for Mary O'Brien as I think she lived in Bellshill. ^{PZY} ██████████ lived in Currie and Neil Donald lived in Leadburn. I lived in Kaimend, near Lanark.
172. Only senior staff, care staff and the Facilities team had access to the children's living areas. We gained access using fobs. The cleaners had access during the day only.

PWV had limited access for the times he was going in to take a young person out to the deaf club or to another activity.

173. There was a senior member of care staff and a number of care staff who worked overnight, and they were responsible for the residents' living areas during that time.

Discipline and punishment

174. In respect of discipline and punishment, I always advocated negotiation and would try to work out why children were behaving in such a way. I would try to sort it out that way and put in strategies to assist them to manage their behaviour better. Many had anger management issues leading from the frustration arising from their inability to communicate effectively. CALM was very regulated and the training for it was done on the premises by external trainers. There was a very clear policy on the use of CALM with all episodes being clearly recorded and audited the Care Inspectorate on their visits. All policies were held on the intranet.
175. CALM is an accepted model of behaviour management which starts off with the lowest level of intervention, which is trying to negotiate with the pupil; and trying to distract them. It moves up incrementally to try to remove the pupil from the situation, then to use restraint only if all these other interventions failed. The priority was to keep the pupils safe. I can't actually remember anytime where it escalated to the highest level, and I never saw anything that I would describe as excessive restraint. There would have been times where there were physical restraints used to protect the staff and to protect the other children. Restraint sounds like what you sometimes see on TV when they are held down to keep them calm. In reality, when we are talking about restraint, it can be taking somebody by the hand and leading them out. If they were trying to hit out, the staff would hold them at the outside of their arms until they had calmed sufficiently, and they could be removed from the situation.
176. Not everyone who worked at Donaldson's was CALM trained. Key people were but with others, it was an option. Some people felt very uncomfortable doing it, so it was

acceptable to elect not to undertake the training. Obviously, women who were pregnant; staff with back problems; or staff with certain disabilities were exempted.

177. This meant that when management were allocating staffing, they had to take into account who was CALM trained. The same thing happened in the residence.
178. Medication was never used as a method of restraining, sedating or calming a pupil. We could only administer medication prescribed by a doctor and dispensed by a pharmacist. The type of behaviour which could lead to the use of CALM would be disruption, being a danger to themselves, assaulting other pupils, or assaulting staff.
179. In the classrooms, the teacher would be responsible for the behavioural management. In the residence it would be the care staff or escalated up to the management if it was required. There was always a senior member of staff in the Lodge.
180. It was usually time out which was used a pupil was disruptive. Residents would be sent to the bedrooms to calm down with care staff then helping them to reflect on their behaviour. In the school, either the sensory room or the soft play areas could be used. Younger pupils would be accompanied by a classroom assistant. The older ones tended to be removed to the library. Again, staff would try to help the pupil to understand their behaviour.
181. Other tactics used included a withdrawal of privileges, such as not being allowed to go on an outing, or not being able to participate in a group activity. The young people who were residential did get pocket money from their parents, but that wasn't, to my knowledge, one of the privileges that would be removed. Everything was very much done with a person-centred approach. It would certainly not be acceptable for senior children to discipline younger children. There was no corporal punishment.
182. Again, all of these discipline issues would be recorded. Forms were kept in the children's own files, and if it got to the stage that there was some incident that could have been considered to be a child protection issue, then a CP1 form would have to

be raised for that. These were stored in locked cabinets in the Head Teacher's room and/or the Head of Care's. These files later disappeared, more of which later.

Concerns about The Institution

183. I can't remember any instances of anybody raising serious concerns about the school. The Care Inspectorate were very helpful. I don't remember there being any concerns from them about any particular issues. There were always areas for improvement but that is always the case.
184. There were parents who were unhappy at times, and I do recall they were sometimes anxious. Unfortunately, sometimes children's behaviour differs at home from school. Sometimes the children were absolutely delightful at school, and horrendous at home, and vice versa.
185. I had no concerns about the accommodation. It was all high-end build; it was spotless and had all the technology. Neil Donald always said that he was never involved in the design but there were minutes of meetings clearly showing he himself had met individually with the architect to design the Lodge layout and the facilities.
186. I have already given my views on Mary O'Brien and Neil Donald and by default PZY [REDACTED] and PZZ [REDACTED]. There were a couple of members staff who were in post when I started, whom – if I had my choice – I wouldn't have employed, but that is always the case in any organisation.
187. Children did sometimes complain about staff. If it was in the school, Mary O'Brien and PZY [REDACTED] would deal with it. These were the sorts of things that would come up at the SMT meetings and we would talk over what had happened. Mostly it was things like they weren't allowed to do, or that they were playing a game and it had been interrupted. Sometimes it was because the light had flashed to show them it was the end of that class. It was low level to us but for the pupils, these were very important.

188. If a child wanted to make a complaint, they would do this through their key worker or another member of staff that they trusted. There was a process for that complaint to be progressed, but I can't remember the it exactly. The Education and Care Team would deal with those.
189. If staff wanted to make a complaint, there was a complaints procedure on the internet with the necessary forms. Alternatively, but also, they could meet with Olivia Lovely from HR. She would initially deal with it privately, gather the evidence and then she would take that complaint to whomever was the most appropriate to deal with it. When I met with her, she would fill me in on what was going on.
190. I would only deal with the complaint if it was in my staff team. The disciplinary procedure at Donaldson's was that it was dealt with by the Heads of School or Care, with me being held in reserve in the event of an appeal. I can remember one instance when Neil Donald had wanted to sack a member of staff, but on appeal, I overturned this and relocated the staff member to the school side where he worked very positively.
191. I can't recall the actual incident, but Neil Donald had pulled him up about something. There was a clash of personality because, in my opinion, Neil didn't like working with any other men. He was a real misogynist. Something had happened in the residence which Neil wasn't happy about. There was an investigation which I that I think was carried out by either Mary O'Brien or PZY. It then came to me on appeal. It was nothing to do with child abuse or child protection and I determined that the best thing to do would be for the member of staff to be moved into the classroom support team. He was pleased with the outcome and remained there happily in that role for many years. That is the only instance I can recall. This was all recorded by Olivia Lovely.

Trusted Adult/Confidante

192. In a special school situation, it is normally the teacher, key worker or a favoured support staff member that a child would approach to if they had any concerns. There

was also a trained counsellor, and/ or psychologist to whom they could speak. There was also the opportunity for them to speak to anybody externally who had maybe mentored them or acted as a befriender.

193. I can't recall any children raising any concerns about staff members that I am aware of. There were maybe times where the children disliked a staff member and maybe the approach of the staff member wasn't right for the child. In those instances, it was up to the managers to manage them. Had a pupil raised a concern about a staff member it would be taken very seriously.
194. A child did once raise a concern with me, and it was unfortunate. A young lady who was about seventeen years old appeared in my room and was very angry. Luckily, I had a staff member with me who was a very good signer as the girl was signing at a very fast rate. The issue was that we had a weekend during which some rooms were being used for another event. It should only have been the eight unused rooms that were being used. However, one extra person arrived with the group and Ian Duncan who was the Facilities Manager, used his own judgement to accommodate the person in this girl's room.
195. On the Monday morning, the girl appeared at my door. She was rightly, in my opinion, angry that her room had been used. Poor Ian Duncan was beside himself because he was trying to do his best. The outcome of the complaint was misinterpreted because we had asked the young lady if there was anything that we could do to make it up to her, and to show her we were sorry. She asked if they could have an end of term disco, which had already been arranged by the senior pupils. I asked if there was anything else, she said a box of chocolates. Helen Greene was dispatched to get the box of chocolates. This was interpreted by some staff as Helen and I trying to bribe her to keep quiet about it. What they didn't know was that I had already reported myself, or the organisation to our lead person, Terry Carr, in the Care Inspectorate. I genuinely can't remember any other incidents.

External Monitoring

196. There were regular inspections but as I said before we had a nominated Inspector through the Scottish Office who was attached to us. Again, that was Mike Gibson who had also been the Inspector at my last school. Mostly he would meet with Mary O'Brien, PZY and PZZ. I would sit in and at the end and he would update me.
197. I was sadly not involved in the presentation for the Education Scotland inspection report, an extract of which is one of the documents sent to me by the Inquiry (Extract of DSD-000000043 (pgs. 14, 30-50). I was and still am sad, because I was appalled at the presentation made to the inspection team from Education Scotland. In fact, I was actually in tears after it because it was such a poor presentation. Mary O'Brien had done absolutely no work for it.
198. We had already paid for Mike Gibson and another ex HMIE person to come in and do an internal audit in preparation for the inspection, so that we would already know our strengths and weaknesses. I had documentary evidence to show that Mary O'Brien actually gave that to the inspection team before they came in. That was raised at the Board meeting where David Wallace, one of the Board members, actually said that it was the intellectual property of Donaldson's and he considered that Mary O'Brien had "sabotaged the inspection." By this, he meant that he had made their jobs very easy as they did not need to look far to see where we needed to improve.
199. Mary O'Brien's whole presentation was "We are on a journey; pretend we are on a little train and the train has got so far but it hasn't reached its destination yet." PZY and PZZ were absolutely appalled, and Mary O'Brien threw them to the wolves. That was discussed with me at great lengths with the inspectors. They saw me separately because they had reservations about the quality of the education management.
200. After the inspection, they expressed disappointment in the grades which I was already very aware of and very upset by. I was absolutely distraught. I could not see where

some of the grades had come from, but I accepted that it was the case, and it would give us something to work on.

201. What was more worrying was Mary O'Brien's attitude, which was that 'she didn't recognise her school, and walked out the feedback meeting. I think that is quoted in the report. That was a really traumatic time for me. The inspection was carried out as any other inspection would be. Alwyn Clark, whom I knew from before as we had been involved in setting up Conductive Education programmes and training, came up to me afterwards and was very sympathetic. She said she was very sorry for me personally. All my grades before at Stanmore had been fives and sixes and mostly sixes. This inspection was the first time I had ever had a three or a four.
202. That report is from 2013, and I am certain there was not a previous inspection in my time, however that would need to be verified by going on to the Education Scotland website. I can't recall there being one, but I feel there should have been. I have a feeling there may have been one done just before Janet Allan left. I have something in my mind that we were due an inspection at the time we were moving, and there was a concession given because we hadn't yet established ourselves in Linlithgow.

Shredded Files/Deleted Emails

203. There were files that were shredded whilst I was off the premises just before my suspension. The child protection files from both the residence and the school disappeared. The only thing I know is that I got a frantic phone call from the Facilities Manager to say that Mary O'Brien was in her office and she was shredding a lot of files. Tracey Haggerty, who was her secretary at the time, had asked her if she wanted help and Mary had bluntly told her no. Later, I suspected there might be a connection between the shredding incident and the disappearance of the CP files. However, I cannot even make an educated guess about why unless there was something she wished to hide.

204. We had already had a lot of issues around emails and files going missing and I had already asked Richard Burns if Michael Buchan and I could set up an independent review of IT. Prior to this, in fact, Richard Burns had already advised us that he, Michael, Helen, and the Clerk of the Board should resort to using our private email addresses when discussing the work of the Trust. We felt there had been a number of IT breaches. It appeared that everything between Richard and me was getting leaked to Mary O'Brien. I suspected this was the work of Brian McAllister, Mary O'Brien's son, who worked in our IT department.
205. This was further substantiated when Carol Wallace, a member of care staff whom I knew semi-socially, came to me saying she was really worried about an email she had received. She had put in an order to Mary O'Brien for something and the order had come back from Tracey Haggart who was Mary O'Brien's new secretary.
206. The email said something like Mary O'Brien has approved the expenditure but underneath it, attached to it, were two emails. One of them was an email Richard Burns had sent to me in confidence. Unfortunately, I think it was in response to one I had sent him about Mary O'Brien's performance. I think the second one was part of the same email chain. I don't have the copies, but they must be somewhere.
207. I still suspect the leak came from Brian McAllister. Brian had previously got in the back door and was appointed to our IT team. By this, I mean that he was initially brought in on a short-term contract to install and roll out new software which was being used in local authority schools about how to store children's files and reports. He had done this for West Lothian Council and possibly in Glasgow. It seemed sensible for us to use him. After he had completed this project, he managed somehow to get a full-time job at Donaldson's without going through the proper recruitment processes. I should have had a final say on this recruitment but because I was on holiday, he was appointed in my absence. Mary O'Brien was in charge in my absence. I cannot say why Olivia would have let this happen, but she maybe did not feel strong enough to contradict the second in command.

208. After Olivia Lovely left, Michael was aware certain files and emails were missing. There was no correspondence throughout the whole of Mary O'Brien's employment to and from Olivia Lovely. Everything had been expunged. Michael asked Elaine Jahanfur, the Head of IT, for access to all Olivia's deleted emails, and to emails which had been sent to Mary O'Brien. Elaine made a complaint against Michael Buchan to Richard, claiming he was harassing her. Richard wrote immediately to Michael and told him to desist from asking Elaine for information as she felt under pressure. Once again, Richard failed to provide support to us, while all the while knowing breaches already had led to us using our own email addresses. We were very disappointed and felt let down.
209. That started a furore with Richard Burns. The advice from the school solicitors, Law at Work, was to say nothing and bring in an independent company to audit the IT systems and department, as we had already suggested. We were in the process of identifying a suitable company when Richard decided to phone Elaine Jahanfur and say 'look don't worry about this, it's fine we are not going to bother doing that. We trust you, you do it yourself'. When Michael and I found out about that we had very difficult conversations with Richard because he had gone against what our lawyers had said. He had also allowed them time to delete any information, which they didn't want us to have. At this time, it became a very toxic relationship with IT. Mary O'Brien's son and Elaine Jahanfur, I think, were both complicit in the cover up. I think this was certainly true when my letter of appeal against my dismissal went missing and could not be presented to the disciplinary committee. By this time, Michael Buchan had resigned over what he considered to be mis management in many areas of the Trust by Richard, in particular, and the Board in general. He considered the Board to be weak and was failing to demonstrate due diligence.

Suspension

210. On 5th June, Helen and I were made aware of a collective grievance submitted to Christine Roebuck from a group of senior staff. The grievance was dated 16th April 2013. Why it took so long for this to be communicated to us, I was never told. Had the

grievance procedure been followed, there would have been ample time to sit down with the staff and resolve the issues. However, the school was about to go on holiday so yet another missed opportunity to sort things out at the lowest level without it escalating into the shambles it became.

211. At first, Richard Burns told us not to worry, and of course we did not need the support of our unions. When I asked if the grievance was against all members of the SMT or just Helen and I, he said he would check with Christine Roebuck. He later phoned and said 'Good news! Christine has confirmed it is only against you and Helen'. I felt this was jaw droppingly insensitive!
212. It wasn't that long after the result of the Education Scotland Inspection, that I was suspended. It took a while for them to get around to suspending me but by that time Richard Burns had been to see me and told me to stay in my office and not to speak to any of the staff. I was told not to meet with Mary O'Brien or Susan Hepburn or anybody else in case it exacerbated the situation! I wasn't to speak to anybody about the report or planning for the new term.
213. It became almost impossible to manage the school. Luckily it was coming towards the end of the term. My contract – because of the business development side – was five weeks holidays a year, so I didn't get the school holidays. Richard's advice wasn't helpful. I believe that Richard Burns and Christine Roebuck have got to take the majority of responsibility about what actually occurred thereafter.
214. Richard Burns was fed up being Chair and often paid lip service to his duties. He was becoming much less supportive and irritable. As an example, Mary O'Brien had been asked to provide management cover over holidays if I was unavailable. The previous summer, this had not been needed and therefore she was not due the extra payment to which the Board had agreed. She went to Christine Roebuck who spoke to Richard, and he agreed it – thus over ruling and undermining me – again!
215. Christine Roebuck was supporting Mary and PZY about the report and had 'bigged' them up that everything was going to be fine. She had caused quite a bit of bother with

the teachers because she had asked to go and sit in to do classroom observations. The EIS (Educational Institute of Scotland) refused to allow that to happen. It caused real ill feeling amongst the staff.

216. When Mary Mulligan took over as Head of the Board of Governors, she said to me that she didn't want to get rid of me, but she wanted to get rid of Christine Roebuck.
217. I told her that I had raised my concerns with Richard Burns about Mary O'Brien, but I had also raised them many times with Christine Roebuck, in her role as Chair of the Education and Care Committee. She aligned herself very much with Mary O'Brien and PZY .
218. I also had told her about my concerns about the pupils not being challenged enough. This was confirmed in the Education Scotland report when they queried the high staffing ratios in the classrooms. Once again, my concerns were not given credence. In her role as chair of the Education and Care Committee, she was ideally placed to make her own judgement.
219. I was surprised by the grades because my issues were always more to do with the educational management and not so much about the quality of teaching.

Other Staff

PTZ

220. I do not know PTZ .

PZY

221. PZY was employed at Donaldson's just after Mary O'Brien was taken on as Head. PZY was recruited by Mary O'Brien and the Care and Education Committee. I do not know what age she will be now.

222. I had a great respect for PZY but I was annoyed sometimes that she acquiesced too much to Mary O'Brien. In my opinion, she was very much more competent than she gave herself credit for. She was always in very early in the morning and met with all the teachers before they went to class which was a practice which I thought was very good. I felt she was a 'no nonsense' leader, who could pull a staff member up about something then return their relationship to amiable immediately afterwards.
223. I knew her professionally, but I wouldn't say I knew her very well on a personal level. I was maybe out with her about three times when we had meetings off the premises, and we might go for a meal or a coffee. I was in her house once when I was dropping her off after a meeting. She wanted to show me her father's medal as he had played for Scotland, and she knew my husband would be interested in me seeing that.
224. In my opinion when I saw PZY with the children, she was very professional, and the children seemed to have a good rapport with her. I never saw her disciplining any child, but they knew where they stood with her. I did see her reprimanding pupils, but she would take time to explain to them that maybe kicking a wall wasn't the best way to deal with frustration. I never saw anything that gave me any concerns.
225. I never saw her abuse the children. I never saw any member of staff abusing a child. If I had, I wouldn't have tolerated it and would have taken appropriate and immediate action.

PZZ and Moira Andrew

226. PZZ was brought in by Mary O'Brien and PZY. She was an older teacher, probably in her late forties or early fifties, but I believe she had not long qualified. In my opinion, she was very competent and she was one of the few people on the management side who actually understood the importance of attending out of hours activities such as School Fayres. She became SNR and was – I think – with responsibility for the primary curriculum. Moira Andrew was SNR with responsibility for the secondary curriculum. I believe she was a maths specialist.

227. PZZ was no nonsense but in my opinion was a very considerate person. She was someone that you could have a good conversation with, and you knew what you had discussed would be taken back and actioned. PZY was like that as well, but you couldn't say that about Mary.

228. I would say PZZ's relationship with the children was very good. She taught some of the younger pupils Maths (I think) and there was certainly a very good professional rapport there.

229. I never saw her discipline any children.

PHZ

230. I remember that name. I think he was a male teacher on a temporary contract for a while. He wasn't there that long but apart from that I don't remember much about him. He had grey hair, used to run to work and arrive in his running gear. He was maybe in his late forties, early fifties.

231. I never saw him with children.

PHY

232. PHY was a classroom assistant who was a very prominent member of the deaf group in the school. He was very opinionated. He was the staff member, who when he phoned up to ask for a meeting, demanded a BSL interpreter to be there.

233. We had a run-in before I left. We had a very generous package for the staff to encourage them to move from the Edinburgh school to Linlithgow which involved them being allowed to claim back their travel expenses.

234. After Helen audited the expenses, we found out that he and some deaf staff had been claiming their travel expenses. He had been claiming his for travelling on the train but because he was deaf, he got on the train for nothing, or a reduced fare. When I

challenged him about that, he said it was his right to claim and we were discriminating against them as deaf people because the hearing staff were getting their travelling expenses paid.

235. I said I believed it was fraud, and we claimed back all the expenses over a time. Helen and I were 'personas non grata' with many of the deaf staff after that. Please note, the savings accrued were then used to offer all staff and their families free health insurance.

236. PHY [REDACTED] also came to me when PWV [REDACTED] got hearing aids and wanted to be in the deaf staff group. PHY [REDACTED] came to me demanding to see PWV [REDACTED]'s hearing profile (which I would not have had anyway) to ascertain if PWV [REDACTED] was 'deaf enough' to join the group.

237. I would say he was in his late thirties, early forties. He was in post when I started and was still there when I left. I met with him a lot because he was a man that had lots and lots of things to say.

238. I saw him communicating a lot with children because he was a signer. I never saw him disciplining children.

KKW [REDACTED]

239. KKW [REDACTED] was quite new to the staff, and I believe she was a PE teacher. I would say she was early to mid-thirties, and she was attractive. Many of the senior boys – I would say – had a bit of a crush on her.

240. I didn't have the highest of regard for her teaching ability. We had low level complaints from some parents – not to do with abuse, but just her behaviour. She was just not very understanding. At a parents' night, a parent approached me about KKW [REDACTED]'s behaviour saying that she could be quite off hand with the pupils – and the parents.

241. I saw her with the children as I went to all the galas and sports days. I would say she still had a lot to learn about teaching pupils with additional needs. Although I had some reservations about that, I didn't see anything that raised red flags.

242. I never saw her disciplining any of the children.

243. I do know from it being brought up at SMT meetings, that there were a number of times that Mary O'Brien, PZY or PZZ had to meet with KKW to mentor her.

244. Before I left there was unrest about her. It was Mary O'Brien and PZY, who had issues about how she was relating to the children. There was nothing abusive to my knowledge but I know they weren't happy with her. As a result, she was given a mentor to try to improve her performance and relationships. I think the appointed mentor was either PZZ or Karen Hunter. Karen was the principal teacher in the primary.

PWV

245. I understand PWV had started as a classroom assistant, and he was an exceptionally good signer. He was already employed in the 'Old' Donaldson's in Edinburgh. I think he would be late 30's – early 40's at that time.

246. We advertised internally for a post of Worker, which was to help the children between sixteen and eighteen years old to move on into the wider community. PWV was responsible for setting up work placements, work experience and working with the young people in preparation for life after school. This project was the foundation for . We later appointed Liam Dunnachie, who had the necessary qualifications, to lead the project.

247. I knew PWV the same as any other member of staff. I don't form personal relationships with members of staff. I like to be friendly, but I also like to keep my reserve. I did the same with PWV but that was not the impression the school staff had. They were quite jealous of PWV because his work had won Donaldson's a number of

quite prestigious awards. They thought PWV was getting preferential treatment because of this.

248. I never gave him preferential treatment as evidenced by an incident around 2009 or 2010. It was brought to my attention by one of the members of the board, Tom Kerr, who was actually the Provost of Linlithgow. He came to me to say that Gordon Ford, who was the Head of Education for West Lothian was really angry about comments PWV had made at a meeting disparaging the work of the Council and asked what was I going to do about it. I told him I would investigate it and get back to him with the findings.
249. I opened my investigation which was supported by either Olivia Lovely or Michael Buchan. I spoke to PWV, who had a colleague with him, and he accepted that he had criticised West Lothian Council at a meeting. I explained that what he had said was very serious. I explained I would be investigating this, particularly as it reflected badly on the school.
250. I told him it was disrespectful and not very smart as the majority of our referrals came from West Lothian Council. We believed we were in partnership with West Lothian Council and the last thing we wanted was a staff member sitting at a meeting with them and criticising them.
251. I was in touch with Gordon Ford at the time and he said while he did not want removed from post, but he did feel it warranted some sanction. The outcomes were; that PWV would never allowed to attend any meetings of that level again unless accompanied by me (or later, Liam); he would write a letter of apology to Gordon Ford; and he would stick to proper procedures when talking to anyone out with the organisation. I gave him an official warning, which remained in his file.
252. It was dealt with thoroughly, and all parties were satisfied with the result. Gordon Ford wrote to me and said he appreciated the way it had been handled. It was all reported through the Board of Governors, who were happy and satisfied that it had been fully

investigated and a conclusion reached. Tom Kerr congratulated me on how well it had been handled.

253. Therefore, in my view, to say I gave him preferential treatment, was wrong. Again, the other incident that eventually led to him being charged and convicted, had never been reported to the police despite staff knowing about it. When I found out about it four years after the event, I suspended him, and I was the one who phoned the police.
254. I saw **PWV** working with the pupils, but I never saw him disciplining or abusing anyone. It wasn't until four years after the event that I heard about him abusing the boy at the party.

Documents

255. I have seen the documents I have been supplied with by the Inquiry.
256. Extract of DSD-000000011 (pgs. 1-11) is an Investigation Report into allegations of misconduct against me.
257. I genuinely don't agree with it because had I had any idea that there had been an incident of abuse. It wouldn't have mattered to me whether it was **PWV** or Neil Donald or anyone, I would have dealt with it. There had been a lot of chat about **PWV** – but I only found that out later.
258. In respect of the **[REDACTED]** incident, **[REDACTED]** said in her statement to Sandra Stewart, who was conducting the investigation into me, that she accepted that she knew that I hadn't known anything about the incident, and she held me in high regard. Mary O'Brien and Neil Donald didn't tell me about it. Nobody told me about it. As **PWV** was under my direct line management, I especially think I should have been informed immediately. When I did find out, I informed Mary Mulligan, now Chair of the Board, and Daniel Gorrie at Law at Work. Daniel. I also later informed the Care inspectorate.

259. It was a sort of moot point in that it was an incident which had happened off the premises. The water was further muddied by the fact that [REDACTED] said that there had been a witness to the abuse by PWV [REDACTED] on [REDACTED] and that turned out to be a lie to try to flush him out.
260. I didn't know a thing about it. It came to light because Olivia Lovely had picked up on rumours in the school that something had happened at [REDACTED]'s fiftieth birthday. I got called back from a meeting by Michael Buchan on Olivia Lovely's last day in post. She was moving on to another position in Edinburgh, and she had said to Michael that there were rumours going around that there has been an allegation of abuse made against PWV [REDACTED]. He had asked her what it was, and she had said it was something that happened at [REDACTED]'s fiftieth birthday party on a Saturday night, out with the premises. She was quite distressed.
261. Michael called me and said there was something going on. I didn't know that it was four years before. I was in Edinburgh at the time, and he asked me to come back as we needed to talk about it as it seemed to have been going on for such a long time, and nobody had picked up on the seriousness of it.
262. That was the first time I had actually heard about it. That was when I reported it to Mary Mulligan, and she sent me an email saying she was in Glasgow and that she would get back to me the next day. She said we would take advice from Anderson Strathern Solicitors, but I said we would be better to go to Law at Work because they were our school lawyers.
263. Michael spoke to Mary O'Brien who said "Och, it happened off the premises, it's nothing to do with the school, nothing to do with the school."
264. Michael and I decided that because it had come to our attention, we couldn't really do nothing. We contacted Daniel Gorrie at Law at Work and that is all recorded. I think Mary Mulligan also contacted him. However, she had led him to believe the incident had happened on the school premises. I told him that the incident actually happened at a party about four years before with a sixteen-year-old who was not a member of

our school community, and in the garden of a house when they were out smoking and drinking.

265. He said I would need to give him time to think about it as this information might alter his advice. He would need to think through what repercussions there were and determine the best course of action.
266. Daniel Gorry's view was that we would need to carry out an investigation, but we needed to consider its parameters. As PWV was on TOIL (time off in lieu) until the Tuesday, (this was Friday) this would give us the time to plan. It was agreed that we would keep him on TOIL and not allow him into the school, if by any chance he turned up.
267. That plan did not work, as Mary Mulligan had a knee-jerk reaction and changed her mind. She sent me a very rude email informing me that I had to suspend PWV straight away. It was a Friday evening by that time, and I had to suspend him by phone. I don't think that is ever a good way of doing things, but I did it and he was suspended that night. This was against the advice of Law at Work, who had wanted more time to seek legal guidance on it, but I had no option but to suspend PWV by phone. This was not good practice in my view.
268. PWV was gobsmacked when I told him and was actually really, desperately upset. It possibly wasn't what I should have done, but I did phone him about an hour and a half later, because I was seriously concerned about his mental state. I said it was something we had to do and that I would make sure it was investigated as quickly and as painlessly as possible, without giving him any indication of what the outcome might be, but yes, I was concerned about him.
269. I do not think Mary O'Brien or anybody else had spoken to him about the incident before. I got the impression that this was the first time it had been raised with him. However, if he had been spoken about it, maybe he thought that it was all in the past. From Mary's comments to Michael, I don't think anyone had spoken to him before. I told him there would be lots of opportunity for him to give his side of the story, when

the investigation was set up. I told him he was entitled to union representation, but I doubt he took that in.

270. I then contacted the police. I also contacted the local Education Authority, and I contacted the Care Commission. As far as I was concerned, I had done everything that I should have done.

271. The police came to see me in the summer holidays, and we went over it. I don't know who was interviewed or anything like that. After that, it was a police matter, and no internal investigation was carried out.

272. To be honest, even when I heard about it, I was concerned about why neither [REDACTED] or her husband had called the police. I also wondered why they would go to bed leaving their vulnerable underage son with a possible abuser. I couldn't get my head round that. I also couldn't understand why she continued to work beside him.

273. The allegation was that ^{PWV} [REDACTED], whilst they were out smoking and drinking, had touched [REDACTED]'s bottom. I assume he must have told his parents that night. I was confused by why they didn't remove ^{PWV} [REDACTED] from the premises or bring their son indoors. That to me, when I heard about it all, was all very confusing because if that had happened with my nephews or stepchildren, I would have been proactive in calling the police and removing them from possible danger.

274. I found no record anywhere that Mary O'Brien or Neil Donald had done anything about it. Michael Buchan had looked through all the personnel files and there was absolutely nothing in any of them. There wasn't a CP1 form – there was nothing in his file, and there was nothing in Olivia Lovely's files, which was understandable as she only heard about it on her last day in post. I believe that to be true as she was a very meticulous worker and notetaker. I know if she had known about it, Olivia would have reported it to Michael and to me.

275. Neil claimed in his evidence to Sandra Stewart, when she was investigating my situation – and again at the GTCS hearing – that he had given me three CP1 forms

about this (on 3 separate occasions) and I had told him to go away because it would damage the reputation of the school if anything came out. I can assure you that is wrong and the fact that at the GTCS hearing, it was proved beyond doubt that he had not given me any forms. That was substantiated both in Mary O'Brien's and PZY's evidence, so it was clear he had never ever done anything about it.

276. He was a very malicious person and the outcome of the GTCS investigation was that he was a disgruntled member of staff, who had taken a grudge against me and was doing everything he could to make me lose my job, and destroy my reputation. This is what I still believe. Unfortunately, I do not have a copy of the ruling as I shredded all my paper files before I moved house after the death of my husband.
277. I was absolutely gobsmacked that staff at the school had known of the incident for four years and hadn't thought to bring it to my attention. I suppose, on reflection, it was because they thought I knew. Why neither of the parents contacted the police remains a mystery to me.
278. I have no idea how it took four years to come to light. Neil Donald knew about it – hence his lies about the CP1 forms, as did Mary O'Brien and PZY. There was no mention of any of them raising this at any Education and Care meetings or any other meetings. If they had done so, it would have been documented in the meeting minutes.
279. [REDACTED] apparently had shared what had happened with Moira Andrew, and Marjorie Douglas. Everyone in the school had a responsibility for child protection and that was very clear in the guidelines. None of them reported this through the proper channels to ensure it was investigated and the pupils protected. Later it became clear that many other senior staff knew about the incident including Joe O'Donnell, the audiologist.
280. What really hurt me about the whole thing was that at that time – over that four-year period, [REDACTED] and I both worked late. I didn't go home at five because the traffic was horrendous, so I worked late. I would say possibly once or twice a week

over that four-year period, [REDACTED] would come up to my room and have coffee. Her daughter, who has since died leaving 2 small children, had developed ovarian cancer. [REDACTED] used to come regularly to speak to me and she cried a lot about her daughter's situation. The incident with PWV and [REDACTED] was never mentioned. [REDACTED] accepts that she never mentioned it with me because she thought that Mary O'Brien had told me about it.

281. I was also sent Extract of DSD-000000043 (pgs. 20-34) an Employment Tribunal Claim Form and Extract of DSD-000000043 (pgs. 14, 30-50). Page 14 is the letter from Donaldson's Governor to me saying that my appeal had been unsuccessful. Pages 30-50 are two versions of minutes of the meeting with me, Donaldson's staff, and HMIE after a concerning May 2013 inspection.
282. I was appalled when the letter came in saying I was dismissed especially – to rub salt in the wounds – as it was delivered by a courier who was very young, and Donaldson's had instructed her to wait until I had opened and read the letter. My husband Ron was absolutely furious. I just felt they had it in for me. I feel so stupid that I opened the letter, read it in front of her and burst into tears. At that time, I was severely depressed and stressed, as was my very supportive husband. I don't think I will ever fully come to terms with how my career ended. I think the Trust acted appallingly, and yet there was no comeback on it.
283. One of the other disadvantages that I had was that my letter of appeal was never received by the disciplinary committee. I have sent a copy of the draft of this to the Inquiry, **which I would like appended**, as much of this my statement focusses on this event. The committee was Tom Kerr, [REDACTED], who was a parent and another governor, who was hard of hearing. Despite no one on the panel using BSL, two BSL interpreters were also present. When Drew Morrice, my union representative from EIS, told them I had submitted a letter of appeal, they did look genuinely confused and said they didn't have it.
284. I assured them I had sent it in, and Paul Campbell, who was the HR person at that time, was dispatched back to the school in Linlithgow to find out where it was. He

searched the servers with the help of the IT department, but there was no trace of it. As I said, in it were a lot of comments about IT breaches and Mary O'Brien's behaviour. I surmise that the document had been deleted by Mary O'Brien's son, Brian McAllister.

285. Drew Morrice and I both said to the committee that we didn't think I should go on with the appeal without my contribution being there. We offered to photocopy a copy for them there, but Tom Kerr refused this. Our request was overridden. In hindsight, we should have walked out. Drew Morrice wrote a letter of complaint about the missing document and them refusing to use our copy. We were asked to vacate the room, and the meeting lasted ten more minutes. We were recalled and I was dismissed by the disciplinary committee working on behalf of the board.
286. Extract of DSD-000000046 which is a letter from me to Mary Mulligan, was also sent to me by the Inquiry.
287. There was a significant issue around IT breaches, which Richard was aware of yet, it came to the disciplinary, no one cared. I had been given huge support from Richard Burns who told me not to worry about the grievance – that it would be fine. Graham Bucknall, who was the assistant chair of the board, had written to me – and this is in my letter of appeal – to say how much the Trust needed me, and not to worry about it.
288. When the situation around the grievance escalated, Richard phoned me. He said, "Look this is going to pass." The grievance had come in, in the February and it wasn't until April that both Helen and I had been made aware of it. The grievance procedure hadn't been followed. The procedure should have been to sort out any grievances at the lowest level possible and I had already said when I found out about the grievance that I was prepared to meet with the staff group, go over everything and was happy to get it sorted out at the lowest level. It was agreed that that was not going to happen because neither Richard or Christine thought it was important. I don't know why Neil – or Mary O'Brien – had as much clout with the Board. Latterly especially, they had far more support than I did. I believe I always worked hard and did my best in all areas of my role for Donaldson's, and yet I was the one who was thrown out

289. Donaldson's did not have any idea of the grievance procedure. Richard phoned and asked what age I was. I told him I was fifty-nine and he asked when I was going to retire. I told him my plans had always been at sixty-two. I asked him if he was asking me these questions because they wanted rid of me and he said, "Oh no, no we are just wondering." He also asked about my health.
290. At that time, the Doran review was coming in, which was going to be reviewing Special Schools. The GAS Schools were going to be considered. This was to be a 5-year review, with one of the suggested outcomes being that instead of getting a grant of sixty per cent from the Scottish Government, each GAS School would have to bid for grant on a project by project basis. It should be noted that the review went nowhere and eventually was disbanded.
291. I had told Richard in that telephone call, that I understood the importance of continuity and that I wasn't going to still be in post at its conclusion. I said that if he felt this was the time for me to go, I had a counter proposal for him. He asked what it would be, and I told him that as well discussing a package for me as I would be taking early retirement, I suggested that the Trust might consider putting me in charge of the expansion of [REDACTED]. My vision was to set up eventually a residential and day provision/ college for young people who were deaf or hard of hearing. The nearest college for deaf young people was down in England. I said that was where my vision was taking me. He then asked if I was up for a fight. I thought he was talking about the Doran Review, and I said, "Well you know me, I am always up for a fight when it comes to you know politicians and things like that."
292. That was what I had understood he was meaning. How wrong I was. I discovered that they had already decided to hold a disciplinary against me and the fight that he was referring to was the fight for my job and my reputation, not a fight for the school in times of the Doran review.
293. Sandra Stewart who was the investigating officer, had a foot in each camp. She was supposed to be investigating me but at the same time she was saying to me "This isn't fair, what you need to do is get the EIS to contact their lawyer and arrange a package."

I was thinking why are you saying this, as you are saying this when you are investigating me? I put this in my appeal – that she had recommended two years' salary and an enhanced pension. When Drew Morrice – on her say so – contacted Anderson Strathearn, they hadn't any knowledge of that.

294. I was also sent document reference number SGV-001033134 – Letter to Janice MacNeill from Parents of a pupil (20th Jan 2013).
295. I note that my response to that letter is not included in the file of documents sent to me, nor the action plan that I had sent in response to receiving the letter.
296. I acted upon the letter immediately. From my recollection the family had three children, all with additional support needs. While I can't remember the entire outcome, it was certainly taken seriously. I recall having a meeting with the pupil's parents, and we then held a multi-disciplinary meeting to determine the best way forward. I think we recommended that we moved her into another class, with a different teacher. I met again with the parents and – as I would always do – I wrote and confirmed the outcome. My recollection is that they were satisfied with the end result.
297. I also remember speaking to the pupil's mother both on the phone and at our Parents Staff Association of which this parent was actively involved. To my recollection, nothing was raised thereafter, and the situation returned to the normal process of reviews.

My Appeal to General Teaching Council of Scotland

298. I sent documents into the Inquiry about my appeal. I couldn't find the final document but what I have sent was the draft which went to the solicitor representing me, Jamie Foulis.

299. I would like to state for the record that in 2016, my appeal to the GTCS was upheld. I was cleared, as they said there was no case to answer and I retained my 'fitness to teach'.
300. This appeal was a long time after my dismissal, and both my husband and I were badly affected by all this.
301. The first person the GTCS interviewed at the appeal was Neil Donald. He came in like a peacock and started going on about how horrible a person I was. I was sitting quite a distance away from him, and as I am partially deaf, I asked Jamie Foulis to ask Neil if he could speak up. Neil started shouting 'That's typical, that's typical, that just shows exactly what I am talking about. I'm speaking and she's got to speak over me'. Jamie Foulis and the board were quite taken aback. Jamie said, "Actually my client is just asking for Mr Donald to speak up, and I think because she is deaf, it would be a good idea to move the tables around so that Mr Donald is in front of her."
302. That set the tone for the whole process. Neil Donald was very nasty. He said that I had been aware of the allegation against PWV. However, there was no evidence of this. He was allowed to talk, and I think they let him do so as I think he 'dug his own hole'. As far as he was concerned, I was 'Attila the Hun', and I controlled everything.
303. Despite being cited to appear, Mary O'Brien didn't attend. I don't know why, but I suspect she was scared, although I was never told the official reason. She would say it was stress because that was what her excuse was for everything. PZY was never asked to appear.
304. appeared and was very anxious. She said that she completely understood that I knew nothing whatsoever about the issue and that she had full confidence that if I had known I would have done something about it. She also reiterated that she had always held me in high regard.

305. John Chalmers, my previous chairman of the Board of Governors came in, and was very fair and reasonable. He discussed my performance. He was asked if he would be confident to employ me again and without hesitation he said yes.
306. The GTCS upheld my appeal and said there was no case to answer. The Donaldson's Trust had also said that I was not a suitable person to hold a PVG. However, as a result of the GTCS hearing, this was dropped, so I retained both my 'fitness to teach' and my PVG.
307. In the letter confirming my 'fitness to teach' after the appeal, it actually said that it was a disgruntled member of staff, Neil Donald, who had something against me and the GTCS were of the opinion that it should never have got to this stage. (This is my recollection as I did not retain all the paperwork from this nightmare time.)
308. The Donaldson's Trust compensated me for not taking it to tribunal. We were meant to go to an Employment Tribunal before the GTCS appeal hearing. On the Friday night before the tribunal, which was scheduled for the next week, I got a phone call from Anderson Strathern Solicitors offering me a settlement. I was offered £40,000. This was not the amount my salary would have been over the period since I was dismissed, but my husband wasn't well at the time and the whole thing had a huge mental effect on me and my family. I had to make a value judgement as to whether or not I could justify putting ourselves through for another four days.
309. My lawyer Laura O'Neill, from McLay, Murray and Spence Solicitors said that she was very confident that we had a strong case because we had an excellent evidence trail, as well as an age discrimination issue. I wasn't in it for the money. I wanted to be vindicated. I had had an unblemished career over forty years. It was a traumatic time. I am sure my lawyer will still have the documentary evidence.
310. I didn't want it to end the way it did because I don't think Donaldson's would be in the situation it is just now if I had still been there. I don't mean that to sound arrogant, but the school is lying almost empty at the moment; the residence isn't used and there are

only about a small number of 'neuro divergent' pupils there. It no longer specialises in deafness.

311. My view is that if I had still been there, we would have opened it up as a college of further education for people who are deaf within Scotland and the North of England. That empty residence is beautiful and all the technology we put into it and the school will be lying virtually unused.
312. I think our [REDACTED] project would have been an excellent feather in the cap for Scotland. As I knew I wasn't going to stay for five years to take forward the Doran Review, I offered to step down and run [REDACTED] part-time, working three days a week, to allow whoever the new Principal was going to be to take on the advancement of Donaldson's under the new Doran Review. This was never considered.

Staff with Knowledge of Allegation against PWV [REDACTED]

313. [REDACTED] said both in her statement to Sandra Stewart during the investigation and at the GTCS hearing that Mary O'Brien and PZY [REDACTED] both knew about the allegation because she had met with them frequently. Mary O'Brien had told [REDACTED] that it was going to be discussed at the following week's SMT and [REDACTED] had thought that was a really good thing. She never heard anything back so she went to Mary O'Brien who told her it had been discussed but nothing would be done as it was out with the school. This was a lie.
314. According to [REDACTED]'s testimony at the GTCS appeal, Neil Donald somehow knew about the incident, and a number of other staff knew of the incident. [REDACTED] said in her statement to the GTCS that she accepted completely that I knew nothing about it. She said she had no idea why she had not asked me when meeting and having coffee regularly over that four-year period. I would have told her I knew nothing about it – but I would have made it my business to find out.

315. Sandra Stewart has also said that she completely accepts that I knew nothing about it, and that [REDACTED] held me in high regard.
316. Michael Buchan actually resigned over the way I was treated, and because – as a respected HR professional – he was not trusted by the Board to be independent. I also heard that Paul Campbell, who took over and was present at the disciplinary hearing, also resigned. Hearsay from an ex-member of staff said that Mr Campbell told her he was appalled by the process and that was partly why he too resigned. Donaldson's lost quite a few people over their mishandling of the situation.
317. I do think there was a bit of a witch-hunt against me but I think it was also that Mary O'Brien was, to use [REDACTED] PZY's words, always in such a spin that the allegation about [REDACTED] PWV would have been an annoyance and an inconvenience to her. One of the things that I find really strange is that she knew there was an allegation against [REDACTED] PWV, but she still timetabled him to take young people out on an individual basis to work placements, to the Deaf Action club, and on work experience. I would also consider [REDACTED] PZY to be complicit in that too.
318. If I had any indication that a staff member was under any sort of investigation, or had been accused of something like that, the last thing I would have done would have given them the opportunity of being alone with young people. If I had known that there had been gossip about somebody having abused a young person – whether it had been on the premises or not – I certainly wouldn't have been allowing them to go out in their own car with individual young people. [REDACTED] PWV had a [REDACTED] condition, and he had dispensation to use his own car when he took the young people off site. I certainly wouldn't have sanctioned him taking out individual young people like that and Mary O'Brien and [REDACTED] PZY should have known that as well.
319. If the non-reporting and lack of investigation into the incident involving [REDACTED] PWV had been investigated properly and it was found that Mary O'Brien had known about it but failed to do anything about it, she would have been investigated for gross misconduct. I certainly think that both she, [REDACTED] PZY and Neil Donald – as well as

other senior staff – failed in their duty of care. I understand that Mary O'Brien has now changed her name.

Conviction of PWV

320. I know that following my reporting the incident to police, PWV was found guilty of the offence against [REDACTED] at court. I do not have any idea about what evidence was presented or sentence or he got.

Other information

321. I feel I was very badly treated by the Donaldson Trust, and as Principal was made a scapegoat to hide the inadequacies of certain staff members, and the lack of proper governance in the Trust in the latter years of my career.
322. A further indication of poor governance is evidenced by the fact that they never even heard the grievance against Helen Greene and myself despite frequent requests by Helen Greene and I to do so.
323. I never spoke to the press – despite many requests for interviews – unlike the Trust. I never felt I have had the opportunity to give my side of the story. It is with regret that it is the National Inquiry into Child Abuse has given me the opportunity.
324. 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.. [REDACTED]

Dated.. 25/8/25