

Scottish Child Abuse Inquiry

Witness Statement of

KOO

Support person present: No

1. My name is KOO. My date of birth is 1953. My contact details are known to the Inquiry.

Background

2. I left school with my school leavers certificate. I then got my City and Guilds in plumbing and worked as a plumber until I became unemployed. I then decided to get a job as a prison officer. That was all in England before I moved to Scotland. I met my wife on a holiday in Majorca and we decided we wanted to move to Scotland. We moved to Scotland in 1981.
3. My first job in Scotland was at Raisdale, a Salvation Army adolescent home, for a few months before I went to Redheugh. That was in Barrhead. I then moved across to Redheugh because it was nearer our home.
4. I applied for the job at Raisdale when I was in England knowing that I wanted to live in Scotland with my wife. HDD was in the Salvation Army and my wife was in the Salvation Army. She asked him if there were any jobs and he gave me an interview, that was me. I guess I would have provided references, but I can't say for sure.
5. I don't think there was a need for me to have any specific knowledge or experience, it was mostly based on character. There was a probation period, but I don't remember

what that was. I do remember both Raisdale and Redheugh had probation periods for new people coming in.

6. Raisdale had a similar age group to Redheugh, about twelve or thirteen to sixteen or seventeen year olds.
7. I'm not sure what it's called now but the only qualification I have is a Social Services Certificate. I'm sure that's what it was called back then. I completed that course over a year at Langside College in Glasgow. That was after I had started at Redheugh. I didn't have any qualifications or training for working with young people before I went to Redheugh. The course at Langside was the first formal training I had and that was basically it as far as qualifications were concerned in those days.

Redheugh Adolescent Unit

8. I did go along to the Salvation Army church but I was never really a member. I went to church on a Sunday but I wasn't in uniform when I first started working with them. That all came much later on after my time at Redheugh.
9. I went into Redheugh in 1982 as a houseparent. I know it was that year because it was the same year we were married.
10. I put in for a transfer from Raisdale to Redheugh. I made it clear that I wanted to get over to Redheugh because it was nearer our home. When I started at Raisdale, **HDD** was both places so I put in for the transfer and he got me across.
11. Redheugh was a big building in big grounds with a long driveway. There was a gatehouse at the bottom of the drive where Joe Sanderson, one of the staff, and his family lived. At the top of the drive was a parking area and the main building. There were some other smaller buildings to the right hand side, a laundry, the Minimum Support Unit and the Craft Unit.

12. The Minimum Support Unit (MSU) was for older kids who were getting ready to leave care. I think they were all about sixteen, but that's a guess as I didn't have much to do with that unit. I was in the McGregor Unit.
13. The Craft Unit was for kids to learn all sorts of crafts. I used to go and help out in there on a Monday night. They had a craft instructor and between the two of us we did all sorts of crafts with the kids. We did painting, pottery, you name it, just whatever the kids fancied.
14. I thought there was a very supportive culture at Redheugh. The staff were supportive of each other and were good with the kids. I would describe it as a happy place. I have found out other stuff since then, because of Stewart Burgess, as the police came to interview me about him. That's all in hindsight though.
15. The relationship between the staff and the kids was easy go lucky, in general. We went through a period when we had the skinhead culture and some kids wanted to rebel a wee bit but other than that I thought the relationships were quite good. A lot of the kids got on well with a lot of different staff.
16. Some kids got it into their heads that the skinhead culture was the way forward and wanted to rebel. That impacted at school because the schools didn't like them going with shaved heads and wearing bovver boots. We allowed them to dress like that at Redheugh, there were no restrictions on how anybody dressed. We would explain to kids that they were drawing attention to themselves but there was very little we could do. There was sometimes a little friction with the school and someone might get sent back to the home but they would just get some chores to do around the house.

My time at Redheugh

17. I was a houseparent all the way through. I did that job until I left. I think I was there for about ten years, so I would have left around 1992. I'm not sure of all the dates.

18. I did day-to-day work with the kids, made sure they went to school, worked with the social work department regarding any orders the kids were under, made sure they got their home leaves, all that kind of stuff.
19. As a houseparent we had to make sure the kids in our unit got up in the morning, got washed and dressed and went for some breakfast. We would make sure they were on the school run if they were at school. We made sure they got out to their work alright if they were working, some older kids were out working. We made sure they had all they needed for the day, a packed lunch or whatever.
20. It was shift work, we had an early shift from about 8am until about 2pm, a backshift until 11pm and then we had two people who came in for nights. The nightshift were employed as night people, and the only time anyone else did a night was if a nightshift worker was ill or on holiday, something like that.
21. I did work nights, but only very rarely as I didn't like nightshift. I don't like working nights, I never liked it in the prison either. That doesn't suit me. In my ten years I guess I only worked about five or six nights.
22. Where I worked, in the McGregor Unit, there was a little room next to the main office where the night staff would go. If you worked nights you were expected to be up all night, keeping your ears open making sure everything was okay, but we would be in that room or the main office.
23. The training that I went on at Langside would probably have been arranged by Elaine Jenks. She was the deputy and then the officer in charge at Redheugh when I was there.
24. I did go on courses from time to time but I can't tell you very much about them. I didn't do any training straight away, I guess it would have been after about six months that we started doing things.

25. I remember going to Bonskeid House up near Pitlochry for a couple of days, twice a year or so. We went as a class and we did all sorts of conference type stuff, talking about everything to do with the social work. That was all part of the qualification I passed. It's all very vague for me now I couldn't tell you what we covered on those courses. I did get certificates but I've not got any of them now.
26. I would have thought I had some induction training specific to Redheugh. I think I shadowed somebody, but that's just a guess, I can't really remember.
27. I did go to Langside College and that gave me an insight into how the social work system works in Scotland. Working with the whole spectrum, not just kids, so it was quite generic. I do remember doing health and safety type training at Langside. I thought that training was quite good then and I still feel it was appropriate training for those days. It was a recognised and proper course and was good thing to have, a good grounding at that time.

Structure and recruitment of staff

28. HDD [redacted] was SNR [redacted] at Redheugh when I started there. [redacted] [redacted] was SNR [redacted]. She became SNR [redacted] HDD [redacted]. I've no idea when that happened but it would have been during my first couple of years.
29. [redacted] always took more to do with the day-to-day [redacted] of Redheugh. HDD [redacted] later became the Director of [redacted] for the Salvation Army in Scotland.
30. The senior houseparent at each unit would have come next in the staff structure. The units were McGregor, Knox, Wallace and the MSU. My unit was McGregor and George Gillan was the senior houseparent. There were three staff in our unit in total. After the senior houseparent, the houseparents in our unit were Edith Gillan, George's wife, and me. Later on it became [redacted] and me, I think that was it.

31. George Gillan and Edith Gillan lived in a house [REDACTED] from Redheugh, so they were on site a lot. George was a nice wee fella, he got on well with the kids.
32. The nightshift staff I remember were [REDACTED], who's now dead, she was a relative of my wife. My father-in-law, [REDACTED], did nights at one point. He's now dead. Jean Jamieson, she was another who did nights and [HDF], I forget his last name. I think that would be about it during my time at Redheugh.
33. There were other staff at Redheugh, a secretary, who worked in the office in the main building along with Gina Johnstone, her husband David Johnstone was the gardener. There was also Glenn Allen, she was the cook and [RFF], [HDD] wife, who was a house mother. Later on Joy Gillan, who was George and Edith's daughter, took over as the housemother for the whole of Redheugh. Jim, I forget his last name, was the craft instructor.
34. [HDD]'s [REDACTED] style was very much about doing things together. If there was ever any physical work to be done he would be there with you doing it. I thought he was very good.
35. Elaine Jenks was similar, as in doing things with the kids, although she wasn't as hands on as [HDD] but she was great with the kids. One thing I remember Elaine doing was a ten minute informal chat with the dayshift before we started our shift. We would go into the kitchen, have a coffee and a slice of toast and discuss the day ahead and generally set the tone for the day. Just a little thing but it set the relaxed and decent tone that we had at Redheugh.
36. I wasn't involved in the recruitment of any staff. A lot of the recruitment was by word of mouth and I can't say how they did it. I'd guess it would have been [HDD] and Elaine Jenks that would have done the interviewing. It was certainly the two of them that interviewed me.
37. There was one volunteer, my stepson [RSM], he was a young volunteer at Redheugh. [RSM] was about eighteen. I have no idea what the process was for

assessing or vetting volunteers. Everybody knew everybody at Redheugh, and in and around Kilbirnie. RSM knew HDD and Elaine Jenks and other people that worked in the place so a lot of the recruitment would be by word of mouth.

38. I don't know to what extent references were obtained. I do know I had to provide references. I had to get a reference from the day-to-day SNR at Raisdale, RLX. He would have written something and he gave that to HDD HDD.
39. I guess a lot of that would have been character, your willingness to go the extra mile. That's what I would be looking for anyway.
40. I don't think I provided a reference to get the job at Raisdale. I can't imagine me going to the prison service and asking for a reference. That wasn't something that was normally done then.
41. I wasn't involved in the management of any staff at Redheugh. I was only ever a houseparent.

Training

42. I wasn't involved in the training or personal development of any staff at Redheugh.

Supervision / appraisal / evaluation

43. Supervision is separate to appraisal. Appraisal is looking at your overall performance over a year and how you want to progress forward whereas supervision is more about how you achieve all that. I can't really remember much about the supervision. I'm just not sure about supervision because you have to bear in mind that I would be working alongside the person that was supervising me. George Gillan was my supervisor and we worked alongside one another most days.

44. I'm sure we did a yearly appraisal. I didn't give any other staff appraisals but I'm certain I received annual appraisals from George Gillan or perhaps Elaine Jenks. I don't have any recollection of that though. I can't see it being anyone else because no one else knew me well enough, on a day-to-day working scenario, that could do my appraisal.
45. Elaine Jenks wasn't the sort of person that would let something like that not happen. She knew her job and was very good at it.
46. I was never involved in the supervision or appraisal of any staff.
47. I would have thought there would be supervision of the volunteers by permanent staff but I just don't know, I can't remember. I'm sure the least that would be asked is for an update on how they were doing, but I don't know as I wasn't involved in any of that.

Policy

48. I was not involved in anything to do with the policy in relation to the care of the children at Redheugh.

Strategic Planning

49. I was not involved in any strategic planning. I went to staff meetings but it was just day- to-day stuff, nothing else.

Children

General

50. Most of the kids were placed at Redheugh through the social work department and Children's Panels. I can remember going to a couple of Children's Panels.

51. I'm certain that virtually everybody that came into Redheugh went through Elaine Jenks. She was the one who would assess them and decide what was what, what schooling they would need and sorting everything out for their admission.
52. I don't know what kind of assessments were carried out on the children. I would guess it would be the usual social work stuff; kids that had been struggling in school or nicking stuff, that type of thing.
53. Sometimes social workers came into Redheugh. They had a boardroom with a big table and everyone would get round that and discuss things.
54. I do know that some of the kids came from terrible backgrounds where the parents were just awful. Information like that was in the children's files and we would read the files. Each kid had a file and we would go through them and update them as well. The files all contained background information on the kids.
55. Occasionally if a kid had something that was important to them, a photograph or a document perhaps, they would ask you to put it in their file, so they knew where it was.
56. Day-to-day information was all kept in the kids' files as well. If somebody was sent home from school, for example, that would be written up in their file. It would be the keyworker for the kid that wrote up the files or whoever was on duty in their unit. Every kid had a keyworker, which would be a houseparent.
57. I'm not sure how kids were allocated to keyworkers, I would guess that George Gillan would have done that as head of McGregor Unit. I imagine it would be based on who was available, how many kids each of us had at the time. We would have about four or five kids each and I was a keyworker.
58. As a keyworker, we would work with the families and the schools, not always bad stuff, there was good stuff as well. We would work with the kid, to try and help with what they were wanting to do, that type of stuff. We would maybe help the kid prepare for a

weekend away with their family and then when they came back spend some time with them to see how they got on. A lot of it was just general wellbeing.

59. The length of time children stayed at Redheugh depended on different things. Some move on to different places. I would think on average it would be one to two years, some more, some less, but it always just depended on individual circumstances.
60. The age group of the kids in McGregor Unit was from about twelve or thirteen up to about seventeen or eighteen. I think all the units were about the same but kids went into the MSU when they were a bit older. I think they stayed at the MSU until they were about eighteen.
61. Overall at Redheugh I would think there were about 25 to 40 kids. We had about eight to ten in McGregor Unit.
62. The staff to child ratio in McGregor Unit would usually be two to eight to ten, just however many we had staying at that time. We sometimes had three staff and sometimes had only one, perhaps during staff holidays. The other units would be much the same.

Mealtimes / Food

63. Glenn Allen was very good in the kitchen so the food was excellent. There was a good mixture of nutritious food. We had breakfast, then we'd have a morning roll and cup of tea, then lunch, I think an afternoon break, and then our tea. Teatime was around 4.30pm.
64. If a child didn't like the food that was on offer, Glenn would sort something out for them. If she could give them something she would.

Sleeping arrangements

65. In McGregor Unit there was one bigger room with four or five beds in it. Then there was a room with two beds and some single rooms. All the rooms were off the main corridor. Also off that corridor was the office, that was the main office for the whole building and the toilets, bathroom and shower room. There was another small room, I can't remember what was in there, and then a fire escape at the far end of that corridor.

Washing and Bathing

66. The kids all got up and washed themselves. I don't think it was just baths, I think we had showers, I can't remember. They could wash or shower whenever they wanted to, but if somebody stank we would tell them to go and have a bath or whatever.
67. They all brushed their teeth and took care of everything to do with hygiene. As a houseparent it was part of our job to make sure your kids were looked after.

Leisure time/trips/holidays

68. We played football almost every night with the kids. The only night they couldn't play was a Monday as they were at the craft unit. We did all activities, we walked the West Highland Way, we went swimming, we took them to the Magnum, a big recreational centre in Irvine with ice rinks and all sorts. We would get the kids into the minibus and do as many activities as we could, especially when many of them had never done anything like that in their lives.
69. We took the kids on plenty organised trips. Sometimes we would go away for a day trip and sometimes we would go on weeklong trips. Skiing, youth hostelling, canoeing, hill-walking, all sorts of stuff, all over the place.
70. Sometimes an idea would come into your head so you would ask whoever was in charge, get approval, ask the kids if they fancied a day out and off you'd go. Sometimes it was that informal.

71. I'm not certain if staff would be taking children to their own homes. That isn't something I ever did.
72. Staff might have taken children somewhere on their own, I don't know. You would need to have permission to take the child out the building, you couldn't just leave without asking whoever was in charge, we could never just walk out.
73. If I was taking kids out of my unit I would ask George Gillan. If George wasn't about it would be Elaine Jenks. I don't know if there were written records kept of who was in the building at certain times. There was no clocking on or anything like that.
74. Children did much the same with volunteers as they did with the houseparents but I think it would be more to do with leisure activities. The volunteers wouldn't have had as much access to the information held on the child. I don't think they would have had access to the files.

Healthcare

75. Houseparents would deal with any health problems. The kids did all have doctors and dentists, if they needed them, but it would be the houseparent that would initially deal with it. It might be that they needed to be kept off school, it would just depend on what the problem was.
76. I don't remember administering any medication. I don't think we liked to do that as we wouldn't be sure exactly what we should or shouldn't be administering. If it was something that had come through a doctor then I think the houseparent would take the place of a parent in relation to administering medication. I would have thought something might have been written in the child's file to cover anything like that, but I couldn't say for sure.
77. I'm not aware of any kids having medication that was to be taken to control their behaviour.

78. I'm not sure about seeking consent from parents for administering medication. If we went to the local doctor with someone who had an upset stomach and there was some medication provided I can't think that we would have asked a parent for consent.
79. I would have thought if someone was allergic to paracetamol, or something like that, it would have been in the kids' files and we would have known about that. It would have to be something serious if we were contacting parents. I can't remember ever having anything serious that would have needed us to contact a parent. I can't remember ever having to give any kid any medication or where it would even have been stored.

Schooling

80. We had kids at Redheugh who went out to the local school, Garnock Academy and other different schools as well; Auchendarvie Academy, Ardrossan Academy and, I think, one at St Michael's Academy, in Kilwinning.
81. We took the kids to school in the minibus, we did a school run every day and then picked them up at the end of the day. The ones attending Garnock Academy could walk as it was local. The school run could be done by any of the houseparents.

Chores

82. The kids had to keep their rooms clean and tidy. They would have to make sure their beds were kept reasonably tidy and no clothes were lying around. We did have cleaners though, one was a wee gem and the kids all loved her. Basically a lot of the housework was done by the cleaners so that was all very informal.

Visitors

83. The kids had social workers visiting fairly regularly, family would also visit from time to time and occasionally they had friends come and visit them.

84. Visits would normally be arranged through the kids' social worker. If there was no problem with the family, they could just phone us up and arrange to come and visit, that was never a problem.
85. As houseparents we would always check the kids' files to make sure there was nothing there that said family couldn't visit or if there were any difficulties regarding any visitors that might create a problem. I can't ever remember a family member coming to visit a kid that shouldn't have been there.
86. One of the things with sanctions, for example, was if a kid was misbehaving but came from a family that really looked after their kids, we didn't want to stop that, we wanted to keep that going. We would need to contact their social worker if that was the case and work something out.
87. Friends could visit as well. There wasn't really any vetting done for that. All the houseparents got to know the kids and their friends so there was no need for anything like that. Family and friends could all spend time alone with the kids if they wanted to, and sometimes they went out and did something. I would think that would be noted and recorded in their file.
88. There were more formal visits, there were social work meetings with psychologists and psychiatrists, that would be held in the boardroom. We would sometimes be involved in them but sometimes they spoke to the kids on their own. I imagine everything would have been recorded in the minutes of the meetings. That would have been done by the social work.
89. Social workers would also take kids out on their own as well. They would let us know what they were doing and I would guess it was all recorded and put in the files. It would just have been a one liner to say they had taken whoever out, for whatever reason.
90. Reviews were carried out for children regarding their continued residence. They covered everything, any behavioural issues, anybody that was making good progress and discussing where they might move on to, all sorts of stuff.

91. The keyworker and social worker would certainly be involved in those reviews and either the senior from the unit the child was in or Elaine Jenks.
92. I'm not certain about the discharge process. A lot would be arranged between Elaine Jenks and the social worker.
93. A lot of kids would come back and see us after leaving Redheugh. Sometimes it was years later and it was just to say hello, so there was always support available. I would like to think there was other support available when the kids moved on, but I don't know. I would say the social work department were the ones that followed that up.

Living arrangements

94. I lived near Redheugh. It was about a mile and a half away. The staff lived all over the place. George Gillan and his wife lived [REDACTED] away at the most. Joe Sanderson lived in the gatehouse, which was on the grounds. Stewart Burgess lived in Cumnock. ^{RSM} [REDACTED] lived in Kilbirnie, which was about two miles away. [REDACTED] lived about [REDACTED] away. Nobody lived on the actual premises, in the Redheugh main building.
95. All the staff, all the cleaners, everybody really, had access to the children's residential areas.
96. The night staff had responsibility for the children's residential areas throughout the night.

Discipline and Punishment

97. Every Friday George Gillan, [REDACTED], Edith Gillan and myself, all from McGregor Unit, would discuss any stopping of pocket money which was the main

discipline we used. That was because pocket money was given out on a Friday night. It would be between all four of us, or whoever was at the Friday discussion, to implement that.

98. One of us would then tell the kid they were having pocket money deducted. I actually made it a rule that George Gillan told the kid their money was being stopped because he wasn't keen on telling them that. I felt it wasn't fair we were all doing it and he wasn't so I told him he needed to do it as well, being the senior. We would then get the child into the office and explain why we were stopping their pocket money. It wasn't about being cruel, we would want them to learn from it, so it wasn't a case of being vindictive or anything like that. That was one of the reasons we did that as a team, so the child would see it was a team decision and not a decision by one person.
99. Stopping kids getting home at weekends was generally a last resort because if a kid had a good relationship with their family the last thing we wanted to do was stop them seeing them.
100. If a kid hadn't been going to school we would tend to just give them some extra chores during the day, in and around the house. That may not get dealt with at the Friday discussion as it could be that someone might get sent home from school mid-week and they would just get a chore or an extra duty to do that day in the house. That was how we dealt with things like that and that was about it when it came to punishment and discipline.
101. I can't remember if there was any formal policy or code of conduct in relation to discipline and punishment.
102. There was no discipline allowed by any of the older or more senior children at Redheugh.
103. Children could be disciplined for not going to school, for being aggressive, for hitting another boy, just basic stuff.

104. There was no physical discipline or punishments. Children were never segregated from others for any period of time.
105. I did discipline children, along with the other staff in our unit, just as I've described. We would stop pocket money, give them a job to do or, very occasionally, stop them going home at the weekend. Stopping them going home would have to be something reasonably serious, because we didn't like to stop kids getting to go home. Getting them home was the cement we were building everything on so we didn't like to do that.
106. An example would be someone hitting someone, and it being more than just a hit, an actual assault, something really serious.
107. There was no punishment book to record any punishment or discipline, it would be recorded in the kids' file. There was no central book, just the individuals file. It would be recorded by George Gillan and the staff member who did it. There would be at least three of us discussing it on the Friday so it would be down to them to record it on the kids' file.

Restraint

108. I would say there was no restraint used on children at Redheugh. I can't think that I ever used it. If two boys were fighting I would maybe pull them apart, that type of stuff but not actual restraint.
109. If I was pulling boys apart who were fighting I would probably have grabbed one of them by the arm or by the shoulders so they couldn't hit anybody. I would hold them by the arm or shoulders and tell them to calm down. I'd either hold an arm or shoulder to stop them hitting anyone or maybe a bear hug type hold to stop them swinging at someone. If that's termed as restraint then I would have had some involvement in restraint but that's as far as it would go. I can't think of any other circumstance.

110. When something like that happened, the children were never removed from the room and placed on their own in another room. The only time something like that might happen would be if you took them out the room and into the office, but they would never be left alone or locked in there. The staff would be sitting with them and talking to them to try and calm them down.
111. There was never any medication used to sedate or calm children down, no chance.
112. I would have pulled boys apart who were fighting, definitely, just as I've described. I wouldn't want them to hit me or anyone else. That was very rare, something like that, because there wasn't much like that happened at Redheugh, things never escalated like that very often.
113. I'm sure there would have been policies and practices relating to restraint at Redheugh. Things like that would have been covered at Langside College but it hardly ever happened. I don't think there was ever a training session to do with restraint. It wasn't something that was a priority, it wasn't a big thing.
114. If restraint was used it would absolutely be recorded in the child's file. If it had been a fight, it would be recorded in both the boys' files. The staff would all need to know to keep an eye on them.
115. I never saw excessive restraint being used on children at Redheugh. I would have said something if I'd seen anything like that.
116. I would have gone straight to Elaine Jenks if I'd seen anything like that. I wouldn't have gone to my senior, George Gillan, I'd have gone straight to Elaine. With anything serious, I'd have gone straight to Elaine Jenks.

Concerns about the institution

117. Redheugh was never the subject of concern to anybody or any agency because of the way the children were treated there. Not as far as I'm aware.

118. The only time there might have been any concern, which I had no knowledge of at the time, was when Stewart Burgess disappeared. I remember asking someone where he was, as I expected him to be in, but I was just told he'd gone. I was then told he'd gone 'under a cloud', but that was it, and that could have been a fall out with management or anything. I didn't know then if that was anything to do with any concerns about how children were being treated. That was the extent of my knowledge. Stewart was there one day then gone the next.
119. I've no idea to what extent parents were made aware of any of those concerns because I was not involved in any of that. I think it was all very hush hush. It was ages later, when Stewart Burgess was charged and it was in the papers, that I actually got to know the truth.

Reporting of complaints/concerns

120. If a child, or any other person wanted to make a complaint or report a concern the first port of call would have been a houseparent. If they didn't go to a houseparent I would expect them to go to the senior houseparent, so that would be George Gillan in our unit. However, Elaine Jenks's culture was such that any kid could go to her about anything. So I do think Elaine could have been the one someone would go to.
121. I don't think there was anything ever reported, I certainly didn't hear of anything. I understand it must have come out somehow about Stewart Burgess but how it came out and who it came out to, I don't know.
122. No one ever complained to me about any abuse. If they had I would have gone straight to Elaine with it. I wouldn't have gone to George Gillan because it cuts out the middle person, and it would probably have gone to Elaine anyway. If someone does approach you, you don't know how true it is and if it's false you need to know it's false. I'm talking about everything, all types of abuse, it has to be reported right away. Nothing was ever reported to me.

123. If there had been a complaint about something in my unit I would have gone to George Gillan to give him his place, but had it been somewhere else I would have gone to [REDACTED]. She was SNR [REDACTED] of the day-to-day [REDACTED] of Redheugh and was so professional. She had all the qualifications as well.
124. HDD [REDACTED] probably wouldn't have been at Redheugh as he had a different role at one point, he became the Director of [REDACTED]. It was really [REDACTED] that was SNR [REDACTED] for most of my time at Redheugh.
125. I don't know about the recording of complaints. I don't know if there was a complaints file. I would have thought that would be something Elaine Jenks would have dealt with, but I don't know.

Trusted adult/confidante

126. I would have thought that, outside of Redheugh, kids could have possibly gone to someone at their schools if they had any worries. They could definitely have gone to their social workers as well, that would have been the main people they could go to.
127. I would think the kids would have known how to raise any concerns or complaints, I'm sure that's something that would be discussed on their admission. That's perhaps what I would have liked to have happened rather than what I know happened but I would have thought that was something kids would be told on admission. So I can't say for definite that the kids were told that at admission.
128. I don't know if any children ever did raise any concerns or complaints to schoolteachers or social workers or anybody. No children ever raised any concerns or complaints with me. If they had, I'd have taken it straight to Elaine Jenks.

Abuse

129. I don't know if there was an official definition of abuse when I was at Redheugh. I know that in my own head it would be anything that's not wanted, be it mental, physical, racial, ageist, you know. I didn't ever see any behaviour at Redheugh that I would describe as abusive.
130. I did look hard at that when I was thinking about Stewart Burgess, I wondered if there was something I had missed or something I should have known about. Was there something I should have picked up on?
131. Never once did anybody ever report abuse to me. Nothing, not of any type.
132. Looking back, I would have said that, if any child was being abused or ill-treated, it would have come to light at or around the time it was occurring. I look at Stewart Burgess and ask how they came to know about him. That must have come to light somehow.
133. There were certainly enough keyworkers but there were other staff too, the cleaner was a wee gem and kids went to her with all sorts of problems. We had the keyworkers, the senior workers, all sorts of different people as well as people outside of Redheugh like the social workers, families and the schools, so I'm sure it would have come out if a child was being abused.
134. With the cleaner, she maybe wouldn't tell me if something was told to her in confidence. I would have thought she would have gone to a senior or Elaine Jenks. The cleaner never came to me with anything to do with abuse but she would maybe tell me to keep an eye on someone because they weren't feeling great or they were worried about something.
135. I don't know how abuse occurred at Redheugh and went undetected. I've no idea and that's why I sometimes ask myself about Stewart Burgess. I ask myself how he managed to do it.

136. He was in the MSU and I was in the McGregor Unit, so I didn't see what was going on in the MSU, and people did take kids out, but you were only meant to go out with people if you'd had it cleared. Stewart was a senior, so I don't know if he took kids out or if he cleared it with Elaine Jenks but everybody did take kids out and I certainly always went to my senior or Elaine Jenks to get clearance to do that.

Child protection arrangements

137. Child protection was just part of the woodwork. Everybody looked after the kids, that was what we did. I don't know that we were actually given guidance and instruction on how to protect children from abuse. I can't give you an example because I can't think of an occasion when it came up.
138. There must have been some form of training at some point but I just can't remember. I can't sit here, knowing what I know nowadays and say there hasn't been any training, there must have been, but I just can't think of it. I can't think of any in-house training or a day course I might have attended. It's quite frustrating for me.
139. I can't think what guidance and instruction was given on how to handle, and respond to, reports of abuse or ill-treatment of children by staff, other adults, or other children. I can't think of anything at all. All I can say is that if there had been any reports of any type of abuse or something I wasn't happy about I would have gone straight to my senior, George Gillan, or to Elaine Jenks.
140. I can't say anything about autonomy and discretion given to staff. I would be talking about my knowledge now rather than at the time. I can't place anything I remember doing. It would probably have been Langside College that would have covered child protection and how to respond to complaints of abuse.
141. I don't really know if there were any child protection arrangements in place to reduce the likelihood of abuse by staff towards children. There were obvious things like making sure people knew you were in the unit when you returned from somewhere

and if you were outside you had to tell people where you were going. I can't think of anything other than that.

142. Knowing what I know now, particularly about Stewart Burgess, I would say the arrangements we had in place at Redheugh didn't work, but that is in hindsight. It can't have worked if he managed to do what he did.

External monitoring

143. I'm not sure about inspections. We had that many different visitors to Redheugh and, as houseparents, we probably wouldn't have known who they were. Elaine Jenks would have arranged things like that and then shown visitors round the place. I was never involved in anything like that.
144. Children's Panel members came round occasionally. If someone was carrying out an inspection or something like that, I would maybe have a chat with them, but just chit-chat nothing in depth. I would guess that they would speak to the children but I don't know, I wasn't involved in that.
145. There were Salvation Army visitors came around as well. I think they were called provisional officers or divisional officers, something like that. ^{HDD} [REDACTED] was the [REDACTED] Director, so he would visit in that capacity as well. I'm not sure what the purpose of those visits was. I think it was just to say they had been and visited as it was the Salvation Army that ran the place.

Record-keeping

146. In addition to the record keeping I've already mentioned, there was a Night Book. The nightshift workers always filled out that book. Whatever had happened during the night was recorded.

147. I think there was also a Day Book and a Visitors Book. The Day Book was just general stuff like, a leak in the toilet or something like that. Anything to do with the kids went in their files.
148. I thought the quality of the records was pretty good. I would also say that it varied from houseparent to houseparent and keyworker to keyworker. Everyone recorded things slightly differently. The more you put in, the better the quality was and the more it meant.
149. All the kids' records were kept in the main office, which was next to the McGregor Unit. They were all locked in a file in there. There weren't any records kept anywhere else in the unit itself.
150. I don't know about historical records or record-keeping from before I was working at Redheugh. I know I definitely read through the files for the kids I was keyworker for and I would guess I read through the ones for the other kids in the unit as well. I couldn't tell you what state they were in.
151. I can't remember any kids making any complaints of abuse or ill-treatment so I would have to say, from my experience, there wouldn't have been any information recorded about any kids making complaints like that. I can't remember ever seeing anything like that in any records I read over.

Allegations of abuse

152. I have never been the subject of an allegation of abuse or ill-treatment of a child or children who resided at Redheugh, when I was working there. I have fallen out with kids, and they would maybe complain to another member of staff about falling out with me but never abuse or anything like that.
153. The Inquiry sent me a copy of Case Conference Minutes that were about a confrontation of some description between HPY and myself. I can't remember that

confrontation, I don't know what that was all about. That's the only thing I can think of, that might have been some kind of allegation, but when I received that from the Inquiry that was the first time I'd ever seen that document. There's never been anything given to me or anything further said to me about any of that.

Investigations into abuse – personal involvement

154. I've never been involved in any investigation on behalf of Redheugh into allegations of any abuse by staff or others towards children. The only investigation I've ever had any involvement in was when the police got in touch with me about Stewart Burgess.

Reports of abuse and civil claims

155. I've never been involved in the handling of any reports of abuse or any civil claims that were made against Redheugh by former residents, concerning historical abuse.

Police investigations/criminal proceedings

156. Years after the day Stewart Burgess left out the blue and I was told he'd just gone, I was contacted by the police and asked to provide a statement.
157. It wasn't until then that I learnt he'd been charged by the police with his first sexual abuse offence. The police came to me then and asked about the layout of Redheugh and whether or not it would be possible for him to go into certain places. I think one was to go into the laundry. I obviously told them it was possible but I couldn't say whether or not it actually happened. I told them I didn't know or suspect anything otherwise I would have reported it.
158. Then there was a second time Stewart was charged and I ended up going to court and giving evidence. They wanted me to give a description and layout of the building. I did

that from the witness stand and that was it. I wasn't asked anything to do with any abuse or anything to do with the children at Redheugh.

Convicted abusers

Stewart Burgess

159. I did know Stewart Burgess, he worked at Redheugh. He was there before me, right through until he left, which was still while I was there.
160. Stewart was older than me. I was 29 when I started at Redheugh and I would have put him in his forties then. I think he was a senior houseparent in Knox Unit when I started and he then went on to the MSU as a senior houseparent. He never had any role in relation to me. He worked in two separate units and neither were anything to do with my unit, McGregor Unit, other than the odd get together for the boys.
161. I thought I knew Stewart Burgess quite well, I thought I knew nearly all the staff quite well, but obviously we don't know somebody when something like that happens.
162. I did see him with children, definitely, and he was just like anybody else. There was never anything that I saw that made me think I wasn't happy.
163. I never saw Stewart Burgess discipline or abuse any children and I never heard of him abusing any children when I was working with him at Redheugh.
164. I did have personal dealings with Stewart, we walked part of the West Highland Way one weekend and I think Stewart wanted me to go because he knew I'd done the whole thing before. We went to the Drovers pub on that trip and I never saw anything then that made me at all suspicious about his behaviour.
165. On a day-to-day basis I would see him now and again around the house but he didn't work in the same unit as me, he wasn't in McGregor Unit, he did Knox Unit and then

the MSU. I would see him from time to time, in the passing, and I'd talk to him but I didn't know him that well.

166. Stewart used to always remind me of Michael Barrymore, the comedian, in his looks and behaviour. He was quite an extrovert character but didn't get involved in the football and stuff like that. I spent a lot of time doing the football with the kids in the evenings so I didn't spend an awful lot of time with Stewart.
167. Stewart had a bit of a warped sense of humour at times, not my sense of humour anyway. It was a bit weird, stuff he could laugh at but I wouldn't laugh at, not sexual or offensive just quite childish and frivolous, not my cup of tea. I suppose I'm just a bit more straight laced than he was. We were just different characters. There was nothing that I could have said that would have made me want to keep an eye on him. If there had been I would have done that.
168. RSM [REDACTED], my stepson, knew him better than me, he worked closer with Stewart than I did and when it all came out about Stewart, RSM [REDACTED] told me that he would never have believed it.
169. That day Stewart never turned up, I would have thought it was because of an argument with management, sexual abuse was the last thing I would ever have thought. No one told me what it was about at the time. I didn't know what it was about until after he'd been charged.
170. I don't know how Stewart Burgess was recruited, he was at Redheugh well before I was. I think he was well qualified, I'm sure he was and he did become senior at one point. I don't know what his qualifications actually were or what training he had.
171. I would think, if he was a senior, his supervisor was Elaine Jenks.
172. I don't know about any previous allegations of abuse ever being made against Stewart. The only time I found out about anything to do with Stewart was years after he had

gone from Redheugh. When he left there was no build up to it, no whispers, nothing, he was just gone, out the door, under a cloud and that was it.

173. As staff, we did wonder why he was away but it was obviously all kept quiet, because nobody knew anything about it at all. That includes **RSM**, my stepson, he worked with Stewart, and he knew nothing about it, otherwise he would definitely have told me.

Other Staff

HDD

174. I remember **HDD**. He was **SNR** at Redheugh when I started but I'm not sure when he left. I would guess he was there for about two years before he left.
175. **HDD** would have been towards sixty years old when I started. He didn't have much to do with my role. He did the **HDD** of Redheugh. I would go to him if there was something I needed to go to him with but I can't think of anything that I did need to go to him with.
176. He was involved in the rebuilding of the recreation hall, he came and gave us a hand with that. We did a garden fete every year and he had a big involvement in that as well. I remember doing part of the West Highland Way with him as well once. That was all staff though, there weren't any kids on that trip.
177. He was very amiable and the kids were very much at his forefront. Elaine Jenks was the same as him, that's why they both got on so well. He always wanted to do his best and I thought he was a very good **SNR**.
178. He was a very big jolly chap, he was outgoing and had a nice personality. I did know **HDD** quite well, because I did know him outside of Redheugh, I knew him

to do with the Salvation Army. He was in the Salvation Army band and he was a [REDACTED] as well.

179. I dare say I would have seen him with children and he would definitely have been good with children.
180. I never saw [HDD] discipline children, I never saw him abuse children and I never heard of him abusing children.

George Gillan

181. I think George Gillan was at Redheugh when I started but I'm not certain. I'm not certain if he was there when I left either. He was my senior houseparent, my direct line manager, in the McGregor Unit throughout the time we were both there. George would have been in his fifties when I started.
182. George was good, he got on really well with the kids, they loved him, he was like a grandfather figure. He liked a laugh, to have a bit of fun and got on well with the kids.
183. I did see him discipline kids because it was his job to do that. He was part of our Friday afternoon meetings when we discussed possible sanctions for kids. He would stop pocket money or weekend leave but that would be it. It was all the agreed proper discipline.
184. I never saw George Gillan abuse children and I never heard of him abusing children.

Allegations that have been made to the Inquiry about me

[HDT]

185. [HDT] has given a statement to the Inquiry. At paragraphs 55 and 56 of his statement, he has said, "*Some of the staff at Redheugh were brilliant towards me.*"

KOO had shotguns and he took me and another boy out shooting. We went up to the woods and he showed us what to do. The other boy was quite small so **KOO** stood behind him because of the kick from the shotgun. He asked me if I wanted a shot and I said yes, but I would stand against a tree to deal with the kick. I didn't want him standing behind me given what had happened when Stewart Burgess did that. He was fine with that but I don't know if he suspected anything given the way I didn't want him standing behind me".

186. First of all it wasn't two boys, it was four boys, as I can remember the day I took them wood pigeon shooting. It was all part of a field craft trip, so it wasn't just shooting. I don't remember standing behind anybody while they were firing guns. I don't need to stand behind anybody. That's all I remember about that. I can't think of anything at all from that trip that made me at all suspicious about anyone being abused, nothing like that at all. It was just a day out and as far as I remember everything went fine.
187. I do remember **HDT** he was a sandy haired lad. He was a nice lad, I quite liked him.
188. **HDT** goes on to say the following at paragraph 82 of his statement, "I told Wee Joe about Stewart Burgess slapping me in the incident at the laundry, but I didn't report the sexual abuse. I'm pretty sure Wee Joe would have told **KOO** about that because **KOO** was the senior member of staff for my unit. However, nobody came and spoke to me about that incident. Burgess came up with his story about why he had slapped me and that seems to have been believed. I didn't want to talk about the details of the abuse".
189. I was never a senior in my unit. **HDT** has that wrong. I was his keyworker and a houseparent at McGregor Unit.
190. There were two Joe's, Joe Harvey and Joe Sanderson, but Wee Joe would be Joe Sanderson who worked in Wallace Unit and lived down at the gatehouse.

191. If Joe Sanderson had been told anything by HDT [REDACTED], at the very least I would have expected him to tell me because I was HDT [REDACTED]'s keyworker. I can tell you Joe didn't tell me anything, I knew nothing about Stewart Burgess.
192. If Burgess has come up with a story that was believed then he must have explained it to somebody. It wasn't me because I wasn't a senior so I would have thought it would have been Elaine Jenks or George Gillan. No one ever mentioned anything about it to me, I never heard of Stewart Burgess hitting anybody.
193. If something like that had ever been brought to my attention I would have gone to either George Gillan or Elaine Jenks and reported it. As Stewart Burgess didn't work in McGregor Unit I would probably have gone to Elaine Jenks.

KQR [REDACTED]

194. I remember KQR [REDACTED] he was known as KQR [REDACTED]. He was a wee guy, very small and he was bullied quite a bit because of his size.
195. KQR [REDACTED] has given a statement to the Inquiry. At paragraph 45 of his statement, he has said, "*I did get visits from social workers, but I am not sure how often they came to visit. Sometimes they phoned the home to check on how I was getting on. If they came to the home to visit me, more often than not, either Burgess or KOO [REDACTED] would be in the room*".
196. I don't understand why Stewart Burgess would be in the room as he didn't work at McGregor Unit. I would have thought it would be George Gillan or Elaine Jenks, certainly not Stewart Burgess. I was KQR [REDACTED]'s keyworker so I would have been in the room. The kids always had opportunities to speak with their social workers on their own though, the social workers often took them out for an hour or whatever, there was no one stopping them speaking one to one.
197. If he's suggesting there was always a member of staff in the room, he's wrong, that wasn't the policy, the policy was to leave the kid with the social worker. That was

always the case unless there was a meeting and we needed to be there. We wouldn't be in the room normally, not unless the social worker or the kid asked us to be there.

198. At paragraph 53, 54, 55 and 56 of his statement, [KQR] goes on to say, *"Another member of the staff who abused me was [KOO], but that was mainly physical. He was an Englishman and heavy set. He was a complete bully to me and many others in the home. He would hit you in any way he could, which would usually be punches to my head and body. On other occasions, he would be holding me in choke holds, and other times it would be kneeling me to the thigh, giving me a dead leg. I can remember times when he was so angry he would physically throw me against my bedroom wall or throw me over the couch in the living area. There were times when he would kneel on my back as he held me down on the floor. I was screaming that I could not breathe. Sometimes the other boys would come to my defence and try to pull him off of me. He never had any fear about hitting me in front of other boys. I am not sure if there were other staff present when he was hitting me. He would do anything he could to upset me. I can remember I was due to have home leave, and at short notice he decided I had upset him and would not be getting out that weekend. He also made comments to me that I was not good enough to be going home. The abuse from [KOO] was frequent, but I cannot give exact time and dates. I do know I was being beaten so regularly, it would have been countless days throughout my time there, even during the same periods Burgess was sexually abusing me".*

199. That is absolute pure fabrication. No if's and but's about it, for lots of reasons. One was because I stuck up for [KQR] and that's why this has annoyed and upset me. On top of that, there's not one single member of staff would have stood back and watched anyone hit anybody. If any of that happened in his bedroom, that was right next to an office which regularly had staff in it. They would surely have heard things and wondered what was going on. He says that other kids saw it and helped him, if other kids saw it why didn't any of them raise anything? That is just pure and utter lies and is really annoying.

200. I would have sanctioned him, I would have taken his pocket money away from him or whatever, that would have happened. The weekend thing he's saying is absolute

rubbish, I wouldn't do that, taking a weekend from them could be important for them in the future, there's no way I did that.

201. I did not abuse ^{KQR} [REDACTED], absolutely not, in any shape or fashion. The passage of time has not affected my recollection at all because I never abused any kid at Redheugh in any shape or fashion. I certainly wouldn't go about clattering a little lad.
202. I can only think he's saying that to try and get money. I think that's what's driving him. It's the only thing I can think of. Nothing was brought up at the time by him or anyone else.
203. If a child was treated that way it would definitely be abuse. Just a slap is abuse, never mind anything else.
204. ^{KQR} [REDACTED] goes on to say the following at paragraph 51 and 52 of his statement, *"One of the punishments for misbehaving may have been a loss of privileges, such as no access to my cigarettes. There were sometimes that I was being punished and locked inside the room at the turret. I think I had been refusing to do something and I was left there overnight. There was nothing in that room, no window and it was freezing in there. I did not have any warm clothes on. This was Stewart Burgess again. When I stayed in the larger room at Redheugh, sometimes, during the night, some other unknown members of staff would come in and take one of the boys out of the room. If they were brought back, they were always crying in pain. Some were taken out and the next morning they were nowhere to be seen. The staff would just say they had been shipped out. I was never taken out of that room"*.
205. That is absolute fabrication. A lot of rubbish. Pure and utter nonsense. It's like something out of a movie. He has some imagination. He talks about people being locked in a turret at night. There is no turret, that doesn't exist, and if anything like that does exist I have no idea how it would be accessed. I've never accessed anything like that in all my years at Redheugh. There is no way on earth any staff member at Redheugh would have done anything like that.

206. No kid would be locked up anywhere overnight, that would be horrendous. There was never any segregation, there was no room for anyone to be segregated. The only thing that may have happened is having his cigarettes taken from him, that might have happened.

207. I know kids can be traumatised from being in care but that it is just pure lies. It shows you where his mindset was. I can't stress strongly enough how much he is lying about me hitting him, I would never have hit a kid, that really upsets me. He says other kids witnessed me hitting him, why have none of those kids come forward, it's all just pure fabrication.

ECK

208. ECK has given a statement to the Inquiry. At paragraph 145 of his statement, he has said, "*Near the end of my time at Redheugh I went with KOO, RSM and Stewart on a night away. We stayed at the Drovers Inn and they got me drunk.*"

209. I remember that, and we did stay at the Drovers Inn because we did part of the West Highland Way. So we did all go away but we never got him drunk, no chance. Stewart, RSM and I might have had a pint, and ECK might have sneaked a drink but we never got him drunk.

210. I liked ECK, I thought he was great guy, he got on well with the staff and he got on well with the kids. He was about sixteen or seventeen when he was at Redheugh. He always came across as helpful and I do think some of the staff had ECK talk to other kids occasionally but he was never involved in any discipline or anything like that.

211. The passage of time hasn't affected my recollection of these events. I wouldn't have been in anybody's company that got a kid, in our care, drunk. That just wouldn't happen. His recollection might be that he was drunk, if he sneaked a couple of drinks but I certainly wouldn't have been buying him drink and I don't remember him having a drink, not with us.

212. If a child was taken out and people got them drunk, I would consider that to be abuse.
213. I do remember that a female visited ECK when he was at Redheugh. I think she was a social worker. I don't know what kind of relationship they had. I didn't have an awful lot to do with ECK though because he was in the MSU. I never heard of there being anything untoward about their relationship. He never mentioned anything on that weekend away and that's not the sort of thing you would forget.
214. If I had been aware of them having a relationship that was wrong, I would have reported it. You can't sanction anything like that and by keeping quiet you would have been.

Documentation

215. I was provided with a copy of a document by the Inquiry, 'Case Conference Minute 20/1/1988) – Copy of ERC-000000123'. I have read this document and I can't remember any of it.
216. In the document it says, "HPY had been moved, on an interim emergency basis, from Redheugh to Geilsland because of a short accumulation of difficulties culminating in a physical exchange between him and KOO".
217. All I remember about HPY was that he was a tall blonde lad that would expose himself regularly to female staff. I can remember being at Pollock Swimming Pool with kids from the unit on a number of occasions, but I can't remember ever falling out with HPY at the swimming pool. I have sat and thought hard about it but I can't think what that incident was all about. I don't know if he got mad at me or what it was about.
218. HPY was in my unit, McGregor Unit. I can't remember how long he was there. I would guess that he was about fifteen or sixteen.

219. I'm not saying him exposing himself was one of the difficulties that culminated in anything, I don't remember any physical exchange at all. There were staff, female cleaners, who complained about his behaviour. I'm not sure what action was taken about that.
220. I've read those minutes over and over and it's really annoyed me because I can't remember a thing about that.

Leaving Redheugh

221. I left Redheugh because it shut. I had to get a job elsewhere, at Wallace of Campsie House in Glasgow. I think Elaine Jenks gave me a reference and I know it said I had been a good staff member and that I was trustworthy. HDD got in touch with the officer at Wallace to say they should give me the job because I was a good staff member and was trustworthy. The officer told me I had been recommended.
222. When they closed Redheugh it was HDD and a Hugh Rae, who was a provincial officer with the Salvation Army, that came to shut it. They sat all the staff around a table and told us what was happening. The reason it had to shut down was to do with money, it was too expensive to run, which was a shame. There was a lot of ill feeling when it closed. A chap who was at the meeting, Nigel somebody, slagged off the Salvation Army, and that didn't sit right with me. He was saying the Salvation Army only worshipped money. I didn't agree with him.
223. I went on to Wallace of Campsie House in Glasgow and carried out a keyworker type role working with homeless people. There were two centres in Glasgow and the guy who ran one of them, William Hunter House, wanted me as one of his seniors. I then went to William Hunter House as assistant centre manager and worked there going on to become deputy manager.
224. After William Hunter House I went to a Scottish Vocational Qualifications (SVQ) Assessment Centre. I ran the assessment centre and was responsible for putting

Salvation Army staff working in homelessness through their qualifications, as were required by the Scottish Social Services Council.

225. From the assessment centre I got a job as a trainer covering the whole of Scotland. Most of that was also to do with homelessness. I loved being a trainer and I eventually retired from that job. That was all Salvation Army work.

Helping the Inquiry

226. I've no idea why allegations are being made now to the Inquiry. My thoughts on the one relating to me, which is **KQR** really, is somebody jumping on the bandwagon looking for payment.
227. That hurts me because **KQR** was a small guy who was bullied from time to time and I stuck up for him. The only thing I can think of is that he is looking for payment.
228. I understand that the Inquiry has information to the effect that the experiences of abuse some children had at Redheugh continued to affect them and impact on their lives. I can't explain that as I didn't see any abuse.
229. What I can say is that if the justice system is accurate and works then I can understand how the Stewart Burgess stuff would impact on people.
230. I am guessing a bit here but I would say that the appraisal and supervision system needs to be tighter. That might help as I just cannot remember what supervision and appraisal I got.
231. Training is definitely another area, there needs to be training on how to recognise abuse through signs and behaviours.

232. I thought the staff and management at Redheugh were really good, I had a lot of time for both Elaine Jenks and ^{HDD} [REDACTED]. I thought it was a good place to work and that a lot of kids had a lot of good times there. That was borne out by the number of kids that used to come back and visit us.

Other information

233. 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.

KOO KOO
[REDACTED]

Signed.....

Dated..... 19/1/26