Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

Scottish Child Abuse Inquiry

Witness Statement of

Neil John BROWNLEE

Support person present: No

1. My name is Neil John Brownlee. My date of birth is [redacted]1970. My contact details are known to the Inquiry.

2. I have come forward to the Inquiry because of allegations made against my father John Brownlee, which only came to light to our family in [redacted]2023.

3. I have read a lot about the work of the Inquiry. I have read many statements particularly from people connected to Edinburgh Academy but also from other institutions and other cases being heard by the Inquiry. I have also been exposed to numerous media articles about the Academy and my father and my mother. I also sat in court once I had given my own evidence. I will draw on all of those experiences to provide my statement.

4. I am fifty-four years of age. I spent my entire childhood education at the same school as those who accused my father, and I grew up in the same boarding house where some of the allegations of abuse originate from. I went to the same junior and senior school with many of the accusers and I am here to give my part of our family's response which I feel has not got out there yet.

Background

5. My father is John Brownlee, he started full-time at the Edinburgh Academy in 1964. He was head hunted twice by the school and invited to join twice. He started teaching

rugby and was then asked to become a full-time teacher at the prep school. He did not seek employment at Edinburgh Academy.

6. He married my mother in 1964, the same year he started at the school full time. My brother Graeme was born in 1968, and I came along in 1970.

7. All of my childhood education was at Edinburgh Academy, as was my brother Graeme's. I went to the junior school, the "Prep", from 1975 until 1981 and then the senior school, the "Upper School" at Henderson Row from 1981 until 1988.

8. My father worked at the Academy for thirty-one years, leaving in 1995, aged 60 years old.

9. We have submitted a full timeline of my father's time at the EA to the Inquiry.

10. At school I was often referred to as "Mr Brownlee" and this has continued throughout my life, including university and all my jobs in the United Kingdom and overseas by people who never met my father.

Dundas House, Kinnear Road, Edinburgh

11. We moved into the school boarding house, Dundas House, for the start of the new school year in September 1972. I was two years old. I don't have any recollection of any other family home before Dundas House. I had three years in the house before I started at the school, so I don't think I became aware that I was in a boarding house or its routine until I was about four or five years old myself.

12. During my time in Dundas House, I was younger than the boys, then the same age and then became older than them. I believe I have a unique perspective to offer, as I recall my childhood there with fondness, certainly up to [redacted] 2023.

13. Dundas House was spartan, though I would not say it was dilapidated. I lived there after all and found no great issues at the time. In retrospect, it needed a lot of money spent on it. When my parents moved in the dormitory floors were bare floorboards. The boiler was inadequate at generating hot water. That's one of the things we are mystified about; the allegations of boys being put in hot scalding baths. There wasn't enough hot water, so why would my father do that? How?

14. The house was cold. A lot of these boys were from hot climates like the Solomon Islands, Hong Kong and Malaysia so it does not surprise me they felt unhappy in an Edinburgh winter. My parents spent ages trying to get funding from the school bursar for improvements. The bursar suggested paraffin heaters as a way of heating the house, but my mother said that was not conducive to children running about.

15. My father painted the library/television room himself because the school wouldn't pay for a painter. I believe my parents still have letters from the bursar or rector after they requested money for improvements.

16. We looked after about one hundred different boys overall during our 11 years in the house. The boys broadly ranged in age from eight years to eleven years old. I think there was one seven-year-old, who my mother realised from very early on needed a lot of help and advised the rector we would not be taking such a young child again.

17. I keep reading in the Inquiry details about a six-year-old, there was never someone so young in the house. I think only one accuser mentions this mystery person, albeit with absolute certainty, but they are mistaken, as any records will show.

18. I would go so far as to say Dundas House was popular, it was always full. I remember we got bunk beds to accommodate the demand at one point.

19. We left Dundas House in 1983 when I was thirteen years old. We then moved to [redacted] in Trinity. My parents lived there, fully contactable in the phonebook right up until 2021.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

Layout

20. Dundas House was a relatively old building and as a child I thought it was a huge house. It was built in 1901 and was a typical Edinburgh villa. It was set back from Kinnear Road, so looked fairly imposing and seemed a lot bigger than it does now. I had the run of the house with my brother and friends for all of the holidays when the boarders were not there. Despite what some of the accusers have said, there were no cellars and no basements. The garage, which can be seen today from looking at the house from the street, dates from post 1983 and was installed by the Polish authorities. I believe some of the other boarding houses did have basements though. This sort of detail matters, and any accuser referencing cellars, basements or a downstairs boiler room at Dundas, are mistaken at best and stating falsehoods at worst.

21. The layout of Dundas House is very important for me to explain. Unlike the other schoolhouses there was no segregation between the boys' area and our family accommodation. There was no separate door leading to our family quarters. The other houses across the road, Mackenzie, Scott and Jeffrey were all purpose-built boarding houses. They had a dedicated family area or at the minimum, an area whereby you went through a door and that entire, extensive area from the door onwards was defined as the family quarters. Dundas House was not purpose built. All of our family rooms were next to or opposite the boys' rooms.

22. As you entered the front door, the ground floor had the big boys' common room on the right, opposite our sitting room. Our living room was further along on the left, and the boy's library/ living room was on the right past the stairs.

23. There was one main door in and out of the house at the front and a side door, likely unknown to the boys leading from our living room/rear, the boys did not use this door. There was only one flight of stairs that we all used. The stairs, which became a key element in one allegation, were a typical wooden Edwardian staircase. Each wooden step had green linoleum and white grips which were effective for the time, but it was not a staircase to be taken at speed or in stocking soles, certainly not going down them. To this day, I still remember the banister and the individual bumps along it as I

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

ran my left hand up it. I worked out I was up and down these stairs 30,000 times. I know these stairs. On the same staircase was a small landing, then a bigger landing and then the stairs continued up to the top floor. There was no carpeted part to the stairs. My father was protective of the boys in his charge, especially around health and safety, before it became a thing. You certainly weren't allowed to run about in your stocking soles on them because you would go flying. I was always being checked by the matron and my mum if I did so.

24. The middle landing was possibly the most notable one, as that was where our family bedrooms and my father's study were. That was also where the 'big dorm' was. The dorm had a large bay window with amazing views towards the castle and Arthurs Seat. I slept on that same floor for eleven years and the 'big dorm' door was no further than four metres or six paces from my room. I could hear anything that may have been going on.

25. On the same floor next to the big dorm was my dad's study. Next to that was the boy's toilet and our family bathroom. I remember our bathroom well. It had the original 1901 bathtub in it. We certainly did not live in luxury. My parents had their bedroom on that floor too.

26. I believe there was a room for the matron on the first floor. There weren't dedicated quarters for matrons, and I think that's why 'live in' matrons didn't last, as they had to share their toilet and washing facilities with the boys.

27. We have submitted a full timeline and detailed layouts, floorplans and photos of Dundas to the Inquiry.

My relationship with boarders

28. When I was ages with the boarders, around 1978-1982, I would go to school with the boys. I would then go home and have tea with my family and then do my homework in

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

my own room. In the evening, I would go and hang out with the boys in the common room. We would play with models and things in there.

29. I believe I got on with the boys and would go so far as to say I was fascinated by them and where they lived. My dad had a map of the world in the boarding house and there was a pin in where each of the boys' parents were.

30. I haven't kept in touch with many boarders but then I haven't kept in touch with many of my classmates. It's coming up for forty years since I left school. However, I did see ninety five percent of them for the rest of my time at school.

31. I recall no physical bullying from any of the boys in the house or at school. Graeme however did get set upon once or twice at the upper school by some senior boarders, which I expect he will cover in his statement.

Parents

32. We had a really good relationship with the parents of the boys. They could and would phone up during the night from places like India as was the norm with time differences and long-distance calls in the 1970's. My parents have been invited to weddings of some of the boys, including an accuser. My brother has played music at those same weddings, and indeed helped select some music for some funerals, often decades after we left Dundas. Sometimes the parents would offer us their Scottish homes to stay in, which were uninhabited for long periods due to their overseas postings or work.

33. All of the parents would have had a tour of Dundas House, all would have signed off on the condition of the house, the dorms and, implicitly, aspects of the routine, such an 8:30 pm bedtime and there being no payphone. As far as I am aware no parent complained about there not being a payphone. There is an element of understanding that the parents wanted their child to go to Edinburgh Academy and knew exactly where the child was going to be staying. No child was placed there blind or without their parents knowing the physical setting.

34. Every boy needed to have a contact in Scotland or at the minimum, the UK. Many had relatives in the surrounding area, including some central accusers. This idea that the house was up a glen, in a remote castle with no contact with the outside world is just false. This was relatively close to the city centre in an established residential area. The boys went shopping to Goldenacre and Stockbridge every weekend and any boy could have posted a letter without my parents knowing anything about it. I think the boy who alleges being pushed down the stairs by my father had about four or five relatives in the Edinburgh and Lothians area. Giles Moffat had an aunt in Edinburgh for his entire time in Dundas.

House Tutors

35. We periodically had house tutors in the boarding house. The house tutors lived on the top floor with the boys, and they were in charge of those boys. I believe there were about ten boys on the top floor at any one time. IDQ [redacted] was the first house tutor, and he was there from 197[redacted] to 197[redacted]. Geoff Fisher [redacted] and he came in 1981.

36. Geoff was a lovely guy. I understand Geoff was contacted by Giles Moffat, but Geoff essentially replied that he did not see any of it. Geoff is retired and in Australia now and I have good memories of him. He taught nearly all my classes in my first year at the Upper School, and our class was not very well behaved, including me, I am afraid to say.

Food

37. The boarders all had their meals across in the prep school dining hall. As a family, we ate in our own house, but Graeme and I sometimes joined the boys at weekends in the school dining room.

Leisure time

38. My dad spent almost every Sunday of the eleven years in Dundas House taking the boys out somewhere, often in the school minibus or one he hired from Mitchell's Self

Drive. He didn't need to; it was off his own volition. Graeme and I would often join these trips, and I think my mother did on occasion.

39. On a Saturday the boys could walk to Goldenacre or Stockbridge in a group to spend their pocket money.

Toys

40. I cannot avoid the fact that despite mixing well with them, so I believed, I was not one of the house boys and neither was my brother. It was our family home, and my childhood home, which made it fundamentally different for me. There are a few misrepresentations of me from some of the boys about me and their toys. Quite how this has come up in allegations of abuse is beyond me, but I feel entitled to respond. I don't know where they get this idea that I was always trying to steal their toys. I had my own toys, and they were in my room, I would also take my toys to the common room to play with as well. I would say that the boys' toys tended to be a step up, as they would come back from holidays with the latest gadgets, like the early Sony Walkman, early computer games and so on.

41. I recall that I had this huge fascination with the space shuttle. [redacted] came back from Christmas holidays one year and he had this very big model of the space shuttle. I possibly was a little too enthusiastic and overtook the project of making the model. I was two years older, and enthusiasm got the better of me. I remember putting the nose wheel in and the whole thing collapsed down. Did I make a hash of it? Yes, I did. To be fair to [redacted], I don't think he made this complaint. Someone else raised it. Who knew this would be wheeled out some forty-two years later in a statement to an inquiry in connection with abuse.

Healthcare

42. There was a GP, Doctor McKinlay, who visited every other day.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

43. We had a matron for the best part of our time in Dundas, certainly the final seven years as far as I can recall. Her name was Valerie Henderson, she was lovely. She testified at court that she bathed boys at the boarding house for five or six years and never saw anything on the boys and that if she had she would have had no compunction in reporting it. She was appalled and upset when she heard about the allegations from Dundas, as she was there, washing the boys' hair twice a week. She was also already an adult at the time, unlike any of the accusers who put absolute faith and expect absolute acceptance of their recollections as eight- to ten-year-olds.

Visitors

44. The boys could have visitors by arrangement. They could be taken out any weekend by day pupils, friends or relatives. What wasn't allowed was a relative randomly turning up, which was presented to this Inquiry as someone being denied a visit.

45. Other housemasters and sports masters would swing by on their way to and from the school playing fields at Newfield, or the other houses.

46. There were no other formal visits or inspections that I am aware of in my time at Dundas House but bear in mind I was only two years old when we went in and thirteen years old on exit.

Letters

47. In the court there were contradictions amongst the boys about letters, with some saying they had no issues and yet others saying their letters were interfered with. What I do remember is that many of the boys struggled to write letters home. They would sit down each week and struggle to think of what to write. These were young boys, and this was the weekly equivalent of having to write thank you letters after a birthday or Christmas. The stories about my father interfering with the letters doesn't hold water as the boys could easily have written a letter and posted it at the weekend.

48. I know [redacted], a boarder, had written a letter and said something about the food being 'carp', instead of crap. [redacted] proudly showed it to my father, and [redacted] was told to change his letter. It was a wryly amusing moment, nothing more. For anyone to turn around over forty years later and say that sort of thing was censorship or abuse is galling. Again, I do not think [redacted] made this complaint. Someone else did so on his behalf, as a general complaint.

49. There is a huge difference between someone saying, 'I hate it here' and 'I'm being abused by the housemaster'. That is the distinction I would make. I hated going to cub camp in the winter of 1978, every minute of it, and that was only three nights. It does not mean I was abused, or that the conditions themselves were abusive. Hating and resenting a period in one's life does not mean one was by extension abused by those in charge.

50. I'm sure a big factor in some boys' memory is that John Brownlee was potentially the first disciplinarian in their life. However right he may have been in admonishing them or saying 'no', they only remember it was him saying no or doing this and possibly the first adult to do so. Parents no doubt smothered boys with attention during school holidays which would merely emphasise his firm but fair style once they got back to school. More than one of my contemporaries these days from all sorts of schools and institutions around the globe, has stated that they would not report any punishment at the time because they would have feared worse from their own father. The boy who claims to have been pushed down the stairs admitted to being obliged to call his own father "Sir" and was terrified of his own father when he lost, or other boarders stole, a new watch he had been given. How is this my father's fault, fifty years later? I think it is the same for the day boys and their allegations, but I will come to them.

Pocket money

51. The boys got pocket money on a Saturday, and it was my mum who handed it out. Dad was generally away with the rugby team on a Saturday so didn't get involved. The allegation that my father would have said anything about it beyond not wasting it on

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

rubbish, is false. He would not have been interested and would not even have been there.

Discipline

52. The discipline in the house I would characterise as the 'firm but fair' demeanour of my father's school manner. Anyone with the slightest degree of self-awareness, even an eight-year-old boy, would know where the boundaries lay. I do not recognise the description of an atmosphere of fear.

53. I know he had a clacken in the house, but I never saw him use it. He didn't have a belt or tawse.

54. The house was large but surprisingly poorly soundproofed. I remember messing around with my brother in the sitting room during school holidays, miles away from the living room, and the commotion was heard by my mother. You could hear people walking around in the big dorm when you were in the common room beneath it. My point being, any alleged punishment would have been done in earshot of others. I never saw him administer corporal punishment nor did I hear any screams.

55. I remember once at the prep school a boy telling me that my father had taken aside another boy at the back of the morning line up in Dundas House to tell him his grandad had died and then the boys all trooped off to school. I spoke to my parents, and they said it was the best time to tell a child rather than at night. There was merit in my father's approach, as a qualified teacher I would remind everyone, and it was done so the child could go off to class and be with their friends for the day and be distracted. Firm but fair is an expression I have heard to describe my father on quite a few occasions. However they might look back on it now, if the norm had been to tell a boy of a family death last thing at night, they would be complaining about that now.

Leaving Dundas House

56. Normally the housemaster term was ten years and as a result we should have left Dundas House in summer 1982. Mum and dad had been looking forward to getting a change and getting some semblance of a social life back, and I recall the preparations. They had already bought a house in [redacted] in Trinity to move to after the ten years.

57. It then emerged that the school was going to close Dundas and consolidate the boys with the other houses but wanted to give it one more year to sort out these changes. As a result, the Rector, Laurence Ellis, asked my parents to stay on for one more year. I want to say, that if there had been any concern from the school or rumours about the Brownlees and how my parents ran Dundas House then he would not have asked them to stay on. It would not have been just the rector's decision, there could have been any number of other people who could raise any concerns. To me that is a very compelling case that we did eleven years instead of ten and that there wasn't anything going on or amiss. As well as the absence of a single contemporaneous complaint.

58. I enjoyed my time in Dundas. It was the family home. I looked back on it very fondly until [redacted] 2023. And to be clear, my brother and I are not blithely making statements to this Inquiry through some misguided sense of loyalty to our father. We slept on the same floor of Dundas as the boys. We were in the line up every morning for the walk over the road to school. We never saw anything untoward, and we feel strongly about putting the truth on record. We were there, and we remember with clarity.

Comments on allegations to court and Inquiry

59. Since this all kicked off in [redacted] 2023, I have studied the statements on the Inquiry website and have identified and read all statements mentioning my father. I was then able to deduce from cipher names from the statements, who people were with relative ease. For those I could identify, I know exactly who said what, including what they say about their life before Dundas or the EA Prep, their time at the Upper School or senior Boarding Houses, and later on in life, as well as the names of other boys they reference or accuse of peer bullying or assault.

60. I think a lot of the allegations from the accusers come from an inherent unhappiness of being sent away in the first place. I think the prep boys are jumping on similar bandwagon and looking for someone to blame. The worst story that many of them have to relate isn't necessarily my father, but their peers or older boys. There was a lot of bullying by peers in later houses. Certainly, the boys were very homesick, and I just don't think they liked boarding. I am sympathetic to that but don't blame it all on my father nearly fifty years later, because chronologically he is your first boarding house recollection.

61. Some of our young boarders actually had servants back at home. Many didn't know how to tie a tie. They didn't know how to put clothes out for the following morning. Many of them struggled to adapt with the routine at the boarding house. I get all of that, but why forty or fifty years later say it was all John Brownlee's fault or even more annoying to me, say it was Mrs Brownlee's fault? She was not the housemistress; she was not a surrogate mother. My mother was the wife of the housemaster, she did not have a job description.

62. A lot of the allegations from Dundas House are presented in a way that Valerie the matron didn't exist, my mother didn't exist, nor Graeme and me. They don't seem to realise that we do exist, and we do remember with crystal clear clarity. We remember the layout of the house. We remember details of some of the things the accusers have thrown in, in the hope of embellishing their story. On several allegations they tried to "date stamp" their central allegation by adding detail and context, such as festival fireworks, that in fact merely cancel out any potential veracity of their claim. There are many examples of this in statements to the Inquiry.

63. In our time in Dundas not one boy left early. Often siblings would follow. A lot of boys did indeed leave the Academy and boarding houses once they moved up into Mackenzie, Scott or Jeffrey House. It's utterly wrong for them to say boys didn't last in Dundas and they would be taken away from it. It didn't happen and it is false to say otherwise.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

64. I feel strongly that a lot of the specific allegations against my father are distortion, exaggeration and are so full of errors and mis-recollections that I am not sure where mis-recollections become something more legally perilous for those making them. I will stick with the words distortion and exaggeration, maybe "misremembrance".

Bedwetting

65. There are a number of stories about my father handling bedwetting badly. My father would not have known if anyone had wet the bed as he was off to school. There were also two accusers who said bedwetting was dealt with very well. When boys talk about being teased and mocked about bedwetting, I think it was more likely other boys. My father would not mock a boy for such things. It was not in his nature, and I do wonder who these accusers are thinking of when they make these allegations from 45 years ago.

Vegetable patch

66. There are a couple of things that my father got the boys to do which have been completely distorted, such as digging a vegetable patch. On what basis would my parents ask the boys to dig a vegetable patch in winter when the ground was hard, and they would all get a chill? Who would have the problem there when the boys were ill? It would be my parents. He did try to interest the boys in the garden in spring, which I remember being later in our time there, but the boys never saw the fruits of anything they planted because the time when the potatoes or sunflowers came out it would have been getting on for the summer holidays. To my mind there is a disconnect there. It was never a punishment, and it is disingenuous at best to infer forty years later that it was.

Stairs

67. I want to mention the allegation of my dad allegedly pushing a boy down the aforementioned stairs. The now fifty-something adult alleges that he was pushed down the 'non-carpeted' part of the stair by my father. Why make that distinction when, as I

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

mentioned earlier, there was no carpeted part of the stair? I question which boarding house he was recollecting in this alleged incident.

68. I found it interesting that he glossed over this alleged incident in his statement to this Inquiry, saying he couldn't remember the details, yet he mentioned it in his police statement. It bothers me, as we are led to believe he was pushed down fourteen hard wooden/linoleum stairs, with Mr Brownlee standing at the top saying "Oh did you fall?" Again, I have known my dad for over half a century and that is just not in his character. If it happened, how was my father to know that the boy being pushed down those stairs wasn't going to be crippled or that he would land safely? In addition, my dad would have been the one to take him to hospital and then be quite reasonably asked by the staff, what had happened. Also, if the boy or anyone else had fallen down those stairs they would have landed outside the boys' common room and family living room. It would have been a standout moment for the other boys as well as my family. Everyone would have rushed out. The idea that my dad would do something this dangerous is ludicrous. This accuser could have in fact ended up in a wheelchair or worse, killed. Where has this come from after nearly fifty years?

Garden shed

69. My brother and I remember the garden shed that forms part of one of the allegations by Giles Moffat. My brother Graeme and I were hardly in it. I can count on one hand the number of times I was in that shed in my entire eleven years in Dundas. It was not a child friendly environment; it was full of dangling gardening tools. It had a lock but never a padlock, and it was nowhere near the vegetable patch, despite Giles's claims in both respects. The vegetable patch was up on a higher level. This shed was in fact one half of a shared roof, divided into two sheds (a garden shed, and a bike shed for family bikes and storage). Giles claims he was locked in the Garden Shed with two others for a weekend, neither of whom have repeated this allegation, as far as I can establish, and with good reason. To Lady Smith's credit she asked him about the toilet. There was then some discussion between her and Giles where he then indicated that they must have been let out at night and put back in during the day. It is an extraordinary story, even without the final embellishment by Giles that my mother

would periodically bring them bread and water. That is a malevolent and fundamentally untrue allegation. He said the last bit about my mother to the media. What he said about this, and several other instances is defamatory against my mother as well as my father. It is utterly ludicrous.

Other allegations

70. There was an allegation around boys being locked out of the toilet on the first floor. You couldn't do that. You could not lock the door from the outside. Also, the tale that if you flushed the toilet during the night, it would cause the plumbing to make a noise which upset or wake up Mrs Brownlee, is completely false. It is such a daft detail for the accusers to think would add value. It is untrue.

71. Across at the prep dining hall I remember the height of bannisters which one accuser alleges he was dangled off. He alleges he was dangled over the banister, and he soiled himself out of fear of the height. That particular banister according to my recollection and those of many others, was not high enough to dangle someone from as it was only waist high.

72. If my father acted like that and did all of the things exactly as alleged, which we are expected to believe, then on a daily basis he would have been jeopardising not only his job but literally the roof over his head and that of his family, along with the education of his children. Its fantastical that some of those allegations have been aired. More so that they were swallowed hook, line and sinker by Police Scotland, CoPFS, some journalists and in most part by the sheriff who oversaw the travesty of the so called 'examination of facts' in March 2024.

Other information regarding Dundas House

73. I reject that any of the alleged corporal punishment that went on in Dundas House, and which was legal at the time, ever went beyond what was necessary or appropriate.

Comments on allegations about mother

74. A handful of the accusers go out of their way to say my mother wasn't loving enough but I'm not sure what they were expecting. She was not their surrogate mother or a nurse maid. IBI [redacted] says she was cold but at the same token admits to her allowing him into the family sitting room to watch a television programme which no one else wanted to watch.

75. IWO [redacted] is one of those who describes my mother as cold. He forgets it was my mother that took him to the Western General hospital when he had concussion from the rugby field. I think I was there that time because I distinctly recall IWO [redacted] being in his rugby kit. They seem to forget these details, but to be fair he had concussion at the time.

76. The attempts by Giles Moffat and IWO [redacted] to suggest that not only was my mother cold but that she also was somehow a victim of my father, sticks in the craw. They are as ludicrous, misplaced, wrong and upsetting as the worst allegations against my father. I have known my mother all my life and anyone else that knows her is aware that is not the case. I know their marriage is as happy as it could be, they are coming up for sixty years married on Boxing Day this year. For people like that to start analysing my parents' marriage forty-five years later is malevolent and desperate. A number of the complainers from Dundas House and indeed the prep setting would be better to look at their own family dynamics, their relationship with their own parents and between their parents.

Comments on specific boarders/pupils who made allegations

IWO

77. IWO 's brother was in Dundas House a couple of years before IWO . IWO was never a smiler and always seemed a bit miserable. I remember his mother very well; she was a glamourous lady. IWO 's allegations focus on one or two incidents. IWO talks about the comb that my dad used in the mornings on the boys. This small metal comb is made out to be some kind of horse comb. My dad had it up until two years ago. It was a man's metal comb. Maybe it was a bit sore if your hair was tuggy, but was it something to go to the police about forty years later? I don't think so. I wish the comb had resurfaced so it could have been shown to the court so that the allegation could be met with the derision it deserves.

78. IWO had terrible tragedy in his life in that his brother was killed in a road accident. He was also caught up in a bomb in the Philippines and I believe his girlfriend was killed in front of him. On any level this is dreadful, and I am sorry it happened to him. By the same token, I don't know what to make of it when he then goes to the police and says that the worst thing that could have happened to him was living in the house with John Brownlee. I cannot compute the two. What happened to IWO in his later life was tragic. I am not qualified to say how it has affected him in other respects.

IKM

79. IKM made the allegation of my dad ridiculing him about supporting Falkirk football club. He ended up shoplifting and getting into the wrong crowd at the Upper School, which naturally was not IKM 's fault. He blames that on John Brownlee and what happened seven years before. To make a police statement and indeed approach this Inquiry with this allegation – being teased about a football club by someone professing to support Raith Rovers, a joke at my father's expense - demeans the work of this Inquiry and the truly terrible allegations from other institutions which this Inquiry has heard.

John Graham

80. John Graham made a statement to the Inquiry. We actually spoke for a while at the 2019 Edinburgh Academy reunion, he was quite relaxed and chatty. He was asking sincerely about my father and mother. The sort of stuff he and others would say to me was my father could be tough but that was what they needed at the time. I say again, not one of them complained to me about how he treated them. Nothing was mentioned about abuse. I think we talked for at least fifteen minutes, and we had a photo taken together. It was great chatting to John, and I was pleased to show my parents the photo of us. I probably have it somewhere.

[redacted]

81. [redacted] made a ludicrous complaint to the police. I am unsure of the precise details but it seems that my mother had sewn some sort of velvet glove for the clacken so it would not make a mark on boys. Things like that made my brother and I roll our eyes. What are we supposed to do when we are confronted by such notions? What are we up against here? This was a clear sign of the levels of creativity and outright falsehoods that were being thrown at our family.

82. I didn't even realise [redacted] was a boarder. I know his parents used the boarding house as after care in the afternoons as they had other priorities than [redacted]. It seems he may have spent one or two nights in the house and therefore deems himself to qualify as a boarder. I really don't know what he's going on about.

IBI [redacted]

83. IBI [redacted] makes an allegation about my father hitting him over the knuckles for no reason, apparently on the stairs of Dundas House. IBI [redacted] was only in Dundas for one year, yet it seems we are to believe that every misfortune in his life stems from his stay there. I don't buy it. In his statement to this Inquiry, he relates a litany of truly awful things that happened to him long after Dundas House and the prep school. He admits in his testimony he was bullied by an older boy at Dundas House and admits it was my father who moved him out of the dormitory and away from bullying, thus protecting him. My father chose to take IBI [redacted] out of the environment. IBI [redacted] of course credits the

house tutor, Geoff Fisher, with this, but Geoff could not have made that decision without my father's approval.

84. [redacted] is a prime example of where I wish accusers would sit back and look at their own family dynamics. He talks about all of the shouting and screaming in his own home and about being sent to a boarding school in the first place.

85. I am pleased that he acknowledges my mother and the time she took him into our living room to watch a programme that the other boys were not in the least bit interested in. Also, for him saying he had no issues in the way in which bedwetting was dealt with.

[redacted]

86. [redacted]'s story in [redacted] last [redacted] (2023) was the first we heard of anything at all about all of this, almost forty years [redacted] since we left Dundas House in 1983.

87. This article was about [redacted] and his time at the Academy. It was a tale about his housemaster (identifiable by dates to anyone with that information) 'creeping' into the dormitory and dragging [redacted] from his bed, taking him to the study and beating him with a clacken. This article was picked up by Nicky Campbell, who never set foot in Dundas House when we were there, and he reposted it [redacted] with inverted commas around it. The article did not mention my father's name, but Nicky Campbell and others went on to conflate this allegation and others against my father with those against Hamish Dawson and Iain Wares. They muddied the waters, as did the media, and it all started from there.

88. [redacted] was one of the people who suggested boys wouldn't make it through their time at Dundas and leave. I have said before, this is not true. He talks about his parents fighting, terrible arguments, how he had behavioural issues at school, how he liked to be on his own. Yet he suggests all his subsequent problems stem from this one

incident when my father allegedly dragged him from bed and belted him with the clacken.

89. He also talks about an unlikely freedom to roam about Newfield playing fields at eight years old. Again, there is no way that happened, as a moment's thought would illustrate.

90. [redacted] was also the source of a story where a boy wanted to go to the toilet on a walk while on a trip at Blair House. He said the boy soiled himself because my dad wouldn't let him. This makes no sense, firstly there is no reason or indeed benefit for my father to decline permission in the first place and secondly there would have been at least one other adult in the walking party, if not two, as was standard practice for any school outings in the hills. One leading from the front and one at the back. No boy has come forward to say that they were this person, who was denied what we would now call a "comfort break" by up to three supervising adults present.

91. He also talks about a semi-military regime and being told to polish his own shoes. Is polishing one's own shoes child abuse?

92. He talks about having grandparents and two uncles nearby. He talks about that and also having a strong imagination and that he liked storytelling.

93. He is one of a number of accusers, including Nicky Campbell, who admit to a degree of uncontrollability and bad behaviour in their lives before going to Dundas House or arriving at the EA. They cannot see any correlation between being badly behaved as children and being admonished or corrected more so than any other boys. There is a lack of self-awareness that would appear to continue to this day.

94. I noticed that [redacted]'s peers [redacted] and [redacted] later gave evidence. They were in the same year as him, and although I would have been only four or five, I remember them very well. They were great guys.

[redacted]

95. INI was a particularly nice guy. INI seems to feel bad about what happened to IOI but clearly stated to the Inquiry that he didn't know it was happening, and he was in the bed next to IOI. How can this be?

96. INI also says his letters weren't intercepted and says he saw no abuse, nor anyone being abused. All of this is hardly a ringing endorsement of IOI's claims.

INR

97. INR says there was no issues with bed wetting in Dundas House in relation to how it was handled.

98. He would have been on the same trip to Blair House where the boy supposedly soiled himself because my dad supposedly didn't let him go to the toilet. Neither he nor INI mentioned that alleged incident in their statements.

Nicholas Campbell

99. Nicholas Campbell shared the story by IOI on without any conceivable knowledge of whether it was true. He then took it upon himself to demand the arrest of my father and this was on the front page of the Daily Record. Who does Nicholas Campbell think he is? I know my view and that of many others, but he clearly succeeded in bouncing the police and crown into action with his self-promoting circumvention of fundamental due process, decency, and the law, never mind abuse of his BBC position.

100. Campbell never set foot in Dundas House. He maintains he heard stories about Dundas when he was at the Prep, but this was before Dundas House even became a prep boarding house and before the Brownlees moved in. Dundas House was not, before we got there, a boarding house for junior boys. The house master before my father was Hamish Dawson. Nicky Campbell may have heard stories about Dundas

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

when he was at the prep, but it cannot have been when we were there. It is factually impossible that when Nicky Campbell was at the prep, which he left in July 1972, that he was hearing stories about the Brownlees. It just can't have happened; facts and details matter when the stakes are this high, rather than guesswork and assumption that no one can or will check.

101. He seems happy to muddy the waters around Iain Wares, Hamish Dawson and my father. I think the naming of Wares in March (2023) then emboldened Nicky Campbell and others to name my father without any attempt at due process. He was certainly on a roll, and to hell with the consequences. This was aggressive and spiteful behaviour on his part, utterly dismissive of us as a family.

102. Nicky Campbell in his testimony, admits to laughing when he was getting punished by my dad in the class. He is particularly proud of the fact that he was badly behaved and a troublemaker and naturally claims that the school did it to him.

103. Thousands of pupils got through the Academy without so much as Saturday detention, never mind expulsion. It would have taken a great deal of effort and consistently bad behaviour over a period of time to be expelled from the Edinburgh Academy in the late 1970's, which he was, and indeed did not realise he had been until pointed out by someone else. For him to wear this as a badge of pride and part of who he is today, is precisely the absence of self-awareness I referred to earlier.

104. For someone so experienced in his own brand of journalism, Campbell has shown a staggering gullibility and great naivety in believing everything that every other person has claimed. I believe Nicky Campbell should sit down with certain individuals, look them in the eye and say "Is every detail of everything you have claimed and how it happened, absolutely accurate? You haven't made anything up, or exaggerated anything? Just to reassure me." Sadly, it's too late for that.

105. Nicky Campbell says he tried to get my dad on his radio programme in 1993/4, already 22 years after he left the prep school. The producers telephoned our house at [redacted]. It was to invite Dad on to his show for the BBC. It was sold as the BBC doing a

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

feature on a favourite teacher. The producers went on to say that Campbell recalled dad as being very funny and a good mimic. We always thought that a perfectly benign call, fitting as it does with everyone's recollections of my father. If we are to believe Nicky Campbell and everything he has said now, then he was in fact trying to entrap my dad all those years ago and expose him then. He has said to the Inquiry and the police that that was his intention, as well as repeating his view that he found my father very funny and amusing. It's not for me to say whether his admission of attempted entrapment was in breach of BBC guidelines then or now. I'm told by friends in the media that it manifestly was.

106. Campbell then waited three more decades before doing anything about it. He cannot explain why he waited that long, other than referencing his wider state of mind, (which has not impeded his successful public profile and broadcasting career in the slightest). I feel if he had anything to say back then, he should have gone to the police then. Instead, he waited so long that my dad was then incapable of giving any response. When you read what he says my father did to him, it sounds like pretty normal admonishment, which Nicky Campbell admits to laughing at when my dad was giving him the punishment.

107. He has been a figurehead in the persecution of my father, and he has shown a tremendous empathy bypass to my elderly mother. I do think he has abused his BBC position and continues to do so.

108. His complaints about my father go back fifty-one or fifty-two years ago. That is as far from today as 1919 was from 1971. The end of WW1. He has never met my mother. It's as if my brother and I don't exist. He made great play of seeking out the family of the deceased Hamish Dawson so they could be prepped for any press coverage. Yet he made no effort to contact us. This is shameful and malevolent behaviour by somebody who presents himself as the Great Empathiser.

109. Nicky Campbell also had the audacity to do a podcast in May last year about the "trial" of John Brownlee. We were alerted to it by our lawyers, and it was the BBC who contacted them. I did not listen to it myself, but I know from others he signed off the

podcast by repeating a factually false representation of the court proceedings. Legal shorthand or not, this is disgraceful and unprofessional behaviour by a BBC employee seeking ratings and coverage on a matter that clearly, he has a personal interest in.

110. I believe he has behaved disgracefully and in regard to his treatment of my family he has behaved appallingly. I am prepared to acknowledge that he has done good work in other spheres and has received awards. But in regard to his treatment of us, he has shown his true colours.

IKA [redacted]

111. He is part of the 197[redacted] year group. If you look at the clusters of which year group have engaged with the Inquiry and police, it boils down to four or five different year groups. Some year groups had not a single complaint, which speaks volumes.

112. IKA [redacted] is a peculiar man and admits to creeping around Trinity to see where my parents lived after moving from [redacted] in 2021. It happened to be near Tony Dyer, and indeed he and my father were good friends until dad succumbed to Alzheimer's. IKA [redacted] saw great intrigue in this mundane coincidence and appears to have passed on this important piece of intelligence to a grateful Police Scotland. Rather than engaging in amateur sleuthing, IKA [redacted], as an adult, would have done well to bring any alleged issues to the fore in the three decades he encountered my father at [redacted], their shared golf club.

113. Indeed, IKA [redacted] could have done more than anyone to bring this to the fore decades ago if there was anything meriting it. He was a member at [redacted] Golf club as was my dad and Tony Dyer and IKA [redacted] would often bump into them there. He would have bumped into my father as recently as 2015/2016. He failed to do so in every respect. Why?

114. IKA [redacted] never set foot in a boarding house, beyond I think a short spell in Mackenzie House, but he is very opinionated about what went on in the various houses. He admits to being appallingly behaved since day one and all the way through the school. He

says his academic decline started at fourteen or fifteen years old. This would have been about four or five years after he left my dad's classes and part of the school. He talks about corruption and conspiracies. He thought dad came from Leven and that he had a big chip on his shoulder, that he joined the Academy to get his own back on private education by leaving a legacy of disruption and abuse. This is idiotic. Dad was born in West Lothian and came to Kirkcaldy aged three. My dad was headhunted twice by the Academy.

115. IKA suffered some terrible bullying later on in school. He seems to retain his own personal issues with perceived elitism to this day yet still sent his own children to Edinburgh Academy, as did Giles Moffat.

116. He has some of the descriptions of dad like others, where you wonder if they are thinking about the same teacher. I've read statements comparing him to Dick Van Dyke and Clint Eastwood. Of my dad having curly hair and big sideburns. My dad never had curly or wavy hair. For the era, my father did not have big sideburns by any stretch, per our family photos of that time. I wonder if in many cases this was mistaken identity. It appears not to matter to Police Scotland, like so many other basic details.

117. IKA talks about being hit in a 'nice way' with a clacken by Mr IJW. He goes on at length about speaking in recent years to retired school chaplain Howard Hazlett, but Hazlett heard nothing. I think IKA is on a mission, though I'm not sure what. I consider his part in this witch hunt to be key, when I don't think he has much to say about my dad at all. His testimony is full of errors. If you're not sure, say nothing. When the stakes are this high, then you have to be sure of your facts or you leave that detail out.

118. IKA also floated the idea that being a Housemaster at EA was some kind of financial windfall for those lucky enough to be appointed. Nothing could be further from the truth, however it did contribute to Lady Smith's attachment to the notion of "Buggin's Turn". It is not true. The other sacrifices made by families moving into school houses far outweighed any perceived compensation for running the house, which was limited in the extreme to certain expenses.

119. He goes on to say in his testimony, "The fear of what Brownlee did to me stayed with me all of my life. It may not all be attributable to him, but it didn't help". I think IKA [redacted]'s main issues were with other teachers and perhaps other perceived shortcomings in his life, but he went guns blazing to the media and put stuff in there without any of us knowing anything about it. He should have done something twenty years ago when my dad was able to respond, if he had truly had anything to raise.

[redacted]

120. [redacted] was a fragile boy; he was always being injured on the playing field or in the boys' common room by simply walking from A to B. He arrived at the boarding house so sad and miserable. He was unwell and dreadfully homesick. It turned out he had a massive tooth abscess. I think my father had an upcoming appointment for the dentist and so he swapped out his own and gave it to [redacted]. I think [redacted] took a lot of my parent's time looking after him, which they did and without complaint.

121. [redacted] was a good guy, and I was really disappointed when he started coming on board with some of Giles' allegations. It cannot however go unnoticed that [redacted] withdrew, despite being central to the asthma allegation and two others unique to Giles.

Giles Moffat

122. Up until last [redacted] I considered some of my best memories from the boarding house to be [redacted] and Giles Moffat. Up until about 2010 or possibly later than that I often bumped into Giles more than anyone else as he lived in [redacted] for a long spell. We would cross over the road and speak to each other, and it wouldn't just be for five minutes, it was for fifteen or twenty minutes. The first and last thing he would do would be to ask after my mum and dad. We would then talk about other things, including shared memories of school days, some laughs, and the usual sort of chat. I was connected with him on LinkedIn until last year.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

123. As far as I am concerned, and don't forget I was there for the duration and older than him, Giles got on well with my father, they always had a good relationship, and I'm flabbergasted to hear his claims decades later.

124. I liked Giles, he was a funny guy. He was one of my fondest memories of Dundas. When he turned up, he had so much energy. I considered him a friend. He was a 'cheeky chappy' but critically he didn't know the line between being funny and being irritating. I don't say that from my point of view, it was from other boys later on at school. I do think he was bullied by other boys. I know of the incident with a senior, much bigger boy who threw Giles over his shoulder and Giles fell off and broke his shoulder bone. I believe Giles had been aggravating him and the older boy playfully tossed him over his shoulder. My mum took him off to the hospital. Giles portrays in his statement that my dad protected the senior boy as he was a good sportsman. The harsh reality is that the incident was 80% of Giles' making, if not 100%. A complete lack of self-awareness on his part, even 45 years later.

125. Giles' testimony is so full of errors, "I don't know," and "I'm not sure". He talks about his first night in Dundas House. He suggests it was September 1980, and he alleges it was the Edinburgh Festival fireworks. The festival fireworks started in 1982 so it cannot have been 1980. Let's say for the sake of argument there were some fireworks. The school always started on the same day every September. There was never a boy in any of the boarding houses when the fireworks were taking place. It's possible Giles might have been in Edinburgh earlier staying with his aunt. It's categorically incorrect that he was in Dundas House when the fireworks were on. Why give such detail in quite an extended part of his in-person evidence to this Inquiry when a casual knowledge and a look at school dates from the time completely cancel out the claim. I am no psychiatrist, but I believe Giles believes his own stories and details once he gets going, and it all blends into immutable fact as far as he is concerned. All of the doubt about recollections falls away, and he confidently repeats them as fact to the Police, to this Inquiry and anyone else who will listen and not challenge him.

126. He talks about "[redacted]" falling on a piece of groundsman's machinery down at Newfield. I remember the incident, we were all playing, me, Giles and [redacted].

[redacted] may have been there. I believe I would have been about twelve years old when this happened, and I was two years older than Giles and [redacted]. [redacted] fell when he went to get a ball. In those days, the groundsmen's machinery was not safely stowed or fenced off, as would be the case now, thanks to the positive developments in H&S. He fell onto this stationary machinery that had weirdly shaped things on it that made holes in the ground. It nearly took his ear off. We all panicked and went up to the house. My mum appeared and it was obvious he needed to go to hospital. My mum took him, I don't think I went but may have done.

127. When you read Giles' statement, he can't even remember it was [redacted] who fell, he says it was [redacted]. It's a basic detail and he got it 100% wrong. He then says that when we got to Dundas House my dad hit "[redacted]", despite "[redacted]'s" ear almost hanging off. It's mistake after mistake. Another housemaster from a nearby EA house took us all up to the house following the incident. Giles got so much of that story wrong it is hard to know what to believe in the rest of his testimony. Which part of his recollection process does not recall me being there or even the boy who was injured, and what does this say to the rest of his testimony to the Inquiry, the police and comments to the media?

128. Giles and [redacted] were good buddies, I'm not sure if [redacted] spoke to the Inquiry or not but I know Giles seems to have spoken on his behalf. One of the most upsetting allegations that Giles made was that boys were abused for having asthma. The only boy I know to have had asthma was [redacted]. Both my brother and I remember this as he had a ventilator thing with a fan that pierced two little pills that released a powder. My mother tells me she sat up holding [redacted] during the night for many nights due to his asthma. Yet Giles says [redacted] was abused for having asthma. It is simply evil of him to say that, and defamatory - without limit of time - against my mother as well my father. It's very odd that [redacted] himself did not make this allegation, although it is pretty obvious to me why not. Conspicuously, this charge was deleted by the Sheriff and not found, although that is not clear from the EASG group annual report.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

129. The story which is the worst from Giles was the one about a boy having a hose inserted into him. Depending on Giles' version of it, it's not clear if my father is supposed to have inserted the hose or sprayed water on the boy. Either way it didn't happen. This was one of the things that frustrated us in the witness box, we could not articulate that we weren't there when something did not happen. I kept being cut off by the sheriff. That story is so upsetting for my mum as it veers into territory that my father has not been accused of. It was as if Giles had to get people to sit up and listen. This incident allegedly happened to a six-year-old, who as stated, did not exist.

130. In terms of the water supply for this alleged incident I could go into where did the water source come from? I remember, and it was technically and logistically impossible for this to have happened. Also, that dad would have marched the boys out to humiliate a boy at any time. That was not in his manner or style.

131. I consider this allegation entirely false, and maliciously so, but in other respects wonder if Giles and others feel retrospectively humiliated on behalf of others who did not feel that way at the time and furthermore have not deigned to come forward 45 years later to say that they were.

132. Three final points about the allegations Giles made about my father. One of them is about the use of the word 'nigger'. I have not, in fifty-four years ever heard my father use that word. I don't know where Giles gets that from. Another boy, another teacher? Another school?

133. In the court there was a story about my dad challenging the boys about what they spent their pocket money on. Giles tells of a story that my father said, "Don't buy someone that birthday present because its shit". This is not language my father, a qualified teacher of nearly twenty years by then, would use to young boys in the first place and is not how he speaks at all. He may have said "Thats not a great present to buy someone", but it would have been nothing more than well intentioned good parental advice.

134. The other one is the VHS pornographic cassette story. My dad apparently said he had such things and had "contacts in the police". Does Giles think people would believe that my dad would offer pornographic material to an eight-year-old, even if he possessed any? Three people, all adults now, have told me who that person was, and it was not even a member of the school teaching staff, and the timeline is from the latter part of Giles's schooling at the EA. Why does Giles think it is acceptable to just guess and make things up, as if he alone has recollections, false or otherwise? It is a defamatory allegation.

135. Giles said my father commented on his 'gay coat'. That is not a word my father would have used. It's not a word people of my dad's age would have used, and I have never heard him use it to this day. He may have said something along the lines of "you're really drawing attention to yourself", maybe not a bad thing to say to a young person, to give them advice when everyone else is dressed in their own blue or brown coats. Forty years later this then morphs into John Brownlee and homophobic slurs. This is typical of Giles Moffat's testimony, given in the full knowledge that my father cannot answer back.

136. Giles has related quite the compendium of stories from his time at the Academy. He has come up with "evidence" where he cannot remember the name, whether it was a peer or teacher, and then inserted "John Brownlee" without thinking that could be disproved or reasons where it literally could not have been the case. For him to go to the Daily Record and say my dad was racially abusive to the "only black boy in the house" is defamatory and remains actionable. We did not even have a black boy in the house. I would say to Giles, who are you talking about? We had an Asian boy called [redacted]; does he mean him? He was the most unassuming, lovely boy. Placing such a term into the mouth of my father is unconscionable, and as I say, defamatory without time limit.

137. Giles and others have managed to create this idea that my dad was an inherently cruel person, something that neither his grown-up sons nor wife of sixty years have experienced or noticed. My dad was in fact always big at laughing at himself. He would joke about being a fan of Raith Rovers and now we have people forty years later saying

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

they were mocked by him for coming from Falkirk. Is that really abuse, and worthy of this Inquiry?

138. Giles mentioned Geoff Fisher, our house tutor. I believe he reached out to Geoff at some point during the Inquiry. I thought it was interesting that Geoff didn't come to the Inquiry saying everything was true. He was an adult in the top floor with the boys, so he would have known.

139. Giles left the Academy and went to Loretto for one year and then returned to the school. It was then he got heavily involved in lighting and shows for the school. All of that took place in the prep school. Apart from going back to the Academy he then put himself back in the environment where he would meet Mr Brownlee. He sent his own children to the EA, like [IKA] . I just do not know what to make of that.

140. I know Giles has had problems in his life including alcohol problems, a codeine overdose which left him brain damaged, and I'm sorry his mother was an alcoholic, which he says he did not realise until much later in life. All of this is in his testimony. But for him to come up with these unique allegations, of which some were found to be not found by the Sheriff, places Giles into very precarious territory really for the rest of his life. What he said to the media out with the protection of this Inquiry, was typically rash of Giles. I don't know what to say. It's really for others in the EASG to judge. Did he tell nothing but the truth? Did he embellish anything? Was he mistaken about anything he said to the court, Lady Smith or to the media?

141. What I also want to reiterate is that I was always out there in terms of him being able to find me on social media, including LinkedIn. Giles or any number of those people who have made allegations could have contacted me. Giles could have said to me at some point that he had serious issues with my father, but he never did. Something has profoundly changed in Giles, and he is a different person from the energetic person we knew and very much liked.

142. Finally, I found it interesting that Giles and others had been in the pub the night before his testimony. There is a kind of arrogance, as if he believes 'It doesn't apply to me'. I

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

feel his testimony should have been disregarded there and then, but the part time sheriff decided that the basic tenet of legal process whereby witnesses should not gather before they give evidence did not matter. They were not even subtle about it or did so away from the time of the court proceedings. It was the night before Giles gave testimony. We know this because he told the court precisely that. What a sham.

143. I have been in Academy circles since 1988, gone to cricket and rugby matches. I have been at Raeburn Place with my dad and without him. For the last three decades I've been at school reunions, bumping into boys and not once even with plenty of alcohol flowing, has anyone come up to me and said anything negative at about my dad. The same applies to my brother and mother. You can imagine our surprise when my sister-in-law let us know about [redacted] article about the Academy.

144. I would say to those accusers that we remember things with immense clarity and in the case of a lot of the stories, I was older than them at the time. I would also say that I know very well right from wrong.

145. By commenting on some of the boarders making allegations, it does not mean I accept allegations from those I haven't namechecked. I could make observations about each one of them but need to draw the line somewhere. My view can be surmised from what I have said about the few above.

Edinburgh Academy Prep school

146. I started at Denham Green school in 1975, when I was five years old. In 1977 I moved to Arboretum where my father taught, and I was there until July 1981. I had a great time in prep school, it was just across the road from where I lived, and I had lots of close friends.

147. James Burnett was the headteacher at the prep school for the duration of the time I was there. I believe he was there from 1973 until 1987. He was in charge of the Junior school and not my father as some infer.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

148. In years three and four at the prep, all of the teachers were women who were a bit older. In years five and six, the teachers were men.

149. My father taught geography and English. Someone mentioned he taught French; he may well have but I don't know. I was never taught by my father, partly because it was not done, but also due to streaming I was never in his classes. My father would teach 'A' and 'B' streamed classes. My brother was never taught by him either.

150. Whilst I was never taught by my father, there could be times when he would cover a class for another teacher, but that did not occur often.

151. I also wish to point out that the class names changed. 6B one year could mean 'B' stream, but another year it could be called 6B and the 'B' stood for Brownlee and the class was an 'A' stream class. A few say they were in 6B, but that doesn't mean they were in his class. Detail matters.

152. When I was at the Prep, my father's classroom was situated in the sixth block, his room was on the top floor. It was a prefab building, and the walls were very thin. I was in the classroom through the wall to my father's when I was in years five and six, my teachers at that time were IBL [redacted] who taught [redacted] and Nigel Archdale.

153. I never once heard, and no one ever said to me that they heard, any screams or noises from my dad's classroom that you wouldn't want to hear. I recall you could hear fun noises and whoops of laughter from his classroom.

154. I believe, and have heard from many of his formal pupils, there was generally a sense of levity in his class, as everyone know where they stood. My father was not someone that could not control a class. He could control his class by his presence. He wasn't scary but he just had this teacherly thing, a faux seriousness that every teacher has to put on from time to time. Clearly, some former pupils do not make this distinction when they look back nearly half a century.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

155. Later in school I became close friends with a number of boys who were in my father's class and remain friends to this day. Some acted as defence witnesses for my father at court. Incidentally, two of which went on to become teachers themselves and state that John Brownlee was one of a handful of teachers who they most admired and aspired to be like in their own teaching style, including classroom demeanour that kept control without suppressing enthusiasm as many teachers do.

156. There is an idea that has come out in statements, that my father had a great influence that seeped into other boarding houses or across the entire school. It's absolute nonsense and if my dad was capable of understanding it, he would find it wryly amusing. He had zero influence on the other boarding houses and absolutely zero influence on the upper school.

157. I do believe there were occasional quite lively written or telephone exchanges between the teachers at the upper school and prep school. Upper School teachers very much treated prep teachers as the lesser of the two and viewed it as literally the preparatory school for the real school. There were definitely conflicts with things like bookings for the minibuses and getting investment in the prep school. Typical school departmental politics in other words.

Trips

158. We would go on hill walking trips and walks around Glen Doll. If any member of the public had set about the boys, my father would have been someone to reckon with.

159. I remember being up in Glen Doll and Blair House and being with the seven-year-old boarder, who would have been eight years old then. We were up a mountain path and the boy, whose name I cannot remember, went scampering off towards the edge of a quarry and steep drop. I think one of the prefects grabbed him. I think it was the same walk that Giles mentioned. My father took safety and wellbeing very seriously.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

Discipline

160. There was a good degree of discipline at the prep school, but I don't recognise, nor do my friends recognise the description of the prep or the Edinburgh Academy in general, being this 'Lord of the Flies' thing. This is over dramatized nonsense, just like the equally daft notion of "omerta".

161. I do not recall being subjected to corporal punishment at the school. I think I may have got a rap across the knuckles by a female teacher in the prep, but I cannot recall who it was or why. I probably deserved it.

162. I did not receive any preferential treatment in the junior school because my father taught there. I was in a reading class one day, and I was asked to remain behind. I was given a stern talking to because I had not conducted myself as I should have in the class by taking the opportunity to read. I had been flicking through multiple books, looking at the pictures. I was reduced to tears because of the telling off. Not in a million years would I suggest now that that was some kind of abuse but is also shows that John Brownlee's sons were not somehow immune to admonishment from his colleagues or any other teacher in the school.

Comments about abuse at the Junior school

163. The junior school was a day school, these boys were going home every day. I worked out my father taught over thirty-one years. He taught about 3700 different boys in total over thirty-one years. Over 44,000 class periods. The bell sounding the start and end of a period nearly 90,000 times. Let's be generous and say that if something was badly amiss, there might have been a 10% complaint rate. That would mean 4000 complaints, letters or comments. Even 1% would be 400. There were fewer than 40 complainers who came to the Sheriff court. The idea that out of the 3700 boys, that no child went home with an injury from allegedly being bashed into the blackboard or any other damage following those assaults, mere hours earlier, defies credibility. As far as

we are concerned, the school did not have a single contemporaneous complaint about my father, and I do not believe they have produced any.

164. We are to believe that the parents of the day boys never saw their child in a state of undress for entire school terms at a time. Weeks and weeks on end. Those are the same boys who did PE with very flimsy shorts, bare legs and nothing on the top, and for many years, a female PE teacher. They were running around with the things that allegedly John Brownlee did and there were no marks. The accusers are very fond of saying that "it's inconceivable that no one could hear or see things". Well, I would say it is conceivable if there were no marks. If there were no marks, the boys were not being hit and certainly not in the manner they allege. It is that simple, as a moment's thought would illustrate.

165. These boys went home at 3:05 pm or 3.30 pm every day for five days a week to their parents. I do not understand why their claims are believed when there was zero evidence of injury that such attacks would manifestly have left.

166. A lot of their allegations are the same allegation being referred to more than once. It boils down to about twenty incidents. Some of them are idiotic, an example is the allegation by IOH [redacted] when my father stamped on his head in class. The Sheriff did not find this to be found as alleged. The idea that a grown adult could stamp repeatedly on another child's head in front of nineteen other pupils is ludicrous, as another moment's thought would illustrate.

167. I was at this same school, remember. I can say with certainty, that at eight, nine or ten years old, half of the class, if not all, would have fled the room to find the nearest adult who would have been next door. If this is what happened, the police should have been called and my father arrested. It could not have happened as the guy would have been brain damaged or badly injured. Even a slight version of this allegation would have caused the boy to go home with visible damage or at least in a state of emotional distress. It's inconceivable that it happened. It's a disgrace that people can make these allegations with a sense of impunity and the police believe them. Does common sense

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

count for anything, or is the obligation to act, or be seen to act, all that matters to the police or Crown?

168. Punching them in the stomach? I've never seen my father punch anyone anywhere, never mind in the stomach, which is an awful thing at any age. He was supposedly hitting them around the head and kicking them on the leg. He isn't a sadist and he's not a psychopath. That is what is so upsetting about the hose story. My father's character, the person I have known for over half a century never comes into it. He wouldn't do these things. End of story.

169. So much of what I have heard about from the school has been mis-recollected or mispresented. The fake guillotine for instance, like the cupboard not quite taking someone's head off. Or boys having their heads smashed into blackboards. Boys being strangled. At the risk of repeating myself, all of this would have left marks for even the most unobservant parent or sibling or family friend to notice, not even at home, but at the school gates on the way home at 3.30 pm. Suggestions that they routinely passed off alleged injuries as rugby injuries, or from mucking about in the playground, are incredible and say nothing for the state of their relationship with their parents.

170. One of my dad's colleagues said he got to my dad's classroom one day and my dad was in the middle of hoisting a pupil's bag out of the window. It was a joke. He further told me the kids were in tears with laughter. A lot of the good-natured stuff has been shown to be in retrospect, "I was humiliated, or I was frightened". Including someone who was 'not hit' by a chalk duster because my father, being a good cricketer, could "aim to miss". This is just ridiculous and demeans this Inquiry and its purpose.

171. Like my older brother, Graeme, I remember in minute detail and with crystal clarity the layout of the prep school, the corridors, the cupboards, the school hall. Also, the impossibility of my father marching somebody to the middle of the Prep school hall, then taking the time and effort to put out a gym mat and then punching and kicking the boy at leisure. Why bother with the mat? Even if he was capable of doing this, which he was not in a million years, how could he possibly know that no one else was going

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

to appear at any moment through one of the five doors leading into the school hall, the main "junction" of the entire campus?

172. There is a misconception on the part of many accusers that when classes are ongoing there is nobody going about in the corridor. My brother who was a teacher for thirty years can confirm this. There are always other adults, other teachers and staff, making their way from A to B, even when classes are in.

173. I am keen to get across that my father did not have to resort to corporal punishment to control a room or a house full of boys. He wasn't a chaotic teacher who couldn't control a room. The Academy had plenty of those, especially at the Upper School, from where many of the accusers later complaints originate.

174. None of the other teachers said anything at the time, they were grown adults, not meek, newly graduated teachers, and would have had nothing to lose by saying " I have come to the conclusion that John Brownlee is a maniac, deal with it, here is my letter of complaint and if you don't deal with it, I will go to the Board of Directors." It never happened and not even decades after has any teacher come forward to say that they did so. No one made contemporaneous complaints. That matters, it speaks volumes.

175. The pupils never made subsequent complaints once they got to the comparable safety of Henderson Row. They all make comment of having teachers they were comfortable with. They could have gone to the chaplain, their parents. Then they got to university, all those nights in the union, staring into pints. In their thirties and forties, still nothing. They get into their fifties and sixties and here we are. Once it was known John Brownlee had Alzheimer's, I feel that the ones who made complaints later, possibly thought John Brownlee was okay, firm but fair, had his moments, you knew where you stood with him, but it was a good laugh at the time. But they think if he also did the house allegations as described, the shed, the hose and asthma incidents and stamping on a head in class, maybe I should be part of this process. I firmly believe that those fantastical complaints tipped this whole thing over the edge.

176. Many of the pupils in my dad's class at prep school were children of fellow teachers. The Rector Laurence Ellis's [redacted], James Burnet, the headmaster of the junior school (and my father's boss) two sons were taught by my father, as was [redacted]. RJX [redacted]'s sons, Rob Cowie's sons, Tony Cook's son, the Chaplain Howard Hazlett's sons. I find it beyond belief that the son of the school chaplain cannot go to his dad and complain about a teacher, but he didn't. I just do not know what to make of that. Did all of the complainers amongst those boys have zero relationship with their fathers, or are they jumping on the bandwagon without a moment's consideration of how this now reflects on themselves and their fathers, if any of it was remotely true?

177. We cannot ignore the clacken, the wooden paddle. It has grown a mythological status all of its own. It's become much more than it is. If it had been a belt or a tawse, none of which my dad owned or used, I think all of this stuff at the prep would have just disappeared into 'use of belt'. I struggle to believe it would have become a police matter. The clacken is presented as something that uniquely my dad would have used. Every EA teacher had one. If he had used it, it would only have been on the buttocks. It was legal then.

178. We used to have a clacken before we moved house, it was signed on one side by his rugby team and another signed by his cricket team and it was for their favourite coach. These kids were not being coerced by their parents; these are boys who have decided to give him that because they admired him and loved being in his rugby or cricket teams.

179. I categorically reject any of the allegations made that he would have hit anyone around the head or anywhere else. Again, because it would leave bruises and marks, it just doesn't make sense.

180. The idea from his abusers that his behaviour went from zero to excessive punishment is self-serving and misses out any context as to their own behaviour. To my mind there is a lot conveniently missing from the accusers' testimony, if not memory. The build-up, the why? My dad did not need to beat a boy at the start of a class to get a

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

class under control. I would love to hear my father's version of some of these allegations, but sadly he cannot do so now. And they know that full well.

181. My father and the rector for much our time there, Laurence Ellis, didn't particularly get on, with dad being from Fife and the rector being very Oxbridge. They did however work together as well as they could. That said, Laurence Ellis would not have needed any excuse to find a reason to get rid of dad, but he didn't. This speaks volumes.

182. If the forty or fifty accusers want to define my dad's time at prep school for thirty-one years on what they say happened forty or fifty years later, then I will take the 3,660 other pupils he taught for a year at a time, the 99.5%, who didn't share that experience of him as the definition of his time at EA. They would do well to remember that and that they do not own the reputation of John Brownlee, whatever legal travesty occurred in March 2024.

Comments on teachers who spoke about John Brownlee to the Inquiry or Crown

Rob Cowie

183. Rob Cowie was the housemaster in Scott House for last few years we were in Dundas. It was frustrating as he gave evidence to the Inquiry that Geoff Fisher, one of our house tutors, had supposedly said - over forty years ago - that he, Geoff, would like to move to Scott House as he felt John Brownlee was a bit tough on the boys.

184. I'm deeply disappointed in Rob making a statement to the police forty years after we left Dundas House, without once letting us know. He knew exactly where to find me, or my brother, for that matter, in his self-styled post-retirement role as expert on Academicals and former pupils and where they are located.

185. I think Rob is bewildered and overwhelmed by the wider issues against an institution he cares for deeply, and like my father, gave almost all his teaching life to. He at least acknowledged that my father was very proud of the boys and the Academy in general. But Rob has pinned his colours to Giles's mast without a shred of first-hand knowledge

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

of Dundas or really knowing my father who worked in an entirely campus of the school, and that's that.

Tony Cook

186. Tony Cook didn't quite click with my father. He also said some presumptuous and damaging things about my father to this Inquiry, despite not knowing him well or working with him. Tony suggested he saw my dad taking rugby practice and he saw "the fear" on the boys' faces. Everyone in the first fifteen at prep was there for merit and because they were good at rugby. Nobody was there if they didn't want to be. Anyone with the merest knowledge of school rugby, and prep rugby in particular would know that. Tony Cook did not teach at the Prep. He was based at Henderson Row, the Upper School. For Tony to say there was a fear just contributes to the picture of my dad being a monster. This is reckless and naive on the part of Tony. Like Rob, I think he just doesn't know what to do or say. He has the EA running through his veins, and this is a terrible time, but he was wrong to say what he did about my father.

187. Tony Cook's wife Jenny is quoted as saying at a lunch decades ago that "everyone knew what the Brownlees were up to". Why did she not say anything to us? We never heard it, although I do recall Jenny's nickname amongst Academy circles.

188. To my knowledge, the Cooks did not run an EA boarding house. I have no idea if they were even asked.

Upper School Teachers

189. I would say to a few Upper School teachers who were obliged to comment on my father by the Inquiry - despite not working with him as they were on a different campus – that finding my father's sense of humour rather dry or even odd, not getting on with him and perhaps not even liking him, does not mean he was an abuser of children or that they should believe what is being said about him when he cannot defend himself.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

190. More than one Upper School teacher made snide comments about my father based on what I perceive to be nothing more than self-preservation, and without proffering a single example of abuse towards his pupils. Upper School teachers who negatively commented on my father would do better to reflect and focus more on the allegations against many of their contemporaries at the Upper School during their long service there, in some cases including themselves.

191. I thank ICM [redacted] for his conspicuously measured and balanced contribution to the Inquiry and only wish more of his colleagues had done the same.

Edinburgh Academy Senior School, Henderson Row, Edinburgh

Discipline at Senior school

192. I never received corporal punishment at the senior school, yet I think it was still a time when prefects could administer it to younger boys. They could also administer the clacken or belt. I also can't say I saw corporal punishment being administered at the upper school.

193. I was subjected to discipline in the Upper school in a music class. I was fooling around and the teacher laid into me verbally in front of the class. I remember sobbing. I was being disruptive and deserved it.

194. In terms of both cases of discipline that I experienced at the junior and senior schools, I was on good terms with both teachers later in life. I would often bump into them at social occasions after leaving school. I wouldn't dream of reporting them now or saying who it was. It's called teaching, and I have no doubt at all that I deserved the admonishment at the time.

Life after Edinburgh Academy

195. I left the Academy in 1988 at eighteen years old. I didn't want to do the normal Academy thing of lawyer or similar, I wanted to be a hotel manager or chef. I went off to study at Strathclyde University and did Hotel and Catering Management. I am now with VisitScotland.

196. I am proud of my schooling and grateful for my education, it gave me a good rounding, an interest in people and a wider world view. My experience at the school is part of the reason I have ended up in the job I am in. I am interested in the world and travelling and that is down to my upbringing in Dundas House and education at the EA.

197. I credit my mother and father equally with bringing me up in this way. They have been wonderful parents to me. They have always been present.

Life after Edinburgh Academy for John Brownlee

198. My dad retired in 1995, and he was very much plugged into the Academy network when he retired, in a voluntary, healthy way rather than being unable to disconnect. He would go to reunions, go to the Rugby club at Raeburn Place for every home and many away matches, and generally stayed involved almost into his eighties. The Academy was a huge part of his life, and he was very proud of it.

199. My father was also a member of the "Academical Ancients" who were a group of golfers from [redacted] and other golf clubs who would meet and play different courses. They were fathers of former pupils. Not just anyone would be admitted to the group. In fact, my dad was not an obvious fit as he came from Fife and was not privately educated. They however wanted his company, and he had taught many of their sons. He was a part of that for years and it brought him much joy in retirement.

200. He golfed at [redacted] until 2015 or 2016. Every Boxing Day we would go to the golf club as it was my parents' anniversary on that day. Boys and parents would come up to speak to dad all the time, of all ages. Not once did I sense anyone was saying hello to him under duress in front of his parents, as some now try to claim.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

201. When EA Prep Headmaster James Burnet retired, he gave a glowing letter to my dad, thanking him for all of his help when they worked together. The Inquiry has a copy of this letter.

202. Former pupils voted my dad to be the president of the EA academical rugby and cricket club. This would be impossible if there were known concerns about him as is now widely claimed.

203. The onset of my father's Alzheimer's was around 2016/2017, if not earlier, and he was finally diagnosed in January 2019.

204. A full record and timeline of my father's time at the EA, including post-retirement, has been submitted to the Inquiry.

205. If my family and I had spent the last thirty years thinking "Oh my god, when is something going to come out, when is it all going to be revealed?" then we wouldn't have spent the last thirty or forty years staying engaged with the school, going to Academy functions and reunions, we would have been hiding and keeping my father out of sight. We did quite the opposite, because we had no idea that he would become a lightning rod for a handful of disaffected former pupils whose true issues in life were either dead, needing extradited or had nothing to do with the school in the first place.

Impact

206. This whole thing has affected us very badly. It has affected Graeme and I differently to my mother. The fact that all three of us were stunned when this first came out in the media says a lot. It became paramount we get our version of the truth across. We didn't have to sit down and compare notes because we remember those days well, which is also why our statements will bear some similarities. We were all there and haven't been suppressing anything. It was so left field, that it felt like witch hunt and in some cases mistaken identity. It absolutely felt like they had the wrong person and

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

were confusing my dad with someone else entirely. The allegations were that outlandish, and in some cases fantastical.

207. My brother and I are at an earlier stage of life than my mother. We are grievously upset about the allegations, not least because we know the truth and what's a distortion and what's an exaggeration, or worse. We know the gaps and errors, the "misrememberings" too many to count. We probably have time to get over it once we have got our side of the story on record.

208. We hold a lot of anger about all of this. If people had come out and said John Brownlee had his moments in the classroom, like many other firm but fair teachers, and any teacher you care to mention, and it was just that, then fine. But the added inferences, nuances and approach of certain people and the allegations they have made, go way beyond just a complaint to this Inquiry or police. Some display a malevolent creativity and in one case profound narcissism and that is where the anger comes.

209. There are times when I waken during the night and struggle to get back to sleep and it's because of the injustice of it all. My father is not a sadist and not a monster, my mother would not have been married to him for sixty years if he was. We are a close family. I am proud to be John Brownlee's son.

Impact on mother

210. The impact on my mum will be lasting. I like to hope we can rehabilitate some of that before her time comes, but she is my number one concern. This is a hell of a thing to have to deal with at this stage of life, no matter how much we say don't worry about the media. For her, it's her whole life that has been tarnished with a part-time Sheriff declaring that he won't accept any version we give. She had good memories of Dundas. My parents gave up their social life for eleven years but looked back on "Dundas" with a sense of achievement and pride as a large and significant part of their lives, mine and my brother's, and of course the boys and their parents. Mum says that we now have people who didn't know dad, who had never met him passing judgement on him, and who have created this alternative universe of how he was and it's just not

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

true. She is right, and I will do what I can to rectify it, be that now or in the future. There is no time limit to my reaction to this, even once they are both gone.

211. I remember going round to visit my mother one day after it had been in the media via Nicky Campbell, and there she was sitting in the kitchen hyperventilating. My mother is susceptible to strokes going back to 2011. We did not know it at the time, and to be fair to the accusers – because I am reasonable – they could not have known either, but [redacted] 2023 to [redacted] 2023 were the last few months of my father being at home with my mother, and of being part of our daily family life. They had been happily married for nearly 60 years, and in early [redacted] 2023 he went into a nursing home. That is enough grief and emotional strife to deal with, even without these allegations appearing out of the blue. As I say, the accusers could not have known, but nor did it ever occur to them what our personal circumstances at that time might be. They were high on getting Wares named, Campbell was high on getting one of Dawson's daughters to say terrible things about her parents on his BBC podcast, were upset at delays and what they perceived as lack of progress, and went charging in without a thought for anyone, including my mother. I am not looking for sympathy, but I wonder how Nicky Campbell of all people would feel if someone went after his parents, though I believe they are dead now. For someone who appears to be a champion of the underdog and the Great Empathiser who weeps at the drop of a hat, he showed a complete lack of concern and empathy. I hope my mother lasts a bit longer because I do hold Campbell, Giles Moffat and [redacted] accountable for a huge part of her emotional and physical state now.

Comments about court case

The Crown/Procurator Fiscal ([redacted] 2023 onwards)

212. I believe very strongly that the whole thing with my father should not have gone to court. I believe the courts gave into pressure from the self-styled Edinburgh Academy Survivor's Group (EASG), which now includes members from many other schools.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

Odd of them to keep the name, and their dogged interest in completely irrelevant cases elsewhere.

213. It defies belief that with a huge backlog of cases due to the pandemic, that the CoPFS deemed it in the "public interest" to prosecute an 88-year-old man with Alzheimer's who could not answer back. The Police and Crown gave into pressure to be seen to be making progress, with others accused being dead, needing extradited or part of a long queue.

214. So keen was the Crown to be seen to be making progress, they resorted to the Moorov Doctrine, which gave the accusers and their lawyers a conclusion to work back towards. They merely had to fulfil the requirements of the Moorov Doctrine, which is specifically founded on the idea that enough similar but unconnected allegations between only two parties can be enough to find in favour of the prosecution. With the accused person known at that point to be unable to reply, it is no wonder the EASG feels well treated by the Crown and the Court. From the decision to prosecute onwards, this process was a sham and a foregone conclusion that disgraces Scotland's legal system.

215. The first diet for the case was all over the papers. Then there was the Panorama programme which didn't mention my dad, I think because the legal proceedings had started. It didn't matter, as so much had already been in the papers. In that respect, it seems there is no such thing as prejudicial media coverage, irrespective of its origin.

216. Nothing will convince me otherwise that my father was just the right person to take the hit to relieve the pressure on the authorities who were running scared of Nicky Campbell and Giles Moffatt. This is a widely held belief, not just my own interpretation of events to console myself, my brother or my mother. The backlog of cases since Covid is in the news even to this day. It is transparent that the Crown felt obliged to be seen to do something, which is shameful indictment on the state of the Scottish legal system and its priorities.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

217. Every single day I see worse stories, worse allegations and worse crimes in the newspapers and BBC news website. Far, far worse than what my father was being accused of, yet they pushed this out there as being in the "public interest". They can convince themselves, but they will never convince me that they weren't scared of a TV celebrity and other vocal complainers.

218. On the lead up to the court case it was painful too, as we had uniformed police trying to serve prosecution paperwork on us at home, every week for more than a month. It is shambolic enough for this admin error to happen once, but for it to be repeated multiple times, with the officers saying they will report back only for it to happen again the following week, shows the degree of institutional incompetence in the prosecution service. What would it have taken for someone in front of a computer to untick the box next to my name, my mother's name, and my brother's name so that we didn't repeatedly get served citations for the prosecution of our own father. This is basic, basic process. No wonder there is a backlog.

219. We also had police turning up at my door and those of our witnesses allegedly taking statements for the defence, but they were not instructed by our lawyer to do this, although they insisted that they were. After lying to me four times in ninety seconds, I established that they were in fact there at the behest of the prosecution, specifically the office of Peter Reid. This was early February 2024, just a few weeks before the court proceedings. I can FOI the exact details, and my wife took a photo of them and their car registration as they left. They also said they had "popped a note through my mother's door". No, they banged on it hard, more than once. That was harassment, as she was under no obligation to speak to them. I had always been brought up to respect the police, by my father no less, but at the age of 53, I realised they can lie, and they did so to me on that day, through their teeth. They also spooked some of our witnesses who then withdrew.

220. Police Scotland compounded their lies to us by saying that we had told our witnesses "not to speak to the Police". This is a creative and self-serving interpretation of us telling our witnesses, on that same morning, that they were under no obligation to speak to the police officers who may turn up at your door in the next hour. It is

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

falsification and borderline corruption on the part of Police Scotland to suggest otherwise.

Examination of Facts

221. The part-time Sherrif behaved in ways I found to be both perturbing and somewhat dismissive, however procedurally or legally permitted he might have been to do so. He did not want to hear what we had to say. It simply didn't matter. It was difficult for us to disprove something that we weren't there for, especially incidents that didn't happen in the first place. The prosecutor only had fifty percent of the story. We were on a losing position although we had lodged a defence. Our lodging of a defence was not out of love or loyalty to our father, it was out of seeking the truth and fact. I am quite prepared to accept in life people find out some unsavoury things about their parents, but not us, we were there, we knew what happened. To hear not a hint of trouble prior to [redacted] 2023 speaks volumes.

222. I was explicitly cut off by the part-time Sheriff when I started explaining why nobody could have fallen down the stairs in Dundas House, never mind being pushed, and not be very badly injured. I was told by him in no uncertain terms that I could not state things that the court "might not know" and to stop my explanation forthwith. I tried again, with the same result. What idiocy of the system means a defence witness who was present in a key setting and with eleven years of knowledge of it, cannot explain why an allegation could not have happened?

223. The summing up by the Sheriff was beyond belief in its transparent bias. "I will give due consideration of the evidence of the defence witnesses; in most respects they could not speak to events in the charges. <u>In any event I have accepted the evidence of the complainers where there was a conflict</u>." In other words, if we said something different to the accusers, he would take their version as the truth. What on earth were we doing there if people giving evidence, including the matron who was giving evidence as an adult from the time she was an adult, was going to be discounted. She

said she never saw a single injury on the boys in the eight years that she was there. It seemed not to matter. It infuriates me even a year later.

224. We could have said the house was painted pink, the accusers say it was painted blue, and the Sheriff would conclude that it was blue because they say so. That really angers our family. He did acknowledge there were kind words said about my father, and that even a tap on the shoulder would constitute assault. He stated one should not judge on the standards of today but then went on to do precisely that. He deleted the shed incident, the stamping on the head and the asthma thing but you wouldn't know this by reading it first time, so rushed and perfunctory was his summing-up, as if he needed to be somewhere else urgently. It is no surprise that the complainers wrongly believed they had a home run of "wins". They did not.

225. I couldn't believe one comment made by him, "I am satisfied in this case that there is potential corroboration for every charge from one source or another." I do not understand what 'potential corroboration' is. There is either corroboration or there is not. If the Moorov Doctrine operates on the basis of "potential corroboration", then it is deeply flawed, irrespective of its origins and purpose, and indeed the esteem in which it might be held by others.

226. The entire process was a foregone conclusion. I would not have dreamt of saying anything like this before [redacted]2023, but the scales have perhaps come off my eyes about how these things work.

227. It still seems the accusers are running the whole narrative that my dad was tried and found guilty. EASG's "annual report" of September 2024 was full of factual inaccuracies, stating boldly that my father "was found guilty on all charges". That is not true. He was not arrested; he was not tried as he wasn't present, and he was not found guilty. The Sheriff only found some of the facts and deleted some. I downloaded this report at the time and it's with our lawyers, so none of the authors need bother amending it or removing it now.

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

228. I sadly also believe that had the Sheriff actually given our defence a proper hearing and found in our favour that would not have been the end of it. The accusers would have doubled down, and we would be continuing on this nightmare.

229. We were told right at the start, that if we came out and said this didn't happen or that didn't happen then we risked, by omission, inferring that other things did happen. It made sense at the time, but now I am not going to hold back on those allegations I know to be lies. The only thing different to what I am saying today as to what I would have said a year ago is the experience of the Sheriff and the proceedings.

230. After the "Examination of Facts", we complained to Peter Reid the Prosecutor about the entire sorry affair of how they went about this, including the wrong citations, the police spooking our witnesses and lying to us, the general decision to prosecute someone with Alzheimer's and so on. He was evasive and disingenuous by referring us back to Police Scotland for those who turned up at our homes. They used his name, but it was for us to take it up with them. He deftly ignored all our complaints about the process and had the brass neck to conclude that the outcome of the court proceedings showed it had all been merited. That is some twisted logic, and a reason I have no longer have any interest in the police or the court process in Scotland. It is broken.

Hopes for Inquiry

231. There are a lot of people being drawn into this who are dead and it's always unedifying when that is the case. That's the ultimate situation of not being able to answer for oneself. I hope the findings don't dwell solely on the allegations and acknowledge when the accused cannot reply, as is the case with my father. He can't answer for himself, but it's not stopped the accusers doing what they did. I just hope the Inquiry truly puts all of the evidence together and weighs it up like I have said. It's our evidence just as much as their evidence.

232. The big difference is, we have been through the court and have nothing to lose. It is very important that when the book is finally closed on the Academy that our point of

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

view and all our supporting documents will have at least been read by Lady Smith and the current leadership of the school. It would have been excruciating if we had been too late for this. We've felt the police and the Crown have solely been working for one side. We were upset early in the Inquiry when it was decided not to redact dad's name on the basis of it already being out there in the public domain thanks to Nicholas Campbell.

233. I don't think anyone thought this when the Inquiry was set up, but essentially it is a blank canvas for former pupils to say what they want about any teacher who has died, and in our case, one who cannot respond, and not be challenged. Some kind of measures need considered, as inviting wholesale allegations from only one side is writing a version of history and putting things on the record that are not known to be true. The general public think the Inquiry is a court of law and anything said must be true. The fact that anything said by any witness is labelled as "evidence" troubles me, as the man in the street considers evidence to be fact. However, I can at least know that my own contribution now counts as "evidence", and it will be read by Lady Smith.

234. Consideration should also be given as to the time that has passed, and the likely age not only of those being accused, but of their spouses. If an accused person is not dead, but is very old, then there is a high likelihood that they may not be entirely *compos mentis* even without a diagnosis of an illness such as Alzheimer's. The same applies to their spouse, or indeed widow. The pressure the Inquiry piles onto those bewildered people at a late stage in life is unbearable. My father knows nothing about any of this, but I cannot imagine how my mother would have got through this without the support of Graeme, myself and our wider family and friends. The impact on someone without that support is immense, even if they are not the one accused. Unfortunately, the Inquiry has inadvertently created this space whereby people are at least damned in the eyes of interested parties, irrespective of whether any court proceedings later follow. The basic tenet of being innocent until proven guilty simply does not come into it.

235. Apart from the issue of not redacting my father's name – explained by a contrived reference to a quote about "what's in a name", suggesting a certain detachment from

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

the reality faced by families of accused - I would like to say the Inquiry has been tremendously helpful and fair to us so far and is helping us get through this now. The whole demeanour of the Inquiry, understanding how it is set up and what the Inquiry can and can't say is useful to know. I understand the Academy's position is also legally what they have to say, as is the case for all institutions being investigated.

236. Some good will come out of the Inquiry, I'm sure, but as above, I recommend more focus is placed on people coming forward with positive testimony. Many people I have met assume they can only go to the Inquiry to report abuse. This is reflected in the standard communications from the team, about how hard it can be giving evidence about abuse. I am not giving evidence of abuse. I am here to contradict what people have alleged about my father, and there are likely many others out there in the same boat. This needs some work by the Inquiry.

Other information

237. For those who came out with any allegations after it was known dad had Alzheimer's, only they can say why they did that. I have nothing to say to them. Perhaps they felt emboldened with what was being reported in the media. I think dad got swept up in the wider reporting of people who deservedly voiced their view that they allegedly suffered abuse at the hands of others, including other institutions. I understand and accept that is what the Inquiry does but not everything that someone remembers from forty-five years ago is necessarily factually correct, for all sorts of reasons.

238. I am struck how many of the accusers spent all or most of their entire schooling at the Edinburgh Academy. This begs the question, to what are they comparing their experiences?

239. I believe early on in the media that when unknown people came out and supported John Brownlee that ignited a fire with the accusers. That someone would have the temerity to contradict them seems to drive them into a frenzy. We still have no idea

who those early supporters were, but I thank them for that even if the accusers couldn't handle anyone contradicting them at that early stage or at any stage since.

240. We see this indignation to this day, when EASG conflicts with other groups and points of view. They believe they own the only true narrative, and only their experience of the Inquiry counts. They also forget that they do not represent the vast majority of EA pupils – tens of thousands to their 120. They represent nobody but themselves. I do think financial compensation is a motivator for some.

241. Others are disaffected with their lives, schooling, childhood, parents, who knows? They won't like me saying that, but they are the ones coming up with allegations from so long ago, which they should have raised decades ago if they felt there was something to say, and then my father would have been able to respond. Doing it now is lose/lose. I really doubt that the outcome of the Examination of Facts has solved all their issues.

242. I want to make it clear that I do not criticise the Inquiry or the notion of people coming forward. I criticise when people cross the line. I am unclear of the distinction between misremembering, forgetting, embellishing, distorting, fabricating and actual perjury, which as far as I know, has no time limit.

243. Despite everything I have said to the Inquiry, I wish to be clear that if anyone believes they were abused as a child then they deserve to be heard. But not everything they say should be believed or taken as immutable fact.

244. 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] .....

Docusign Envelope ID: 4AD8702F-FEF2-42EA-B2BC-52C3050EA8FB

Dated 13 May 2025